

# **SUMMARY OF DECISIONS REQUESTED**

**(submissions and further submissions)**

**on**

**Proposed Plan Change 2  
(Regionally Significant Wetlands)**

**to the**

**Regional Plan: Water for Otago**



**Otago  
Regional  
Council**

**23 November 2011**



## Preface

Proposed Plan Change 2 (Regionally Significant Wetlands) to the Regional Plan: Water for Otago was publicly notified on Saturday 2 July 2011 in accordance with Clause 5 of the First Schedule of the Resource Management Act 1991 (RMA).

The Otago Regional Council received a total of forty-nine submissions and nine further submissions on the Proposed Plan Change from a range of groups, organisations and individuals.

This document summarises the decisions requested in the submissions by both issue and submitter, and the further submissions received by issue. The submissions and further submissions are available on our website [www.orc.govt.nz](http://www.orc.govt.nz) and at the ORC Dunedin office, 70 Stafford Street.

## Index to Submitters – By Name

<b>Surname, First Name <u>or</u> Organisation</b>	<b>Submitter Number/Further Submitter Number</b>
Allan, Wayne and Hagan, Rochelle Anne	10
Amende, Deanne and Steve	1
Andrews, John	7
Beaton, Mark	45
Beattie, D V E and Burnett-Beattie, S G	28
Begg, William Thomas	17
Broekhuizen, Simon	31
Burgess, Karl Frank	49
Cardrona Alpine Resort	15
Clutha District Council	34
Contact Energy Ltd.	30/107
Dowling, M V	23
Federated Farmers of New Zealand	29/105
Fox, Herb	36
Galloway Irrigation Society Inc.	41
Hagan, Graeme John	9
Hawksbury Lagoon Inc.	39
Herlihy, Gavan James	22
Holland, Michael and Christine	25
Isbister, Ian and Judith	19
Jopp, David	12
Judge, Bronwyn	48
Kerr, Gregory	35
Kerr, Vivienne	33
Ladies Mile Partnership	44
Lake Waihola Waipori Wetlands Society Inc.	20/104
Lyders, D W	24
Meridian Energy Ltd.	32/101
New Zealand Railways Corporation	46
Nimmo, Trevor and Vivien	18

NZSki Limited	11
Otago Conservation Board	27
Otago Fish & Game Council	8/103
OtagoNet Joint Venture	43/100
Palmer, Martin and Barbara	4
River-Estuary Care: Waikouaiti-Karitane	13
Royal Forest and Bird Protection Society of New Zealand Inc.	47/106
Save the Otago Peninsula Inc. Society	21
Solid Energy New Zealand Ltd	5
Te Ao Marama Inc.	16
Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou, and Hokonui Runanga	38
The Director General of Conservation	42/108
The Yellow-eyed Penguin Trust	26
Thomson, Geoffrey	6
Transpower New Zealand Ltd.	37
Treble Cone Investments Ltd.	2
TrustPower Ltd.	40/102
Waitaki District Council	14
Wenita Forest Products Ltd.	3

**Grouped by Submitter**  
**(Matters within the scope of the proposed plan change)**



## 1 Deanne and Steve Amende

ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
General support and opposition	144	General opposition	Oppose	Oppose proposed plan change 2	<ul style="list-style-type: none"> <li>•Policies are open to interpretation - regarding restrictions on our land use.</li> <li>•Plan is unreasonable and unworkable.</li> <li>•Financial cost.</li> </ul>
Specific Schedule 9 wetlands	201	Schedule 9 - Akatore Creek Swamp (#1, Map F46)	Amend	Re-negotiate the boundaries of the Akatore Creek Swamp on our property.	<ul style="list-style-type: none"> <li>•This is not a significant wetland.</li> <li>•There has not been enough thought put into the boundary.</li> </ul>

## 2 Treble Cone Investments Limited

ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
What is a Regionally Significant Wetland	7.139	Policy 10.4.1A - Definition of a Regionally Significant Wetland	Amend	Delete 10.4.1A(c).	•Remove provisions that relate to wetlands higher than 800m.
What is a Regionally Significant Wetland	7.139	Policy 10.4.1A - Definition of a Regionally Significant Wetland	Amend	Provide for wetlands within Ski Area Sub Zones to be excluded from definition of Regionally Significant Wetlands in 10.4.1A.	No reason given.
Chapter 10 - Wetlands	153	Chapter 10 general	Amend	The locations identified as Ski Area Sub Zones in the Queenstown-Lakes District Plan should also be adopted as policy areas within the ORC Plan.	No reason given.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	155	Chapter 13 general	Amend	Amend clauses within 13.2, 13.3, 13.4, 13.5, 13.6 and 13.7 to provide for: <ul style="list-style-type: none"> <li>•erection, placement, extension, alteration, reconstruction, demolition or removal of structures and</li> <li>•alteration of a wetland and</li> <li>•introduction, planting or removal of vegetation</li> </ul> to be a permitted activity for wetlands within the Ski Area Sub Zones (areas currently designated as Ski Area Sub Zones in the Queenstown-Lakes District Plan).	No reason given.
Chapter 12 - Rules: Water Take, Use and Management	156	Chapter 12 general	Amend	Amend clauses within 12.1 to provide for taking of surface water to be a permitted activity for wetlands within the Ski Area Sub Zones (areas currently designated as Ski Area Sub Zones in the Queenstown-Lakes District Plan).	No reasons given.
Chapter 12 - Rules: Water Take, Use and Management	156	Chapter 12 general	Amend	Amend clauses within 12.2, 12.3, 12.9, and 12.11 to provide for: <ul style="list-style-type: none"> <li>•taking of ground water, and</li> <li>•damming and diversion of water, and</li> <li>•discharges from drilling and bore testing, and</li> <li>•discharges of water or tracer dye</li> </ul> to be a permitted activity within the Ski Area Sub Zones (areas currently designated as Ski Area Sub Zones in the Queenstown-Lakes District Plan).	No reasons given.
Chapter 12 - Rules: Water Take, Use and Management	156	Chapter 12 general	Amend	Clarify Discharge of Water provisions to confirm that any discharge of water associated with a snowmaking system is a permitted activity.	No reason given.
Protection general	161	Protection general	Amend	Specific note should be made in assessment criteria and background as to the substantial positive effects created by Snowmaking Systems and the water use associated with these systems.	No reason given.



### 3 Wenita Forest Products Limited

ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
General support and opposition	145	General support	Support	Support written content of the plan.	No reason given.
Specific Schedule 9 wetlands	201	Schedule 9 - Akatore Creek Swamp (#1, Map F46)	Amend	Review mapping and redefine the actual ground areas affected by the Akatore Creek Swamp to show those areas. "Do not include areas already established in trees by Wenita".	<ul style="list-style-type: none"> <li>•Map includes areas that are not swamp or estuary.</li> <li>•Map includes areas with established trees - inclusion will affect Wenita's operations.</li> </ul>

### 4 Martin and Barbara Palmer

ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Specific Schedule 9 wetlands	287	Schedule 9 - Lower Couotts Gully Swamp (#87, Map F46)	Amend	Change name of the wetland from the "Lower Couotts Gully Swamp" to the "Couotts Gully Wetland".	•Suggested name is better known.
Specific Schedule 9 wetlands	287	Schedule 9 - Lower Couotts Gully Swamp (#87, Map F46)	Amend	Map F46 is reduced in extent within the Palmer property as shown on the annotated attached map.	<ul style="list-style-type: none"> <li>•Mapped extent does not accurately reflect wetland area accurately.</li> <li>•Map includes areas of operational farm land, including stock gateway (in use for over 50 years) that is not damaging the wetland.</li> <li>•Difficult to determine the actual boundary from the map.</li> </ul>

### 5 Solid Energy New Zealand Ltd

ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
What is a Regionally Significant Wetland	7.139	Policy 10.4.1A - Definition of a Regionally Significant Wetland	Amend	Remove 10.4.1A(c) and replace with: <i>(c) A wetland higher than 800 metres above sea level which has been subjected to an evaluation confirming its ecological values against the ecological criteria detailed in Schedule 9.</i>	<ul style="list-style-type: none"> <li>•Definition of Regionally Significant Wetland is extremely broad given all 'wetlands' above a nominal 800m above sea level mark automatically trigger a regional significance status and subsequent protection.</li> <li>•A nominal altitude of 800m above sea level is not an effective gauge of ecological significance, which may be confirmed by survey or ground-truthing.</li> <li>•Submitter holds permit for exploration of a lignite deposit in Home Hills / Hawkdun area and future mining could take place above 800m above sea level.</li> <li>•Proposed definition of Regionally Significant Wetland would constrain future mining. Mining would require modification to existing landforms for access and extraction. If there is a wetland 800m above sea level within the resource envelope, this modification would have a non-complying activity status, regardless of the wetland's ecological significance.</li> <li>•This constraint is unsupported by ecological information, and would hinder access to a resource which is of value to Otago.</li> </ul>
General support and opposition	145	General support	Support	Generally support direction of plan change.	•Will provide more definitive identification of significant wetlands.

### 6 Geoffrey Thomson

ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Specific Schedule 9 wetlands	235	Schedule 9 - Diamond Lake Wetland (#35, Map F3)	Amend	Amend the boundaries of wetland which is on parts of my farm property.	<ul style="list-style-type: none"> <li>•Maps show areas that are not significant wetland, they need to be changed.</li> <li>•Wants a site visit to establish better boundaries.</li> </ul>
Specific Schedule 9 wetlands	276	Schedule 9 - Lake Reid Wetland (#76, Map F3)	Amend	Amend the boundaries of wetland, which is on parts of my farm property.	<ul style="list-style-type: none"> <li>•Maps show areas that are not significant wetland, they need to be changed.</li> <li>•Wants a site visit to establish better boundaries.</li> </ul>

## 7 SH Andrews and Sons Ltd

ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Promotion, information and funding	148	Funding	Did not specify	Compensate for the confiscation of freehold property rights.	•Believe this is a confiscation of property rights.
Protection general	161	Protection general	Amend	Honour ORC staff assurances given at public meetings that existing farm practises continue within the new boundary.	•Would have accepted proposed changes when assured that current farming practices could continue. •Assurances incorrect with maintenance of drains and over sowing of clover seed now requiring consent.
Specific Schedule 9 wetlands	361	Schedule 9 - Upper Taieri Wetlands Complex (#161, Maps F22 to F28)	Amend	Redraw the map within our property to exclude additional areas that are not genuine wetlands.	•Much of the area is not a wetland, except during floods.

## 8 Otago Fish & Game Council

ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Regionally Significant Wetland values	6.14	Policy 10.4.1 - Definition of Regionally Significant Wetland values	Amend	Add criterion: <i>A10) Importance of this wetland within the wider network of wetlands within its catchment.</i>	•Proposed plan only considers wetlands in isolation and doesn't consider networks of wetlands as important (e.g. for river flow stability).
Chapter 10 - Wetlands	9	Policy 10.4.2 - Priority on avoiding adverse effects	Support	Support for the preference of an "avoid" test where possible.	•Gives a strong signal the Regionally Significant Wetlands should be left alone.
Protection general	10	Financial contributions policy (Policy 10.4.2A and Ch.17)	Support	Support for 10.4.2A	No reason given.
Chapter 12 - Rules: Water Take, Use and Management	22	Rule 12.1.1A.1 - Take and use of surface water from any Regionally Significant Wetland	Support	Support.	•Will help to protect wetlands into the future.
Chapter 12 - Rules: Water Take, Use and Management	26	Rule 12.1.2.4 - Take and use of surface water for no more than 3 days	Support	Support.	•Allows submitter to look at the effect of water takes on wetlands, and advise ORC accordingly.
Chapter 12 - Rules: Water Take, Use and Management	27	Rule 12.1.2.5 - Take and use of surface water general	Support	Support.	•Allows submitter to look at the effect of water takes on wetlands, and advise ORC accordingly.
Chapter 12 - Rules: Water Take, Use and Management	28	Rule 12.1.2.6 - Take and use of surface water for land drainage	Support	Support.	•Allows submitter to look at the effect of water takes on wetlands, and advise ORC accordingly.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	118	Rule 13.5.1.8 - Disturbance by livestock	Amend	Remove the word "conspicuous" 13.5.1.8(b) unless guidance can be given on what constitutes "conspicuous".	•All stock use of waterway or wetland margins will cause pugging and erosion and the proposed plan offers no guidance on this.
General support and opposition	145	General support	Support	Generally supports the proposed changes.	•Strengthens protection for regionally significant wetlands.
Promotion, information and funding	148	Funding	Amend	State as criterion that financial support, resource consent fee relief or in-kind payments may be provided to protect, create, or enhance wetlands. Expertise, fencing materials, rates relief, or plants are suggested as options.	•Resource consent fee relief is most workable and proactive. •Creation/enhancement of a wetland should not have the same consent fees as an activity that will damage a wetland. •Current consent fees encourage non-compliance and illegal activity and discourage creation or enhancement of wetlands. •Notes that plan provides little guidance on how wetland monitoring will be carried out.
Chapter 10 - Wetlands	153	Chapter 10 general	Amend	Amend the objectives and policies to reflect that wetland boundaries are often indistinct and changeable.  Suggested wording of new policy: <i>"Due to the seasonal variability of wetlands and their changing boundaries, resource consent applications on or near defined regionally significant wetland boundaries with likely wetland characteristics will be assessed to ensure that they have no adverse effect on the functioning of the wetland as a whole."</i>	•Proposed plan does not address issue of wetland transition and seasonal variability. •Suggested change enables assessment of effects of activities adjacent to wetland boundary.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	155	Chapter 13 general	Support	Supports all rules within the proposed plan where the addition of the words "Regionally Significant Wetland" has been added to the previous rule which was related to lakes and rivers.	No reason given.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	155	Chapter 13 general	Amend	Would like the proposed plan to signal the following as criterion within the rules: Resource consent fee relief to protect, create, or enhance wetlands.	•Resource consent fee relief is workable and proactive. •Creation/enhancement of a wetland should not have the same consent fees as an activity that will damage a wetland. •Current consent fees encourage non-compliance and illegal activity and discourage creation or enhancement of wetlands.

Summary of Decisions Requested (submissions and further submissions) on Proposed Plan Change 2 (Regionally Significant Wetlands)  
Regional Plan: Water for Otago 23 November 2011

ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Chapter 12 - Rules: Water Take, Use and Management	156	Chapter 12 general	Amend	Would like the proposed plan to signal the following as criterion within the rules: Resource consent fee relief to protect, create, or enhance wetlands.	<ul style="list-style-type: none"> <li>•Also wants clarification how internal compliance/enforcement practices will change.</li> <li>•Resource consent fee relief is workable and proactive.</li> <li>•Creation/enhancement of a wetland should not have the same consent fees as an activity that will damage a wetland.</li> <li>•Current consent fees encourage non-compliance and illegal activity and discourage creation or enhancement of wetlands.</li> <li>•Also wants clarification how internal compliance/enforcement practices will change.</li> </ul>
Chapter 12 - Rules: Water Take, Use and Management	156	Chapter 12 general	Support	Supports all rules within the proposed plan where the addition of the words "Regionally Significant Wetland" has been added to the previous rule which was related to lakes and rivers.	No reason given.
Mapping of Schedule 9 wetlands - general	199	Mapping of Schedule 9 wetlands - general	Amend	Place detailed aerial photograph-based maps with cadastral boundaries of wetlands overlaid alongside the topographical maps within this plan.	<ul style="list-style-type: none"> <li>•Maps do not show level of detail needed to assess effect of changes, or to give effect to the proposed plan.</li> <li>•Maps in the Wetland Inventory will not be sufficient as it doesn't have legal force.</li> </ul>
Schedule 9 general	200	Schedule 9	Support	Welcomes the addition of many of the wetlands from the former Schedule 9 into Schedule 10.	<ul style="list-style-type: none"> <li>•No reason given.</li> <li>•Notes that approx. 1/3 of the wetlands in Schedule 10 now receive no protection or identification under this plan.</li> </ul>

### 9 Graeme John Hagan

ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Specific Schedule 9 wetlands	323	Schedule 9 - Pleasant River Estuary Wetland Complex (#123, Map F67)	Oppose	Oppose changes.	No reason given.

### 10 Wayne Allan and Rochelle Anne Hagan

ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Specific Schedule 9 wetlands	323	Schedule 9 - Pleasant River Estuary Wetland Complex (#123, Map F67)	Oppose	Oppose changes.	<ul style="list-style-type: none"> <li>•Prepared for the ORC to use and monitor the land below the flood gates on our property as a wetland - but not above the flood gate.</li> <li>•Flood gate has been present for many years and that land is used/grazed as part of everyday farming operation.</li> <li>•Land within wetland boundary is used in farming operations, we should be able to keep using it the way we want.</li> <li>•Lack of consultation.</li> </ul>

### 11 NZSki Limited

ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
What is a Regionally Significant Wetland	7.139	Policy 10.4.1A - Definition of a Regionally Significant Wetland	Amend	That the definition of regionally significant wetlands exempts:  (a) wetlands in or around its operations not already identified in statutory or other legal instruments as significant from the definition of "wetlands" or description of "regionally significant wetlands" in Proposed Plan Change 2: and (b) ski field operations (including existing use management and future development) from the restrictions otherwise proposed in Proposed Plan Change 2.	<ul style="list-style-type: none"> <li>•Definition of Regionally Significant Wetland is too broad as includes all wetlands (including shallow pools) above 800m.</li> <li>•Water levels at this height are dynamic and hard to monitor/assess.</li> <li>•Majority of NZSki's land is above 800m, they must operate at high altitude.</li> <li>•Proposed changes could restrict use, management, growth and development of NZSki's ski fields, or could impose costly financial contributions for unavoidable effects.</li> <li>•Current planning and consent regimes have been rigorous and all effects of the ski fields were assessed (including for wetlands).</li> </ul>
Minor and other	143	Minor and consequential changes	Amend	Make any other amendments as may be necessary or expedient to give effect to the purpose and intent of the relief sought in the submission.	No reason given.

### 12 David Jopp

ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
-------	------	-----------	----------	--------------------	-------------------------------

Summary of Decisions Requested (submissions and further submissions) on Proposed Plan Change 2 (Regionally Significant Wetlands)  
Regional Plan: Water for Otago 23 November 2011

ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Specific Schedule 9 wetlands	356	Schedule 9 - Trig Q Ephemeral Pool (#156, Map F55)	Oppose	Not include Trig Q Ephemeral Pool.	•Is not a true ephemeral wet area and only ponds during high rainfall winters and when receiving run-off.

### 13 River-Estuary Care: Waikouaiti-Karitane

ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
RMA streamlining and simplifying	150	RMA streamlining and simplifying	Oppose	Certain sections of the Consultation Draft should be included in the final proposal, e.g. the Wetlands Introduction, the Issues section, and Section 10.5 Anticipated Environmental Results (especially the inclusion of the concept of "habitat and hydrological services").	•Introduction clearly sets out the context, explains the types and values of wetlands in Otago. •Issues give clear reasons for the need for certain wetlands to have special consideration.
Chapter 10 - Wetlands	153	Chapter 10 general	Amend	Make emphasis on the interconnectedness of some wetlands (e.g. saltmarsh) with the marine environment and acknowledge the reliance of marine organisms and fish on various habitats for critical parts of their life cycles and food chains.	No reason given.
Chapter 10 - Wetlands	153	Chapter 10 general	Amend	There should be specific mention of negative effects of tidal gates on coastal wetland habitats, blocking natural tidal flows to and from the wetland and the sea.	No reason given.
Specific Schedule 9 wetlands	240	Schedule 9 - Ellison Saltmarsh (#40, Map F61)	Support	Inclusion of wetland commended.	•Areas are valuable in themselves and as areas with special biodiversity value.
Specific Schedule 9 wetlands	300	Schedule 9 - McGregor Swamp (#100, Map F61)	Support	Inclusion of wetland commended.	•Areas are valuable in themselves and as areas with special biodiversity value.
Specific Schedule 9 wetlands	302	Schedule 9 - McLachlan Road Marsh (#102, Map F61)	Support	Inclusion of wetland commended.	•Areas are valuable in themselves and as areas with special biodiversity value.
Specific Schedule 9 wetlands	365	Schedule 9 - Waikouaiti River Estuary Wetland Complex (#165, Map F61)	Support	Inclusion of wetland commended.	•Areas are valuable in themselves and as areas with special biodiversity value.
Wetland values information and Wetland Inventory	400	Schedule 9 - Wetlands values in Schedule 9	Oppose	Certain sections of the Consultation Draft should be included in the final proposal, e.g. listing of the specific nature and values in each of the designated wetlands.	No reason given.

### 14 Waitaki District Council

ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
General support and opposition	145	General support	Support	General support for plan change.	No reason given.
Wetland values information and Wetland Inventory	151	Wetland Inventory	Support	Supports providing information in a non-regulatory inventory of wetlands.	•Allows the inventory to be more extensive, regularly updated, and freely accessible to all. •Inventory information will be useful to the Waitaki DC's Ecological Study.
Mapping of Schedule 9 wetlands - general	199	Mapping of Schedule 9 wetlands - general	Support	Support the refined mapping for Schedule 9 wetlands.	•Will assist in determining compliance with Waitaki DC's Rural Zone Site Development Standard 4.4.7.

### 15 Cardrona Alpine Resort

ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
What is a Regionally Significant Wetland	7.139	Policy 10.4.1A - Definition of a Regionally Significant Wetland	Amend	Delete 10.4.1A(c).	•Remove provisions that relate to wetlands higher than 800m. •Skifield operations have not been considered in the proposal, and are a vital part of the economy.
What is a Regionally Significant Wetland	7.139	Policy 10.4.1A - Definition of a Regionally Significant Wetland	Amend	Provide for wetlands within Ski Area Sub Zones to be excluded from definition of Regionally Significant Wetlands in 10.4.1A.	•Skifield operations have not been considered in the proposal, and are a vital part of the economy.
Chapter 10 - Wetlands	153	Chapter 10 general	Amend	The locations identified as Ski Area Sub Zones in the Queenstown-Lakes District Plan should also be adopted as policy areas within the ORC Plan.	•Skifield operations have not been considered in the proposal, and are a vital part of the economy.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	155	Chapter 13 general	Amend	Amend clauses within 13.2, 13.3, 13.4, 13.5, 13.6 and 13.7 to provide for: •erection, placement, extension, alteration, reconstruction, demolition or removal of structures and •alteration of a wetland and •introduction, planting or removal of vegetation	•Skifield operations have not been considered in the proposal, and are a vital part of the economy.

Summary of Decisions Requested (submissions and further submissions) on Proposed Plan Change 2 (Regionally Significant Wetlands)  
Regional Plan: Water for Otago 23 November 2011

ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
				to be a permitted activity for wetlands within the Ski Area Sub Zones (areas currently designated as Ski Area Sub Zones in the Queenstown-Lakes District Plan).	
Chapter 12 - Rules: Water Take, Use and Management	156	Chapter 12 general	Amend	Amend clauses within 12.1 to provide for taking of surface water to be a permitted activity for wetlands within the Ski Area Sub Zones (areas currently designated as Ski Area Sub Zones in the Queenstown-Lakes District Plan).	•Skifield operations have not been considered in the proposal, and are a vital part of the economy.
Chapter 12 - Rules: Water Take, Use and Management	156	Chapter 12 general	Amend	Amend clauses within 12.2, 12.3, 12.9, and 12.11 to provide for: •taking of ground water, and •damming and diversion of water, and •discharges from drilling and bore testing, and •discharges of water or tracer dye to be a permitted activity within the Ski Area Sub Zones (areas currently designated as Ski Area Sub Zones in the Queenstown-Lakes District Plan).	•Skifield operations have not been considered in the proposal, and are a vital part of the economy.
Chapter 12 - Rules: Water Take, Use and Management	156	Chapter 12 general	Amend	Clarify Discharge of Water provisions to confirm that any discharge of water associated with a snowmaking system is a permitted activity.	•Skifield operations have not been considered in the proposal, and are a vital part of the economy.
Protection general	161	Protection general	Amend	Specific note should be made in assessment criteria and background as to the substantial positive effects created by Snowmaking Systems and the water use associated with these systems.	•Skifield operations have not been considered in the proposal, and are a vital part of the economy.

## 16 Te Ao Marama Inc

ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Chapter 10 - Wetlands	153	Chapter 10 general	Amend	Include preservation of wetland, lake and river margins in the proposed plan change.	•Proposed change does not address this (as required by s 6 RMA). •Would significantly strengthen the provisions proposed and help to achieve the purpose of RMA. •A lot of inappropriate use and development has been carried out in the margins, with significant effects on wetlands, lakes, rivers and the coast.

## 17 William Thomas Begg

ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	124	Rule 13.7.1.2 - Removal or clearance of exotic plant material	Amend	If Stirling Marsh Complex is retained as a Regionally Significant Wetland then provide for the harvesting of exotic species occurring in the wetland as a permitted activity.	•Part of the wetland area on my property is planted in poplar trees for timber. •Plan Change fails to provide for my economic wellbeing and that of the surrounding community (required by s 5 RMA).
Promotion, information and funding	148	Funding	Amend	If Stirling Marsh Complex is retained as a Regionally Significant Wetland then provide rates relief of up to 50% of total rates for the property to recognise the cost of protection and fencing.	•Plan Change fails to provide for my economic wellbeing and that of the surrounding community (required by s 5 RMA). •Measures are an infringement of my freehold property rights - compensation, fencing assistance or rate relief should be provided.
Promotion, information and funding	148	Funding	Amend	If Stirling Marsh Complex is retained as a Regionally Significant Wetland then provide a gorse and broom management/eradication plan for the wetland undertaken, implemented and funded by ORC.	•The areas of this wetland on my property are used for intensive grazing, and one area has gorse and is fenced to keep cattle out.
Specific Schedule 9 wetlands	339	Schedule 9 - Stirling Marsh Complex (#139, Map F43)	Amend	Remove the areas identified as Stirling Marsh Complex that are on my property from proposed plan change 2.	•Areas of this wetland on my property do not meet the criteria of regional significance. They are used for intensive grazing, growing poplar trees for timber, and one area has gorse and is fenced to keep cattle out. •Insufficient consultation.

## 18 Trevor and Vivien Nimmo

ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
-------	------	-----------	----------	--------------------	-------------------------------

Summary of Decisions Requested (submissions and further submissions) on Proposed Plan Change 2 (Regionally Significant Wetlands)  
Regional Plan: Water for Otago 23 November 2011

ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Specific Schedule 9 wetlands	270	Schedule 9 - Kemp Road Lagoon (#70, Map F65)	Amend	Remove wetland from Schedule 9.	<ul style="list-style-type: none"> <li>The lagoon is not regionally significant, it has none of the values listed in policy 10.4.1, and is not a freshwater lagoon.</li> <li>Inclusion in Schedule 9 would be a barrier to possible future development.</li> <li>Insufficient consultation.</li> </ul>

## 19 Three Creeks Farm

ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Chapter 12 - Rules: Water Take, Use and Management	81	Rule 12.8.1.2 - Discharge of contaminants collected in animal waste collection system in Zone A of Lower Waitaki Plains Groundwater Protection Zone	Amend	If Te Hua Taki Wetland (Map F66, #171) is retained as a regionally significant wetland then provide that there are no setbacks from the wetland for the application of Farm Dairy Effluent.	<ul style="list-style-type: none"> <li>We have farmed alongside the wetland and in harmony with its values for a number of years, it is fenced and kept in its natural state.</li> <li>Our cowshed and milking platform are close to the wetland.</li> <li>Identifying the wetland as regionally significant may affect the integrity and functioning of our dairy farm effluent system.</li> </ul>
Promotion, information and funding	148	Funding	Amend	If Te Hua Taki Wetland (Map F66, #171) is retained as a regionally significant wetland then provide rates relief of up to 50% of total rates for the property to recognise the cost of management.	<ul style="list-style-type: none"> <li>Plan Change fails to provide for my economic wellbeing and that of the community around the affected area, as required by s 5 RMA.</li> <li>Identifying the wetland as regionally significant may affect the integrity and functioning of our dairy farm effluent system.</li> </ul>
Promotion, information and funding	148	Funding	Amend	If Te Hua Taki Wetland (Map F66, #171) is retained as a regionally significant wetland and if consents are required for drain maintenance, provide that (a) there is no fee on the consent, (b) consents for drain maintenance are being processed as controlled activities, and (c) a non notification clause is included.	<ul style="list-style-type: none"> <li>Plan Change fails to provide for my economic wellbeing and that of the community around the affected area, as required by s 5 RMA.</li> </ul>
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	155	Chapter 13 general	Amend	If Te Hua Taki Wetland (Map F66, #171) is retained as a regionally significant wetland then provide that there are no arbitrary setbacks on structures or buildings occurring on or near the wetland.	<ul style="list-style-type: none"> <li>Plan Change fails to provide for my economic wellbeing and that of the community around the affected area, as required by s 5 RMA.</li> <li>We have farmed alongside the wetland and in harmony with its values for a number of years.</li> <li>Our cowshed and milking platform are close to the wetland.</li> </ul>
Chapter 12 - Rules: Water Take, Use and Management	156	Chapter 12 general	Amend	If Te Hua Taki Wetland (Map F66, #171) is retained as a regionally significant wetland then provide that the taking of water from the wetland and taking of adjacent groundwater for stock, domestic and agricultural use is a permitted activity.	<ul style="list-style-type: none"> <li>Plan Change fails to provide for my economic wellbeing and that of the community around the affected area, as required by s 5 RMA.</li> <li>We have farmed alongside the wetland and in harmony with its values for a number of years.</li> <li>Our current water take is adjacent to the wetland.</li> </ul>
Protection general	157	Drain maintenance	Amend	If Te Hua Taki Wetland (Map F66, #171) is retained as a regionally significant wetland then: <ul style="list-style-type: none"> <li>Provide for the maintenance of existing drains into and out of the wetland as a permitted activity.</li> <li>If consents are required include a non notification clause, include the consents as a controlled activity, that there is no fee on the consent.</li> </ul>	<ul style="list-style-type: none"> <li>Drains in and out of the wetland need regular maintenance, which is an important part of how the wetland currently functions. Getting consent for drain maintenance will have a significant effect on my farming operation (cost and uncertainty).</li> <li>Plan Change fails to provide for my economic wellbeing and that of the community around the affected area, as required by s 5 RMA.</li> </ul>
Specific Schedule 9 wetlands	371	Schedule 9 - Te Hua Taki Wetland (#171, Map F66)	Oppose	Remove wetland from the proposed schedule of regionally significant wetlands.	<ul style="list-style-type: none"> <li>Areas of this wetland on my property do not meet the criteria of regional significance in policy 10.4.1, and have not previously been identified as regionally significant.</li> <li>Plan Change fails to provide for my economic wellbeing and that of the community around the affected area, as required by s 5 RMA.</li> <li>Insufficient consultation.</li> </ul>

## 20 Lake Waihola Waipori Wetlands Society Inc.

ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
What is a Regionally Significant Wetland	7.139	Policy 10.4.1A – Definition of a Regionally Significant Wetland	Amend	Amend to more clearly delineate between what is defined as aquatic, wetlands, and land.	<ul style="list-style-type: none"> <li>Lack of delineation between aquatic values and wetland values makes the proposal slightly confusing.</li> <li>Aquatic and wetland areas are distinct with quite different plant communities.</li> </ul>

Summary of Decisions Requested (submissions and further submissions) on Proposed Plan Change 2 (Regionally Significant Wetlands)  
Regional Plan: Water for Otago 23 November 2011

ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Promotion, information and funding	14	Policy 10.4.6 - Promotion of wetlands	Support	Supports concepts in 10.4.6.	<ul style="list-style-type: none"> <li>•This will make the rules work more clearly, and give greater guidance to people.</li> <li>•Notes lack of detail around how Council intend to educate, resource and fund the concepts in 10.4.6, and that there are no financial incentives for wetland restoration.</li> <li>•Notes lack of public presentation of wetland information.</li> </ul>
Chapter 12 - Rules: Water Take, Use and Management	76	Rule 12.7.1.1 - Discharge of herbicide to water	Amend	Amend to provide for control of terrestrial weed species within wetlands.	<ul style="list-style-type: none"> <li>•Rule only relates to the control of aquatic plants, not terrestrial plants.</li> <li>•Many weeds within wetlands are terrestrial species (e.g. willow, elder).</li> </ul>
Chapter 12 - Rules: Water Take, Use and Management	77	Rule 12.7.1.2 - Discharge of pesticide, land-based discharge onto land	Amend	Wetland restorative works and weed control must be made simpler.	<ul style="list-style-type: none"> <li>•Rule is confusing and makes wetland restorative efforts difficult to develop, plan and implement.</li> <li>•Weed control by herbicide application in wetlands is virtually impossible without short term effects on non-target species.</li> <li>•Weed control has positive effects on hydrology and sediment movement. Rule only looks at whether effects have occurred. People controlling weeds may be penalised for creating positive changes.</li> </ul>
Chapter 12 - Rules: Water Take, Use and Management	78	Rule 12.7.1.3 - Discharge of herbicide to air or land	Amend	Wetland restorative works and weed control must be made simpler.	<ul style="list-style-type: none"> <li>•Rule is confusing and makes wetland restorative efforts difficult to develop, plan and implement.</li> <li>•Weed control by herbicide application in wetlands is virtually impossible without short term effects on non-target species.</li> <li>•Weed control has positive effects on hydrology and sediment movement. Rule only looks at whether effects have occurred. People controlling weeds may be penalised for creating positive changes.</li> </ul>
Chapter 12 - Rules: Water Take, Use and Management	79	Rule 12.7.1.4 - Discharge of pesticide, aerial discharge onto land	Amend	Wetland restorative works and weed control must be made simpler.	<ul style="list-style-type: none"> <li>•Rule is confusing and makes wetland restorative efforts difficult to develop, plan and implement.</li> <li>•Weed control by herbicide application in wetlands is virtually impossible without short term effects on non-target species.</li> <li>•Weed control has positive effects on hydrology and sediment movement. Rule only looks at whether effects have occurred. People controlling weeds may be penalised for creating positive changes.</li> </ul>
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	118	Rule 13.5.1.8 - Disturbance by livestock	Amend	Amend to encourage farmers not to graze wetlands and to encourage options for protection.	<ul style="list-style-type: none"> <li>•Stock in wetlands will damage native species - counter to goal of protecting wetland values.</li> <li>•Rule sets threshold only when grazing severely damages the wetland, and could result in debate over levels of damage.</li> </ul>
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	121	Rule 13.6.1.1 - Introduction of pest plants general	Amend	Include list of prohibited species in proposed rule 13.6.1. List should reflect that terrestrial species have a greater impact on the health of wetlands than the list of aquatic species in the proposed plan.	<ul style="list-style-type: none"> <li>•These species are invasive and have negative impacts on wetlands.</li> </ul>
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	122	Rule 13.6.2.0 - Introduction or planting of New Zealand native plant	Support	Supports rule in principle.	Allows for planting of native species in wetlands without resource consent being required
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	125	Rule 13.7.2.1 - Removal of pest plants - controlled activity	Amend	Amend to include; Reed Sweetgrass <i>Glyceria maxima</i> , Crack Willow <i>Salix fragilis</i> , Grey Willow <i>Salix cinerea</i> , Black Alder <i>Alnus glutinosa</i> , Red Alder <i>Alnus rubra</i> , Pine <i>Pinus radiata</i> .	<ul style="list-style-type: none"> <li>•Makes consent always be granted for the removal of these species.</li> </ul>
General support and opposition	145	General support	Support	Supports increased focus on the protection, enhancement and restoration of wetlands.	No reason given.
Promotion, information and funding	164	Chapter 15 - Methods other than Rules	Amend	Provide education, information, and leadership on the right kind of plant species for wetland planting in Otago. Recognise acceptance of risk by the Lake Waiholo Waipori Wetlands Society in the planning and resource management process, in ensuring that projects in wetland restoration are to mean the outcomes of 10.4.6. Be proactive in drawing attention to the need to control Reed Sweetgrass in our region.	<ul style="list-style-type: none"> <li>•Choice of plants involves the selection of appropriate plant assemblages for differing wetlands throughout Otago. –</li> <li>•Critical information if biodiversity and wetland functionality are to be retained and enhanced.</li> <li>•Lake Waiholo Waipori Wetlands Society has made a significant public commitment to the sustainable management of wetlands in its area.</li> <li>•Will improve our waterways, wetlands and the region.</li> <li>•Reed Sweetgrass is a significant threat to wetland and</li> </ul>

Summary of Decisions Requested (submissions and further submissions) on Proposed Plan Change 2 (Regionally Significant Wetlands)  
Regional Plan: Water for Otago 23 November 2011

ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
					waterway health in the Waihola waipori Catchment.

## 21 Save the Otago Peninsula Inc Society

ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
RMA streamlining and simplifying	150	RMA streamlining and simplifying	Oppose	Opposes the deletion of 10.2.3	No reason given
Specific Schedule 9 wetlands	261	Schedule 9 - Hoopers Inlet Swamp (#61, Map F58)	Support	Support the new, more accurate boundaries of the wetland.	•Important ecological values are recognised.
Specific Schedule 9 wetlands	320	Schedule 9 - Papanui Inlet Saltmarsh (#120, Map F59)	Support	Support the inclusion of wetland in the Water Plan.	No reason given.
Schedule 10 and Non-Regionally Significant Wetlands	600	Schedule 10 and Non-Regionally Significant Wetlands	Oppose	Oppose the deletion of Schedule 10.	•Deletion of Schedule 10 would contribute to the loss and degradation of small wetlands. •Some small wetlands on the Otago Peninsula are collectively very important as habitat for wading birds - they are gradually being drained and filled. •Wetlands at the head of Papanui Inlet were once on the Wetland of Ecological and National Importance database, and are now almost non-existent.
Schedule 10 and Non-Regionally Significant Wetlands	600	Schedule 10 and Non-Regionally Significant Wetlands	Amend	Raupo swamp at Otakou provides example of a small wetland that should be considered for recognition in Schedule 10.	•Has ecological value, and is significant locally, but maybe not regionally. •Tomahawk Lagoon is the only other site for raupo on the Otago Peninsula.
Schedule 10 and Non-Regionally Significant Wetlands	600	Schedule 10 and Non-Regionally Significant Wetlands	Amend	Include schedule of locally important wetlands in the Water Plan.	No reasons given.

## 22 Gavan James Herlihy

ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Chapter 12 - Rules: Water Take, Use and Management	22	Rule 12.1.1A.1 - Take and use of surface water from any Regionally Significant Wetland	Support	New drains should require consent.	No reason given.
Chapter 12 - Rules: Water Take, Use and Management	45	Rule 12.2.1A.1 - Take and use of groundwater from any Regionally Significant Wetland	Support	New drains should require consent.	No reason given.
Chapter 12 - Rules: Water Take, Use and Management	60	Rule 12.3.1A.1 - Damming or diversion of water: Regionally Significant Wetland	Support	New drains should require consent.	No reason given.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	118	Rule 13.5.1.8 - Disturbance by livestock	Amend	Need greater clarity to what is "conspicuous" in 13.5.1.8(b)	•Unclear as to whether stock will be able to still run on the Upper Taieri River Flats.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	118	Rule 13.5.1.8 - Disturbance by livestock	Amend	13.5.1.8(d) needs greater clarity or higher threshold as to what constitutes "damage".	•Literal interpretation could exclude all stock any time, as any grazing will do some damage.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	120	Rule 13.5.3.2 - Alteration of Regionally Significant Wetland - discretionary activity	Support	New drains should require consent.	No reason given.
Protection general	157	Drain maintenance	Amend	Maintenance of existing drains to be a permitted activity.	No reason given.

## 23 Maniototo Homestead

ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
General support and opposition	144	General opposition	Oppose	Status quo. Strongly oppose the need for the proposed plan change.	•Could cause management issues.
Specific Schedule 9 wetlands	232	Schedule 9 - Cross Eden Creek Marsh Complex (#32, Map F16)	Oppose	Status quo.	•Could cause management issues. •The plants mentioned in the ecologist report on wetland values have long lived in harmony with farming practise.

## 24 D W Lyders

ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	155	Chapter 13 general	Did not specify	No decision requested.	•Concern that proposed rules will prevent or hamper the continuation of enhancement of Waipori/Waihola Wetland (by spraying willow, alders, gorse or by creation of ponds for wildlife) by requiring costly and time consuming consent.

Summary of Decisions Requested (submissions and further submissions) on Proposed Plan Change 2 (Regionally Significant Wetlands)  
Regional Plan: Water for Otago 23 November 2011



ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Chapter 12 - Rules: Water Take, Use and Management	156	Chapter 12 general	Did not specify	No decision requested.	•Concern that proposed rules will prevent or hamper the continuation of enhancement of Waipori/Waiholo Wetland (by spraying willow, alders, gorse or by creation of ponds for wildlife) by requiring costly and time consuming consent.

## 25 Michael and Christine Holland

ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	155	Chapter 13 general	Amend	Want no changes to land use adjacent to the Waianakarua River Estuary Swamp (Map F65, #164).	•Do not want farming operation affected, wetland is already adequately protected by fencing.
Chapter 12 - Rules: Water Take, Use and Management	156	Chapter 12 general	Amend	Want no changes to irrigation takes above the Waianakarua River Estuary Swamp (Map F65, #164).	•Do not want farming operation affected, wetland is already adequately protected by fencing.
Specific Schedule 9 wetlands	364	Schedule 9 - Waianakarua River Estuary Swamp (#164, Map F65)	Support	Support the identification of the wetland.	•Land is not farmed, and is fenced.

## 26 The Yellow-eyed Penguin Trust

ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Mapping of Schedule 9 wetlands - general	199	Mapping of Schedule 9 wetlands - general	Support	Commends more accurate definition of wetland areas.	No reason given.
Schedule 9 general	200	Schedule 9	Support	Commends the addition of 24 new wetlands.	No reason given.
Schedule 9 general	200	Schedule 9	Amend	Inclusion in Schedule 9 of Tavora Wetland at Bobbys Head.	•Wetland has been restored to improve wetland function. •Council has funded signs on wetland and vegetation - it gets lots of visitors, wetland is important for public education. •Notes the plan change offers little protection for "lesser" wetlands, which may be equally important in the wider scheme.
Specific Schedule 9 wetlands	315	Schedule 9 - Okia Flat Wetland Management Area (#115, Map F68)	Support	Approve of the wetland being a Wetland Management Area in Schedule 9.	No reason given.
Specific Schedule 9 wetlands	320	Schedule 9 - Papanui Inlet Saltmarsh (#120, Map F59)	Support	Approve of the wetland being in Schedule 9.	No reason given.
Specific Schedule 9 wetlands	349	Schedule 9 - Te Matai Marsh Complex (#149, Map F68)	Support	Approve of the wetland being in Schedule 9.	No reason given.

## 27 Otago Conservation Board

ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Chapter 10 - Wetlands	9	Policy 10.4.2 - Priority on avoiding adverse effects	Support	Strongly support the intention to avoid adverse effects on wetlands rather than to remedy or mitigate such effects.	•No longer acceptable to merely remedy or mitigate effects.
Chapter 12 - Rules: Water Take, Use and Management	22	Rule 12.1.1A.1 - Take and use of surface water from any Regionally Significant Wetland	Support	Strongly support setting the default activity status of activities that affect wetlands as 'non-complying'.	•Essential that all remaining wetlands receive highest level of protection.
Chapter 12 - Rules: Water Take, Use and Management	45	Rule 12.2.1A.1 - Take and use of groundwater from any Regionally Significant Wetland	Support	Strongly support setting the default activity status of activities that affect wetlands as 'non-complying'.	•Essential that all remaining wetlands receive highest level of protection.
Chapter 12 - Rules: Water Take, Use and Management	60	Rule 12.3.1A.1 - Damming or diversion of water: Regionally Significant Wetland	Support	Strongly support setting the default activity status of activities that affect wetlands as 'non-complying'.	•Essential that all remaining wetlands receive highest level of protection.
General support and opposition	145	General support	Support	Supports the proposed changes	•Will provide much needed protection for remaining wetlands.
Mapping of Schedule 9 wetlands - general	199	Mapping of Schedule 9 wetlands - general	Amend	Detailed maps and their base aerial photographs should be used in the new Schedule.	•Wetlands are often small areas with complicated boundaries •1:50,000 maps inadequate
Schedule 9 general	200	Schedule 9	Support	Strongly supports the addition of new wetlands to the list of protected wetlands.	No reason given.
Wetland values information and Wetland Inventory	400	Schedule 9 - Wetlands values in Schedule 9	Oppose	Information on wetland values should be retained and included in the new Schedule to be used for ongoing planning and protection.	•Planning decisions and protection improved by having ready access to values information.
Schedule 10 and Non-Regionally Significant Wetlands	600	Schedule 10 and Non-Regionally Significant Wetlands	Amend	Schedule 10 areas which are not going to be added into Schedule 9 should be re-evaluated and, where appropriate, given protection.	•Not including will mean fewer wetlands protected.

## 28 The Retreat Trust

Summary of Decisions Requested (submissions and further submissions) on Proposed Plan Change 2 (Regionally Significant Wetlands)  
Regional Plan: Water for Otago 23 November 2011

ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Specific Schedule 9 wetlands	351	Schedule 9 - Three Stones Fen Complex (#151, Map F53)	Oppose	Oppose the proposed Plan Change. Take the tussock ground out of the fen system.	<ul style="list-style-type: none"> <li>It is insignificant and not a wetland area.</li> <li>Has ditches throughout tussock, needs periodic cleaning to maintain drain and stock entrapment.</li> </ul>

## 29 Federated Farmers of New Zealand

ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Regionally Significant Wetland values	6.14	Policy 10.4.1 - Definition of Regionally Significant Wetland values	Support	Adopt the provision as proposed.	<ul style="list-style-type: none"> <li>Supports the incorporation of wetland values within one provision, and the addition of "significant" to value A9.</li> </ul>
Protection general	10	Financial contributions policy (Policy 10.4.2A and Ch.17)	Oppose	Opposes in part 10.4.2A and the Introduction to Chapter 17 in part.	No reason given.
Regionally Significant Wetland values	11	Policy 10.4.3 - Identification of Type B values	Support	Supports the incorporation of wetland values within one provision.	No reason given.
Chapter 12 - Rules: Water Take, Use and Management	22	Rule 12.1.1A.1 - Take and use of surface water from any Regionally Significant Wetland	Amend	Amend the activity status to a restricted discretionary activity.	<ul style="list-style-type: none"> <li>Unnecessary, and adds needless expense and time compared to restricted discretionary.</li> </ul>
Chapter 12 - Rules: Water Take, Use and Management	28	Rule 12.1.2.6 - Take and use of surface water for land drainage	Amend	Categorise the maintenance of an existing drain, including the clearing of any subsequent slumping, as a permitted activity.	<ul style="list-style-type: none"> <li>Land drainage has positive benefits, both locally and wider.</li> <li>Unmaintained drainage systems risk flooding, erosion and discharges.</li> <li>Requiring consent may deter maintenance.</li> </ul>
Chapter 12 - Rules: Water Take, Use and Management	45	Rule 12.2.1A.1 - Take and use of groundwater from any Regionally Significant Wetland	Amend	Amend the activity status to a restricted discretionary activity.	<ul style="list-style-type: none"> <li>Unnecessary, and adds needless expense and time compared to restricted discretionary.</li> </ul>
Chapter 12 - Rules: Water Take, Use and Management	53	Rule 12.2.3.4 - Take and use of groundwater - restricted discretionary activity	Amend	Amend: "Any <i>adverse effect on any Regionally Significant Wetland or on any regionally significant wetland value</i> "	<ul style="list-style-type: none"> <li>Implementation uncertain; means standard farming practices may be captured.</li> </ul>
Chapter 12 - Rules: Water Take, Use and Management	60	Rule 12.3.1A.1 - Damming or diversion of water: Regionally Significant Wetland	Amend	Amend the activity status to a restricted discretionary activity.	<ul style="list-style-type: none"> <li>Unnecessary, and adds needless expense and time compared to restricted discretionary.</li> </ul>
Chapter 12 - Rules: Water Take, Use and Management	64	Rule 12.3.2.2 - Damming or diversion of water for land drainage	Amend	Categorise the maintenance of an existing drain, including the clearing of any subsequent slumping, as a permitted activity.	<ul style="list-style-type: none"> <li>Land drainage has positive benefits, both locally and wider.</li> <li>Unmaintained drainage systems risk flooding, erosion and discharges.</li> <li>Requiring consent may deter maintenance.</li> </ul>
Chapter 12 - Rules: Water Take, Use and Management	66	Rule 12.3.3.1 - Damming or diversion of water - restricted discretionary activity	Amend	Amend: "Any <i>adverse effect on any Regionally Significant Wetland or on any regionally significant wetland value</i> "	<ul style="list-style-type: none"> <li>Implementation uncertain; means standard farming practices may be captured.</li> </ul>
Chapter 12 - Rules: Water Take, Use and Management	73	Rule 12.4.2.1 - Discharge of stormwater to water, or onto or into land where it may enter water	Amend	Amend: "Any <i>adverse effect on any Regionally Significant Wetland or on any regionally significant wetland value</i> "	<ul style="list-style-type: none"> <li>Implementation uncertain; means standard farming practices may be captured.</li> </ul>
Chapter 12 - Rules: Water Take, Use and Management	75	Rule 12.5.2.1 - Discharge of drainage water - restricted discretionary activity	Amend	Amend: "Any <i>adverse effect on any Regionally Significant Wetland or on any regionally significant wetland value</i> "	<ul style="list-style-type: none"> <li>Implementation uncertain; means standard farming practices may be captured.</li> </ul>
Chapter 12 - Rules: Water Take, Use and Management	84	Rule 12.8.2.1 - Discharge of contaminants collected in animal waste collection system in Zone A Groundwater Protection Zones on Maps C10-C12 and C15	Amend	Amend: "Any <i>adverse effect on any Regionally Significant Wetland or on any regionally significant wetland value</i> "	<ul style="list-style-type: none"> <li>Implementation uncertain; means standard farming practices may be captured.</li> </ul>
Chapter 12 - Rules: Water Take, Use and Management	87	Rule 12.9.2.1 - Discharge of water or contaminants associated with down-hole pump testing or drilling - restricted discretionary activity	Amend	Amend: "Any <i>adverse effect on any Regionally Significant Wetland or on any regionally significant wetland value</i> "	<ul style="list-style-type: none"> <li>Implementation uncertain; means standard farming practices may be captured.</li> </ul>
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	96	Rule 13.2.1.1 - Erection or placement of fence, pipe, line or cable over the bed	Support	Adopt 13.2.1.1 as proposed.	<ul style="list-style-type: none"> <li>Supports continuing as permitted activity the activities covered by the rule.</li> <li>Supports no requirement to fence wetlands.</li> </ul>
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	97	Rule 13.2.1.2 - Erection or placement of pipe, line or cable on or under the bed	Support	Adopt 13.2.1.2 as proposed.	<ul style="list-style-type: none"> <li>Supports continuing as permitted activity the activities covered by the rule.</li> </ul>
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	99	Rule 13.2.1.5 - Erection or placement of maimai	Amend	Amend: "... <i>is a permitted activity, providing that for the bed of any lake, river or Regionally Significant</i> "	<ul style="list-style-type: none"> <li>Supports Council permitting erection or placement of maimai, whitebait stand or eel trap in/on Regionally Significant Wetland.</li> </ul>

Summary of Decisions Requested (submissions and further submissions) on Proposed Plan Change 2 (Regionally Significant Wetlands)  
Regional Plan: Water for Otago 23 November 2011

ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
				<i>Wetland...</i>	•As written, interpretation is uncertain.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	100	Rule 13.2.1.6 - Erection or placement of whitebait stand or eel trap	Amend	Amend: "... <i>is a permitted activity, providing that for the bed of any lake, river or Regionally Significant Wetland...</i> "	•Supports Council permitting erection or placement of maimai, whitebait stand or eel trap in/on Regionally Significant Wetland. •As written, interpretation is uncertain.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	103	Rule 13.2.2.1 - Erection or placement - restricted discretionary activity	Amend	Amend: "Any <i>adverse effect on any Regionally Significant Wetland or on any regionally significant wetland value</i> "	•Implementation uncertain; means standard farming practices may be captured.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	108	Rule 13.3.2.1 - Extension, alteration, replacement or reconstruction of structure - restricted discretionary activity	Amend	Amend: "Any <i>adverse effect on any Regionally Significant Wetland or on any regionally significant wetland value</i> "	•Implementation uncertain; means standard farming practices may be captured.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	111	Rule 13.4.2.1 - Demolition or removal of a structure - restricted discretionary activity	Amend	Amend: "Any <i>adverse effect on any Regionally Significant Wetland or on any regionally significant wetland value</i> "	•Implementation uncertain; means standard farming practices may be captured.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	119	Rule 13.5.2.1 - Extraction of alluvium - restricted discretionary activity	Amend	Amend: "Any <i>adverse effect on any Regionally Significant Wetland or on any regionally significant wetland value</i> "	•Implementation uncertain; means standard farming practices may be captured.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	120	Rule 13.5.3.2 - Alteration of Regionally Significant Wetland - discretionary activity	Support	Adopt 13.5.3.2 as proposed.	No reason given.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	122	Rule 13.6.2.0 - Introduction or planting of New Zealand native plant	Support	Adopt 13.6.2.0 as proposed.	No reason given.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	124	Rule 13.7.1.2 - Removal or clearance of exotic plant material	Support	Adopt 13.7.1.2 as proposed.	No reason given.
General support and opposition	145	General support	Support	Supports general approach to management of wetlands in the region so that it is acceptable in social and economic terms to the ratepayers of the region.	No reason given.
Promotion, information and funding	148	Funding	Amend	Introduce a non regulatory method that provides for Council to undertake, implement and fund weed management or eradication plans, where appropriate for regionally significant wetlands.	•Where wetlands primarily protected for the public interest Council should pay for weed management/eradication to prevent spread. •This will ensure wetland values are maintained and enhanced.
Promotion, information and funding	148	Funding	Amend	An acknowledgement from Council that financial contribution or rates relief will be required in certain circumstances and that this be introduced as a non-regulatory method in the proposed plan change.	•Wetlands primarily protected for the public interest so Council should pay, e.g., for fencing where it is necessary.
Promotion, information and funding	148	Funding	Amend	That Council be responsible for undertaking, implementing and funding the management and eradication of exotic plants where required to maintain or enhance wetland values.	•Where wetlands primarily protected for the public interest Council should pay for weed management/eradication to prevent spread.
Promotion, information and funding	148	Funding	Amend	Allow for a financial contribution or rates relief where a fence is considered necessary to protect wetland values by introducing appropriate non-regulatory methods.	•Fencing may be expensive or impractical, particularly for wetlands above 800m.
Wetland values information and Wetland Inventory	151	Wetland Inventory	Amend	Include only those values and wetlands already identified within the proposed plan to any non-regulatory inventory. Alternatively ensure that any changes or updating of any wetland inventory only occur in direct consultation with landowners concerned and that Council introduces a policy and method that provides for a process of consultation with the affected landowner(s).	•Values could be changed without plan change process and public consultation process. •Affected farmers should be able to submit on inventory contents, and appeal to Environment Court if necessary. •Concerned that inventory would be counterproductive to working positively unless landowners involved, and that ability to easily change inventory brings uncertainty to landowners.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	155	Chapter 13 general	Amend	Reinstate the word 'adverse' in these provisions: 13.2.2.1, 13.3.2.1, 13.4.2.1, 13.5.2.1.	•Implementation uncertain; means standard farming practices may be captured.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	155	Chapter 13 general	Support	Supports the restructuring of wetland rules to make them more concise, clear and consistent.	No reason given.
Chapter 12 - Rules: Water Take, Use and Management	156	Chapter 12 general	Support	Supports the restructuring of wetland rules to make them more concise, clear and consistent.	No reason given.
Chapter 12 - Rules: Water Take, Use and Management	156	Chapter 12 general	Amend	Reinstate the word 'adverse' in these provisions: 12.1.4.8, 12.2.3.4, 12.3.3.1, 12.4.2.1, 12.5.2.1, 12.8.2, 12.9.2.1.	•Implementation uncertain; means standard farming practices may be captured.

Summary of Decisions Requested (submissions and further submissions) on Proposed Plan Change 2 (Regionally Significant Wetlands)  
Regional Plan: Water for Otago 23 November 2011

ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Protection general	162	Generic permitted activity condition for wetlands protection	Amend	Delete: "There is no change to the water level or hydrological function, or no damage to the flora, fauna or its habitat, in or on any Regionally Significant Wetland." In rules 12.1.2.4, 12.1.2.5, 12.1.2.6, 12.2.2.5, 12.2.2.6, 12.3.2.1, 12.3.2.2, 12.3.2.3, 13.4.1.1, 13.5.1.1, 13.5.1.3, 13.5.1.8.	<ul style="list-style-type: none"> <li>•Since other provisions control water in Regionally Significant Wetlands and wetlands are mapped, unsure of need for condition.</li> <li>•Concerned that implementation of rule is uncertain near mapped areas.</li> </ul>
Schedule 9 general	200	Schedule 9	Amend	Remove any wetlands inaccurately identified as Regionally Significant Wetlands included within Schedule 9 maps as identified by individual submitters.	<ul style="list-style-type: none"> <li>•Applying for consent for normal farming activities that have little/no effect on wetland values is unfair for landowners of inaccurately identified wetland areas.</li> <li>•Insufficient consultation</li> </ul>

### 30 Contact Energy Limited

ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
What is a Regionally Significant Wetland	7.139	Policy 10.4.1A - Definition of a Regionally Significant Wetland	Oppose	That the definition of a Regionally Significant Wetland (which includes all wetlands over 800m above sea level) be not approved.	<ul style="list-style-type: none"> <li>•Process classifying the wetlands as regionally significant was not robust.</li> <li>•Wetlands above 800m should not be automatically included if these are not accurately mapped/plotted and if no values assessment has been done on them.</li> </ul>
Protection general	10	Financial contributions policy (Policy 10.4.2A and Ch.17)	Amend	That the new policy 10.4.2A on financial contributions be amended to clarify that not every effect not avoided, remedied or mitigated is required to be addressed by way of financial contribution for environmental compensation, but only those residual effects above a certain threshold - being more than minor effects. Appropriate clarification of the circumstances, purpose and method of determining the contribution amount should also be provided.	<ul style="list-style-type: none"> <li>•Not every effect needs to be addressed.</li> <li>•The policy implies a "no net loss" approach, which is not taken in RMA.</li> </ul>
Chapter 12 - Rules: Water Take, Use and Management	22	Rule 12.1.1A.1 - Take and use of surface water from any Regionally Significant Wetland	Amend	That the non-complying activity status proposed for activities controlled by Chapter 12 be not approved and that such activities remain as discretionary activities.	<ul style="list-style-type: none"> <li>•Non-complying status is too onerous, especially given concerns on artificial wetlands, and the lack of robustness in the process classifying the wetlands as regionally significant</li> <li>•Activity with an adverse effect on a wetland value may still be appropriate.</li> <li>•Discretionary status allows robust examination, and the possibility of declining activities.</li> </ul>
Chapter 12 - Rules: Water Take, Use and Management	45	Rule 12.2.1A.1 - Take and use of groundwater from any Regionally Significant Wetland	Amend	That the non-complying activity status proposed for activities controlled by Chapter 12 be not approved and that such activities remain as discretionary activities.	<ul style="list-style-type: none"> <li>•Non-complying status is too onerous, especially given concerns on artificial wetlands, and the lack of robustness in the process classifying the wetlands as regionally significant.</li> <li>•Activity with an adverse effect on a wetland value may still be appropriate.</li> <li>•Discretionary status allows robust examination, and the possibility of declining activities.</li> </ul>
Chapter 12 - Rules: Water Take, Use and Management	60	Rule 12.3.1A.1 - Damming or diversion of water: Regionally Significant Wetland	Amend	That the non-complying activity status proposed for activities controlled by Chapter 12 be not approved and that such activities remain as discretionary activities.	<ul style="list-style-type: none"> <li>•Non-complying status is too onerous, especially given concerns on artificial wetlands, and the lack of robustness in the process classifying the wetlands as regionally significant</li> <li>•Activity with an adverse effect on a wetland value may still be appropriate.</li> <li>•Discretionary status allows robust examination, and the possibility of declining activities.</li> </ul>
Chapter 12 - Rules: Water Take, Use and Management	66	Rule 12.3.3.1 - Damming or diversion of water - restricted discretionary activity	Support	The restricted discretionary activity status for the damming of water that has previously been carried out remains a restricted discretionary activity (Rule 12.3.3.1(i)).	No reason given.
Minor and other	143	Minor and consequential changes	Amend	Give such other relief, including consequential relief, required to address the issues raised in this submission.	No reason given.
Plan general	154	Plan general	Amend	That recognition be given to the fact that Regionally Significant Wetlands can be an outcome of legitimate resource development such as hydro power generation.	<ul style="list-style-type: none"> <li>•Concerned that wetland origin (natural or man made) has not been appropriately considered in classifying wetlands, and in writing provisions.</li> <li>•Plan change does not make allowance for the creation of new</li> </ul>

Summary of Decisions Requested (submissions and further submissions) on Proposed Plan Change 2 (Regionally Significant Wetlands)  
Regional Plan: Water for Otago 23 November 2011

ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
					wetlands
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	155	Chapter 13 general	Amend	That controls on the use of the beds of wetlands are not duplicated by the Regional and District Plans.	•Queries Chapter 13 rules applying to wetlands. •Especially relevant to Central Otago District Plan.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	155	Chapter 13 general	Did not specify	The opportunity to mitigate or offset the effects of activities on Regionally Significant Wetlands be given recognition in the rules.	•Wetlands can be relocated and enhanced. •Concerned by hierarchy of avoid, followed by remedy or mitigate - not endorsed in RMA.
Chapter 12 - Rules: Water Take, Use and Management	156	Chapter 12 general	Did not specify	The opportunity to mitigate or offset the effects of activities on Regionally Significant Wetlands be given recognition in the rules.	•Wetlands can be relocated and enhanced. •Concerned by hierarchy of avoid, followed by remedy or mitigate - not endorsed in RMA.
Protection general	161	Protection general	Support	The opportunity to mitigate or offset the effects of activities on Regionally Significant Wetlands be given recognition in the objectives, policies, and rules.	•Wetlands can be relocated and enhanced. •Concerned by hierarchy of avoid, followed by remedy or mitigate - not endorsed in RMA.
Mapping of Schedule 9 wetlands - general	199	Mapping of Schedule 9 wetlands - general	Support	Supports all wetlands classified as Regionally Significant being accurately plotted/mapped before inclusion in the Regional Plan.	No reason given.
Schedule 9 general	200	Schedule 9	Oppose	That Schedule 9 be not approved.	•Process classifying the wetlands as regionally significant was not robust, had low level of investigation and assessment, which is not justified with the restrictive objectives and policies.
Schedule 9 general	200	Schedule 9	Amend	Clarify statement "Schedule 9 is not exhaustive" and make it explicit in order to provide certainty.	•Meaning of this is not clear. •Additional wetlands cannot be added to the Schedule without a formal plan change process.
Wetland values information and Wetland Inventory	400	Schedule 9 - Wetlands values in Schedule 9	Oppose	Opposes the removal of all descriptive information on each listed wetland, and the development of a separate non-regulatory inventory.	•Removing values is ultra vires - allows non-public, non-contestable process to assign values to a wetland, removes certainty for plan users, and is not just - especially as these values trigger non-complying category.

### 31 Brookhouse Farm Ltd

ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Specific Schedule 9 wetlands	277	Schedule 9 - Lake Tuakitoto Wetland (#77, Map F43)	Amend	Some of the land on the far Western boundary of the wetland should not be classified as regionally significant wetland. Proposed an alternative boundary on an attached copy of Map F43 and the area of concern is marked 'a'.	•Minimum water levels will never result in area 'a' being used "for natural beauty or wetland". •Aerial photos show area 'a' is not the same vegetation. On ground, only sparse rushes and grass, because area 'a' higher than rest: waterlogged during wet periods and floods once or twice a year. •Have managed area 'a' as intensively as soil conditions allowed. •Rest of western boundary should stay undisturbed with no animal access.

### 32 Meridian Energy Limited

ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Chapter 10 - Wetlands	5	Objective 10.3.1 - Maintain or enhance wetlands	Support	Retain objective 10.3.1 as notified.	•Provides appropriate direction to resource users with respect to management expectations for wetland values.
Regionally Significant Wetland values	6.14	Policy 10.4.1 - Definition of Regionally Significant Wetland values	Amend	Amend policy 10.4.1: "A1 Habitat for <i>regionally, nationally or internationally rare or threatened species or communities</i> ; ... <del>A7 - High diversity of indigenous flora and fauna;</del> <del>A8 - Regionally significant habitat for waterfowl; and</del> <del>A7g Significant hydrological values including maintaining water quality or low flows, or reducing flood flows."</del>	•The new characteristics/identification criteria listed in A7 to A8 is unnecessary.
What is a Regionally Significant Wetland	7.139	Policy 10.4.1A - Definition of a Regionally Significant Wetland	Amend	Amend: "A Regionally Significant Wetland is: [...] (b) A wetland physically within a wetland management area listed in Schedule 9; or (c) <del>A wetland higher than 800 metres above sea level.</del> "	•Arbitrary classification on elevation; many wetlands will not meet habitat, flora, fauna or cultural values. •More restrictive management is inappropriate given values not known.
Chapter 10 - Wetlands	9	Policy 10.4.2 - Priority on avoiding	Amend	Delete policy 10.4.2 and replace with:	•Overly restrictive; fails to acknowledge remediation/mitigation

Summary of Decisions Requested (submissions and further submissions) on Proposed Plan Change 2 (Regionally Significant Wetlands)  
Regional Plan: Water for Otago 23 November 2011

ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
		adverse effects		<u>"The adverse effects of activities on Regionally Significant Wetland shall be avoided where practicable and, otherwise, remedied or mitigated."</u>	may be more appropriate. •Priority to avoid doesn't reflect intent of Objective 10.3.1; objective doesn't preclude remediation and mitigation. •S 5(2)(c) RMA not a strict hierarchy.
Protection general	10	Financial contributions policy (Policy 10.4.2A and Ch.17)	Amend	Amend the sixth paragraph of Section 17.1: <i>"Works and services apply to remediation or mitigation activities, while financial contributions may apply to the offsetting of adverse effects that cannot be <u>directly fully avoided, or completely remedied or, in the Council's opinion, adequately mitigated, perhaps due to the nature of activity that needs to occur within the vicinity of the Regionally Significant Wetland.</u>"</i>	•Explanation suggests financial contributions will be used to address residual effects that cannot be avoided, remedied or mitigated; not consistent with Policy 10.4.2A. •Given RMA is not a 'no effects' statute, 17.1 requires amendment to reflect direction provided in 10.4.2A.
Chapter 12 - Rules: Water Take, Use and Management	22	Rule 12.1.1A.1 - Take and use of surface water from any Regionally Significant Wetland	Amend	Amend Rule 12.1.1A.1: <i>"Unless covered by Rules 12.1.1.1, 12.1.1.2, 12.1.2.1 and 12.1.2.3, the taking and use of surface water <u>directly from any Regionally Significant Wetland is a non-complying activity.</u>"</i>	•Many Regionally Significant Wetlands form part of rivers or lakes; the rule should be explicit that only water taken directly from the area identified as Regionally Significant Wetland is non-complying.
Chapter 12 - Rules: Water Take, Use and Management	60	Rule 12.3.1A.1 - Damming or diversion of water: Regionally Significant Wetland	Amend	Amend Rule 12.3.1A.1: <i>"Unless covered by Rules 12.3.1.1 to 12.3.1.4, and 12.3.3.1(i): (i) The direct <u>damming or diversion of water from or within any Regionally Significant Wetland; or</u> (ii) <u>The damming or diversion of water that affects the water level of any Regionally Significant Wetland; is a non-complying activity.</u>"</i>	•Determination as to whether a diversion will 'affect' the water level requires subjective analysis and is not suitable for determining non-compliance. •Unclear why diversion is treated differently to (direct) take and use of surface water. Given many resource consents involve the take and diversion of water, inappropriate to treat differently. •Many Regionally Significant Wetlands form part of rivers or lakes; the rule should be explicit that only water diverted directly from/to the area identified as Regionally Significant Wetland is non-complying. •Non-complying activity overly restrictive: diversion may improve water flow enabling the enhancement of wetland values.
Minor and other	143	Minor and consequential changes	Amend	Make any similar or consequential amendments to Plan Change 2 that stem from the submissions and general relief sought.	No reason given.
Plan general	154	Plan general	Amend	Ensure there is an enabling policy framework for Renewable Energy Generation production when planning documents are being prepared and determined.	•Electricity is vital to everyday life •Reliability of supply is critical to economic growth and social well-being.
Protection general	162	Generic permitted activity condition for wetlands protection	Amend	Delete: <i>"There is no change to the water level or hydrological function, or no damage to the flora, fauna or its habitats, in or on any Regionally Significant Wetland"</i> In rules 12.1.2.4, 12.1.2.5, 12.1.2.6, 12.2.2.5, 12.2.2.6, 12.3.2.1, 12.3.2.2, 12.3.2.3, 12.5.1.1 and 13.5.1.3	•Condition doesn't provide certainty to enable compliance to be objectively assessed (e.g., take of water affecting hydrological function or damaging habitat requires subjective analysis and not suitable as a permitted activity).
Protection general	165	Financial contributions rules	Amend	Delete clause regarding the consideration of the need for a financial contribution and replace with: <i>"In circumstances where adverse effects on Regionally Significant Wetlands cannot be avoided, remedied or mitigated, whether a financial contribution is necessary and the appropriate value of any contribution."</i>	•Should more accurately reflect Policy 10.4.2A. •Note: Relevant to Rules 12.1.4.8, 12.2.3.4, 12.3.3.1, 12.4.2.1, 12.5.2.1, 13.2.2.1, 13.3.2.1
Specific Schedule 9 wetlands	255	Schedule 9 - Great Moss Swamp (#55, Maps F29 & F30)	Support	Retain Maps F29 and F30 as notified.	•Boundaries now more accurately reflect existing human influences in the area, particularly roads.
Specific Schedule 9 wetlands	361	Schedule 9 - Upper Taieri Wetlands Complex (#161, Maps F22 to F28)	Amend	Amend boundary of Map F26 to reflect changes indicated in Annexure One to this submission (changes to boundary indicated in pink).	•South-eastern boundary defined in Map F26 not accurate: much area included is pasture and doesn't contain hydrological characteristics of a wetland or ecological or habitat values identified in Policy 10.4.1. •Amended area captures only areas with hydrological and ecological characteristics and aren't pasture.

### 33 Vivienne Kerr

ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
General support and opposition	145	General support	Support	Support of the proposed plan change.	No reason given.
RMA streamlining and simplifying	150	RMA streamlining and simplifying	Amend	Introduction, Issues and Anticipated Environmental Results, as they appear in the draft document of May 2010, be re-instated in the final plan.	This has the effect of downplaying the essential role wetlands play in the ecosystems of the Otago region in the plan document and in the public mind.

### 34 Clutha District Council

ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Chapter 10 - Wetlands	9	Policy 10.4.2 - Priority on avoiding adverse effects	Amend	Delete: "Remediating or mitigating effects will be considered only where those effects cannot be avoided."	<ul style="list-style-type: none"> <li>•The requirement to avoid adverse effects where possible is too strict and inflexible.</li> <li>•It is counter to the regime set up in Part 5 RMA, which treats 'avoid', 'remedy' and 'mitigate' equally, and is also contrary to the established principle that the Act contemplates that activities can have adverse effects and still be acceptable.</li> <li>•If provision remains it is inevitable that proposals will be opposed on the basis that effects can always be avoided by not doing anything.</li> </ul>
Protection general	10	Financial contributions policy (Policy 10.4.2A and Ch.17)	Support	Supports the use of financial contributions to offset adverse effects	•Can help ensure the best environmental outcome.
Promotion, information and funding	14	Policy 10.4.6 - Promotion of wetlands	Support	Supports monitoring and provision of information, and suggests that this could usefully be done in conjunction with Territorial Authorities and other agencies.	No reason given.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	122	Rule 13.6.2.0 - Introduction or planting of New Zealand native plant	Amend	Either: <ul style="list-style-type: none"> <li>• Restrict native plants to wetland species which are native to the area; or</li> <li>• Add new condition "(d) There is no change to the water level or hydrological function, or no damage to the flora, fauna and its habitat, in or on any Regionally Significant Wetland".</li> </ul>	•Rule allows planting of any native plant, and some native plants can be inappropriate in wetlands (e.g., non-wetland species which could be invasive or encourage succession away from wetland species, or non-local genetic stock).
General support and opposition	145	General support	Support	Overall, CDC supports the proposed plan change.	•Wetlands have significant biodiversity values, and fulfil vital roles in catchment functioning.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	155	Chapter 13 general	Support	Strongly support the addition of Regionally Significant Wetlands into existing rules controlling activities in lake and river beds.	•Addresses existing gap between Regional Council and Territorial Authority functions, which allowed significant impacts on wetlands from activities such as the erection of structures, disturbance, planting and vegetation removal.
Schedule 9 general	200	Schedule 9	Support	Supports the inclusion of additional wetlands in the Clutha District, recognising that the affected landowners need to be involved in finalising the details of wetland boundaries.	•No reason given.

### 35 Gregory Kerr

ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Chapter 10 - Wetlands	1	Introduction to Chapter 10	Amend	Include statement on the importance of wetlands.	•Can be linked or written into future consents
General support and opposition	145	General support	Support	Largely support the Proposal.	<ul style="list-style-type: none"> <li>•Nationally 10% of wetlands remaining, with less than half protected.</li> <li>•Trustees of the Waikouaiti Maori Reserve were not informed of the proposed plan change.</li> </ul>
RMA streamlining and simplifying	150	RMA streamlining and simplifying	Amend	Chapter 10's Introduction, Issues and Anticipated Environmental Results sections should be reinstated.	•Nationally 10% of wetlands remaining, with less than half protected.
Chapter 10 - Wetlands	153	Chapter 10 general	Amend	Include acknowledgement of 2-way relationship [between wetlands and sea] and the vital link it plays in the lifecycles of species.	•Wetlands are connected to each other and the sea.
Schedule 9 general	200	Schedule 9	Amend	Pleasing to see local wetlands included and expanded in Proposed Plan Change. May be better to regard them as one 'complex', interconnected to each other and to the sea - the salt marsh system of the Waikouaiti River Estuary / Hawksbury Lagoon.	•Vital link with lifecycles of species.

### 36 Herb Fox

ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Specific Schedule 9 wetlands	223	Schedule 9 - Chapman Road Inland Saline Wetland (#23, Map F18)	Amend	Map to accurately reflect the position of the "wetlands" of Dry Gully as the area is known.	•Mapped area covers driveway, and exceeds area that could be considered wetland when viewed on site.

### 37 Transpower New Zealand Limited

ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Minor and other	143	Minor and consequential changes	Amend	Amend the notification statement to reference the current notification sections of the RMA.	•Current sections referenced have been repealed. •Note: Relevant to Rules 12.1.3.1, 12.1.4.8, 12.2.2A.1, 12.2.3.4, 12.5.2.1, 12.8.2.1, 12.9.2.1, 12.10.2.1, 13.2.2.1, 13.3.2.1, 13.4.2.1, 13.5.2.1, 13.7.2.1.
Minor and other	143	Minor and consequential changes	Amend	Make any additions, deletions or consequential amendments necessary as a result of the matters raised in this submission. Adopt any other such relief as to give effect to this submission.	No reason given.
General support and opposition	145	General support	Support	Overall approach generally supported.	•Identification of wetlands will help in route evaluating for any new transmission lines.
Chapter 10 - Wetlands	153	Chapter 10 general	Support	Retain the objectives and policies as drafted without further modification.	No reasons given.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	155	Chapter 13 general	Amend	In relation to Rules 13.7.1.2, 13.7.2.1 and 13.7.3.1: Further consideration required in terms of adequate provision provided for vegetation removal around transmission lines.	•Vegetation trimming undertaken to protect lines, not included in "removal and clearance of vegetation". •Electricity (Hazards from Trees) Regulations 2003 and NES Electricity Transmission Activities 2009 are relevant to vegetation control. •Not immediate issue as wetlands generally have low growing plants.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	155	Chapter 13 general	Amend	Provide for the "use" of existing structures in Rule 13.1.1.1 by including after the words "any lake or river" the word "or any Regionally Significant Wetlands".	•It is important to clearly sanction the operation of existing lawfully established structures in or over wetlands. •Not including wetlands in this rule creates uncertainty (when they are included in other rules - e.g. 13.2, 13.3).
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	155	Chapter 13 general	Support	Retain rules 13.2 to 13.7 without further modification.	•Vegetation trimming undertaken to protect lines, not included in "removal and clearance of vegetation". •Electricity (Hazards from Trees) Regulations 2003 and NES Electricity Transmission Activities 2009 are relevant to vegetation control. •Not immediate issue as wetlands generally have low growing plants.
Chapter 12 - Rules: Water Take, Use and Management	156	Chapter 12 general	Support	Retain the amendments to the discharge rules without further modification.	•With no structures within wetlands, there should be no need for Transpower to make any discharges.
Specific Schedule 9 wetlands	367	Schedule 9 - Waipori/Waiholo Wetland Complex (#167, Maps F48 & F49)	Did not specify	Review the extent of the wetland complex at the location of transmission support structures for the GOR-HWB 110kV and NMA-TMH 220kV lines, and confirm that these structures are not contained within the Waipori/Waiholo Wetland Complex.	•From the maps looks like these are within the wetland boundary. •Don't want to get unnecessary consent to maintain/upgrade assets. Effects from such works cannot be avoided, and do not want financial contributions to be required. •Need to appropriately provide for the national grid, recognise its benefits and be in accordance with NPS Electricity Transmission.

### 38 Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou, and Hokonui Runanga

ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Chapter 10 - Wetlands	5	Objective 10.3.1 - Maintain or enhance wetlands	Oppose	Opposes removal of Kai Tahu cultural and spiritual beliefs, values and uses from objective 10.3.1.	•Provides insufficient recognition of the role of nga Runanga as kaitiaki. •All cultural and spiritual beliefs, values and uses associated with wetlands should be protected.
Regionally Significant Wetland values	6.14	Policy 10.4.1 - Definition of Regionally Significant Wetland values	Amend	Add Kai Tahu cultural and spiritual beliefs, values and uses to policy 10.4.1 A6.	•Provides insufficient recognition of the role of nga Runanga as kaitiaki. •All cultural and spiritual beliefs, values and uses associated with wetlands should be protected.
Protection general	10	Financial contributions policy (Policy	Amend	Amend policy 10.4.2A:	•Want clarity on the process for triggering the mitigation listed in

Summary of Decisions Requested (submissions and further submissions) on Proposed Plan Change 2 (Regionally Significant Wetlands)  
Regional Plan: Water for Otago 23 November 2011



ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
		10.4.2A and Ch.17)		"Where the avoidance, remedy or mitigation of adverse effects is not possible (agreed upon by stakeholders including nga Runanga), financial contribution may be required to: (a) Restore or rehabilitate regionally significant wetlands or regionally significant values where those have been degraded; and (b) Restore or rehabilitate regionally significant wetlands or regionally significant values where those have been lost."	policy 10.4.2A. Nga Runanga as kaitiaki should be consulted before a decision is reached that mitigation of adverse effects is not possible. •Seeks to focus on improving wetlands rather than just restoring them to their past state. •Seeks to achieve the outcomes using all resources available to stakeholders.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	121	Rule 13.6.1.1 - Introduction of pest plants general	Support	Supports addition of regionally significant wetlands to this provision.	No reason given.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	122	Rule 13.6.2.0 - Introduction or planting of New Zealand native plant	Support	Supports addition: "The introduction or planting of any New Zealand native plant to any Regionally Significant Wetland, is a permitted activity providing: (a) . . ."	•May assist in the future restoration of wetlands.
General support and opposition	144	General opposition	Oppose	Oppose Plan Change, but support the intent of protecting more wetlands that are regionally significant, and strengthening protection for regionally significant wetlands.	•Does not adequately recognise and provide for the association of nga Runanga with their ancestral lands and waters. •Is in part contrary to Te Tiriti o Waitangi.
RMA streamlining and simplifying	150	RMA streamlining and simplifying	Support	Support the intent of "making provisions easier to read and understand", provided that important details are not lost through doing this.	No reason given.
Wetland values information and Wetland Inventory	151	Wetland Inventory	Support	Support the intent of the following changes to the plan change; "providing better wetland information".	•Recognise the need for flexibility. •Wish to be involved in process which helps inform the public about wetlands. •But consider that the information may not assist in the protection and enhancement of wetland values, and need to know this will occur.
Protection general	162	Generic permitted activity condition for wetlands protection	Support	Support the addition throughout the Plan of: "There is no change to the water level or hydrological function, or no damage to the flora, fauna or its habitat, in or on any Regionally Significant Wetland."	•Note, want independent assessment to determine whether there are changes to regionally significant wetlands. •Want clarification on how an assessment would be done, who would do it, and whether the causes of these changes can be established. •Risk that cumulative effects are missed, and only marked changes are picked up.
Protection general	162	Generic permitted activity condition for wetlands protection	Oppose	Do not support the permissive nature of this change to the plan as in many places within the plan this provision: "There is no change to the water level or hydrological function, or no damage to the flora, fauna or its habitat, in or on any Regionally Significant Wetland." has replaced the following provisions as a permitted activity: "The water is not taken from any wetlands identified in Schedule 9 or any wetland higher than 800 metres above sea level; and" or "The discharge is not to any wetland identified in Schedule 9"	•Proposed changes reduce the protection of regionally significant wetlands.
Protection general	162	Generic permitted activity condition for wetlands protection	Amend	Add provision to all permitted activities where it concerns permanent structures in or possible effects on regionally significant wetlands: "That there is no change to the water level or hydrological function, or no damage to the flora, fauna or its habitat, in or on any Regionally Significant Wetland."	•There are now activities permitted within Regionally Significant Wetlands that may have a permanent impact.
Schedule 9 general	200	Schedule 9	Amend	Nga Runanga need to know that the wetlands in Schedule 9 - regionally significant wetlands include all wetlands significant to them. If not there needs to be a process or a mechanism to achieve this.	•Added protection for wetlands is irrelevant if wetlands that are wahi taonga are not in Schedule 9.

### 39 Hawksbury Lagoon Inc

ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
-------	------	-----------	----------	--------------------	-------------------------------

Summary of Decisions Requested (submissions and further submissions) on Proposed Plan Change 2 (Regionally Significant Wetlands)  
Regional Plan: Water for Otago 23 November 2011

ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Regionally Significant Wetland values	6.14	Policy 10.4.1 - Definition of Regionally Significant Wetland values	Amend	In identifying significant wetlands, ensure adequate weight is given to the pattern of wetlands in maintaining corridors and feeding sites for waterfowl.	No reason given.
Promotion, information and funding	14	Policy 10.4.6 - Promotion of wetlands	Amend	In promoting rehabilitation, ensure adequate weight is given to the pattern of wetlands in maintaining corridors and feeding sites for waterfowl.	No reason given.
Promotion, information and funding	14	Policy 10.4.6 - Promotion of wetlands	Amend	Amend: (d) change 'and' for 'or'.	No reason given.
General support and opposition	145	General support	Support	Endorses ORC's commitment to ongoing protection and promotion of wetlands, and education of all public as to their value.	•Submitter has benefited greatly from such support already.
Promotion, information and funding	148	Funding	Amend	Providing financial assistance or rates incentives for landowners to fence off wetlands and fund revegetation would be of great value.	•Wetlands benefit everyone. •There are many small wetlands of great value that have not been identified as significant in this plan and which face an uncertain future. •Allows ORC to set timeframe for fencing off all significant wetlands in the knowledge it was not causing hardship for landowners.
Chapter 10 - Wetlands	153	Chapter 10 general	Amend	Default position on rules and policies should be a conserved wetland rather than create permitted activities (To keep faith with the objective to "avoid").	No reason given.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	155	Chapter 13 general	Amend	Default position on rules and policies should be a conserved wetland rather than create permitted activities (To keep faith with the objective to "avoid").	No reason given.
Chapter 12 - Rules: Water Take, Use and Management	156	Chapter 12 general	Amend	Default position on rules and policies should be a conserved wetland rather than create permitted activities (To keep faith with the objective to "avoid").	No reason given.
Wetland values information and Wetland Inventory	400	Schedule 9 - Wetlands values in Schedule 9	Amend	Ensure there is an explicit requirement in the plan to keep wetland values up to date to use when considering applications for activities.	No reason given.
Schedule 10 and Non-Regionally Significant Wetlands	600	Schedule 10 and Non-Regionally Significant Wetlands	Amend	Would like to see as many as possible of the remaining wetlands, classified as significant or not, preserved.	•Wetlands play important role in sustaining diverse ecology, filtering water and providing interest to our landscapes. •The extent of loss makes all remaining wetlands significant.

#### 40 TrustPower Limited

ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Chapter 10 - Wetlands	5	Objective 10.3.1 - Maintain or enhance wetlands	Amend	Amend: <i>"Otago's regionally significant wetlands and their values and services will be maintained or enhanced for present and future generations."</i>	•Provide better alignment with other provisions, and avoid confusion with broad definition of wetland in the Water Plan.
Regionally Significant Wetland values	6.14	Policy 10.4.1 - Definition of Regionally Significant Wetland values	Amend	Amend: <i>"The regionally significant wetland values of Otago's wetlands are include one or more of the following: . . ."</i>	•Clarifies that only one regionally significant value is needed for a wetland to be regionally significant.
Regionally Significant Wetland values	6.14	Policy 10.4.1 - Definition of Regionally Significant Wetland values	Amend	Amend: <i>" . . . A8 Regionally significant habitat for indigenous waterfowl; and . . ."</i>	•Better reflects s 6(c) RMA, and sets a practical threshold test.
What is a Regionally Significant Wetland	7.139	Policy 10.4.1A - Definition of a Regionally Significant Wetland	Amend	Amend: <i>" . . . (c) A wetland higher than 800 metres above sea level with one or more regionally significant wetland values."</i>	•Only wetlands which have regionally significant values should be regionally significant wetlands, doing otherwise is unjustified. •All wetlands above 800m will not necessarily have a regionally significant value, especially with the broad definition of wetland.
What is a Regionally Significant Wetland	7.139	Policy 10.4.1A - Definition of a Regionally Significant Wetland	Amend	Resolution of confusion around the separation of wetlands identified in Schedule 9 that are not "wetland management areas" from those that are.	The reference to "wetland management area" in this Policy is confusing to land users as no definition of "wetland management area" is provided in Water Plan.
What is a Regionally Significant Wetland	8	Policy 10.4.1B - Schedule 9	Amend	Amend 10.4.1B: <i>"Schedule 9 lists those Regionally Significant Wetlands that are mapped in Maps F1-F68 and contain one or more regionally significant wetland values and their regionally significant wetland values as per Policy"</i>	•As proposed the policy implies that values information will not be listed in the Plan. •Values information established for each Significant Wetland should be listed in the Water Plan because this information needs to be assessed under proposed provisions.

Summary of Decisions Requested (submissions and further submissions) on Proposed Plan Change 2 (Regionally Significant Wetlands)  
Regional Plan: Water for Otago 23 November 2011

ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Chapter 10 - Wetlands	9	Policy 10.4.2 - Priority on avoiding adverse effects	Amend	10.4.1." Replace proposed policy with: <i>"Adverse effects on Regionally Significant Wetlands and their regionally significant values identified in Schedule 9 should be avoided, remedied or mitigated."</i>	<ul style="list-style-type: none"> <li>•Giving primacy to avoiding over remedying or mitigating is inconsistent with sustainable management as defined in the RMA and established case law.</li> <li>•If this primacy is intended to give effect to the proposed NPS on Indigenous Biodiversity, should recognise that this is subject to change.</li> </ul>
Protection general	10	Financial contributions policy (Policy 10.4.2A and Ch.17)	Amend	Include more specific guidelines as to how a financial contribution may be constructively applied.	<ul style="list-style-type: none"> <li>•Generally supports the intent of this policy in terms of offsetting adverse environmental effects.</li> <li>•Would be helpful to plan users.</li> </ul>
Promotion, information and funding	14	Policy 10.4.6 - Promotion of wetlands	Amend	Amend: <i>"To promote the maintenance and conservation, creation and reinstatement of wetland areas and enhancement of wetland values by:</i> <i>(a) Educating Otago's people and communities about land use activities that may result in the loss of wetlands and their values;</i> <i>(b) Initiating or supporting investigations and monitoring of wetlands and their values;</i> <i>(c) Supporting voluntary community and landholder programmes; or</i> <i>(d) Supporting the reinstatement of wetlands that have been drained or the creation of new wetlands where appropriate.</i> <del><i>(e) Initiating or undertaking works in consultation with local communities; or</i></del> <del><i>(f) Providing general information on wetlands in a non-regulatory inventory and identifying Regionally Significant Wetland's their values in Schedule 9 to the Water Plan.</i></del> <i>(g) Providing information about wetlands in Otago in general, including those that are not regarded as Regionally Significant Wetlands where such information exists."</i>	<ul style="list-style-type: none"> <li>•Creation of wetlands is of negligible ecological value.</li> <li>•Regionally Significant Wetlands values information should be contained in the Water Plan.</li> <li>•Providing information may lead to wetland maintenance and conservation.</li> </ul>
Chapter 12 - Rules: Water Take, Use and Management	22	Rule 12.1.1A.1 - Take and use of surface water from any Regionally Significant Wetland	Oppose	Delete rule. Takes and uses that are not covered by other specified rules should have discretionary status.	•Minor takes and uses from Regionally Significant Wetlands may be required and should not be non-complying.
Chapter 12 - Rules: Water Take, Use and Management	45	Rule 12.2.1A.1 - Take and use of groundwater from any Regionally Significant Wetland	Oppose	Delete rule. Takes and uses that are not covered by other specified rules should have discretionary status.	•Minor takes and uses from Regionally Significant Wetlands may be required and should not be non-complying.
Chapter 12 - Rules: Water Take, Use and Management	60	Rule 12.3.1A.1 - Damming or diversion of water: Regionally Significant Wetland	Amend	Amend: <i>"Unless covered by Rules 12.3.1.1 to 12.3.1.4, and 12.3.3.1(i) or 12.3.2.0:</i> <i>(i) The diversion of water from or within any Regionally Significant Wetland, or</i> <i>(ii) The damming or diversion of water that affects the water level of any Regionally Significant Wetland, is a non-complying activity."</i>  And a comprehensive assessment in terms of water allocation for a particular water body should be undertaken to determine whether the water level of any Regionally Significant Wetland is adversely affected, rather than a blanket rule that provides for no effects on water level.	•Point (ii) is subjective and does not provide certainty to plan users.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	116	Rule 13.5.1.5A - Alteration of Regionally Significant Wetland associated with plant material	Support	Supports this rule.	No reason given.
Chapter 13 - Land Use (Beds and	117	Rule 13.5.1.6 - Extraction of alluvium	Support	Supports this rule.	No reason given.

Summary of Decisions Requested (submissions and further submissions) on Proposed Plan Change 2 (Regionally Significant Wetlands)  
Regional Plan: Water for Otago 23 November 2011

ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Regionally Significant Wetlands					
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	120	Rule 13.5.3.2 - Alteration of Regionally Significant Wetland - discretionary activity	Support	Supports this rule.	No reason given.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	122	Rule 13.6.2.0 - Introduction or planting of New Zealand native plant	Support	Supports this rule.	No reason given.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	124	Rule 13.7.1.2 - Removal or clearance of exotic plant material	Support	Supports this rule.	No reason given.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	125	Rule 13.7.2.1 - Removal of pest plants - controlled activity	Support	Supports this rule.	No reason given.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	126	Rule 13.7.3.1 - Removal or clearance of plant material - discretionary activity	Support	Supports this rule.	No reason given.
Minor and other	143	Minor and consequential changes	Amend	Give such further or other relief as is appropriate or desirable in order to take account of the concerns expressed in this submission.	No reason given.
General support and opposition	144	General opposition	Oppose	Withdraw Plan Change in the event that the amendments set out in the submission are not implemented.	Generally opposes the Plan Change and has set out specific relief sought.
Wetland values information and Wetland Inventory	151	Wetland Inventory	Amend	Amend the inventory to reflect the following change to policy 10.4.1: " . . . A8 Regionally significant habitat for <i>indigenous waterfowl</i> ; and . . ."	•Better reflects s 6(c) RMA, and sets a practical threshold test.
Wetland values information and Wetland Inventory	151	Wetland Inventory	Amend	Identify, record and provide for human use influences on Regionally Significant Wetlands where they occur.	•Human use influences can positively influence ecology and play a significant role in sustaining the life-supporting capacity of certain wetlands, contribute significantly to economy, and have positive social effects. •Can be provided for in the inventory, establishing boundaries and values of certain wetlands, Plan Change 2.
Chapter 10 - Wetlands	153	Chapter 10 General	Amend	Recognise and provide for the potential for alterations in the human use influences that affect certain wetlands.	•A change in human use that affects a wetland may be sustainable (e.g. affecting hydrology, but not adversely affecting flora and fauna). •This is not provided for in Plan Change 2.
Plan general	154	Plan general	Amend	Amend to give effect to the NPS Renewable Energy Generation.	No reason given.
Plan general	154	Plan general	Amend	Provide for activities associated with the use and development of regionally significant infrastructure.	No reason given.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	155	Chapter 13 general	Amend	Remove rules (or standards in rules) that seek to achieve no net change of any particular value(s).	•They do not enable compliance to be objectively assessed, and result in uncertainty over their application.
Chapter 12 - Rules: Water Take, Use and Management	156	Chapter 12 general	Amend	Remove rules (or standards in rules) that seek to achieve no net change of any particular value(s).	•They do not enable compliance to be objectively assessed, and result in uncertainty over their application.
What is a Regionally Significant Wetland	159	Chapter 16	Amend	Include in the Water Plan formal guidance on what an assessment of effects on a wetland above 800m should entail.  Include the following information requirement:  <i>"Any activity managed by this Plan which has the potential to affect any wetland higher than 800 metres, must consider:</i> <i>1. Whether the wetland is associated with one or more of the regionally significant values identified in Policy 10.4.1; and if so</i> <i>2. The wetland is a Regionally Significant Wetland and the applicant must provide the following information:</i> <i>a. An assessment of the activity against the rules and standards pertaining to Regionally Significant Wetlands;</i> <i>b. An assessment of the effects of the activity on the wetland; and</i> <i>c. An assessment of the effects of the activity on any</i>	•Guidance is important given that wetlands above 800m are not proposed to be listed in Water Plan.

Summary of Decisions Requested (submissions and further submissions) on Proposed Plan Change 2 (Regionally Significant Wetlands)  
Regional Plan: Water for Otago 23 November 2011

ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Protection general	161	Protection general	Amend	Establish Management Zone for the Waipori Hydro Scheme and the Loch Luella and Loch Loudon Fen Complexes which recognises and provides for the longstanding human use influences on these wetlands and the potential for such influences to change. [Submission includes a draft management zone, with objectives, policies and rules, to be conjointly developed by submitter and Council]. <i>regionally significant wetland value."</i>	•Waipori Hydro Scheme is a key electricity generating asset for the region which warrants protection under policy B of NPS Renewable Energy Generation. •Plan Change 2 has the potential to unduly compromise its operating regime and future consenting requirements, which does not meet sustainable management.
Protection general	162	Generic permitted activity condition for wetlands protection	Amend	Delete: <i>"There is no change to the water level or hydrological function, or no damage to the flora, fauna or its habitat, in or on any Regionally Significant Wetland"</i> in rules 12.1.2.4, 12.1.2.5, 12.1.2.6, 12.2.2.5, 12.2.2.6, 12.3.2.1, 12.3.2.2, 12.3.2.3, 13.4.1.1, 13.5.1.1, 13.5.1.3.  Rules 12.1.2.4, 12.1.2.5, 12.2.2.5, and 12.2.2.6 may include an alternative standard that provides that water is not taken from any Regionally Significant Wetland.  May be appropriate to include a maximum allocation value in rules 12.1.2.5 and 12.2.2.6 to control takes that may affect the water level of any particular Regionally Significant Wetland.	•Does not enable compliance to be objectively assessed, resulting in uncertainty in application of this standard.
Protection general	165	Financial contributions rules	Amend	Consideration should be given to whether a financial contribution is necessary, and at what scale it would be required to ensure any financial contribution is constructive.  Amend: <i>"13.3.2.1(k) A financial contribution if the structure is a dam, or for regionally significant wetland values or Regionally Significant Wetlands that are adversely affected. Whether and at what scale a financial contribution is necessary, such as when adverse effects on regionally significant wetlands cannot be avoided, remedied or mitigated; and"</i>  Amend 13.4.2.1(k) and 13.5.2.1(b): <i>"Any financial contribution for regionally significant wetland values or Regionally Significant Wetlands that are adversely affected. Whether and at what scale a financial contribution is necessary, such as when adverse effects on regionally significant wetlands cannot be avoided, remedied or mitigated."</i>	No reason given.
Protection general	165	Financial contributions rules	Amend	The proposed rules should guide financial contributions only where they are necessary, such as when adverse effects cannot be avoided, remedied or mitigated to ensure they have tangible benefits.	No reason given.
Specific Schedule 9 wetlands	284	Schedule 9 - Loch Loudon Fen Complex (#84, Map F50)	Amend	Establish a Management Zone for the Waipori Hydro Scheme and Loch Loudon Fen Complex which recognises and provides for the longstanding human use influences on this wetland and the potential for such influences to change. [Submission includes a draft management zone, with objectives, policies and rules, to be conjointly developed by submitter and Council].	•Waipori Hydro Scheme is a key electricity generating asset for the region which warrants protection under policy B of NPS Renewable Energy Generation. •Plan Change 2 has the potential to unduly compromise its operating regime and future consenting requirements, which does not meet sustainable management.
Specific Schedule 9 wetlands	285	Schedule 9 - Loch Luella Fen Complex (#85, Maps F50 & F51)	Amend	Establish Management Zone for the Waipori Hydro Scheme and Loch Luella Fen Complex which	•Waipori Hydro Scheme is a key electricity generating asset for the region which warrants protection under policy B of NPS

ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
				recognises and provides for the longstanding human use influences on this wetland and the potential for such influences to change. [Submission includes a draft management zone, with objectives, policies and rules, to be conjointly developed by submitter and Council].	Renewable Energy Generation. •Plan Change 2 has the potential to unduly compromise its operating regime and future consenting requirements, which does not meet sustainable management.
Wetland values information and Wetland Inventory	400	Schedule 9 - Wetlands values in Schedule 9	Oppose	Regionally significant values ascribed to each Regionally Significant Wetland should be included in Schedule 9 to the Water Plan.	•There are likely to be issues in applying proposed provisions if values information is not listed in Water Plan. •Any change to regionally significant wetland values identified for a Regionally Significant Wetland should require a formal plan change. •Values are not mutually exclusive, and wetlands have any one or more values. •General information can go in non-regulatory inventory.

#### 41 Galloway Irrigation Society Incorporated

ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Specific Schedule 9 wetlands	288	Schedule 9 - Lower Manorburn Dam Margins (#88, Map F15)	Oppose	Wetland not to be classified as a Significant Wetland and not included in Schedule 9.	•Lower Manorburn Dam is artificial dam to supply irrigation water. May not be possible to maintain wetland values. •Plan change does not describe wetland values that have contributed to scheduling. •Use of dam lowers water level during the irrigation season. Therefore GIS cannot comply with the general regulation in Proposed Plan Change 2 that "there is no change to the water level or hydrological function, or no damage to the flora, fauna or its habitat, in or on any regionally significant wetland". •Problematic for other activities such as maintenance on dam wall, construction of structures (water level or flow measuring devices), discharge of the top race into dam for temporary storage, and maintaining an easement for a water race along north side of dam. •Lower Manorburn Dam is not excluded from Rule 12.1.1A.1 by Rule 12.1.2.3 because Rule 12.3.2.1 and the prior "General Authorisation" refer to small dams (i.e., less than 3m in height, less than 20,000 m3 and less than 50 ha upstream).

#### 42 Department of Conservation

ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Chapter 10 - Wetlands	5	Objective 10.3.1 - Maintain or enhance wetlands	Amend	Amend: <i>"Otago's wetlands and their values and ecosystem services will be maintained <del>or</del> and enhanced for present and future generations."</i>	•Amend so that the services provided by wetlands are clarified. These services include providing base flows for streams, especially during critical low flow periods and removing silt and nutrients from any water entering the wetland and purifying it before discharge downstream. •Objective gives effect to section 30(1)(c)(iia) RMA. •Objective gives effect to the NPS Freshwater Management 2011.
Regionally Significant Wetland values	6.14	Policy 10.4.1 - Definition of Regionally Significant Wetland values	Support	Retain with no amendments.	•Consistent with Part 2 RMA. •Gives guidance when considering activities in wetlands. •Maintains flows in streams sourced from wetlands which protects habitat of indigenous threatened fish. •Gives effect to the NPS Freshwater Management.
What is a Regionally Significant Wetland	7.139	Policy 10.4.1A - Definition of a Regionally Significant Wetland	Support	Retain with no amendments.	•Consistent with Part 2 RMA. •Gives guidance when considering activities in wetlands. •Maintains flows in streams sourced from wetlands which protects habitat of indigenous threatened fish. •Gives effect to the NPS Freshwater Management.
What is a Regionally Significant Wetland	8	Policy 10.4.1B - Schedule 9	Support	Retain with no amendments.	•Consistent with Part 2 RMA. •Gives guidance when considering activities in wetlands. •Maintains flows in streams sourced from wetlands which

Summary of Decisions Requested (submissions and further submissions) on Proposed Plan Change 2 (Regionally Significant Wetlands)  
Regional Plan: Water for Otago 23 November 2011

ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
					protects habitat of indigenous threatened fish. •Gives effect to the NPS Freshwater Management.
Chapter 10 - Wetlands	9	Policy 10.4.2 - Priority on avoiding adverse effects	Support	Retain with no amendments.	•Consistent with Part 2 RMA. •Gives guidance when considering activities in wetlands. •Maintains flows in streams sourced from wetlands which protects habitat of indigenous threatened fish. •Gives effect to the NPS Freshwater Management.
Protection general	10	Financial contributions policy (Policy 10.4.2A and Ch.17)	Support	Retain policy 10.4.2A with no amendments.	•Consistent with Part 2 RMA. •Gives guidance when considering activities in wetlands. •Maintains flows in streams sourced from wetlands which protects habitat of indigenous threatened fish. •Gives effect to the NPS Freshwater Management.
Promotion, information and funding	14	Policy 10.4.6 - Promotion of wetlands	Support	Retain with no amendments, except amend "(e): <i>Providing information on wetlands and their values ecosystem services.</i> "	•Consistent with Part 2 RMA. •Gives guidance when considering activities in wetlands. •Maintains flows in streams sourced from wetlands which protects habitat of indigenous threatened fish. •Gives effect to the NPS Freshwater Management. •Monitoring of wetland condition is essential to ensure ORC is fulfilling its functions under section 30(1)(c)(iia) RMA. •Requests that the policy be amended to clarify the values of and services provided by wetlands.
Chapter 12 - Rules: Water Take, Use and Management	77	Rule 12.7.1.2 - Discharge of pesticide, land-based discharge onto land	Amend	Amend: <i>"(e) There is no change to the water level or hydrological function, or damage to the flora, indigenous fauna or its habitat, in or on any Regionally Significant Wetland."</i>	•The discharge of pesticide may damage selected indigenous fauna.
Chapter 12 - Rules: Water Take, Use and Management	78	Rule 12.7.1.3 - Discharge of herbicide to air or land	Amend	Amend: <i>"(e) There is no change to the water level or hydrological function, or damage to the flora, indigenous fauna or its habitat, in or on any Regionally Significant Wetland."</i>	•The discharge of herbicide may damage selected indigenous flora.
Chapter 12 - Rules: Water Take, Use and Management	79	Rule 12.7.1.4 - Discharge of pesticide, aerial discharge onto land	Amend	Amend: <i>"(e) There is no change to the water level or hydrological function, or damage to the flora, indigenous fauna or its habitat, in or on any Regionally Significant Wetland."</i>	•The discharge of pesticide may damage selected indigenous fauna.
Chapter 12 - Rules: Water Take, Use and Management	81	Rule 12.8.1.2 - Discharge of contaminants collected in animal waste collection system in Zone A of Lower Waitaki Plains Groundwater Protection Zone	Amend	Amend: <i>"(c) The discharge occurs more than 50 metres from any surface water body, Regionally Significant Wetland, or mean high water springs:"</i>	•The addition of nutrients directly to Regionally Significant Wetlands should be restrained, as it is highly likely to cause adverse effects. •Gives effect to NPS Freshwater Management.
Chapter 12 - Rules: Water Take, Use and Management	82	Rule 12.8.1.3 - Discharge of contaminants collected in animal waste collection system not in Zone A of a Groundwater Protection Zone	Amend	Amend: <i>"(c) The discharge occurs more than 50 metres from any surface water body, Regionally Significant Wetland, or mean high water springs:"</i>	•The addition of nutrients directly to Regionally Significant Wetlands should be restrained, as it is highly likely to cause adverse effects. •Gives effect to NPS Freshwater Management.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	96	Rule 13.2.1.1 - Erection or placement of fence, pipe, line or cable over the bed	Amend	Amend: <i>"The erection or placement of any fence, pipe (used solely for the carrying of domestic and/or stock water), line or cable over the bed....."</i>	•Current non-definition of pipes would allow erection or placement of "pipes" such as tile drains which could be used to take water from a wetland. •Gives effect to Part 2 RMA. •Gives effect to NPS Freshwater Management.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	97	Rule 13.2.1.2 - Erection or placement of pipe, line or cable on or under the bed	Amend	Amend: <i>"The erection or placement of any fence, pipe (used solely for the carrying of domestic and/or stock water), line or cable over the bed....."</i>	•Current non-definition of pipes would allow erection or placement of "pipes" such as tile drains which could be used to take water from a wetland. •Gives effect to Part 2 RMA. •Gives effect to NPS Freshwater Management.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	121	Rule 13.6.1.1 - Introduction of pest plants general	Amend	Amend: <i>"The introduction of material of the following species: (i) Lagarosiphon (Lagarosiphon major); or (ii) Eel Grass (Vallisneria spiralis); or .... (xi) Glyceria species (xii) Alder (Alnus) species; (xiii) Crack willow;</i>	•The 4 species proposed for inclusion have potential to adversely effect Regionally Significant Wetlands and Regionally Significant Wetland Values. •Amendment is consistent with Part 2 RMA. •Amendment gives effect to NPS Freshwater Management.

ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
				<i>(xiv) Gray willow, To the bed of any Otago Lake...."</i>	
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	124	Rule 13.7.1.2 - Removal or clearance of exotic plant material	Amend	Amend: "(c) <i>The wetland alteration is limited to that which is necessary, <u>the use of best practice methods</u>, for the removal or clearance of the plant material."</i>	•Amendment sought so that the removal or clearance of exotic plant material cannot be used as a pretext to damage Regionally Significant Wetlands or Regionally Significant Wetland Values.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	125	Rule 13.7.2.1 - Removal of pest plants - controlled activity	Amend	Amend: " <i>Except as provided for by Rules 13.7.1.1..... (i) Lagarosiphon (Lagarosiphon major); or (ii) Eel Grass (Vallisneria spiralis); or .... (xv) Glyceria species (xvi) Alder (Alnus) species; (xvii) Crack willow; (xviii) Gray willow, from the bed of any lake or river, or from....."</i>	•The 4 species proposed for inclusion have potential to adversely effect Regionally Significant Wetlands and/or Regionally Significant Wetland Values. •Amendment is consistent with Part 2 RMA. •Amendment gives effect to NPS Freshwater Management.
Minor and other	143	Minor and consequential changes	Amend	Make any other consequential amendments to the Plan required to explain or give effects to these changes to be made.	No reason given.
Minor and other	143	Minor and consequential changes	Amend	Amend so that s 95 of the RMA is referred to.	•Reference is made to repealed s 93 and s 94(1) RMA. •Note: Relevant to Rules 12.1.3.1, 12.1.4.8, 12.2.2A.1, 12.2.3.4, 12.5.2.1, 12.8.2.1, 12.9.2.1, 12.10.2.1, 13.2.2.1, 13.3.2.1, 13.4.2.1, 13.5.2.1, 13.7.2.1.
General support and opposition	144	General opposition	Amend	That the Proposal be retained or amended as set out under the headings "Decision Sought" in Attachment One or to like effect	No reason given
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	155	Chapter 13 general	Support	For the following rules: 13.2.1.4 - 13.2.1.8; 13.2.2.1; 13.2.3.1; 13.3.1.1; 13.3.1.2; 13.3.2.1; 13.4.1.1; 13.4.2.1; 13.5.1.1; 13.5.1.3; 13.5.1.5A; 13.5.1.6; 13.5.1.8; 13.5.2.1; 13.5.3.2; 13.6.2.0; 13.6.3.1 and 13.7.3.1.  Retain with no amendments.	•Consistent with Part 2 RMA. •Gives Regionally Significant Wetlands the same recognition as the region's rivers and lakes •Protects wetland flora •Enables the maintenance and restoration of regionally significant wetlands. •Gives effect to NPS Freshwater Management.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	155	Chapter 13 general	Amend	Adopt new Rule 13.7.2.1A in full and apply only to the proposed extensions to: • the Upper Taieri Wetlands Complex as contained and described (on maps 22-28) in Appendix 2 of this submission, and • the map describing the extent of the Ida Valley Kettle Holes as contained and described in Appendix 3 of this submission.  <b><u>"13.7.2.1A: Permitted activity: No resource consent required</u></b>  <i>13.7.2.1A The removal of vegetation by haying from both the proposed extensions to the Upper Taieri Wetlands Complex (as contained in Appendix 2) and the Ida Valley Kettle Holes (as contained in Appendix 3) is a permitted activity providing: (a) The wetland alteration is limited to that necessary for the removal of hay material; (b) All reasonable steps are taken to minimise the release of sediment to the wetland during haying and there is no conspicuous change in colour or visual clarity of the water body."</i>	•These areas of the Upper Taieri Wetland Complex act as buffer zones for the wetland. •Ida Valley Kettle Holes are collectively significant. •Regionally Significant Wetland Values of both these areas are not threatened by vegetation removal such as haying.
Chapter 12 - Rules: Water Take, Use and Management	156	Chapter 12 general	Support	For the following rules: 12.1.1A.1 - 12.1.1A.3; 12.1.2.4 - 12.1.2.6; 12.1.3.1; 12.2.1A.1; 12.2.1A.2, 12.2.2.5; 12.2.2.6; 12.2.2A.1; 12.2.3.1A; 12.2.3.2A; 12.2.3.4; 12.2.3.5; 12.2.4.1; 12.3.1A.1; 12.3.1A.2; 12.3.2.1 -	•Consistent with Part 2 RMA. •Gives guidance when considering activities in wetlands. •Manages discharges, the damming and diversion of water in a manner that protects the habitat of indigenous fish.



ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
				12.3.2.3; 12.3.3.1; 12.3.4.1; 12.4.1.1; 12.4.2.1; 12.5.1.1; 12.5.2.1; 12.7.1.1; 12.8.1.1; 12.8.1.5; 12.8.2.1; 12.9.1.1; 12.9.1.2; 12.10.1.1; 12.10.2.1; 12.11.2.1 - 12.11.2.3. Retain with no amendments.	<ul style="list-style-type: none"> <li>•Maintains groundwater and surface flows in a manner that protects the habitat of indigenous fish.</li> <li>•Gives effect to the NPS Freshwater Management.</li> </ul>
Minor and other	158	Glossary	Amend	Add: <i>"Ecosystem services: Are the benefits that people can obtain from ecosystems. These include provisioning, regulating, supporting and cultural services."</i>	<ul style="list-style-type: none"> <li>•As the term is not widely used, definition should be provided.</li> </ul>
Schedule 9 general	200	Schedule 9	Amend	Include Ida Valley Kettle Holes in Schedule 9 and the F-Series Maps	<ul style="list-style-type: none"> <li>•Wetland contains Regionally Significant Wetland Values</li> <li>•Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.</li> </ul>
Schedule 9 general	200	Schedule 9	Amend	Include current Schedule 10 wetland Silver Peak Swamp (Schedule 10, #80) in Schedule 9.	<ul style="list-style-type: none"> <li>•Contains Regionally Significant Wetland Values</li> <li>•Consistent with Part 2 RMA, NPS Freshwater Management, and reflects ORC's functions under s 30 RMA.</li> </ul>
Schedule 9 general	200	Schedule 9	Amend	Include current Schedule 10 wetland Upper Waipahi River Swamp (Schedule 10, #99) in Schedule 9.	<ul style="list-style-type: none"> <li>•Contains Regionally Significant Wetland Values</li> <li>•Consistent with Part 2 RMA, NPS Freshwater Management, and reflects ORC's functions under s 30 RMA.</li> </ul>
Specific Schedule 9 wetlands	201	Schedule 9 - Akatore Creek Swamp (#1, Map F46)	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	<ul style="list-style-type: none"> <li>•Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.</li> </ul>
Specific Schedule 9 wetlands	208	Schedule 9 - Big Boggy Swamp (#8, Map F1)	Amend	Retain wetland and amend mapping to reflect that in Appendix 2.	<ul style="list-style-type: none"> <li>•Additional area shown in Appendix 2 contains Regionally Significant Wetland Values.</li> <li>•Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.</li> </ul>
Specific Schedule 9 wetlands	223	Schedule 9 - Chapman Road Inland Saline Wetland (#23, Map F18)	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	<ul style="list-style-type: none"> <li>•Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.</li> </ul>
Specific Schedule 9 wetlands	232	Schedule 9 - Cross Eden Creek Marsh Complex (#32, Map F16)	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	<ul style="list-style-type: none"> <li>•Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.</li> </ul>
Specific Schedule 9 wetlands	235	Schedule 9 - Diamond Lake Wetland (#35, Map F3)	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	<ul style="list-style-type: none"> <li>•Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.</li> </ul>
Specific Schedule 9 wetlands	236	Schedule 9 - Dingle Lagoon (#36, Map F1)	Amend	Retain wetland and amend mapping to reflect that in Appendix 2.	<ul style="list-style-type: none"> <li>•Additional area shown in Appendix 2 contains Regionally Significant Wetland Values.</li> <li>•Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.</li> </ul>
Specific Schedule 9 wetlands	240	Schedule 9 - Ellison Saltmarsh (#40, Map F61)	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	<ul style="list-style-type: none"> <li>•Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.</li> </ul>
Specific Schedule 9 wetlands	244	Schedule 9 - Flat Top Hill Ephemeral Wetlands (#44, Map F19)	Amend	Retain inclusion of Flat Top Hill Ephemeral Wetlands, and amend mapping of wetland.	<ul style="list-style-type: none"> <li>•Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.</li> </ul>
Specific Schedule 9 wetlands	252	Schedule 9 - Glenorchy Lagoon Wetland (#52, Map F9)	Amend	Retain wetland and amend mapping to reflect that in Appendix 2.	<ul style="list-style-type: none"> <li>•Additional area shown in Appendix 2 contains Regionally Significant Wetland Values.</li> <li>•Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.</li> </ul>
Specific Schedule 9 wetlands	255	Schedule 9 - Great Moss Swamp (#55, Maps F29 & F30)	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	<ul style="list-style-type: none"> <li>•Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.</li> </ul>
Specific Schedule 9 wetlands	261	Schedule 9 - Hoopers Inlet Swamp (#61, Map F58)	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	<ul style="list-style-type: none"> <li>•Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.</li> </ul>
Specific Schedule 9 wetlands	270	Schedule 9 - Kemp Road Lagoon (#70, Map F65)	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	<ul style="list-style-type: none"> <li>•Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.</li> </ul>
Specific Schedule 9 wetlands	276	Schedule 9 - Lake Reid Wetland (#76, Map F3)	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	<ul style="list-style-type: none"> <li>•Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.</li> </ul>
Specific Schedule 9 wetlands	277	Schedule 9 - Lake Tuakitoto Wetland (#77, Map F43)	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	<ul style="list-style-type: none"> <li>•Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.</li> </ul>
Specific Schedule 9 wetlands	284	Schedule 9 - Loch Loudon Fen Complex (#84, Map F50)	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	<ul style="list-style-type: none"> <li>•Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.</li> </ul>
Specific Schedule 9 wetlands	285	Schedule 9 - Loch Luella Fen Complex (#85, Maps F50 & F51)	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	<ul style="list-style-type: none"> <li>•Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.</li> </ul>
Specific Schedule 9 wetlands	287	Schedule 9 - Lower Couatts Gully Swamp (#87, Map F46)	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	<ul style="list-style-type: none"> <li>•Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.</li> </ul>
Specific Schedule 9 wetlands	288	Schedule 9 - Lower Manorburn Dam	Support	That the inclusion in Schedule 9, and the extent of the	<ul style="list-style-type: none"> <li>•Consistent with Part 2 RMA, and reflects ORC's functions</li> </ul>

Summary of Decisions Requested (submissions and further submissions) on Proposed Plan Change 2 (Regionally Significant Wetlands)  
Regional Plan: Water for Otago 23 November 2011

ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
		Margins (#88, Map F15)		wetland be retained without amendment.	under s 30 RMA.
Specific Schedule 9 wetlands	293	Schedule 9 - Makarora Flat Swamp Complex (#93, Map F1)	Amend	Retain wetland and amend mapping to reflect that in Appendix 2.	•Additional area shown in Appendix 2 contains Regionally Significant Wetland Values. •Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
Specific Schedule 9 wetlands	300	Schedule 9 - McGregor Swamp (#100, Map F61)	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	•Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
Specific Schedule 9 wetlands	302	Schedule 9 - McLachlan Road Marsh (#102, Map F61)	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	•Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
Specific Schedule 9 wetlands	315	Schedule 9 - Okia Flat Wetland Management Area (#115, Map F68)	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	•Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
Specific Schedule 9 wetlands	320	Schedule 9 - Papanui Inlet Saltmarsh (#120, Map F59)	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	•Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
Specific Schedule 9 wetlands	323	Schedule 9 - Pleasant River Estuary Wetland Complex (#123, Map F67)	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	•Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
Specific Schedule 9 wetlands	337	Schedule 9 - Shotover River Confluence Swamp (#137, Map F5)	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	•Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
Specific Schedule 9 wetlands	339	Schedule 9 - Stirling Marsh Complex (#139, Map F43)	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	•Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
Specific Schedule 9 wetlands	345	Schedule 9 - Tahakopa Marsh Complex (#145, Map F4)	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	•Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
Specific Schedule 9 wetlands	349	Schedule 9 - Te Matai Marsh Complex (#149, Map F68)	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	•Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
Specific Schedule 9 wetlands	351	Schedule 9 - Three Stones Fen Complex (#151, Map F53)	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	•Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
Specific Schedule 9 wetlands	356	Schedule 9 - Trig Q Ephemeral Pool (#156, Map F55)	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	•Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
Specific Schedule 9 wetlands	361	Schedule 9 - Upper Taieri Wetlands Complex (#161, Maps F22 to F28)	Amend	Retain wetland and amend mapping to reflect that in Appendix 2.	•Additional area shown in Appendix 2 contains Regionally Significant Wetland Values. •Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
Specific Schedule 9 wetlands	364	Schedule 9 - Waianakaru River Estuary Swamp (#164, Map F65)	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	•Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
Specific Schedule 9 wetlands	365	Schedule 9 - Waikouaiti River Estuary Wetland Complex (#165, Map F61)	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	•Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
Specific Schedule 9 wetlands	367	Schedule 9 - Waipori/Waiholo Wetland Complex (#167, Maps F48 & F49)	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	•Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
Specific Schedule 9 wetlands	371	Schedule 9 - Te Hua Taki Wetland (#171, Map F66)	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	•Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
Specific Schedule 9 wetlands	399	Schedule 9 - All other wetlands not otherwise listed	Support	For Schedule 9 wetlands #2 - 7; 9 - 22; 24 - 31; 33; 34; 37 - 39; 41 - 43; 45 - 51; 53; 54; 56 - 60; 62 - 69; 71 - 75; 78 - 83; 86; 89 - 92; 94 - 99; 101; 103 - 114; 116 - 119; 121; 122; 124 - 136; 138; 140 - 144; 146 - 148; 150; 152 - 155; 157 - 160; 162; 163; 166; 168 - 170; 172: That the inclusion in Schedule 9, and the extent of the wetlands be retained without amendment.	•Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.

### 43 OtagoNet Joint Venture

ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Chapter 10 - Wetlands	9	Policy 10.4.2 - Priority on avoiding adverse effects	Amend	Amend: <i>"Priority will be given to the avoidance of adverse effects of activities on Regionally Significant Wetlands and values. Remedying or mitigating adverse effects will be considered only where those effects cannot be avoided. Adverse effects on Regionally Significant Wetlands and their regionally significant values should be avoided, remedied or mitigated."</i>	•Primacy should not be given to avoiding adverse effects, over remedying or mitigating adverse effects. •Giving primacy to avoidance is inconsistent with sustainable management as defined in RMA and established case law.
Chapter 13 - Land Use (Beds and	96	Rule 13.2.1.1 - Erection or placement	Amend	Pipe, lines or cables should only be prevented from	•Is uncertain of the purpose of 13.2.1.1(d).

Summary of Decisions Requested (submissions and further submissions) on Proposed Plan Change 2 (Regionally Significant Wetlands)  
Regional Plan: Water for Otago 23 November 2011

ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Regionally Significant Wetlands)		of fence, pipe, line or cable over the bed		extending below the underside of a lawful structure if the lawful structure is within two metres of the 1 percent probability flood limit.	
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	96	Rule 13.2.1.1 - Erection or placement of fence, pipe, line or cable over the bed	Amend	Amend: "(f) <i>The fence, pipe, line or cable does not interfere with established navigation routes; and</i> "	•Subjective and difficult to decipher regarding effects on wetlands.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	96	Rule 13.2.1.1 - Erection or placement of fence, pipe, line or cable over the bed	Amend	Amend: "(h) <i>The fence, pipe, line or cable is maintained in good repair such that it does not present a hazard to persons or their property.</i> "	•High degree of subjectivity.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	97	Rule 13.2.1.2 - Erection or placement of pipe, line or cable on or under the bed	Amend	Amend: "(c) <i>The pipe, line or cable is maintained in good repair such that it does not present a hazard to persons or their property.</i> "	•High degree of subjectivity.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	106	Rule 13.3.1.1 - Repair or maintenance of structure	Support	Support.	•This should be permitted.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	107	Rule 13.3.1.2 - Extension, alteration, replacement or reconstruction of structure	Amend	Amend: "(a) <i>In the case of a replacement or reconstruction, the structure is replaced or reconstructed in approximately the same location as the original structure; and</i> "	•To avoid minor re-locations unnecessarily needing consent.
Minor and other	143	Minor and consequential changes	Amend	That the amendments and addendums outlined in sections 4 and 5 [of this submission] are accepted and any necessary consequential amendments to Plan Change 2 are made. Also give such further or other relief as is appropriate or desirable in order to take account of the concerns expressed in this submission.	No reasons given.
General support and opposition	144	General opposition	Oppose	Plan Change 2 be withdrawn if the amendments and addendums set out in the submission are not implemented.	•Would be effects on existing infrastructure if the changes requested are not made.
Wetland values information and Wetland Inventory	151	Wetland Inventory	Amend	Give due consideration to existing and consented activities and infrastructure and any associated human use in establishing the non-regulatory inventory for Regionally Significant Wetlands. This may involve identifying activities and human use values within or surrounding scheduled Regionally Significant Wetlands.	•Enables protection of physical resources in a way which enables people and communities to provide for their social, economic and cultural wellbeing and for their health and safety pursuant to s 5 RMA
Wetland values information and Wetland Inventory	151	Wetland Inventory	Support	Supports the periodic surveying of wetlands and the general information contained in the non-regulatory inventory being kept up to date.	•Aware that ecology is subject to change.
Chapter 10 - Wetlands	153	Chapter 10 General	Amend	Activities and human use values should be provided for in Plan Change 2 such that they are not unduly compromised without recognition of their benefits.	•Relevant in establishing the boundaries and values ascribed to wetlands, and establishing the policy regime and the inventory. •ORC is required to protect regionally significant infrastructure. •Would meet s 5 RMA.
Plan general	154	Plan General	Did not specify	OtagoNet's existing lawfully established utility assets in and surrounding areas identified as Regionally Significant Wetlands, and the essential renewal of these assets should not be unduly compromised.	•ORC is required to protect regionally significant infrastructure under Part 2 RMA.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	155	Chapter 13 general	Oppose	Generally opposes proposed permitted activity rules.	•Superfluous resource consents are likely to be required under proposed provisions. Could impede OtagoNet's operations and risk the security of it's network.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	155	Chapter 13 general	Amend	Rules (or standards in rules) that seek to achieve no net change of any particular value(s) should not be included in the Water Plan.	•Do not enable compliance to be objectively assessed. •Application is uncertain.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	155	Chapter 13 general	Amend	Amend or delete rules (or standards in rules) associated with a high degree of subjectivity.	No reasons given.
Chapter 12 - Rules: Water Take, Use and Management	156	Chapter 12 general	Amend	Rules (or standards in rules) that seek to achieve no net change of any particular value(s) should not be included in the Water Plan.	•Do not enable compliance to be objectively assessed. •Application is uncertain.
Chapter 12 - Rules: Water Take, Use and Management	156	Chapter 12 general	Amend	Amend or delete rules (or standards in rules) associated with a high degree of subjectivity.	No reasons given.

Summary of Decisions Requested (submissions and further submissions) on Proposed Plan Change 2 (Regionally Significant Wetlands)  
Regional Plan: Water for Otago 23 November 2011

ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Protection general	162	Generic permitted activity condition for wetlands protection	Amend	Delete permitted activity standard in Rules 13.4.1.1, 13.5.1.1 and 13.5.1.3: <i>"There is no change in water level or hydrological function, or no damage to the flora, fauna or its habitat, in or on any Regionally Significant Wetland."</i>	<ul style="list-style-type: none"> <li>Does not enable compliance to be objectively assessed.</li> <li>Precludes any development in a Regionally Significant Wetland without consent.</li> <li>Inconsistent with s 5(2) RMA.</li> <li>Extends protection for flora and fauna beyond s 6(c) RMA.</li> </ul>
Wetland values information and Wetland Inventory	400	Schedule 9 - Wetlands values in Schedule 9	Amend	Include regionally significant wetland values ascribed to each Regionally Significant Wetland in Schedule 9.	<ul style="list-style-type: none"> <li>There are likely to be issues in applying proposed provisions if values information is not listed in the Water Plan.</li> <li>Any change to the regionally significant wetland values identified for a Regionally Significant Wetland should require a formal plan change.</li> <li>General information can go in the non-regulatory inventory.</li> <li>The non-regulatory inventory which is to contain regionally significant wetland values for scheduled Regionally Significant Wetlands should have been available to stakeholders and the public at least at the time Plan Change 2 was publicly notified.</li> <li>For consideration in submission.</li> <li>Method of assessing and mapping individual wetlands also has not been made available.</li> <li>Lack of transparency is a significant shortcoming.</li> </ul>
Schedule 10 and Non-Regionally Significant Wetlands	600	Schedule 10 and Non-Regionally Significant Wetlands	Support	Supports repeal of Schedule 10.	<ul style="list-style-type: none"> <li>Streamlines wetland provisions, conducive to people using the Water Plan.</li> </ul>

#### 44 Ladies Mile Partnership

ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Minor and other	143	Minor and consequential changes	Amend	Give any other relief necessary to address the points raised in the submission	No reason given.
Specific Schedule 9 wetlands	337	Schedule 9 - Shotover River Confluence Swamp (#137, Map F5)	Oppose	a.) Removal of wetland's categorisation as a regionally significant wetland; or b.) Reduction in the size of the area mapped in Map F5.	<ul style="list-style-type: none"> <li>Wetland does not have the values that would necessitate its status as regionally significant (specifically A1 and A3)</li> <li>Plan Change 41 (before Queenstown-Lakes District Council) already provides sufficient protection to the wetland.</li> <li>Categorising the wetland as regionally significant will not result in sustainable management under Part 2 RMA.</li> <li>If Plan Change 41 is confirmed by Queenstown-Lakes DC, submitter may develop part of wetland as ecological and/or recreation area and may discharge stormwater to it. Plan Change 2 makes resource consent for this harder to obtain, is unnecessary and will not result in efficient use of resources.</li> <li>Area mapped is inaccurate and exaggerated.</li> </ul>

#### 45 Beaton family of Berwick

ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Chapter 12 - Rules: Water Take, Use and Management	77	Rule 12.7.1.2 - Discharge of pesticide, land-based discharge onto land	Amend	Amend to include some control on spraying, and spray drift.	<ul style="list-style-type: none"> <li>Have experienced people spraying planted trees (e.g., 25 years' old) along with willows.</li> <li>Experience does not support the view that natural vegetation will regenerate by doing nothing after spraying.</li> </ul>
Chapter 12 - Rules: Water Take, Use and Management	78	Rule 12.7.1.3 - Discharge of herbicide to air or land	Amend	Amend to include some control on spraying, and spray drift.	<ul style="list-style-type: none"> <li>Have experienced people spraying planted trees (e.g., 25 years' old) along with willows.</li> <li>Experience does not support the view that natural vegetation will regenerate by doing nothing after spraying.</li> </ul>
Chapter 12 - Rules: Water Take, Use and Management	79	Rule 12.7.1.4 - Discharge of pesticide, aerial discharge onto land	Amend	Amend to include some control on spraying, and spray drift.	<ul style="list-style-type: none"> <li>Have experienced people spraying planted trees (e.g., 25 years' old) along with willows.</li> <li>Experience does not support the view that natural vegetation will regenerate by doing nothing after spraying.</li> </ul>
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	99	Rule 13.2.1.5 - Erection or placement of maimai	Amend	Amend to reflect following position: <i>"We think maimais should be temporary structures, particularly in some areas."</i>	<ul style="list-style-type: none"> <li>Shooters and whitebaiters shouldn't be allowed to squat in wetland area.</li> </ul>
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	116	Rule 13.5.1.5A - Alteration of Regionally Significant Wetland associated with plant material	Amend	Amend to provide for some hump and hollow modification to allow some planting to take place out of the water.	<ul style="list-style-type: none"> <li>Many of the plants put in to wet soil have died.</li> <li>Natural wetland would have mix of firmer ground, mainly next to channels, with interfluvial swamps between.</li> </ul>

Summary of Decisions Requested (submissions and further submissions) on Proposed Plan Change 2 (Regionally Significant Wetlands)  
Regional Plan: Water for Otago 23 November 2011

ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
					•E.g. Titiri wetland has been modified by farming and abandoned. Natural soil conditions may need to be reinstated before successful diverse vegetation may be reinstated.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	122	Rule 13.6.2.0 - Introduction or planting of New Zealand native plant	Amend	Amend to provide for some hump and hollow modification to allow some planting to take place out of the water.	•Many of the plants put in to wet soil have died. •Natural wetland would have mix of firmer ground, mainly next to channels, with interfluvial swamps between. •E.g. Titiri wetland has been modified by farming and abandoned. Natural soil conditions may need to be reinstated before successful diverse vegetation may be reinstated.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	122	Rule 13.6.2.0 - Introduction or planting of New Zealand native plant	Amend	A schedule of species suitable next to rivers might be appropriate.	•Planting next to a river would need to take into account requirements for flood river flow [13.6.2.0(b)], therefore permitted planting of any native wouldn't necessarily apply.
General support and opposition	145	General support	Support	Generally support the proposed document.	No reason given.
Specific Schedule 9 wetlands	367	Schedule 9 - Waipori/Waiholo Wetland Complex (#167, Maps F48 & F49)	Amend	ORC need to shift themselves to ground check the boundaries.	•Concerned that map does not clearly show whether one of our pumps and associated stop banks are included or excluded from the wetland area.

#### 46 New Zealand Railways Corporation

ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
What is a Regionally Significant Wetland	7.139	Policy 10.4.1A - Definition of a Regionally Significant Wetland	Amend	Add definition to the glossary section of the Water Plan which specifically excludes permanently dry areas from regionally significant wetland areas.	•No definition of Regionally Significant Wetland in the Water Plan. •Where activities occur on 'dry' areas they should be permitted and the definition should clarify this.
What is a Regionally Significant Wetland	7.139	Policy 10.4.1A - Definition of a Regionally Significant Wetland	Amend	Add definition to the glossary section of the Water Plan which clarifies that those activities that occur on 'dry' land; such as land transport corridors located within the wider boundary area of the Regionally Significant Wetland shown in the revised Maps accompanying Plan Change 2 are not intended to be affected by the new controls.	Where activities occur on 'dry' areas they should be permitted and the definition should clarify this. Only those activities that impact on wetlands should be captured by the new controls.
General support and opposition	145	General support	Support	Plan Change 2 introduces a greater level of protection to the region's wetlands and this is generally supported.	No reason given
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	155	Chapter 13 general	Amend	Add to 13.2.2, 13.3.2, 13.4.2, and 13.5.2 a criterion which recognises the importance of existing land transport networks, such as rail where these are currently located within regionally significant wetlands such as: "Any positive effect derived from the function of the structure and/or activity in this location" or similar.  <i>NB: Amending Schedule 1 as set out as requested would largely achieve the same relief.</i>	•Criteria do not take into account location and importance of regionally (and nationally) important land transport networks which are, in places, incorporated within the new Regional Significant Wetland boundaries. •No balancing criteria, other than those in Part 2 RMA, which allow for the fixed location of land-based transport networks to be considered when they require replacement, or alteration along their current alignments.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	155	Chapter 13 general	Amend	Add to 13.2.2, 13.3.2, 13.4.2, and 13.5.2 a criterion to recognise that transport infrastructure is particularly important for enabling people and communities to provide for their social, economic, and cultural wellbeing and for their health and safety.	•Criteria do not take into account location and importance of regionally (and nationally) important land transport networks which are, in places, incorporated within the new Regional Significant Wetland boundaries. •No balancing criteria, other than those in Part 2 RMA, which allow for the fixed location of land-based transport networks to be considered when they require replacement, or alteration along their current alignments.
Chapter 12 - Rules: Water Take, Use and Management	156	Chapter 12 general	Amend	Add to 12.3.3, 12.4.2, 12.5.2, 12.9.2 a criterion which recognises the importance of existing land transport networks, such as rail where these are currently located within regionally significant wetlands such as: "Any positive effect derived from the function of the structure and/or activity in this location" or similar.  <i>NB: Amending Schedule 1 as set out as requested would largely achieve the same relief.</i>	•Criteria do not take into account location and importance of regionally (and nationally) important land transport networks which are, in places, incorporated within the new Regional Significant Wetland boundaries. •No balancing criteria, other than those in Part 2 RMA, which allow for the fixed location of land-based transport networks to be considered when they require replacement, or alteration along their current alignments.
Chapter 12 - Rules: Water Take, Use	156	Chapter 12 general	Amend	Add to 12.3.3, 12.4.2, 12.5.2, 12.9.2 a criterion to	•Criteria do not take into account location and importance of

Summary of Decisions Requested (submissions and further submissions) on Proposed Plan Change 2 (Regionally Significant Wetlands)  
Regional Plan: Water for Otago 23 November 2011

ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
and Management				recognise that transport infrastructure is particularly important for enabling people and communities to provide for their social, economic, and cultural wellbeing and for their health and safety.	regionally (and nationally) important land transport networks which are, in places, incorporated within the new Regional Significant Wetland boundaries. •No balancing criteria, other than those in Part 2 RMA, which allow for the fixed location of land-based transport networks to be considered when they require replacement, or alteration along their current alignments.
Mapping of Schedule 9 wetlands - general	199	Mapping of Schedule 9 wetlands - general	Amend	a.) All proposed maps to remove railways corridor(s) from regionally significant wetland areas; or b.) All proposed maps to ensure that rail formation 'above' the permanent regionally significant wetland areas are not subject to Plan Change 2	No reason given.

#### 47 Royal Forest and Bird Protection Society of New Zealand Inc

ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Chapter 10 - Wetlands	5	Objective 10.3.1 - Maintain or enhance wetlands	Amend	Delete Objective and replace with: <i>"To recognise and provide for the protection of the natural character, biodiversity and other values of wetlands in the regions."</i>	•Objective fails to form a framework to protect wetlands and their margins, and set out all that is required by Part 2 RMA.
Regionally Significant Wetland values	6.14	Policy 10.4.1 - Definition of Regionally Significant Wetland values	Amend	Amend: <i>"The regionally significant wetland values of Otago's wetlands that are identified in Schedule 9 are: ..."</i>	•Values inconsistent with case law, such as criterion for representativeness. •Significance criterion used to identify wetlands in Schedule 9 is incomplete and it's possible not all significant wetlands have been captured.
What is a Regionally Significant Wetland	7.139	Policy 10.4.1A - Definition of a Regionally Significant Wetland	Amend	Delete policy and insert in more appropriate place.	•Not a policy; should either be a footnote, explanatory note or added to glossary.
What is a Regionally Significant Wetland	8	Policy 10.4.1B - Schedule 9	Amend	Delete policy and insert in more appropriate place.	•Not a policy; should either be a footnote, explanatory note or added to glossary.
Chapter 10 - Wetlands	9	Policy 10.4.2 - Priority on avoiding adverse effects	Support	Support. No change.	•Appropriately recognises preferability of avoidance of adverse effects.
Protection general	10	Financial contributions policy (Policy 10.4.2A and Ch.17)	Amend	Delete policy 10.4.2A.	•Financial contributions inappropriate given large-scale loss or modification of wetlands, and inconsistent with Part 2 RMA and NPS Freshwater. •Assessment criteria inadequate to assess viability in any offsetting.
Promotion, information and funding	14	Policy 10.4.6 - Promotion of wetlands	Amend	Amend so that the 'or' is deleted from 10.4.6(d).	•As policy (e) works alongside (a) to (d), 'or' is inappropriate. •Notes deletion of 15.4.3 makes implementation of 10.4.6 unclear.
Chapter 12 - Rules: Water Take, Use and Management	22	Rule 12.1.1A.1 - Take and use of surface water from any Regionally Significant Wetland	Support	Retain rule as proposed.	•Consistent with Part 2 and s 30 RMA.
Chapter 12 - Rules: Water Take, Use and Management	26	Rule 12.1.2.4 - Take and use of surface water for no more than 3 days	Amend	Amend 12.1.2.4(b): <i>"The water is not taken from and there is no change to the water level or hydrological function, or no damage to the indigenous flora, fauna or its habitat, in or on any Regionally Significant Wetland, or wetland that meets the significance criteria listed in Appendix XX Ecological Criteria."</i>  Add the following permitted rule conditions: <i>"(a) Effects on biological diversity and ecological values; and (b) Effects on the natural character of wetlands and their margins."</i>	•Deletion of 'water is not taken from' alters intent of rule. •Rule doesn't cover non-assessed and non-scheduled wetlands.
Chapter 12 - Rules: Water Take, Use and Management	27	Rule 12.1.2.5 - Take and use of surface water general	Amend	Amend 12.1.2.5(a): <i>"The water is not taken from and there is no change to the water level or hydrological function, or no damage to the indigenous flora, fauna or its habitat, in or on any</i>	•Deletion of 'water is not taken from' alters intent of rule. •Rule doesn't cover non-assessed and non-scheduled wetlands.

Summary of Decisions Requested (submissions and further submissions) on Proposed Plan Change 2 (Regionally Significant Wetlands)  
Regional Plan: Water for Otago 23 November 2011

ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
				<p><u>Regionally Significant Wetland, or wetland that meets the significance criteria listed in Appendix XX Ecological Criteria.</u></p> <p>Add the following permitted rule conditions:  <u>"(a) Effects on biological diversity and ecological values;</u>  <u>and</u>  <u>(b) Effects on the natural character of wetlands and their margins."</u></p>	
Chapter 12 - Rules: Water Take, Use and Management	28	Rule 12.1.2.6 - Take and use of surface water for land drainage	Amend	<p>Amend 12.1.2.6(a):  <u>"The water is not taken from and there is no change to the water level or hydrological function, or no damage to the indigenous flora, fauna or its habitat, in or on any Regionally Significant Wetland, or wetland that meets the significance criteria listed in Appendix XX Ecological Criteria."</u></p> <p>Add the following permitted rule conditions:  <u>"(a) Effects on biological diversity and ecological values;</u>  <u>and</u>  <u>(b) Effects on the natural character of wetlands and their margins."</u></p>	<ul style="list-style-type: none"> <li>•Deletion of 'water is not taken from' alters intent of rule.</li> <li>•Rule doesn't cover non-assessed and non-scheduled wetlands.</li> </ul>
Chapter 12 - Rules: Water Take, Use and Management	29	Rule 12.1.3.1 - Take and use of surface water for community water supply - controlled activity	Amend	<p>Retain (i) and add new (j) and (l):  <u>"(j) Effects on biological diversity and ecological values;</u>  <u>and</u>  <u>(k) Effects on the natural character of wetlands and their margins."</u></p>	<ul style="list-style-type: none"> <li>•To meet resource management duties, Council needs to control effects on any wetland that meets significance criteria.</li> </ul>
Chapter 12 - Rules: Water Take, Use and Management	37	Rule 12.1.4.8 - Take and use of surface water - restricted discretionary activity	Amend	<p>Add new discretionary matters:  <u>"(a) Effects on biological diversity and ecological values;</u>  <u>and</u>  <u>(b) Effects on the natural character of wetlands and their margins."</u></p> <p>Amend (xvii):  <u>"Any effect on any Regionally Significant Wetland or on any regionally significant wetland value or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria."</u></p>	<ul style="list-style-type: none"> <li>•Council responsibilities are greater than the identification of significant wetlands; need to consider adverse effects on all wetlands.</li> <li>•Possible not all significant wetlands have been captured in Schedule 9.</li> <li>•Gives effect to Part 2 RMA.</li> </ul>
Chapter 12 - Rules: Water Take, Use and Management	48	Rule 12.2.2.5 - Take and use of groundwater for no more than 3 days	Amend	<p>Amend 12.2.2.5(b):  <u>"The water is not taken from and there is no change to the water level or hydrological function, or no damage to the indigenous flora, fauna or its habitat, in or on any Regionally Significant Wetland, or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria."</u></p>	<ul style="list-style-type: none"> <li>•Deletion of 'water is not taken from' alters intent of rule.</li> <li>•Rule doesn't cover non-assessed and non-scheduled wetlands.</li> </ul>
Chapter 12 - Rules: Water Take, Use and Management	49	Rule 12.2.2.6 - Take and use of groundwater from Schedule 2C aquifer or within 100m of any wetland, lake or river	Amend	<p>Amend 12.2.2.6(a):  <u>"The water is not taken from and there is no change to the water level or hydrological function, or no damage to the indigenous flora, fauna or its habitat, in or on any Regionally Significant Wetland, or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria."</u></p>	<ul style="list-style-type: none"> <li>•Deletion of 'water is not taken from' alters intent of rule.</li> <li>•Rule doesn't cover non-assessed and non-scheduled wetlands.</li> </ul>
Chapter 12 - Rules: Water Take, Use and Management	50	Rule 12.2.2A.1 - Take and use of groundwater for community water supply - controlled activity	Amend	<p>Amend 12.2.2A1(g):  <u>"Any effect on and Regionally Significant Wetland or on any regionally significant wetland value or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria."</u></p> <p>Add new matters of control:</p>	<ul style="list-style-type: none"> <li>•Council responsibilities are greater than the identification of significant wetlands; need to consider adverse effects on all wetlands.</li> <li>•Possible not all significant wetlands have been captured in Schedule 9.</li> <li>•Gives effect to Part 2 RMA.</li> </ul>

ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
				"(h) <u>Effects on biological diversity and ecological values;</u> <u>and</u> (i) <u>Effects on the natural character of wetlands and their margins.</u> "	
Chapter 12 - Rules: Water Take, Use and Management	53	Rule 12.2.3.4 - Take and use of groundwater - restricted discretionary activity	Amend	Amend (xiii): "Any effect on and Regionally Significant Wetland or on any regionally significant wetland value or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria."  Add new matters of discretion: "(a) <u>Effects on biological diversity and ecological values;</u> <u>and</u> (b) <u>Effects on the natural character of wetlands and their margins.</u> "	•Council responsibilities are greater than the identification of significant wetlands; need to consider adverse effects on all wetlands. •Possible not all significant wetlands have been captured in Schedule 9. •Gives effect to Part 2 RMA.
Chapter 12 - Rules: Water Take, Use and Management	60	Rule 12.3.1A.1 - Damming or diversion of water: Regionally Significant Wetland	Support	Retain wording as proposed.	No reason given
Chapter 12 - Rules: Water Take, Use and Management	63	Rule 12.3.2.1 - Damming or diversion of water general	Amend	Amend 12.3.2.1(e): "It is not within and there is no change to the water level or hydrological function, or no damage to the flora, fauna or its habitat, in or on any Regionally Significant Wetland; and"	•Should be explicit that damming or diversion within a Regionally Significant Wetland is not permitted.
Chapter 12 - Rules: Water Take, Use and Management	63	Rule 12.3.2.1 - Damming or diversion of water general	Amend	Add new matters of discretion: "(a) <u>Effects on biological diversity and ecological values;</u> <u>and</u> (b) <u>Effects on the natural character of wetlands and their margins.</u> "	•Need to sustainably manage all wetlands not just those considered significant.
Chapter 12 - Rules: Water Take, Use and Management	64	Rule 12.3.2.2 - Damming or diversion of water for land drainage	Amend	Add new matters of discretion: "(a) <u>Effects on biological diversity and ecological values;</u> <u>and</u> (b) <u>Effects on the natural character of wetlands and their margins.</u> "	•Need to sustainably manage all wetlands not just those considered significant.
Chapter 12 - Rules: Water Take, Use and Management	64	Rule 12.3.2.2 - Damming or diversion of water for land drainage	Amend	Amend 12.3.2.2(a): "The water is not diverted from and there is no change to the water level or hydrological function, or no damage to the flora, fauna or its habitat, in or on any Regionally Significant Wetland; and"	•Should be explicit that damming or diversion within a Regionally Significant Wetland is not permitted.
Chapter 12 - Rules: Water Take, Use and Management	65	Rule 12.3.2.3 - Damming or diversion of water for erection, placement, repair or maintenance of structure	Amend	Add new matters of discretion: "(a) <u>Effects on biological diversity and ecological values;</u> <u>and</u> (b) <u>Effects on the natural character of wetlands and their margins.</u> "	•Need to sustainably manage all wetlands not just those considered significant.
Chapter 12 - Rules: Water Take, Use and Management	66	Rule 12.3.3.1 - Damming or diversion of water - restricted discretionary activity	Amend	Amend 12.3.3.1(aa): "Any effect on and Regionally Significant Wetland or on any regionally significant wetland value or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria."  Add new matters of discretion: "(o) <u>Effects on biological diversity and ecological values.</u> "	•Matters of discretion don't address/protect non-scheduled wetlands.
Chapter 12 - Rules: Water Take, Use and Management	72	Rule 12.4.1.1 - Discharge of stormwater general	Amend	Amend (a)(i): "Any effect on and Regionally Significant Wetland or on any regionally significant wetland value or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria."	•Need to sustainably manage all wetlands not just those scheduled.
Chapter 12 - Rules: Water Take, Use and Management	73	Rule 12.4.2.1 - Discharge of stormwater to water, or onto or into	Amend	Amend 12.4.2.1(c): "Any effect on and Regionally Significant Wetland or on	•Need to sustainably manage all wetlands not just those scheduled.

Summary of Decisions Requested (submissions and further submissions) on Proposed Plan Change 2 (Regionally Significant Wetlands)  
Regional Plan: Water for Otago 23 November 2011



ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
		land where it may enter water		<p>any regionally significant wetland value or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria."</p> <p>Add new matter of discretion:  <u>"(o) Effects on biological diversity and ecological values."</u></p>	
Chapter 12 - Rules: Water Take, Use and Management	74	Rule 12.5.1.1 - Discharge of drainage water from any drain	Amend	<p>Amend 12.5.1.1(aa):  <u>"Discharge is not to enter into and there is to be no change in the water level or hydrological function, or no damage to the indigenous flora, fauna or its habitat, in or on any regionally significant wetland value or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria."</u></p>	•Need to sustainably manage all wetlands not just those scheduled.
Chapter 12 - Rules: Water Take, Use and Management	75	Rule 12.5.2.1 - Discharge of drainage water - restricted discretionary activity	Amend	<p>Amend 12.5.2.1(b):  <u>"Discharge is not to enter into and there is to be no change in the water level or hydrological function, or no damage to the indigenous flora, fauna or its habitat, in or on any regionally significant wetland value or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria."</u></p> <p>Add new matter of discretion:  <u>"(n) Effects on biological diversity and ecological values."</u></p>	•Need to sustainably manage all wetlands not just those scheduled.
Chapter 12 - Rules: Water Take, Use and Management	77	Rule 12.7.1.2 - Discharge of pesticide, land-based discharge onto land	Amend	<p>Amend (e):  <u>"There is no change to the water level or hydrological function, or no damage to the indigenous flora, fauna or its habitat, in or on any Regionally Significant Wetland."</u></p>	•Chemicals will be used to kill pest plants; under rule currently worded, a consent would be required.
Chapter 12 - Rules: Water Take, Use and Management	80	Rule 12.8.1.1 - Discharge of animal dip material	Amend	<p>Amend 12.8.1.1(k):  <u>"There is no change to the water level or hydrological function, or no damage to the indigenous flora and fauna or its habitat, in or on any Regionally Significant Wetland, or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria."</u></p>	•Agricultural waste and fertiliser can be toxic to wetlands, and rule should cover more than just scheduled wetlands.
Chapter 12 - Rules: Water Take, Use and Management	81	Rule 12.8.1.2 - Discharge of contaminants collected in animal waste collection system in Zone A of Lower Waitaki Plains Groundwater Protection Zone	Amend	<p>Amend 12.8.1.2(l):  <u>"There is no change to the water level or hydrological function, or no damage to the indigenous flora and fauna or its habitat, in or on any Regionally Significant Wetland, or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria."</u></p>	•Agricultural waste and fertiliser can be toxic to wetlands, and rule should cover more than just scheduled wetlands.
Chapter 12 - Rules: Water Take, Use and Management	82	Rule 12.8.1.3 - Discharge of contaminants collected in animal waste collection system not in Zone A of a Groundwater Protection Zone	Amend	<p>Amend 12.8.1.3(l):  <u>"There is no change to the water level or hydrological function, or no damage to the indigenous flora and fauna or its habitat, in or on any Regionally Significant Wetland, or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria."</u></p>	•Agricultural waste and fertiliser can be toxic to wetlands, and rule should cover more than just scheduled wetlands.
Chapter 12 - Rules: Water Take, Use and Management	83	Rule 12.8.1.5 - Discharge of fertiliser onto production land where it may enter water	Amend	<p>Amend 12.8.1.5(c):  <u>"There is no change to the water level or hydrological function, or no damage to the indigenous flora and fauna or its habitat, in or on any Regionally Significant Wetland, or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria."</u></p>	•Agricultural waste and fertiliser can be toxic to wetlands, and rule should cover more than just scheduled wetlands.
Chapter 12 - Rules: Water Take, Use and Management	84	Rule 12.8.2.1 - Discharge of contaminants collected in animal waste collection system in Zone A Groundwater Protection Zones on Maps C10-C12 and C15	Amend	<p>Amend (aa):  <u>"Any effect on and Regionally Significant Wetland or on any regionally significant wetland value or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria."</u></p>	•Need to sustainably manage all wetlands not just those scheduled.

ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
				Amend (a)(ii): <i>"The natural character of any affected water body and their margins."</i>  Add new matter of discretion: <i>"(o) Any effects on biological diversity and ecological values."</i>	
Chapter 12 - Rules: Water Take, Use and Management	85	Rule 12.9.1.1 - Discharge of water associated with down-hole pump testing	Amend	Amend 12.9.1.1(a): <i>"There is no change to the water level or hydrological function, or no damage to the indigenous flora and fauna or its habitat, in or on any Regionally Significant Wetland, or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria."</i>  Add the following matters: <i>"(a) Effects on biological diversity and ecological values; and (b) There is no discharge to any surface water body including wetlands; and (c) Effects on the natural character of wetlands and their margins."</i>	•Need to sustainably manage all wetlands not just those scheduled.
Chapter 12 - Rules: Water Take, Use and Management	86	Rule 12.9.1.2 - Discharge of contaminants associated with drilling	Amend	Amend 12.9.1.1(a): <i>"There is no change to the water level or hydrological function, or no damage to the indigenous flora and fauna or its habitat, in or on any Regionally Significant Wetland, or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria."</i>  Add the following matters: <i>"(a) Effects on biological diversity and ecological values; and (b) There is no discharge to any surface water body including wetlands; and (c) Effects on the natural character of wetlands and their margins."</i>	•Need to sustainably manage all wetlands not just those scheduled.
Chapter 12 - Rules: Water Take, Use and Management	87	Rule 12.9.2.1 - Discharge of water or contaminants associated with down-hole pump testing or drilling - restricted discretionary activity	Amend	Amend (b): <i>"Any effect on and Regionally Significant Wetland or on any regionally significant wetland value or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria."</i>  Amend (a)(ii): <i>"The natural character of any affected water body and their margins."</i>  Add new matter of discretion: <i>"(o) Any effects on biological diversity and ecological values."</i>	•Need to sustainably manage all wetlands not just those scheduled.
Chapter 12 - Rules: Water Take, Use and Management	88	Rule 12.10.1.1 - Discharge of any contaminant or water from a vessel	Amend	Amend (a): <i>"There is no discharge into or change the water level or hydrological function, or no damage to the indigenous flora and fauna or its habitat, in or on any Regionally Significant Wetland, or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria."</i>	•Current words do not provide Council with necessary control on potential adverse effects of contaminant discharge.
Chapter 12 - Rules: Water Take, Use and Management	89	Rule 12.10.2.1 - Discharge of any contaminant or water from a vessel or from maintenance of vessel - restricted discretionary activity	Amend	Amend (b): <i>"Any effect on any Regionally Significant Wetland or on any regionally significant wetland value or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria."</i>	•Current words do not provide Council with necessary control on potential adverse effects of contaminant discharge.

ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
				<p><u>Ecological Criteria.</u>"</p> <p>Amend (a)(ii):  <i>"The natural character of any affected water body and their margins."</i></p> <p>Add new matter of discretion:  <i>"(m) Any effects on biological diversity and ecological values."</i></p>	
Chapter 12 - Rules: Water Take, Use and Management	90	Rule 12.11.2.1 - Discharge of sullage, cooling, drinking water supply reservoir, water supply pipeline or swimming pool water	Amend	Amend 12.11.2.1(g): <i>"There is no discharge into or change to the water level or hydrological function, or no damage to the indigenous flora and fauna or its habitat, in or on any Regionally Significant Wetland, or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria."</i>	•Need to sustainably manage all wetlands not just those scheduled.
Chapter 12 - Rules: Water Take, Use and Management	91	Rule 12.11.2.2 - Discharge of water used for holding live organisms	Amend	Amend 12.11.2.2(a): <i>"There is no discharge into or change to the water level or hydrological function, or no damage to the indigenous flora and fauna or its habitat, in or on any Regionally Significant Wetland, or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria."</i>	•Need to sustainably manage all wetlands not just those scheduled.
Chapter 12 - Rules: Water Take, Use and Management	92	Rule 12.11.2.3 - Discharge of any other water	Amend	Amend 12.11.2.3(h): <i>"There is no discharge into or change to the water level or hydrological function, or no damage to the indigenous flora and fauna or its habitat, in or on any Regionally Significant Wetland, or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria."</i>	•Need to sustainably manage all wetlands not just those scheduled.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	101	Rule 13.2.1.7 - Erection or placement of bridge, boardwalk or culvert	Amend	Amend 13.2.1.7: <i>"The erection or placement of any bridge, boardwalk or culvert in, on or over the bed of a lake or river, or any Regionally Significant wetland is a permitted activity, providing:"</i>	•Permitted activity inappropriate for bridge or culvert as Council cannot control adverse effects on other wetlands - should be discretionary.. •Support boardwalks being permitted (if for recreation or science) - need separate rule to culverts/bridges.
				Amend (b) to delete "boardwalk".	
				Add the following permitted activity conditions: <i>"(a) The structure is not in a Regionally Significant Wetland or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria.</i> <i>(b) Effects on biological diversity and ecological values;</i> <i>and</i> <i>(c) Effects on the natural character of wetlands and their margins."</i>	
				Add a new rule: <i>"The erection or placement of any boardwalk in, on or over the bed of a lake or river, or any Regionally Significant Wetland, is a permitted activity, providing:</i> <i>(a) The boardwalk is for recreational or scientific purposes and its erection or placement, does not cause any flooding, nor cause any erosion of the bed or banks of a Regionally Significant Wetland, and</i> <i>(b) The site is left tidy following the erection or placement."</i>	
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	103	Rule 13.2.2.1 - Erection or placement - restricted discretionary activity	Amend	Amend (aa): <i>"Any effect on any Regionally Significant Wetland or on</i>	•Current words do not provide Council with necessary control on potential adverse effects of contaminant discharge.

ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
				<p><del>any regionally significant wetland value or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria.</del></p> <p>Amend (a)(ii): "The natural character of any affected water body and their margins."</p> <p>Add new matter of discretion: "(m) Any effects on biological diversity and ecological values."</p>	
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	108	Rule 13.3.2.1 - Extension, alteration, replacement or reconstruction of structure - restricted discretionary activity	Amend	<p>Delete "<del>or any Regionally Significant</del>" from the introduction to the rule.</p> <p>Amend (aa): "Any effect on any Regionally Significant Wetland or on any regionally significant wetland that meets the significance criteria listed in Appendix XX Ecological Criteria; and"</p> <p>Add new matter of discretion: "(m) Any effects on biological diversity and ecological values."</p>	•Values for other wetlands should be assessed against best practice.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	110	Rule 13.4.1.1 - Demolition or removal of a structure	Amend	<p>Delete "<del>or any Regionally Significant</del>" from the introduction to the rule.</p> <p>Amend (f): "There is no change to the water level or hydrological function, <del>or no</del> and damage to the indigenous flora, fauna or its habitat, in or on any <del>Regionally Significant Wetland</del> wetland is managed."</p>	•Current words do not provide Council with necessary control on potential adverse effects of contaminant discharge.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	111	Rule 13.4.2.1 - Demolition or removal of a structure - restricted discretionary activity	Amend	<p>Delete "<del>or any Regionally Significant</del>" from the introduction to the rule.</p> <p>Amend (aa): "Any effect on any Regionally Significant Wetland or on any regionally significant wetland value or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria."</p> <p>Amend (a)(ii): "The natural character of any affected water body and their margins"</p> <p>Add new matter of discretion: "(m) Any effects on biological diversity and ecological values."</p>	•Current words do not provide Council with necessary control on potential adverse effects of contaminant discharge.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	114	Rule 13.5.1.1 - Disturbance of the bed general	Amend	<p>Amend (i): "Except for activities covered by Rules 13.2.1.5, 13.2.1.6, or 13.2.1.8, there is no change to the water level or hydrological function, or no damage to the indigenous flora, fauna or its habitat, in or on any Regionally Significant Wetland, <del>or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria</del>"</p> <p>Amend 13.5.1.1(f) as follows: "...of sediment to the lake, river or wetland..."</p>	•Current words do not provide Council with necessary control on potential adverse effects of contaminant discharge.
Chapter 13 - Land Use (Beds and	118	Rule 13.5.1.8 - Disturbance by	Amend	Delete " <del>or any Regionally Significant</del> " from the	•Grazing degrades wetlands, and is inconsistent with

ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Regionally Significant Wetlands)		livestock		introduction to the rule.  Delete permitted condition (d).  Amend (e): <i>"The activity does not <u>significantly disturb adversely affect indigenous...</u>"</i>  Add new condition: <i>"<u>The activity is not within any Regionally Significant Wetland identified in Schedule 9 or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria.</u>"</i>	sustainable management and protection of wetlands; should not rely on permitted rule. •Regionally significant wetlands should be fenced.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	119	Rule 13.5.2.1 - Extraction of alluvium - restricted discretionary activity	Amend	Delete <del>"or any Regional Significant"</del> from the introduction to the rule  Amend (aa): <i>"Any effect on and Regionally Significant Wetland or on any regionally significant wetland value <u>or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria.</u>"</i>  Amend (a)(ii): <i>"The natural character of any affected water body <u>and their margins</u>"</i>  Add new matter of discretion: <i>"(m) <u>Any effects on biological diversity and ecological values.</u>"</i>	•Current words do not provide Council with necessary control on potential adverse effects of contaminant discharge.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	121	Rule 13.6.1.1 - Introduction of pest plants general	Amend	Amend: <i>"...to the bed or water of any Otago lakes, river or any <del>Regionally Significant</del> Wetland, is a prohibited activity for which no resource consent will be granted."</i>  Add the following species: <i><u>Glyceria species</u></i> <i><u>Alder (Alnus species)</u></i> <i><u>Crack Willow</u></i> <i><u>Gray Willow</u></i>	•Inappropriate to prohibit in Regionally Significant Wetlands only.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	122	Rule 13.6.2.0 - Introduction or planting of New Zealand native plant	Amend	Add the following permitted rule condition: <i>"<u>All plants and seeds are eco-sourced and appropriate for the specific wetland ecosystem.</u>"</i>	•Wetland restoration would be enhanced if permitted plants were eco-sourced (native plants from local seed sources) and appropriate for wetland ecosystem.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	123	Rule 13.6.3.1 - Introduction or planting of vegetation - discretionary activity	Amend	Amend: <i>"...or any <del>Regional Significant</del> Wetland <u>or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria...</u>"</i>	•Current words do not provide Council with necessary control on potential adverse effects of contaminant discharge.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	124	Rule 13.7.1.2 - Removal or clearance of exotic plant material	Amend	Amend: <i>"The removal or clearance...<del>Regional Significant</del> wetlands, is a permitted activity providing:"</i>  Add the following condition: <i>"<u>Damage to indigenous flora and habitats or indigenous fauna managed.</u>"</i>	•Current words do not provide Council with necessary control on potential adverse effects of contaminant discharge.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	125	Rule 13.7.2.1 - Removal of pest plants - controlled activity	Amend	Amend: <i>"...from the bed of any lake or river, or any <del>Regional Significant</del> wetland, is a ..."</i>  Add the following species: <i>"Glyceria species"</i>	•Support removal of all weeds from wetlands.

ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
				Alder ( <i>Alnus species</i> ) Crack Willow Gray Willow Alder ( <i>Alnus species</i> ) Crack Willow Gray Willow"	
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	126	Rule 13.7.3.1 - Removal or clearance of plant material - discretionary activity	Amend	Add the word exotic: " <u>Unless covered by Rules 13.7.1.1 to 13.7.2.1, removal or clearance of exotic plant material from any Regionally Significant Wetland, is a discretionary activity.</u> "	•Agrees may be a need for discretionary consents for some removal of exotic species from significant wetlands, but removal of indigenous vegetation should be avoided and should be non-complying.
Minor and other	143	Minor and consequential changes	Amend	Amend wording and numbering of retained issues, explanations, principle reasons, anticipated results and cross references to account for changes and delete words no longer relevant as a result of the removal of Schedule 10 and the term type A and Type.	No reason given.
RMA streamlining and simplifying	150	RMA streamlining and simplifying	Oppose	Retain issues, Explanations, Principle Reasons, Anticipated Results, and cross references.	•Removal doesn't make Plan easier to understand. •These assist decision-makers individuals better understand the Plan, educates, and helps understand whether consents are required.
Wetland values information and Wetland Inventory	151	Wetland Inventory	Amend	It should be noted on the inventory of wetlands that Tahakopa Marsh Complex (Map F40, #145) is extremely threatened by an infestation of Alder which needs removal before it becomes an intractable weed in the wetlands and waterways. This should be noted on the inventory of wetlands.	No reason given.
Chapter 10 - Wetlands	153	Chapter 10 general	Amend	Insert new policy and explanation: " <u>Policy x.x.x</u> <u>To recognise and provide for the protection of wetlands by managing adverse effects of activities on the values present, including natural character, ecosystem functioning, biodiversity, aesthetics or amenity values.</u>	•Many wetlands not scheduled, and all wetlands should be managed according to Part 2 RMA.
				<u>Explanation:</u> <u>All wetlands are required to be managed sustainably in accordance with RMA, not just those are determined as being significant. Within Part 2 of the RMA wetlands are to be managed to protect biodiversity, natural character and other values.</u>	
Chapter 10 - Wetlands	153	Chapter 10 general	Amend	Insert new policy and explanation: " <u>Policy x.x.x:</u> <u>To recognise and protect wetlands that are shown to have significant values that are not identified on Schedule 9, and to protect those values by controlling activities in wetlands and their margins to ensure their ecosystem functioning, natural character and habitat values are sustained.</u>	•Plan change doesn't allow for further significant wetlands to be identified. •Significance criterion used to identify wetlands in Schedule 9 is incomplete and it's possible not all significant wetlands have been captured.
				<u>Explanation:</u> <u>It is stated in the introduction to Schedule 9 that Schedule 9 is not exhaustive, and therefore not all wetlands with significant values have been identified. This policy recognises and provides for the protection of the values of those unidentified wetlands.</u> "	
Chapter 10 - Wetlands	153	Chapter 10 general	Amend	Insert new policy and explanation: " <u>Unidentified wetlands will be assessed using the following ecological criteria:</u> <u>1. Ecological context</u> <u>2. Representative wetlands</u>	•Values inconsistent with case law, such as criterion for representativeness. •Note: Appendix XX Ecological Criteria can be found in full in the original submission.

ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
				<p><u>3. Rarity</u> <u>4. Distinctiveness</u></p> <p><u>Explanation:</u> <u>It is possible that not all wetlands with significant values have been identified on Schedule 9. This policy recognises and provides for the protection of these wetlands. The policy also introduces an ecological criteria (Appendix XX) that will be used when assessing those wetlands. Where an assessment of any wetlands is required for resource consent purposes it shall be carried out in accordance with the ecological criteria set out in Appendix XX."</u></p>	
Chapter 10 - Wetlands	153	Chapter 10 general	Amend	<p>Insert new policy and explanation: <u>"Where an assessment has been undertaken on a wetland that is not identified on Schedule 9 and is shown to be significant these wetlands will be added to Schedule 9.</u></p> <p><u>Explanation:</u> <u>It is possible through resource consent processes that significant wetlands not included on Schedule 9 will be identified. It is appropriate that these significant wetlands are added to Schedule 9. In doing so the wetlands on Schedule 9 will be derived from two different processes (Policy 10.4.1 and Policy x.x.x (see policy directly above)) and this is appropriate because the management of these significant wetlands will be consistent. Changes to Schedule 9 to include wetlands will be the subject of a plan change process."</u></p>	<ul style="list-style-type: none"> <li>•Possible not all significant wetlands have been captured in Schedule 9.</li> </ul>
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	155	Chapter 13 general	Amend	<p>Amend Rules 13.2.1.1; 13.2.1.2; 13.2.1.4; 13.2.1.5; 13.2.1.6 and 13.2.1.8: <u>"The...bed of a lake or river, or any Regional Significant Wetland is a permitted activity, providing:"</u></p> <p>Add the following permitted activity conditions: <u>"(a) The structure is not in a Regionally Significant Wetland or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria.</u> <u>(b) Effects on biological diversity and ecological values;</u> <u>and</u> <u>(c) Effects on the natural character of wetlands and their margins."</u></p>	<ul style="list-style-type: none"> <li>•Fences shouldn't be erected in wetlands as animals tend to congregate along them, and regionally significant wetlands shouldn't be grazed.</li> <li>•Digging of wetlands for pipe, line and cable placement can cause irreversible damage.</li> <li>•Erection of structures over wetlands can adversely affect them.</li> </ul>
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	155	Chapter 13 general	Amend	<p>Add new non-complying rule: <u>"Removal or clearance of native plant material from any Regionally Significant Wetland, or any wetland that meets the significance criteria listed in Schedule #; and is a non-complying activity."</u></p>	<ul style="list-style-type: none"> <li>•Removal of indigenous vegetation should be avoided and should be non-complying.</li> </ul>
Protection general	165	Financial contributions rules	Amend	<p>Delete all provisions for financial contributions for regionally significant wetlands and values in all rules.</p>	<ul style="list-style-type: none"> <li>•Financial contributions inappropriate given large-scale loss or modification of wetlands, and inconsistent with Part 2 RMA and NPS Freshwater Management.</li> <li>•Assessment criteria inadequate to assess viability in any offsetting.</li> </ul>
Mapping of Schedule 9 wetlands - general	199	Mapping of Schedule 9 wetlands - general	Amend	<p>All regionally significant wetlands, including those above 800m be mapped using detailed current aerial photographs and cadastral boundaries.</p>	<ul style="list-style-type: none"> <li>•Topographical maps inadequate to delineate wetlands and ensure adequate buffer margins.</li> <li>•Current aerial photographs important for rule understanding and enforcement.</li> </ul>
Schedule 9 general	200	Schedule 9	Amend	<p>Additional Wetland to be added to Schedule 9: Daphne Tarwood Peat Dome G46 325178</p>	<ul style="list-style-type: none"> <li>•Welcomes the plan change proposal to add many of the wetlands in Schedule 10, plus 24 newly identified wetlands to</li> </ul>

ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
					Schedule 9. •Wetland dominated by characteristic bog plants and contains threatened species Coprosma elatirioides. •See image in the original submission.
Specific Schedule 9 wetlands	345	Schedule 9 - Tahakopa Marsh Complex (#145, Map F4)	Amend	Entirety of this wetland and surrounding area shown as wetland on the topo map needs to be listed in schedule 9 as a regionally significant wetland.	•Boundaries on Map F40 only partially cover wetland complex. •See image in the original submission.

#### 48 Herbert Heritage Society

ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	118	Rule 13.5.1.8 - Disturbance by livestock	Amend	All wetlands/rivers/estuaries must be fenced off from livestock unless the grazing through the wetland can be considered to be proven beneficial to the wetland in question or that the procedure for fencing would be detrimental to the said wetland.	•Unreasonable for the public to be responsible for observing detrimental effects on the environment (neither time nor money), nor the DOC or ORC (neither manpower or budget). •Farmers can't be expected to self-police their activities when it results in financial benefits/costs. •Rule may be grumbled about but accepted, whereas community pressure for selfless/environmental actions from farmers only results in fracturing a community into conservationists and land developers.

#### 49 Karl Frank Burgess

ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Protection general	157	Drain maintenance	Oppose	Oppose having to get resource consent to clean existing ditches to keep them safe for stock. If I have to get consent I do not want to get consent every year and consent should last for 35 years.	•Ditches need to be safe so the stock can graze grazeable land above the wetland.



**Grouped by Provision**  
**(Matters within the scope of the proposed plan change)**

## Contents

<b>Part 1: Regionally Significant Wetlands and values .....</b>	<b>50</b>
<i>What is a Regionally Significant Wetland .....</i>	<i>50</i>
7.139 Policy 10.4.1A - Definition of a Regionally Significant Wetland.....	50
8 Policy 10.4.1B - Schedule 9.....	53
159 Chapter 16.....	55
<i>Regionally Significant Wetland values .....</i>	<i>55</i>
6.14 Policy 10.4.1 - Definition of Regionally Significant Wetland values .....	55
11 Policy 10.4.3 - Identification of Type B values .....	57
<b>Part 2: Protection of wetlands .....</b>	<b>58</b>
<i>Chapter 10 - Wetlands.....</i>	<i>58</i>
1 Introduction to Chapter 10.....	58
5 Objective 10.3.1 - Maintain or enhance wetlands .....	58
9 Policy 10.4.2 - Priority on avoiding adverse effects.....	59
153 Chapter 10 general .....	61
<i>Chapter 12 - Rules: Water Take, Use and Management .....</i>	<i>65</i>
22 Rule 12.1.1A.1 - Take and use of surface water from any Regionally Significant Wetland .....	65
26 Rule 12.1.2.4 - Take and use of surface water for no more than 3 days.....	67
27 Rule 12.1.2.5 - Take and use of surface water general.....	68
28 Rule 12.1.2.6 - Take and use of surface water for land drainage.....	68
29 Rule 12.1.3.1 - Take and use of surface water for community water supply - controlled activity.....	69
37 Rule 12.1.4.8 - Take and use of surface water - restricted discretionary activity .....	69
45 Rule 12.2.1A.1 - Take and use of groundwater from any Regionally Significant Wetland .....	70
48 Rule 12.2.2.5 - Take and use of groundwater for no more than 3 days.....	71
49 Rule 12.2.2.6 - Take and use of groundwater from Schedule 2C aquifer or within 100m of any wetland, lake or river .....	72
50 Rule 12.2.2A.1 - Take and use of groundwater for community water supply - controlled activity.....	72
53 Rule 12.2.3.4 - Take and use of groundwater - restricted discretionary activity.....	72
60 Rule 12.3.1A.1 - Damming or diversion of water: Regionally Significant Wetland .....	73
63 Rule 12.3.2.1 - Damming or diversion of water general .....	75
64 Rule 12.3.2.2 - Damming or diversion of water for land drainage.....	76
65 Rule 12.3.2.3 - Damming or diversion of water for erection, placement, repair or maintenance of structure.....	77
66 Rule 12.3.3.1 - Damming or diversion of water - restricted discretionary activity.....	77
72 Rule 12.4.1.1 - Discharge of stormwater general.....	78

73	Rule 12.4.2.1 - Discharge of stormwater to water, or onto or into land where it may enter water .....	78
74	Rule 12.5.1.1 - Discharge of drainage water from any drain .....	79
75	Rule 12.5.2.1 - Discharge of drainage water - restricted discretionary activity .....	79
76	Rule 12.7.1.1 - Discharge of herbicide to water .....	80
77	Rule 12.7.1.2 - Discharge of pesticide, land-based discharge onto land .....	80
78	Rule 12.7.1.3 - Discharge of herbicide to air or land .....	81
79	Rule 12.7.1.4 - Discharge of pesticide, aerial discharge onto land .....	81
80	Rule 12.8.1.1 - Discharge of animal dip material.....	82
81	Rule 12.8.1.2 - Discharge of contaminants collected in animal waste collection system in Zone A of Lower Waitaki Plains Groundwater Protection Zone ...	82
82	Rule 12.8.1.3 - Discharge of contaminants collected in animal waste collection system not in Zone A of a Groundwater Protection Zone .....	83
83	Rule 12.8.1.5 - Discharge of fertiliser onto production land where it may enter water.....	83
84	Rule 12.8.2.1 - Discharge of contaminants collected in animal waste collection system in Zone A Groundwater Protection Zones on Maps C10-C12 and C1584	84
85	Rule 12.9.1.1 - Discharge of water associated with down-hole pump testing .....	84
86	Rule 12.9.1.2 - Discharge of contaminants associated with drilling .....	85
87	Rule 12.9.2.1 - Discharge of water or contaminants associated with down-hole pump testing or drilling - restricted discretionary activity.....	85
88	Rule 12.10.1.1 - Discharge of any contaminant or water from a vessel.....	86
89	Rule 12.10.2.1 - Discharge of any contaminant or water from a vessel or from maintenance of vessel - restricted discretionary activity .....	86
90	Rule 12.11.2.1 - Discharge of sullage, cooling, drinking water supply reservoir, water supply pipeline or swimming pool water .....	86
91	Rule 12.11.2.2 - Discharge of water used for holding live organisms.....	87
92	Rule 12.11.2.3 - Discharge of any other water.....	87
156	Chapter 12 general .....	87
	<b>Chapter 13 – Rules: Land Use on Lake or River Beds and Regionally Significant Wetlands .....</b>	<b>92</b>
96	Rule 13.2.1.1 - Erection or placement of fence, pipe, line or cable over the bed.....	92
97	Rule 13.2.1.2 - Erection or placement of pipe, line or cable on or under the bed.....	92
99	Rule 13.2.1.5 - Erection or placement of maimai.....	93
100	Rule 13.2.1.6 - Erection or placement of whitebait stand or eel trap .....	93
101	Rule 13.2.1.7 - Erection or placement of bridge, boardwalk or culvert.....	93
103	Rule 13.2.2.1 - Erection or placement - restricted discretionary activity .....	94
106	Rule 13.3.1.1 - Repair or maintenance of structure.....	94
107	Rule 13.3.1.2 - Extension, alteration, replacement or reconstruction of structure .....	95
108	Rule 13.3.2.1 - Extension, alteration, replacement or reconstruction of structure - restricted discretionary activity .....	95
110	Rule 13.4.1.1 - Demolition or removal of a structure.....	95
111	Rule 13.4.2.1 - Demolition or removal of a structure - restricted discretionary activity.....	96
114	Rule 13.5.1.1 - Disturbance of the bed general.....	96
116	Rule 13.5.1.5A - Alteration of Regionally Significant Wetland associated with plant material.....	97
117	Rule 13.5.1.6 - Extraction of alluvium .....	97
118	Rule 13.5.1.8 - Disturbance by livestock.....	97
119	Rule 13.5.2.1 - Extraction of alluvium - restricted discretionary activity.....	99

120	Rule 13.5.3.2 - Alteration of Regionally Significant Wetland - discretionary activity .....	99
121	Rule 13.6.1.1 - Introduction of pest plants general .....	99
122	Rule 13.6.2.0 - Introduction or planting of New Zealand native plant.....	100
123	Rule 13.6.3.1 - Introduction or planting of vegetation - discretionary activity .....	101
124	Rule 13.7.1.2 - Removal or clearance of exotic plant material.....	102
125	Rule 13.7.2.1 - Removal of pest plants - controlled activity.....	102
126	Rule 13.7.3.1 - Removal or clearance of plant material - discretionary activity.....	103
155	Chapter 13 general .....	103
	<i>Protection general</i> .....	109
157	Drain maintenance.....	109
161	Protection general.....	110
162	Generic permitted activity condition for wetlands protection.....	111
	<i>Financial contributions</i> .....	113
10	Financial contributions policy (Policy 10.4.2A and Ch.17).....	113
165	Financial contributions rules.....	115
	<b>Part 3: Schedules and maps</b> .....	<b>117</b>
	<i>Schedule 9 general</i> .....	117
200	Schedule 9.....	117
	<i>Mapping of Schedule 9 wetlands general</i> .....	119
199	Mapping of Schedule 9 wetlands general .....	119
	<i>Schedule 10 and non-Regionally Significant Wetlands</i> .....	120
600	Schedule 10 and non-Regionally Significant Wetlands.....	120
	<i>Specific Schedule 9 wetlands</i> .....	121
201	Schedule 9 - Akatore Creek Swamp (#1, Map F46).....	121
208	Schedule 9 - Big Boggy Swamp (#8, Map F1) .....	121
223	Schedule 9 - Chapman Road Inland Saline Wetland (#23, Map F18).....	121
232	Schedule 9 - Cross Eden Creek Marsh Complex (#32, Map F16).....	122
235	Schedule 9 - Diamond Lake Wetland (#35, Map F3).....	122
236	Schedule 9 - Dingle Lagoon (#36, Map F1) .....	122
240	Schedule 9 - Ellison Saltmarsh (#40, Map F61) .....	123
244	Schedule 9 - Flat Top Hill Ephemeral Wetlands (#44, Map F19).....	123
252	Schedule 9 - Glenorchy Lagoon Wetland (#52, Map F9).....	123
255	Schedule 9 - Great Moss Swamp (#55, Maps F29 & F30).....	123
261	Schedule 9 - Hoopers Inlet Swamp (#61, Map F58).....	124
270	Schedule 9 - Kemp Road Lagoon (#70, Map F65) .....	124
276	Schedule 9 - Lake Reid Wetland (#76, Map F3).....	124
277	Schedule 9 - Lake Tuakitoto Wetland (#77, Map F43).....	125
284	Schedule 9 - Loch Loudon Fen Complex (#84, Map F50).....	125

285	Schedule 9 - Loch Luella Fen Complex (#85, Maps F50 & F51).....	126
287	Schedule 9 - Lower Coutts Gully Swamp (#87, Map F46).....	126
288	Schedule 9 - Lower Manorburn Dam Margins (#88, Map F15).....	127
293	Schedule 9 - Makarora Flat Swamp Complex (#93, Map F1).....	127
300	Schedule 9 - McGregor Swamp (#100, Map F61).....	128
302	Schedule 9 - McLachlan Road Marsh (#102, Map F61).....	128
315	Schedule 9 - Okia Flat Wetland Management Area (#115, Map F68).....	128
320	Schedule 9 - Papanui Inlet Saltmarsh (#120, Map F59).....	128
323	Schedule 9 - Pleasant River Estuary Wetland Complex (#123, Map F67).....	129
337	Schedule 9 - Shotover River Confluence Swamp (#137, Map F5).....	129
339	Schedule 9 - Stirling Marsh Complex (#139, Map F43).....	130
345	Schedule 9 - Tahakopa Marsh Complex (#145, Map F4).....	130
349	Schedule 9 - Te Matai Marsh Complex (#149, Map F68).....	131
351	Schedule 9 - Three Stones Fen Complex (#151, Map F53).....	131
356	Schedule 9 - Trig Q Ephemeral Pool (#156, Map F55).....	131
361	Schedule 9 - Upper Taieri Wetlands Complex (#161, Maps F22 to F28).....	131
364	Schedule 9 - Waianakarua River Estuary Swamp (#164, Map F65).....	132
365	Schedule 9 - Waikouaiti River Estuary Wetland Complex (#165, Map F61).....	133
367	Schedule 9 - Waipori/Waiholo Wetland Complex (#167, Maps F48 & F49).....	133
371	Schedule 9 - Te Hua Taki Wetland (#171, Map F66).....	133
399	Schedule 9 - All other wetlands not otherwise listed.....	134
<b>Part 4: Methods other than Rules .....</b>		<b>135</b>
<i>Promotion, information and funding.....</i>		<i>135</i>
14	Policy 10.4.6 - Promotion of wetlands .....	135
148	Funding.....	136
164	Chapter 15 - Methods other than Rules .....	137
<i>Wetland values information and Wetland Inventory .....</i>		<i>138</i>
151	Wetland Inventory.....	138
400	Schedule 9 - Wetlands values in Schedule 9.....	139
<b>Part 5: General.....</b>		<b>141</b>
<i>Miscellaneous .....</i>		<i>141</i>
150	RMA streamlining and simplifying.....	141
143	Minor and consequential changes .....	141
158	Glossary.....	142
154	Plan general.....	142
<i>General support and opposition .....</i>		<i>143</i>
144	General opposition .....	143

145	General support .....	144
	<i>Decisions requested beyond the scope of the proposed plan change</i> .....	<i>147</i>

## Part 1: Regionally Significant Wetlands and values

### What is a Regionally Significant Wetland

#### 7.139 Policy 10.4.1A - Definition of a Regionally Significant Wetland

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Treble Cone Investments Limited	2	Amend	Delete 10.4.1A(c).	<ul style="list-style-type: none"> <li>Remove provisions that relate to wetlands higher than 800m.</li> <li>Satisfies concerns in relation to wetlands above 800m asl.</li> </ul>
↳ Trustpower Limited	102	Support submission 2, Ref. 7.139		
↳ Otago Fish & Game Council	103	Oppose submission 2, Ref. 7.139		<ul style="list-style-type: none"> <li>Alpine wetlands are a threatened habitat for Paradise Shelduck.</li> <li>There is no reason to remove alpine wetlands from the blanket protection on the basis of existing skifield operations in a few locations.</li> </ul>
↳ Contact Energy Limited	107	Support in part submission 2, Ref. 7.139		<ul style="list-style-type: none"> <li>Opposes entire definition of a Regionally Significant Wetland.</li> <li>Process classifying the wetlands as regionally significant was not robust, which has implications for the objectives, policies and rules.</li> </ul>
Treble Cone Investments Limited	2	Amend	Provide for wetlands within Ski Area Sub Zones to be excluded from definition of Regionally Significant Wetlands in 10.4.1A.	No reason given.
↳ Otago Fish & Game Council	103	Oppose submission 2, Ref. 7.139		<ul style="list-style-type: none"> <li>Alpine wetlands are a threatened habitat for Paradise Shelduck.</li> <li>There is no reason to remove alpine wetlands from the blanket protection on the basis of existing skifield operations in a few locations.</li> </ul>
Solid Energy New Zealand Ltd	5	Amend	Remove 10.4.1A(c) and replace with: (c) A wetland higher than 800 metres above sea level which has been subjected to an evaluation confirming its ecological values against the ecological criteria detailed in Schedule 9.	<ul style="list-style-type: none"> <li>Definition of Regionally Significant Wetland is extremely broad given all 'wetlands' above a nominal 800m above sea level mark automatically trigger a regional significance status and subsequent protection.</li> <li>A nominal altitude of 800m above sea level is not an effective gauge of ecological significance, which may be confirmed by survey or ground-truthing.</li> <li>Submitter holds permit for exploration of a lignite deposit in Home Hills / Hawkdun area and future mining could take place above 800m above sea level.</li> <li>Proposed definition of Regionally Significant Wetland would constrain future mining. Mining would require modification to existing landforms for access and extraction. If there is a wetland 800m above sea level within the resource envelope, this modification would have a non-complying activity status, regardless of the wetland's ecological significance.</li> <li>This constraint is unsupported by ecological information, and would hinder access to a resource which is of value to Otago.</li> </ul>
↳ Meridian Energy Limited	101	Oppose submission 5, Ref. 7.139		<ul style="list-style-type: none"> <li>Agree that the classification of wetlands 800m asl as significant is arbitrary, however, use of the term "Regionally Significant Wetland" should only apply to those wetlands identified in Schedule 9 or via the additional plan change process.</li> </ul>
↳ Trustpower Limited	102	Support in part submission 5, Ref. 7.139		<ul style="list-style-type: none"> <li>Satisfies concerns in relation to wetlands above 800m asl, providing it is amended to specifically refer to "confirming it has one or more of the regionally significant wetland values contained in Policy 10.4.1".</li> <li>Preferable if all wetlands containing regionally significant values have been identified and already scheduled as such in the Water Plan prior to new Plan Change 2 provisions being adopted.</li> </ul>
↳ Otago Fish & Game Council	103	Oppose submission 5, Ref. 7.139		<ul style="list-style-type: none"> <li>Making the remaining wetlands above 800 metres asl subject to a further ecological assessment prior to deeming them regionally significant is contrary to the purposes of this plan change.</li> </ul>
↳ Federated Farmers of New Zealand	105	Support in part submission 5, Ref. 7.139		<ul style="list-style-type: none"> <li>Ensures wetlands protected hold values of ecological significance rather than the nominal '800m above sea level'.</li> </ul>
↳ Royal Forest and Bird Protection Society of New Zealand Inc	106	Oppose submission 5, Ref. 7.139		<ul style="list-style-type: none"> <li>Only 9.4% of NZ's wetlands remain and it is a national priority to protect remaining wetlands, and the draft NPS foreshadows the</li> </ul>

Summary of Decisions Requested (submissions and further submissions) on Proposed Plan Change 2 (Regionally Significant Wetlands)  
Regional Plan: Water for Otago 23 November 2011

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
				importance of protecting wetlands. • Wetlands above 800m are particularly important in enhancing water quantity and deserve to be protected.
↳ Contact Energy Limited	107	Oppose in part submission 5, Ref. 7.139		• Supports seeking of more robustness around including wetlands above 800m as Regionally Significant Wetlands. However, decision requested does not go far enough (see reasons in Contact's submission).
↳ Department of Conservation	108	Neither support, nor oppose submission 5, Ref. 7.139		• Requires an assessment of values in order to determine significance – reason why Schedule 10 didn't work. • In addition all wetlands 800m and above are likely to meet other regionally significant criteria.
NZSki Limited	11	Amend	That the definition of regionally significant wetlands exempts:  (a) wetlands in or around its operations not already identified in statutory or other legal instruments as significant from the definition of "wetlands" or description of "regionally significant wetlands" in Proposed Plan Change 2: and (b) ski field operations (including existing use management and future development) from the restrictions otherwise proposed in Proposed Plan Change 2.	•Definition of Regionally Significant Wetland is too broad as includes all wetlands (including shallow pools) above 800m. •Water levels at this height are dynamic and hard to monitor/assess. •Majority of NZSki's land is above 800m, they must operate at high altitude. •Proposed changes could restrict use, management, growth and development of NZSki's ski fields, or could impose costly financial contributions for unavoidable effects. •Current planning and consent regimes have been rigorous and all effects of the ski fields were assessed (including for wetlands).
↳ Otago Fish & Game Council	103	Oppose submission 11, Ref. 7.139		• Further submitter is opposed to the removal of alpine wetlands from the schedule. • The burden of proof to prevent ecological damage to wetlands needs to remain on the applicant, rather than on Council.
↳ Department of Conservation	108	Oppose submission 11, Ref. 7.139		• These activities will allow damage to occur to wetlands within Ski Areas = adverse effects
↳ Royal Forest and Bird Protection Society of New Zealand Inc	106	Oppose submission 11, Ref. 7.139		• Ski field activities and developments can cause significant adverse effects to wetlands and should not be exempt from planning restrictions.
Cardrona Alpine Resort	15	Amend	Delete 10.4.1A(c).	•Remove provisions that relate to wetlands higher than 800m. •Skifield operations have not been considered in the proposal, and are a vital part of the economy.
↳ Trustpower Limited	102	Support submission 15, Ref. 7.139		• Satisfies concerns in relation to wetlands above 800m asl.
↳ Otago Fish & Game Council	103	Oppose submission 15, Ref. 7.139		• Opposed to removal alpine wetlands from the schedule.
↳ Contact Energy Limited	107	Support in part submission 15, Ref. 7.139		•Opposes entire definition of a Regionally Significant Wetland. •Process classifying the wetlands as regionally significant was not robust, which has implications for the objectives, policies and rules.
↳ Department of Conservation	108	Oppose submission 15, Ref. 7.139		• All wetlands 800m and above are likely to meet other regionally significant criteria.
Cardrona Alpine Resort	15	Amend	Provide for wetlands within Ski Area Sub Zones to be excluded from definition of Regionally Significant Wetlands in 10.4.1A.	•Skifield operations have not been considered in the proposal, and are a vital part of the economy. • Further submitter is opposed to remove alpine wetlands from the schedule.
↳ Otago Fish & Game Council	103	Oppose submission 15, Ref. 7.139		• All of these activities will allow damage to occur to wetlands within Ski Areas which may result in adverse effects.
↳ Department of Conservation	108	Oppose submission 15, Ref. 7.139		• Lack of delineation between aquatic values and wetland values makes the proposal slightly confusing. •Aquatic and wetland areas are distinct with quite different plant communities. •This will make the rules work more clearly, and give greater guidance to people.
Lake Waiholo Waipori Wetlands Society Inc.	20	Amend	Amend to more clearly delineate between what is defined as aquatic, wetlands, and land.	•Lack of delineation between aquatic values and wetland values makes the proposal slightly confusing. •Aquatic and wetland areas are distinct with quite different plant communities. •This will make the rules work more clearly, and give greater guidance to people.
↳ Trustpower Limited	102	Support submission 20, Ref. 7.139		No reason given.
↳ Otago Fish & Game Council	103	Support submission 20, Ref. 7.139		No reason given.
Contact Energy Limited	30	Oppose	That the definition of a Regionally Significant Wetland (which includes all wetlands over 800m above sea level) be not approved.	•Process classifying the wetlands as regionally significant was not robust. •Wetlands above 800m should not be automatically included if these are

Summary of Decisions Requested (submissions and further submissions) on Proposed Plan Change 2 (Regionally Significant Wetlands)  
Regional Plan: Water for Otago 23 November 2011



SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
				not accurately mapped/plotted and if no values assessment has been done on them.
↳ Trustpower Limited	102	Support submission 30, Ref. 7.139		• Satisfies concerns in relation to wetlands above 800m asl.
↳ Otago Fish & Game Council	103	Oppose submission 30, Ref. 7.139		• The burden of proof of the lack of significance of wetlands, especially alpine wetlands, needs to remain on the applicant, rather than on Council.
↳ Federated Farmers of New Zealand	105	Support in part submission 30, Ref. 7.139		• Ensures only wetlands undergoing appropriate values assessments are included
↳ Department of Conservation	108	Oppose submission 30, Ref. 7.139		• All wetlands 800m and above are likely to meet other regionally significant criteria
Meridian Energy Limited	32	Amend	Amend: "A Regionally Significant Wetland is: [...] (b) A wetland physically within a wetland management area listed in Schedule 9; or <del>(e) A wetland higher than 800 metres above sea level."</del>	•Arbitrary classification on elevation; many wetlands will not meet habitat, flora, fauna or cultural values. •More restrictive management is inappropriate given values not known.
↳ Trustpower Limited	102	Support submission 32, Ref. 7.139		• Satisfies concerns in relation to wetlands above 800m asl.
↳ Otago Fish & Game Council	103	Oppose submission 32, Ref. 7.139		• Opposes the removal of the alpine wetland protection rule.
↳ Federated Farmers of New Zealand	105	Support in part submission 32, Ref. 7.139		• Wetlands above 800m still need to be included but should have a values assessment aspect.
↳ Contact Energy Limited	107	Support in part submission 32, Ref. 7.139		•Opposes entire definition of a Regionally Significant Wetland •Process classifying the wetlands as regionally significant was not robust, which has implications for the objectives, policies and rules.
↳ Department of Conservation	108	Oppose submission 32, Ref. 7.139		• All wetlands 800m and above are likely to meet other regionally significant criteria.
TrustPower Limited	40	Amend	Amend: "... (c) A wetland higher than 800 metres above sea level <u>with one or more regionally significant wetland values.</u> "	•Only wetlands which have regionally significant values should be regionally significant wetlands, doing otherwise is unjustified. •All wetlands above 800m will not necessarily have a regionally significant value, especially with the broad definition of wetland.
↳ Otago Fish & Game Council	103	Oppose submission 40, Ref. 7.139		• Alpine wetlands have significant values, simply because they are rare. • The burden of proof should remain on the developer or user, rather than on Council.
↳ Federated Farmers of New Zealand	105	Support in part submission 40, Ref. 7.139		• Supports wetlands undergoing consistent values assessments
↳ Contact Energy Limited	107	Oppose in part submission 40, Ref. 7.139		• Supports seeking of more robustness around including wetlands above 800m as Regionally Significant Wetlands. However, decision requested does not go far enough (see reasons in Contact's submission).
↳ Department of Conservation	108	Oppose submission 40, Ref. 7.139		• Requires an assessment of values in order to determine significance – reason why Schedule 10 didn't work. All wetlands 800m and above are likely to meet other regionally significant criteria.
TrustPower Limited	40	Amend	Resolution of confusion around the separation of wetlands identified in Schedule 9 that are not "wetland management areas" from those that are.	The reference to "wetland management area" in this Policy is confusing to land users as no definition of "wetland management area" is provided in Water Plan.
↳ Meridian Energy Limited	101	Support submission 40, Ref. 7.139		• Clarification of the different terminology would be beneficial.
↳ Otago Fish & Game Council	103	Support submission 40, Ref. 7.139		• Definition of "wetland management area" from S 23B of the Conservation Act should be provided.
Department of Conservation	42	Support	Retain with no amendments.	•Consistent with Part 2 RMA. •Gives guidance when considering activities in wetlands. •Maintains flows in streams sourced from wetlands which protects habitat of indigenous threatened fish.

Summary of Decisions Requested (submissions and further submissions) on Proposed Plan Change 2 (Regionally Significant Wetlands)  
Regional Plan: Water for Otago 23 November 2011

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
				•Gives effect to the NPS Freshwater Management.
↳ Trustpower Limited	102	Oppose submission 42, Ref. 7.139		• Relief being sought is inconsistent with Trustpower's submission.
↳ Otago Fish & Game Council	103	Support submission 42, Ref. 7.139		No reason given.
↳ Contact Energy Limited	107	Oppose submission 42, Ref. 7.139		• The proposed definition of a Regionally Significant Wetland is not consistent with Part 2 of the RMA and does not give effect to the NPS Freshwater Management.
New Zealand Railways Corporation	46	Amend	Add definition to the glossary section of the Water Plan which specifically excludes permanently dry areas from regionally significant wetland areas.	•No definition of Regionally Significant Wetland in the Water Plan. •Where activities occur on 'dry' areas they should be permitted and the definition should clarify this.
↳ Otago Fish & Game Council	103	Oppose submission 46, Ref. 7.139		• Dry areas could be vitally important.
↳ Federated Farmers of New Zealand	105	Support in part submission 46, Ref. 7.139		• Ensures activities not impacting on wetlands or occurring on wetland areas are permitted
New Zealand Railways Corporation	46	Amend	Add definition to the glossary section of the Water Plan which clarifies that those activities that occur on 'dry' land; such as land transport corridors located within the wider boundary area of the Regionally Significant Wetland shown in the revised Maps accompanying Plan Change 2 are not intended to be affected by the new controls.	Where activities occur on 'dry' areas they should be permitted and the definition should clarify this. Only those activities that impact on wetlands should be captured by the new controls.
↳ Meridian Energy Limited	101	Support submission 46, Ref. 7.139		• Identification of "Regionally Significant Wetlands" should be cognisant of existing human influences and areas of 'dry' land. • Boundaries and characteristics of Regionally Significant Wetlands should be appropriately ground-truthed.
↳ Trustpower Limited	102	Support submission 46, Ref. 7.139		No reason given.
↳ Otago Fish & Game Council	103	Oppose submission 46, Ref. 7.139		• Dry areas could be vitally important.
↳ Federated Farmers of New Zealand	105	Support in part submission 46, Ref. 7.139		• Ensures activities not impacting on wetlands or occurring on wetland areas are permitted
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Delete policy and insert in more appropriate place.	•Not a policy; should either be a footnote, explanatory note or added to glossary.
↳ Otago Fish & Game Council	103	Support submission 47, Ref. 7.139		No reason given.

## 8 Policy 10.4.1B - Schedule 9

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
TrustPower Limited	40	Amend	Amend 10.4.1B: "Schedule 9 lists those Regionally Significant Wetlands that are mapped in Maps F1-F68 and contain one or more regionally significant wetland values and their regionally significant wetland values as per Policy 10.4.1."	•As proposed the policy implies that values information will not be listed in the Plan. •Values information established for each Significant Wetland should be listed in the Water Plan because this information needs to be assessed under proposed provisions.
↳ Otago Fish & Game Council	103	Support in part submission 40, Ref. 8		• Wetland values should be added to the plan.
↳ Royal Forest and Bird Protection Society of New Zealand Inc	106	Oppose submission 40, Ref. 8		• Values are more appropriate in a Inventory as any updates can be added without undergoing a plan change
↳ Contact Energy Limited	107	Support in part submission 40, Ref. 8		• Opposes Schedule 9 due to its lack of robustness. • Opposes the removal of descriptive information on listed wetlands from the Plan and the use of a non-regulatory inventory. (see Contact's submission).
↳ Department of Conservation	108	Neither support, nor oppose submission 40, Ref. 8		• If put into Plan, any additions of or changes to values require Plan Changes – if in Inventory this won't be necessary

Summary of Decisions Requested (submissions and further submissions) on Proposed Plan Change 2 (Regionally Significant Wetlands)  
Regional Plan: Water for Otago 23 November 2011

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Department of Conservation	42	Support	Retain with no amendments.	<ul style="list-style-type: none"> <li>•Consistent with Part 2 RMA.</li> <li>•Gives guidance when considering activities in wetlands.</li> <li>•Maintains flows in streams sourced from wetlands which protects habitat of indigenous threatened fish.</li> <li>•Gives effect to the NPS Freshwater Management.</li> </ul>
↳ Trustpower Limited	102	Oppose submission 42, Ref. 8		• Relief being sought is inconsistent with Trustpower's submission.
↳ Otago Fish & Game Council	103	Support submission 42, Ref. 8		No reason given.
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Delete policy and insert in more appropriate place.	•Not a policy; should either be a footnote, explanatory note or added to glossary.
↳ Otago Fish & Game Council	103	Support submission 47, Ref. 8		No reason given.

## 159 Chapter 16

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
TrustPower Limited	40	Amend	<p>Include in the Water Plan formal guidance on what an assessment of effects on a wetland above 800m should entail.</p> <p>Include the following information requirement:</p> <p><i>"Any activity managed by this Plan which has the potential to affect any wetland higher than 800 metres, must consider:</i></p> <p><i>1. Whether the wetland is associated with one or more of the regionally significant values identified in Policy 10.4.1; and if so</i></p> <p><i>2. The wetland is a Regionally Significant Wetland and the applicant must provide the following information:</i></p> <p><i>a. An assessment of the activity against the rules and standards pertaining to Regionally Significant Wetlands;</i></p> <p><i>b. An assessment of the effects of the activity on the wetland; and</i></p> <p><i>c. An assessment of the effects of the activity on any regionally significant wetland value."</i></p>	<ul style="list-style-type: none"> <li>• Guidance is important given that wetlands above 800m are not proposed to be listed in Water Plan.</li> </ul>
↳ Meridian Energy Limited	101	Oppose submission 40, Ref. 159		<ul style="list-style-type: none"> <li>• Objectives, policies and rules governing the management of "Regionally Significant Wetland" should only apply to those wetlands which have been appropriately assessed and identified as 'significant' in accordance with Schedule 9 and a public consultation process.</li> </ul>
↳ Otago Fish & Game Council	103	Oppose submission 40, Ref. 159		<ul style="list-style-type: none"> <li>• Alpine wetlands are significant and should not be subject to any different rules from those affecting other regionally significant wetlands.</li> </ul>
↳ Royal Forest and Bird Protection Society of New Zealand Inc	106	Oppose submission 40, Ref. 159		<ul style="list-style-type: none"> <li>• Only 9.4% of NZ's wetlands remain and it is a national priority to protect remaining wetlands, and the draft NPS foreshadows the importance of protecting wetlands.</li> <li>• Wetlands above 800m are particularly important in enhancing water quantity and deserve to be protected.</li> </ul>
↳ Department of Conservation	108	Oppose submission 40, Ref. 159		<ul style="list-style-type: none"> <li>• Requires an assessment of values in order to determine significance – reason why Schedule 10 didn't work.</li> <li>• All wetlands 800m and above are likely to meet other regionally significant criteria</li> </ul>

## Regionally Significant Wetland values

### 6.14 Policy 10.4.1 - Definition of Regionally Significant Wetland values

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Otago Fish & Game Council	8	Amend	Add criterion: <i>A10) Importance of this wetland within the wider network of wetlands within its catchment.</i>	<ul style="list-style-type: none"> <li>• Proposed plan only considers wetlands in isolation and doesn't consider networks of wetlands as important (e.g. for river flow stability).</li> </ul>
↳ Meridian Energy Limited	101	Oppose submission 8, Ref. 6.14		<ul style="list-style-type: none"> <li>• The hydrological characteristics of wetlands are already identified as a criterion of regionally significant wetland values, relief proposed by submitter is repetitive and unnecessary.</li> </ul>
↳ Trustpower Limited	102	Oppose submission 8, Ref. 6.14		<ul style="list-style-type: none"> <li>• Not an appropriate criteria for wetlands to be classified as "regionally significant" – all wetlands are part of the hydrological system.</li> </ul>
↳ Federated Farmers of New Zealand	105	Oppose submission 8, Ref. 6.14		<ul style="list-style-type: none"> <li>• Prefers provision as proposed</li> </ul>
↳ Royal Forest and Bird Protection Society of New Zealand Inc	106	Support submission 8, Ref. 6.14		<ul style="list-style-type: none"> <li>• The ecological importance of networks of wetlands are recognised in the criterion "Ecological Context" endorsed by the Environment Court as criteria for identifying significant wetlands.</li> </ul>
↳ Department of Conservation	108	Support submission 8, Ref. 6.14		<ul style="list-style-type: none"> <li>• Often the sum of the parts is greater than the whole.</li> </ul>
Federated Farmers of New Zealand	29	Support	Adopt the provision as proposed.	<ul style="list-style-type: none"> <li>• Supports the incorporation of wetland values within one provision, and</li> </ul>

Summary of Decisions Requested (submissions and further submissions) on Proposed Plan Change 2 (Regionally Significant Wetlands)  
Regional Plan: Water for Otago 23 November 2011

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
				the addition of "significant" to value A9.
↳ Trustpower Limited	102	Oppose submission 29, Ref. 6.14		• Relief being sought is inconsistent with Trustpower's submission.
Meridian Energy Limited	32	Amend	Amend policy 10.4.1: "A1 Habitat for regionally, nationally or internationally rare or threatened species or communities; ... <del>A7 High diversity of indigenous flora and fauna;</del> <del>A8 Regionally significant habitat for waterfowl; and</del> A9 Significant hydrological values including maintaining water quality or low flows, or reducing flood flows."	•The new characteristics/identification criteria listed in A7 to A8 is unnecessary.
↳ Trustpower Limited	102	Support submission 32, Ref. 6.14		No reason given.
↳ Otago Fish & Game Council	103	Oppose submission 32, Ref. 6.14		• Opposes the removal of the words "regionally significant habitat for waterfowl".
↳ Department of Conservation	108	Oppose submission 32, Ref. 6.14		• Criteria A1, A7, A8 and A9 as proposed identify significant features of wetlands.
Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou, and Hokonui Runanga	38	Amend	Add Kai Tahu cultural and spiritual beliefs, values and uses to policy 10.4.1 A6.	•Provides insufficient recognition of the role of nga Runanga as kaitiaki. •All cultural and spiritual beliefs, values and uses associated with wetlands should be protected.
↳ Otago Fish & Game Council	103	Support submission 38, Ref. 6.14		• Runanga values should be included within the plan.
↳ Federated Farmers of New Zealand	105	Oppose submission 38, Ref. 6.14		• Prefer provision as proposed
↳ Department of Conservation	108	Support submission 38, Ref. 6.14		• These are another significant feature of wetlands. Support as gives effect to Treaty of Waitangi Principles
Hawksbury Lagoon Inc	39	Amend	In identifying significant wetlands, ensure adequate weight is given to the pattern of wetlands in maintaining corridors and feeding sites for waterfowl.	No reason given.
↳ Meridian Energy Limited	101	Oppose submission 39, Ref. 6.14		• Importance of wetlands for providing habitat for the life-cycle of indigenous fauna is already captured in criterion A2, relief requested is considered repetitive and unnecessary.
↳ Trustpower Limited	102	Oppose submission 39, Ref. 6.14		• Not an appropriate criteria for wetlands to be classified as "regionally significant" – all wetlands form part of the wider interconnected hydrological system..
↳ Otago Fish & Game Council	103	Support submission 39, Ref. 6.14		No reason given.
↳ Department of Conservation	108	Support submission 39, Ref. 6.14		• Often the sum of the parts is greater than the whole.
TrustPower Limited	40	Amend	Amend: "The regionally significant wetland values of Otago's wetlands <del>are</del> include one or more of the following; . . ."	•Clarifies that only one regionally significant value is needed for a wetland to be regionally significant.
↳ Otago Fish & Game Council	103	Support submission 40, Ref. 6.14		• Supports the "one or more" wording.
↳ Department of Conservation	108	Support submission 40, Ref. 6.14		• This amendment better identifies that 1 value may be the feature that gives a wetland its significance.
TrustPower Limited	40	Amend	Amend: " . . . A8 Regionally significant habitat for indigenous waterfowl; and . . ."	•Better reflects s 6(c) RMA, and sets a practical threshold test.
↳ Meridian Energy Limited	101	Support in part submission 40, Ref. 6.14		•Agrees that the focus of the criterion under Policy 10.4.1 should relate to indigenous fauna. •Submitters suggestions would better reflect section 6(c) of the RMA.
↳ Otago Fish & Game Council	103	Oppose submission 40, Ref. 6.14		• Wetlands are significant for their non-indigenous gamebird fowl.
Department of Conservation	42	Support	Retain with no amendments.	•Consistent with Part 2 RMA. •Gives guidance when considering activities in wetlands. •Maintains flows in streams sourced from wetlands which protects habitat of indigenous threatened fish. •Gives effect to the NPS Freshwater Management.

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
↳ Trustpower Limited	102	Oppose submission 42, Ref. 6.14		• Relief being sought is inconsistent with Trustpower's submission.
↳ Otago Fish & Game Council	103	Support submission 42, Ref. 6.14		No reason given.
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Amend: "The regionally significant wetland values of Otago's wetlands <u>that are identified in Schedule 9</u> are: ..."	• Values inconsistent with case law, such as criterion for representativeness. • Significance criterion used to identify wetlands in Schedule 9 is incomplete and it's possible not all significant wetlands have been captured.
↳ Trustpower Limited	102	Oppose submission 47, Ref. 6.14		• Council did not intend for non-scheduled wetlands to be included in the regionally significant wetland provisions.
↳ Otago Fish & Game Council	103	Support submission 47, Ref. 6.14		No reason given.
↳ Department of Conservation	108	Support submission 47, Ref. 6.14		• Schedule 9 "is not exhaustive" and does not necessarily include all significant wetlands in Otago.

## 11 Policy 10.4.3 - Identification of Type B values

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Federated Farmers of New Zealand	29	Support	Supports the incorporation of wetland values within one provision.	No reason given.

## Part 2: Protection of wetlands

### Chapter 10 - Wetlands

#### 1 Introduction to Chapter 10

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Gregory Kerr	35	Amend	Include statement on the importance of wetlands.	•Can be linked or written into future consents
↳ Otago Fish & Game Council	103	Support submission 35, Ref. 1		No reason given.

#### 5 Objective 10.3.1 - Maintain or enhance wetlands

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Meridian Energy Limited	32	Support	Retain objective 10.3.1 as notified.	•Provides appropriate direction to resource users with respect to management expectations for wetland values.
Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou, and Hokonui Runanga	38	Oppose	Opposes removal of Kai Tahu cultural and spiritual beliefs, values and uses from objective 10.3.1.	•Provides insufficient recognition of the role of nga Runanga as kaitiaki. •All cultural and spiritual beliefs, values and uses associated with wetlands should be protected.
↳ Meridian Energy Limited	101	Oppose submission 38, Ref. 5		• Amendment as proposed by submitter would alter the balance currently provided by Objective 10.3.1. • Current drafting of Objective 10.3.1 is considered to provide appropriate direction to the management expectations for <u>all</u> values associated with wetlands.
↳ Otago Fish & Game Council	103	Support submission 38, Ref. 5		• Runanga values should be included within the plan.
TrustPower Limited	40	Amend	Amend: "Otago's <u>regionally significant</u> wetlands and their values and services will be maintained or enhanced for present and future generations."	•Provide better alignment with other provisions, and avoid confusion with broad definition of wetland in the Water Plan.
↳ Otago Fish & Game Council	103	Oppose submission 40, Ref. 5		• This definition should remain as "wetlands".
↳ Royal Forest and Bird Protection Society of New Zealand Inc	106	Oppose submission 40, Ref. 5		• The RMA requires robust mechanisms for all wetlands not just regionally significant wetlands.
Department of Conservation	42	Amend	Amend: "Otago's wetlands and their values and <u>ecosystem</u> services will be maintained <del>or</del> and enhanced for present and future generations."	•Amend so that the services provided by wetlands are clarified. These services include providing base flows for streams, especially during critical low flow periods and removing silt and nutrients from any water entering the wetland and purifying it before discharge downstream. •Objective gives effect to section 30(1)(c)(iia) RMA. •Objective gives effect to the NPS Freshwater Management 2011.
↳ Meridian Energy Limited	101	Oppose submission 42, Ref. 5		• Not feasible or realistic to suggest that all wetland values in the Otago Region be maintained and enhanced.
↳ Otago Fish & Game Council	103	Support submission 42, Ref. 5		No reason given.
↳ Contact Energy Limited	107	Oppose submission 42, Ref. 5		• It will not always be necessary or appropriate to enhance a wetland.
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Delete Objective and replace with: "To recognise and provide for the protection of the natural character, biodiversity and other values of wetlands in the regions."	•Objective fails to form a framework to protect wetlands and their margins, and set out all that is required by Part 2 RMA.
↳ Meridian Energy Limited	101	Oppose submission 47, Ref. 5		• Current drafting of Objective 10.3.1 provides appropriate direction on the management expectations for <u>all</u> values associated with wetlands. • Current drafting also is considered to best reflect the sustainable

Summary of Decisions Requested (submissions and further submissions) on Proposed Plan Change 2 (Regionally Significant Wetlands)  
Regional Plan: Water for Otago 23 November 2011

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
				<i>management purpose of the RMA.</i>
↳ Trustpower Limited	102	Oppose submission 47, Ref. 5		<ul style="list-style-type: none"> <li>The existing Objective is more appropriate and sets a clear goal for the management of wetlands.</li> <li>The Act does not provide for the outright protection of wetlands – it provides for their protection from inappropriate subdivision, use and development.</li> </ul>
↳ Otago Fish & Game Council	103	Support submission 47, Ref. 5		No reason given.
↳ Department of Conservation	108	Support submission 47, Ref. 5		<ul style="list-style-type: none"> <li>Better encapsulates S 6(a) RMA requirements re: wetlands</li> </ul>

## 9 Policy 10.4.2 - Priority on avoiding adverse effects

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Otago Fish & Game Council	8	Support	Support for the preference of an "avoid" test where possible.	<ul style="list-style-type: none"> <li>Gives a strong signal the Regionally Significant Wetlands should be left alone.</li> </ul>
↳ OtagoNet Joint Venture	100	Oppose submission 8, Ref. 9		<ul style="list-style-type: none"> <li>Concerned with the primacy that has been given to avoiding adverse effects.</li> </ul>
↳ Trustpower Limited	102	Oppose submission 8, Ref. 9		<ul style="list-style-type: none"> <li>Relief being sought is inconsistent with Trustpower's submission.</li> </ul>
↳ Contact Energy Limited	107	Oppose submission 8, Ref. 9		<ul style="list-style-type: none"> <li>The RMA does not endorse a hierarchy of avoidance followed by remediation and mitigation.</li> </ul>
Otago Conservation Board	27	Support	Strongly support the intention to avoid adverse effects on wetlands rather than to remedy or mitigate such effects.	<ul style="list-style-type: none"> <li>No longer acceptable to merely remedy or mitigate effects.</li> </ul>
↳ OtagoNet Joint Venture	100	Oppose submission 27, Ref. 9		<ul style="list-style-type: none"> <li>Concerned with the primacy that has been given to avoiding adverse effects.</li> </ul>
↳ Trustpower Limited	102	Oppose submission 27, Ref. 9		<ul style="list-style-type: none"> <li>Relief being sought is inconsistent with Trustpower's submission.</li> </ul>
↳ Contact Energy Limited	107	Oppose submission 27, Ref. 9		<ul style="list-style-type: none"> <li>The RMA does not endorse a hierarchy of avoidance followed by remediation and mitigation.</li> </ul>
Meridian Energy Limited	32	Amend	Delete policy 10.4.2 and replace with: <u>"The adverse effects of activities on Regionally Significant Wetland shall be avoided where practicable and, otherwise, remedied or mitigated."</u>	<ul style="list-style-type: none"> <li>Overly restrictive; fails to acknowledge remediation/mitigation may be more appropriate.</li> <li>Priority to avoid doesn't reflect intent of Objective 10.3.1; objective doesn't preclude remediation and mitigation.</li> <li>S 5(2)(c) RMA not a strict hierarchy.</li> </ul>
↳ Trustpower Limited	102	Support in part submission 32, Ref. 9		No reason given.
↳ Otago Fish & Game Council	103	Oppose in part submission 32, Ref. 9		<ul style="list-style-type: none"> <li>Proposed amendment sets the test too low.</li> <li>The wording should be "where at all possible".</li> </ul>
↳ Federated Farmers of New Zealand	105	Support in part submission 32, Ref. 9		<ul style="list-style-type: none"> <li>Brings in a practicable element</li> </ul>
↳ Royal Forest and Bird Protection Society of New Zealand Inc	106	Oppose submission 32, Ref. 9		<ul style="list-style-type: none"> <li>Wetlands are severely threatened ecosystems. Avoid preference is an important priority.</li> </ul>
↳ Contact Energy Limited	107	Support submission 32, Ref. 9		<ul style="list-style-type: none"> <li>Supports Meridian's approach in principle – is in-keeping with the RMA.</li> </ul>
↳ Department of Conservation	108	Oppose submission 32, Ref. 9		<ul style="list-style-type: none"> <li>Wetlands are recognised nationally as a severely threatened ecosystem type hence avoid must be a priority.</li> </ul>
Clutha District Council	34	Amend	Delete: "Remedying or mitigating effects will be considered only where those effects cannot be avoided."	<ul style="list-style-type: none"> <li>The requirement to avoid adverse effects where possible is too strict and inflexible.</li> <li>It is counter to the regime set up in Part 5 RMA, which treats 'avoid', 'remedy' and 'mitigate' equally, and is also contrary to the established principle that the Act contemplates that activities can have adverse effects and still be acceptable.</li> <li>If provision remains it is inevitable that proposals will be opposed on the basis that effects can always be avoided by not doing anything.</li> </ul>
↳ OtagoNet Joint Venture	100	Support in part		<ul style="list-style-type: none"> <li>Agrees that the RMA accords an equal value to avoiding, remedying or</li> </ul>

Summary of Decisions Requested (submissions and further submissions) on Proposed Plan Change 2 (Regionally Significant Wetlands)  
Regional Plan: Water for Otago 23 November 2011



SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
		submission 34, Ref. 9		mitigating adverse effects.
↳ Trustpower Limited	102	Support submission 34, Ref. 9		No reason given.
↳ Otago Fish & Game Council	103	Oppose submission 34, Ref. 9		• An "avoid" test should be aimed at in most cases, with "remedy and mitigate" only acceptable if all possibilities to avoid have been exhausted.
↳ Federated Farmers of New Zealand	105	Support in part submission 34, Ref. 9		• Will ensure remediation and mitigation is given due weight
↳ Contact Energy Limited	107	Support in part submission 34, Ref. 9		• Supports reasoning in submission, but it suggests a hierarchy of avoidance followed by remediation and mitigation.
↳ Department of Conservation	108	Support submission 34, Ref. 9		• Avoidance should employed in the first instance given the scarcity of remaining wetlands.
TrustPower Limited	40	Amend	Replace proposed policy with: <u>"Adverse effects on Regionally Significant Wetlands and their regionally significant values identified in Schedule 9 should be avoided, remedied or mitigated."</u>	• Giving primacy to avoiding over remedying or mitigating is inconsistent with sustainable management as defined in the RMA and established case law. • If this primacy is intended to give effect to the proposed NPS on Indigenous Biodiversity, should recognise that this is subject to change.
↳ Otago Fish & Game Council	103	Oppose submission 40, Ref. 9		• Primacy must be given to "avoiding" effects, rather than remedying or mitigating.
↳ Federated Farmers of New Zealand	105	Support in part submission 40, Ref. 9		• Ensures consistency with principles of RMA
↳ Contact Energy Limited	107	Support submission 40, Ref. 9		• Supports Trustpower's approach in principle – is consistent with the RMA.
↳ Department of Conservation	108	Oppose submission 40, Ref. 9		• Wetlands are recognised nationally as a severely threatened ecosystem type hence avoid must be a priority.
Department of Conservation	42	Support	Retain with no amendments.	• Consistent with Part 2 RMA. • Gives guidance when considering activities in wetlands. • Maintains flows in streams sourced from wetlands which protects habitat of indigenous threatened fish. • Gives effect to the NPS Freshwater Management.
↳ OtagoNet Joint Venture	100	Oppose submission 42, Ref. 9		• Concerned with the primacy that has been given to avoiding adverse effects.
↳ Trustpower Limited	102	Oppose submission 42, Ref. 9		• Relief being sought is inconsistent with Trustpower's submission.
↳ Otago Fish & Game Council	103	Support submission 42, Ref. 9		No reason given.
↳ Contact Energy Limited	107	Oppose submission 42, Ref. 9		• The RMA does not endorse a hierarchy of avoidance followed by remediation and mitigation.
OtagoNet Joint Venture	43	Amend	Amend: <u>"Priority will be given to the avoidance of adverse effects of activities on Regionally Significant Wetlands and values. Remedying or mitigating adverse effects will be considered only where those effects cannot be avoided. Adverse effects on Regionally Significant Wetlands and their regionally significant values should be avoided, remedied or mitigated."</u>	• Primacy should not be given to avoiding adverse effects, over remedying or mitigating adverse effects. • Giving primacy to avoidance is inconsistent with sustainable management as defined in RMA and established case law.
↳ Trustpower Limited	102	Support submission 43, Ref. 9		No reason given.
↳ Otago Fish & Game Council	103	Oppose submission 43, Ref. 9		• Priority should remain on avoidance, rather than remedying or mitigating.
↳ Federated Farmers of New Zealand	105	Support in part submission 43, Ref. 9		• Ensures consistency with principles of sustainable management as defined in RMA
↳ Contact Energy Limited	107	Support submission 43, Ref. 9		• Supports OtagoNet JV's approach in principle – is consistent with the RMA.
↳ Department of Conservation	108	Oppose submission 43, Ref. 9		• Wetlands are recognised nationally as a severely threatened ecosystem type hence avoid must be a priority.
Royal Forest and Bird Protection Society of New Zealand Inc	47	Support	Support. No change.	• Appropriately recognises preferability of avoidance of adverse effects.
↳ OtagoNet Joint Venture	100	Oppose submission 47,		• Concerned with the primacy that has been given to avoiding adverse

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
		Ref. 9		effects.
↳ Trustpower Limited	102	Oppose submission 47, Ref. 9		• Relief being sought is inconsistent with Trustpower's submission.
↳ Otago Fish & Game Council	103	Support submission 47, Ref. 9		No reason given.
↳ Contact Energy Limited	107	Oppose submission 47, Ref. 9		• The RMA does not endorse a hierarchy of avoidance followed by remediation and mitigation.

### 153 Chapter 10 general

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Treble Cone Investments Limited	2	Amend	The locations identified as Ski Area Sub Zones in the Queenstown-Lakes District Plan should also be adopted as policy areas within the ORC Plan.	No reason given.
↳ Otago Fish & Game Council	103	Oppose submission 2, Ref. 153		<ul style="list-style-type: none"> <li>• Alpine wetlands are a threatened habitat for Paradise Shelduck.</li> <li>• There is no reason to remove alpine wetlands from the blanket protection on the basis of existing skifield operations in a few locations.</li> <li>• Existing consenting regime in relation to snow-making water ponds works well – no reason to make rules more permissive.</li> </ul>
Otago Fish & Game Council	8	Amend	Amend the objectives and policies to reflect that wetland boundaries are often indistinct and changeable.  Suggested wording of new policy: "Due to the seasonal variability of wetlands and their changing boundaries, resource consent applications on or near defined regionally significant wetland boundaries with likely wetland characteristics will be assessed to ensure that they have no adverse effect on the functioning of the wetland as a whole."	<ul style="list-style-type: none"> <li>• Proposed plan does not address issue of wetland transition and seasonal variability.</li> <li>• Suggested change enables assessment of effects of activities adjacent to wetland boundary.</li> </ul>
↳ OtagoNet Joint Venture	100	Oppose submission 8, Ref. 153		• Suggested wording seeks to ensure that activities will have no <b>adverse effects</b> . Concerned with the primacy that has been given to avoiding adverse effects.
↳ Meridian Energy Limited	101	Oppose submission 8, Ref. 153		<ul style="list-style-type: none"> <li>• Suggested policy is flawed – adopts a "no adverse effects" approach which conflicts with Objective 10.3.1 and Policy 10.4.2.</li> <li>• Groundtruthing, mapping and consultation are appropriate remedies for potential issues around wetland boundaries.</li> </ul>
↳ Trustpower Limited	102	Oppose submission 8, Ref. 153		<ul style="list-style-type: none"> <li>• Imprecise boundaries would make management of the regionally significant wetlands extremely difficult.</li> <li>• Requiring 'no adverse effects' is inconsistent with S 5(2) of the RMA.</li> </ul>
↳ Federated Farmers of New Zealand	105	Oppose submission 8, Ref. 153		<ul style="list-style-type: none"> <li>• Landowners need clarity around which parts of their land are subject to rules around regionally significant wetlands.</li> <li>• Boundaries need to be clear and defined to ensure responsibilities are known and activities can be managed accordingly.</li> </ul>
↳ Royal Forest and Bird Protection Society of New Zealand Inc	106	Support submission 8, Ref. 153		• Promotion of sustainable management requires the maintenance of life supporting capacity of wetlands, and protection of regionally significant wetlands requires avoiding adverse impacts on wetland hydrology.
↳ Department of Conservation	108	Support submission 8, Ref. 153		• Natural boundaries of many wetland types are not fixed and so activities nearby can have an adverse effect.
River-Estuary Care: Waikouaiti-Karitane	13	Amend	Make emphasis on the interconnectedness of some wetlands (e.g. saltmarsh) with the marine environment and acknowledge the reliance of marine organisms and fish on various habitats for critical parts of their life cycles and food chains.	No reason given.
↳ Otago Fish & Game Council	103	Support submission 13, Ref. 153		No reason given.
↳ Department of Conservation	108	Support submission 13, Ref. 153		• Many wetlands interconnections are a fundamental value.
River-Estuary Care: Waikouaiti-Karitane	13	Amend	There should be specific mention of negative effects of tidal gates on	No reason given.

Summary of Decisions Requested (submissions and further submissions) on Proposed Plan Change 2 (Regionally Significant Wetlands)  
Regional Plan: Water for Otago 23 November 2011

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
			coastal wetland habitats, blocking natural tidal flows to and from the wetland and the sea.	
↳ Otago Fish & Game Council	103	Support submission 13, Ref. 153		No reason given.
↳ Royal Forest and Bird Protection Society of New Zealand Inc	106	Support submission 13, Ref. 153		• Tidal gates can have significant adverse effects on wetlands.
↳ Department of Conservation	108	Support submission 13, Ref. 153		• Structures inappropriately installed and maintained can adversely effect such wetlands.
Cardrona Alpine Resort	15	Amend	The locations identified as Ski Area Sub Zones in the Queenstown-Lakes District Plan should also be adopted as policy areas within the ORC Plan.	•Skifield operations have not been considered in the proposal, and are a vital part of the economy.
↳ Otago Fish & Game Council	103	Oppose submission 15, Ref. 153		• No case that that protecting all wetlands above 800m will affect the economics of the skifield industry. • It is likely that the skifield industry can afford to undertake proper planning of operations to limit their effects on alpine wetlands.
↳ Royal Forest and Bird Protection Society of New Zealand Inc	106	Oppose submission 15, Ref. 153		• Wetlands within the Ski Areas Subzone are regionally significant and need to be recognised and managed within this framework.
Te Ao Marama Inc	16	Amend	Include preservation of wetland, lake and river margins in the proposed plan change.	•Proposed change does not address this (as required by s 6 RMA). •Would significantly strengthen the provisions proposed and help to achieve the purpose of RMA. •A lot of inappropriate use and development has been carried out in the margins, with significant effects on wetlands, lakes, rivers and the coast.
↳ Meridian Energy Limited	101	Oppose submission 16, Ref. 153		•Chapter 5 of the Regional Plan: Water for Otago already includes a range of provisions concerning the natural character and amenity values of lakes and rivers (and their margins). •Objectives, policies and rules in PPC2 provide an appropriate framework to manage wetland values.
↳ Trustpower Limited	102	Oppose submission 16, Ref. 153		•Lake and river margins are outside the scope of Plan Change 2.
↳ Otago Fish & Game Council	103	Support submission 16, Ref. 153		• Strongly supports the proposed amendment to include wetland, lake and river margins in the plan.
↳ Federated Farmers of New Zealand	105	Oppose submission 16, Ref. 153		• Landowners need clarity around which parts of their land are subject to rules around regionally significant wetlands. • Boundaries need to be clear and defined to ensure responsibilities are known and activities can be managed accordingly.
↳ Royal Forest and Bird Protection Society of New Zealand Inc	106	Support submission 16, Ref. 153		• This is inline with S6(a) RMA.
↳ Department of Conservation	108	Support submission 16, Ref. 153		• Note this amendment gives effect to sec 6(a) of the RMA.
Gregory Kerr	35	Amend	Include acknowledgement of 2-way relationship [between wetlands and sea] and the vital link it plays in the lifecycles of species.	•Wetlands are connected to each other and the sea.
↳ Otago Fish & Game Council	103	Support submission 35, Ref. 153		No reason given.
↳ Department of Conservation	108	Support submission 35, Ref. 153		• Wetlands interconnections are a fundamental value.
Transpower New Zealand Limited	37	Support	Retain the objectives and policies as drafted without further modification.	No reason given.
↳ Contact Energy Limited	107	Oppose submission 37, Ref. 153		• Opposes parts of Chapter 10 (see Contact's submission)
Hawksbury Lagoon Inc	39	Amend	Default position on rules and policies should be a conserved wetland rather than create permitted activities (To keep faith with the objective to "avoid").	No reason given.
↳ OtagoNet Joint Venture	100	Oppose submission 39, Ref. 153		• Concerned with the primacy that has been given to avoiding adverse effects.
↳ Meridian Energy Limited	101	Oppose submission 39, Ref. 153		•Submitter's suggestion is based on incorrect understanding. Objective 10.3.1 is focused on the maintenance or enhancement of Otago's wetlands. Maintenance and enhancement does not constitute 'conservation' or the 'avoidance' of adverse effects.

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
↳ Trustpower Limited	102	Oppose submission 39, Ref. 153		• Relief being sought is inconsistent with Trustpower's submission.
↳ Otago Fish & Game Council	103	Support in part submission 39, Ref. 153		• Permitted activities cannot exist without oversight, unless overseen by a Wetlands Committee.
↳ Federated Farmers	105	Oppose submission 39, Ref. 153		• Inconsistent with Part 5 RMA
↳ Contact Energy Limited	107	Oppose submission 39, Ref. 153		• The RMA does not endorse a hierarchy of avoidance followed by remediation and mitigation.
TrustPower Limited	40	Amend	Recognise and provide for the potential for alterations in the human use influences that affect certain wetlands.	• A change in human use that affects a wetland may be sustainable (e.g. affecting hydrology, but not adversely affecting flora and fauna). • This is not provided for in Plan Change 2.
↳ Contact Energy Limited	107	Support submission 40, Ref. 153		• A change in human use may be sustainable - this should be acknowledged.
↳ Royal Forest and Bird Protection Society of New Zealand Inc	106	Oppose submission 40, Ref. 153		• S 6(a) RMA requires preservation of the natural character of wetlands and their margins.
↳ Department of Conservation	108	Oppose submission 40, Ref. 153		• S 6(a) RMA requires preservation of natural character of wetlands.
OtagoNet Joint Venture	43	Amend	Activities and human use values should be provided for in Plan Change 2 such that they are not unduly compromised without recognition of their benefits.	• Relevant in establishing the boundaries and values ascribed to wetlands, and establishing the policy regime and the inventory. • ORC is required to protect regionally significant infrastructure. • Would meet S 5 RMA.
↳ Trustpower Limited	102	Support submission 43, Ref. 153		No reason given.
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Insert new policy and explanation: <u>"Policy x.x.x: To recognise and protect wetlands that are shown to have significant values that are not identified on Schedule 9, and to protect those values by controlling activities in wetlands and their margins to ensure their ecosystem functioning, natural character and habitat values are sustained.</u>  <u>Explanation: It is stated in the introduction to Schedule 9 that Schedule 9 is not exhaustive, and therefore not all wetlands with significant values have been identified. This policy recognises and provides for the protection of the values of those unidentified wetlands."</u>	• Plan change doesn't allow for further significant wetlands to be identified. • Significance criterion used to identify wetlands in Schedule 9 is incomplete and it's possible not all significant wetlands have been captured.
↳ Meridian Energy Limited	101	Oppose submission 47, Ref. 153		• The value and certainty provided to all resource users by Schedule 9 will be eroded if additional 'significant' wetlands are identified and managed outside of the current framework.
↳ Trustpower Limited	102	Oppose submission 47, Ref. 153		• ORC has undertaken rigorous task of identifying wetlands with regionally significant value, stakeholders and submitters have had opportunity to seek additional wetlands get protection.
↳ Otago Fish & Game Council	103	Support submission 47, Ref. 153		No reason given.
↳ Federated Farmers of New Zealand	105	Oppose submission 47, Ref. 153		• Landowners need certainty as to responsibilities and extending protection to unidentified wetlands would create confusion.
↳ Contact Energy Limited	107	Oppose submission 47, Ref. 153		• Explicitly protecting wetlands which do not have regionally significant values undermines the intent of the plan change. • Stating wetlands "will" be added to Schedule 9 is ultra vires.
↳ Department of Conservation	108	Support submission 47, Ref. 153		• Not all potentially regionally significant wetlands have been scheduled. • Provides for the future recognition of such wetlands, some of which may up to now have gone un-noticed.
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Insert new policy and explanation: <u>"Unidentified wetlands will be assessed using the following ecological criteria: 1. Ecological context 2. Representative wetlands 3. Rarity</u>	• Values inconsistent with case law, such as criterion for representativeness. • Note: Appendix XX Ecological Criteria can be found in full in the original submission.

Summary of Decisions Requested (submissions and further submissions) on Proposed Plan Change 2 (Regionally Significant Wetlands)  
Regional Plan: Water for Otago 23 November 2011

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
			<p><u>4. Distinctiveness</u></p> <p><u>Explanation:</u>  <i>It is possible that not all wetlands with significant values have been identified on Schedule 9. This policy recognises and provides for the protection of these wetlands. The policy also introduces an ecological criteria (Appendix XX) that will be used when assessing those wetlands. Where an assessment of any wetlands is required for resource consent purposes it shall be carried out in accordance with the ecological criteria set out in Appendix XX."</i></p>	
↳ Meridian Energy Limited	101	Oppose submission 47, Ref. 153		<ul style="list-style-type: none"> <li>• The relief proposed by the submitter would alter the basis by which wetlands are classified as significant and included in Schedule 9.</li> </ul>
↳ Trustpower Limited	102	Oppose submission 47, Ref. 153		<ul style="list-style-type: none"> <li>• ORC has undertaken task of identifying wetlands with regionally significant values and stakeholders and submitters have had the opportunity to comment on scheduled wetlands and seek that additional wetlands that contain regionally significant wetland values are awarded protection.</li> <li>• "Unidentified wetlands may be added to Schedule 9 and awarded protection through a formal plan change process.</li> </ul>
↳ Otago Fish & Game Council	103	Support submission 47, Ref. 153		No reason given.
↳ Federated Farmers of New Zealand	105	Oppose submission 47, Ref. 153		<ul style="list-style-type: none"> <li>• The Proposed Plan Change already provides extensive wetland protection to wetlands with regionally significant values.</li> <li>• To introduce new values and extend protection to unidentified wetlands would create uncertainty to Plan users.</li> </ul>
↳ Contact Energy Limited	107	Oppose submission 47, Ref. 153		<ul style="list-style-type: none"> <li>• Explicitly protecting wetlands which do not have regionally significant values undermines the intent of the plan change.</li> <li>• Stating wetlands "will" be added to Schedule 9 is ultra vires.</li> </ul>
↳ Department of Conservation	108	Support submission 47, Ref. 153		<ul style="list-style-type: none"> <li>• Not all potentially regionally significant wetlands have been scheduled.</li> <li>• Provides for the future evaluation of such wetlands, some of which may up to now have gone un-noticed.</li> </ul>
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	<p>Insert new policy and explanation:  <u>"Where an assessment has been undertaken on a wetland that is not identified on Schedule 9 and is shown to be significant these wetlands will be added to Schedule 9.</u></p> <p><u>Explanation:</u>  <i>It is possible through resource consent processes that significant wetlands not included on Schedule 9 will be identified. It is appropriate that these significant wetlands are added to Schedule 9. In doing so the wetlands on Schedule 9 will be derived from two different processes (Policy 10.4.1 and Policy x.x.x (see policy directly above)) and this is appropriate because the management of these significant wetlands will be consistent. Changes to Schedule 9 to include wetlands will be the subject of a plan change process."</i></p>	<ul style="list-style-type: none"> <li>• Possible not all significant wetlands have been captured in Schedule 9.</li> </ul>
↳ Meridian Energy Limited	101	Support in part submission 47, Ref. 153		<ul style="list-style-type: none"> <li>• Does not support the assessment process proposed by the submitter to assess wetlands not identified in Schedule 9, but supports the inclusion of any additional wetlands into Schedule 9 via a plan change process that is transparent and allows for the participation by resource users and landowners.</li> </ul>
↳ Trustpower Limited	102	Oppose submission 47, Ref. 153		<ul style="list-style-type: none"> <li>• ORC has undertaken task of identifying wetlands with regionally significant values and stakeholders and submitters have had the opportunity to comment on scheduled wetlands and seek that additional wetlands that contain regionally significant wetland values are awarded protection.</li> <li>• "Unidentified" wetlands may be added to Schedule 9 and awarded protection through a formal plan change process.</li> </ul>
↳ Otago Fish & Game Council	103	Support submission 47,		No reason given.

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
↳ Contact Energy Limited	107	Ref. 153 Oppose submission 47, Ref. 153		<ul style="list-style-type: none"> <li>•Explicitly protecting wetlands which do not have regionally significant values undermines the intent of the plan change.</li> <li>•Stating wetlands "will" be added to Schedule 9 is ultra vires.</li> </ul>
↳ Department of Conservation	108	Support submission 47, Ref. 153		<ul style="list-style-type: none"> <li>• Not all potentially regionally significant wetlands have been scheduled.</li> <li>• Amendment provides for the future recognition of such wetlands, some of which may up to now have gone un-noticed.</li> </ul>
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	<p>Insert new policy and explanation:  <u>"Policy x.x.x</u>  <u>To recognise and provide for the protection of wetlands by managing adverse effects of activities on the values present, including natural character, ecosystem functioning, biodiversity, aesthetics or amenity values.</u></p> <p><u>Explanation:</u>  <u>All wetlands are required to be managed sustainably in accordance with RMA, not just those are determined as being significant. Within Part 2 of the RMA wetlands are to be managed to protect biodiversity, natural character and other values.</u></p>	<ul style="list-style-type: none"> <li>•Many wetlands not scheduled, and all wetlands should be managed according to Part 2 RMA.</li> </ul>
↳ Meridian Energy Limited	101	Oppose submission 47, Ref. 153		<ul style="list-style-type: none"> <li>•The policy proposed by the submitter provides very little direction as to how potential adverse effects on wetland values should be managed.</li> <li>•It also fails to delineate between the management of regionally significant wetlands and those which are not significant, which is inappropriate.</li> </ul>
↳ Trustpower Limited	102	Oppose submission 47, Ref. 153		<ul style="list-style-type: none"> <li>•ORC did not intend for non-scheduled wetlands to be included in the regionally significant wetland provisions.</li> <li>•Wetlands may be added to Schedule 9 and awarded protection though a formal plan change process.</li> </ul>
↳ Otago Fish & Game Council	103	Support submission 47, Ref. 153		No reason given.
↳ Federated Farmers of New Zealand	105	Oppose submission 47, Ref. 153		<ul style="list-style-type: none"> <li>• Unnecessary and beyond intent of proposed plan changes</li> </ul>
↳ Contact Energy Limited	107	Oppose submission 47, Ref. 153		<ul style="list-style-type: none"> <li>•Explicitly protecting wetlands which do not have regionally significant values undermines the intent of the plan change.</li> <li>•Stating wetlands "will" be added to Schedule 9 is ultra vires.</li> </ul>
↳ Department of Conservation	108	Support submission 47, Ref. 153		<ul style="list-style-type: none"> <li>• Encapsulates S 6(a) RMA requirements re: wetlands.</li> </ul>

## Chapter 12 - Rules: Water Take, Use and Management

### 22 Rule 12.1.1A.1 - Take and use of surface water from any Regionally Significant Wetland

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Otago Fish & Game Council	8	Support	Support.	<ul style="list-style-type: none"> <li>•Will help to protect wetlands into the future.</li> </ul>
↳ Trustpower Limited	102	Oppose submission 8, Ref. 22		<ul style="list-style-type: none"> <li>• Relief being sought is inconsistent with Trustpower's submission.</li> </ul>
↳ Contact Energy Limited	107	Oppose submission 8 Ref. 22		<ul style="list-style-type: none"> <li>• Non-complying activity status is inappropriate for the reasons outlined in Contact's submission.</li> </ul>
Gavan James Herlihy	22	Support	New drains should require consent.	No reason given.
↳ Otago Fish & Game Council	103	Support submission 22, Ref. 22		<ul style="list-style-type: none"> <li>•While new drains in wetlands should require resource consent, there are two options to deal with existing drains: <ol style="list-style-type: none"> <li>1. Map all existing drains and allow for their clearance as a permitted activity.</li> <li>2. Create a wetlands committee which can assess activities relating to wetlands under permitted or controlled activity rules.</li> </ol> </li> </ul>

Summary of Decisions Requested (submissions and further submissions) on Proposed Plan Change 2 (Regionally Significant Wetlands)  
Regional Plan: Water for Otago 23 November 2011

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
↳ Contact Energy Limited	107	Oppose submission 22, Ref. 22		• Non-complying activity status is inappropriate for the reasons outlined in Contact's submission.
Otago Conservation Board	27	Support	Strongly support setting the default activity status of activities that affect wetlands as 'non-complying'.	• Essential that all remaining wetlands receive highest level of protection.
↳ Trustpower Limited	102	Oppose submission 27, Ref. 22		• Relief being sought is inconsistent with Trustpower's submission.
↳ Contact Energy Limited	107	Oppose submission 27, Ref. 22		• Non-complying activity status is inappropriate for the reasons outlined in Contact's submission.
Federated Farmers of New Zealand	29	Amend	Amend the activity status to a restricted discretionary activity.	• Unnecessary, and adds needless expense and time compared to restricted discretionary.
↳ Trustpower Limited	102	Support submission 29, Ref. 22		No reason given.
↳ Otago Fish & Game Council	103	Support in part submission 29, Ref. 22		• Can only support the amendment provided that the matters under which Council has discretion include: a) Effects on water quality and quantity in the wetland after abstraction b) Effects on water level and hydrological functioning of the wetland; and c) Effects on waterfowl habitat.
↳ Royal Forest and Bird Protection Society of New Zealand Inc	106	Oppose submission 29, Ref. 22		• Non complying is the most appropriate status.
↳ Department of Conservation	108	Oppose submission 29, Ref. 22		• The current class of activity accords wetlands greater legal protection.
Contact Energy Limited	30	Amend	That the non-complying activity status proposed for activities controlled by Chapter 12 be not approved and that such activities remain as discretionary activities.	• Non-complying status is too onerous, especially given concerns on artificial wetlands, and the lack of robustness in the process classifying the wetlands as regionally significant • Activity with an adverse effect on a wetland value may still be appropriate. • Discretionary status allows robust examination, and the possibility of declining activities.
↳ Meridian Energy Limited	101	Support submission 30, Ref. 22		• Agree that an activity with adverse effects on a wetland may still be appropriate and that the use of a discretionary activity would still allow a robust examination.
↳ Trustpower Limited	102	Support submission 30, Ref. 22		No reason given.
↳ Otago Fish & Game Council	103	Oppose submission 30, Ref. 22		• Non-complying status sends a strong signal.
↳ Federated Farmers of New Zealand	105	Support in part submission 30, Ref. 22		• Objectives of the plan change can still be met by requiring landowner to apply for a discretionary activity. • The taking and storing of water holds an important function in many areas and has potential to take pressure off other water resources
↳ Royal Forest and Bird Protection Society of New Zealand Inc	106	Oppose submission 30, Ref. 22		• Non Complying status is Consistent with Part 2 RMA and section 30.
↳ Department of Conservation	108	Oppose submission 30, Ref. 22		• The current class of activity accords wetlands greater legal protection.
Meridian Energy Limited	32	Amend	Amend Rule 12.1.1A.1: "Unless covered by Rules 12.1.1.1, 12.1.1.2, 12.1.2.1 and 12.1.2.3, the taking and use of surface water <b>directly</b> from any Regionally Significant Wetland is a <b>non-complying activity</b> ."	• Many Regionally Significant Wetlands form part of rivers or lakes; the rule should be explicit that only water taken directly from the area identified as Regionally Significant Wetland is non-complying.
↳ Trustpower Limited	102	Support in part submission 32, Ref. 22		• Support the submission generally, but prefer that the non-complying status is removed from the plan.
↳ Otago Fish & Game Council	103	Support in part submission 32, Ref. 22		• Supports the intent of this, but would prefer the wording "directly, or with direct effects on regionally significant wetlands" to be added to the policy.
↳ Federated Farmers of New Zealand	105	Support in part, submission 32, Ref. 22		• We consider a lesser standard than non-complying is appropriate but agree that rule should only affect 'direct' takes from identified and specific RSW areas.
↳ Department of Conservation	108	Oppose submission 32,		• The current class of activity accords wetlands greater legal protection.

Summary of Decisions Requested (submissions and further submissions) on Proposed Plan Change 2 (Regionally Significant Wetlands)  
Regional Plan: Water for Otago 23 November 2011

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
		Ref. 22		
TrustPower Limited	40	Oppose	Delete rule. Takes and uses that are not covered by other specified rules should have discretionary status.	•Minor takes and uses from Regionally Significant Wetlands may be required and should not be non-complying.
↳ Otago Fish & Game Council	103	Oppose submission 40, Ref. 22		No reason given.
↳ Federated Farmers of New Zealand	105	Support in part submission 40, Ref. 22		• Non-complying status too onerous. There will be situations where minor takes and uses from RSWs may be required and these should not be considered non-complying. • A balance needs to be achieved between enabling social and economic wellbeing and the protection of the environment.
↳ Contact Energy Limited	107	Support submission 40, Ref. 22		• Non-complying activity status is inappropriate for the reasons outlined in Contact's submission.
↳ Department of Conservation	108	Oppose submission 40, Ref. 22		• The current class of activity accords wetlands greater legal protection
Royal Forest and Bird Protection Society of New Zealand Inc	47	Support	Retain rule as proposed.	•Consistent with Part 2 and s 30 RMA.
↳ Trustpower Limited	102	Oppose submission 47, Ref. 22		•Oppose for reasons in Trustpower's submission.
↳ Otago Fish & Game Council	103	Support submission 47, Ref. 22		No reason given.
↳ Contact Energy Limited	107	Oppose submission 47, Ref. 22		• Non-complying activity status is inappropriate for the reasons outlined in Contact's submission.

## 26 Rule 12.1.2.4 - Take and use of surface water for no more than 3 days

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Otago Fish & Game Council	8	Support	Support.	•Allows submitter to look at the effect of water takes on wetlands, and advise ORC accordingly.
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Amend 12.1.2.4(b): <i>"The water is not taken from and there is no change to the water level or hydrological function, or no damage to the indigenous flora, fauna or its habitat, in or on any Regionally Significant Wetland, or wetland that meets the significance criteria listed in Appendix XX Ecological Criteria."</i>  Add the following permitted rule conditions: <i>"(a) Effects on biological diversity and ecological values; and (b) Effects on the natural character of wetlands and their margins."</i>	•Deletion of 'water is not taken from' alters intent of rule. •Rule doesn't cover non-assessed and non-scheduled wetlands.
↳ Meridian Energy Limited	101	Oppose submission 47, Ref. 26		•Amendments continue to result in the clause failing to provide sufficient certainty to enable a determination to be made as to whether an activity is permitted or not. •Conditions proposed are effectively assessment matters and do not fit within the framework of a permitted activity.
↳ Trustpower Limited	102	Oppose in part submission 47, Ref. 26		•Opposes all aspects of this submission, except the inclusion of "indigenous" as this is consistent with RMA principles. • "no change to the water level or hydrological function, or no damage to the flora, fauna or its habitat" does not meet the requirements for a permitted activity standard. • The wording "the water is not taken from" may replace this wording, but not that it applies in addition as this would be grossly inefficient. •Proposed additional permitted rule conditions do not make sense and are too subjective to provide any certainty. •Council did not intend for non-scheduled wetlands to be included in the regionally significant wetland provisions.
↳ Otago Fish & Game Council	103	Support submission 47, Ref. 26		No reason given.
↳ Federated Farmers of New Zealand	105	Oppose submission 47,		• Would bring a lack of certainty and clarity. Beyond scope of Plan



SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
		Ref. 26		Change.
↳ Department of Conservation	108	Support submission 47, Ref. 26		• Strengthens wetland protection requirements and follows on from support for Forest & Birds submission in 153 Chap.10 above.

## 27 Rule 12.1.2.5 - Take and use of surface water general

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Otago Fish & Game Council	8	Support	Support.	•Allows submitter to look at the effect of water takes on wetlands, and advise ORC accordingly.
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Amend 12.1.2.5(a): "The water is not taken from and there is no change to the water level or hydrological function, or no damage to the <u>indigenous</u> flora, fauna or its habitat, in or on any Regionally Significant Wetland, or wetland that meets the significance criteria listed in Appendix XX Ecological Criteria."  Add the following permitted rule conditions: "(a) Effects on biological diversity and ecological values; and (b) Effects on the natural character of wetlands and their margins."	•Deletion of 'water is not taken from' alters intent of rule. •Rule doesn't cover non-assessed and non-scheduled wetlands.
↳ Meridian Energy Limited	101	Oppose submission 47, Ref. 27		•Amendments continue to result in the clause failing to provide sufficient certainty to enable a determination to be made as to whether an activity is permitted or not. •Conditions proposed are effectively assessment matters and do not fit within the framework of a permitted activity.
↳ Trustpower Limited	102	Oppose in part submission 47, Ref. 27		•Opposes all aspects of this submission, except the inclusion of "indigenous" as this is consistent with RMA principles. • The rule is set up to be effects-based; the inclusion of "the water is not taken from" is inconsistent with the effects-based approach. •Proposed additional permitted rule conditions do not make sense and are too subjective to be included in any Rules. •Council did not intend for non-scheduled wetlands to be included in the regionally significant wetland provisions.
↳ Otago Fish & Game Council	103	Support submission 47, Ref. 27		No reason given.
↳ Federated Farmers of New Zealand	105	Oppose submission 47, Ref. 27		• Would bring a lack of certainty and clarity. Beyond scope of Plan Change.
↳ Department of Conservation	108	Support submission 47, Ref. 27		• Strengthens wetland protection requirements and follows on from support for Forest & Birds submission in 153 Chap.10 above

## 28 Rule 12.1.2.6 - Take and use of surface water for land drainage

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Otago Fish & Game Council	8	Support	Support.	•Allows submitter to look at the effect of water takes on wetlands, and advise ORC accordingly.
↳ Department of Conservation	108	Support submission 8, Ref. 28		No reason given
Federated Farmers of New Zealand	29	Amend	Categorise the maintenance of an existing drain, including the clearing of any subsequent slumping, as a permitted activity.	•Land drainage has positive benefits, both locally and wider. •Unmaintained drainage systems risk flooding, erosion and discharges. •Requiring consent may deter maintenance.
↳ Otago Fish & Game Council	103	Support in part submission 29, Ref. 28		•There are two options to deal with existing drains: 1. Map all existing drains and allow for their clearance as a permitted activity. 2. Create a wetlands committee which can assess activities relating to wetlands under permitted or controlled activity rules.
↳ Royal Forest and Bird Protection Society of New Zealand Inc	106	Oppose submission 29, Ref. 28		• Clearing of drains can have adverse effects and should require a consent. This is an issue in the pollution of Waituna Lagoon in

Summary of Decisions Requested (submissions and further submissions) on Proposed Plan Change 2 (Regionally Significant Wetlands)  
Regional Plan: Water for Otago 23 November 2011

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
				<i>Southland.</i>
↳ Department of Conservation	108	Oppose submission 29, Ref. 28		<ul style="list-style-type: none"> <li>• Clearing of existing drains should require a resource consent with conditions to protect wetlands and their values, as damage similar to construction of new drains can be caused by this activity.</li> </ul>
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	<p>Amend 12.1.2.6(a):  <u>"The water is not taken from and there is no change to the water level or hydrological function, or no damage to the indigenous flora, fauna or its habitat, in or on any Regionally Significant Wetland, or wetland that meets the significance criteria listed in Appendix XX Ecological Criteria."</u></p> <p>Add the following permitted rule conditions:  <u>"(a) Effects on biological diversity and ecological values; and (b) Effects on the natural character of wetlands and their margins."</u></p>	<ul style="list-style-type: none"> <li>• Deletion of 'water is not taken from' alters intent of rule.</li> <li>• Rule doesn't cover non-assessed and non-scheduled wetlands.</li> </ul>
↳ Meridian Energy Limited	101	Oppose submission 47, Ref. 28		<ul style="list-style-type: none"> <li>• Amendments continue to result in the clause failing to provide sufficient certainty to enable a determination to be made as to whether an activity is permitted or not.</li> <li>• Conditions proposed are effectively assessment matters and do not fit within the framework of a permitted activity.</li> </ul>
↳ Trustpower Limited	102	Oppose in part submission 47, Ref. 28		<ul style="list-style-type: none"> <li>• Opposes all aspects of this submission, except the inclusion of "indigenous" as this is consistent with RMA principles.</li> <li>• "no change to the water level or hydrological function, or no damage to the flora, fauna or its habitat" does not meet the requirements for a permitted activity standard.</li> <li>• The wording "the water is not taken from" may replace this wording, but not that it applies in addition as this would be grossly inefficient.</li> <li>• Proposed additional permitted rule conditions do not make sense and are too subjective to be included in any Rules.</li> <li>• Council did not intend for non-scheduled wetlands to be included in the regionally significant wetland provisions.</li> </ul>
↳ Otago Fish & Game Council	103	Support submission 47, Ref. 28		No reason given.
↳ Federated Farmers of New Zealand	105	Oppose submission 47, Ref. 28		<ul style="list-style-type: none"> <li>• Would bring a lack of certainty and clarity. Beyond scope of Plan Change.</li> </ul>
↳ Department of Conservation	108	Support submission 47, Ref. 28		<ul style="list-style-type: none"> <li>• Strengthens wetland protection requirements.</li> </ul>

## 29 Rule 12.1.3.1 - Take and use of surface water for community water supply - controlled activity

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Retain (i) and add new (j) and (l): <u>"(j) Effects on biological diversity and ecological values; and (k) Effects on the natural character of wetlands and their margins."</u>	<ul style="list-style-type: none"> <li>• To meet resource management duties, Council needs to control effects on any wetland that meets significance criteria.</li> </ul>
↳ Otago Fish & Game Council	103	Support submission 47, Ref. 29		No reason given.

## 37 Rule 12.1.4.8 - Take and use of surface water - restricted discretionary activity

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	<p>Add new discretionary matters:  <u>"(a) Effects on biological diversity and ecological values; and (b) Effects on the natural character of wetlands and their margins."</u></p> <p>Amend (xvii):  <u>"Any effect on any Regionally Significant Wetland or on any regionally significant wetland value or any wetland that meets the significance"</u></p>	<ul style="list-style-type: none"> <li>• Council responsibilities are greater than the identification of significant wetlands; need to consider adverse effects on all wetlands.</li> <li>• Possible not all significant wetlands have been captured in Schedule 9.</li> <li>• Gives effect to Part 2 RMA.</li> </ul>

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
			<i>criteria listed in Appendix XX Ecological Criteria."</i>	
↳ Meridian Energy Limited	101	Oppose submission 47, Ref. 37		•Rule already enables consideration of 'any' potential adverse effects on any Regionally Significant Wetland or regionally significant wetland value. As such, relief sought by submitter is considered unnecessary.
↳ Trustpower Limited	102	Oppose submission 47, Ref. 37		• Matter (xii) and (xvii) are sufficient to assess the potential adverse effects of a water take or use and the new discretionary matters proposed would be unnecessary. • Council did not intend for non-scheduled wetlands to be included in the regionally significant wetland provisions.
↳ Otago Fish & Game Council	103	Support submission 47, Ref. 37		No reason given.
↳ Federated Farmers of New Zealand	105	Oppose submission 47, Ref. 37		• Proposed Plan Change applies rules to wetlands with certain regionally significant wetland values. To extend similar protection to all wetlands goes beyond scope of plan change.

#### 45 Rule 12.2.1A.1 - Take and use of groundwater from any Regionally Significant Wetland

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Gavan James Herlihy	22	Support	New drains should require consent.	No reason given.
↳ Otago Fish & Game Council	103	Support submission 22, Ref. 45		•While new drains in wetlands should require resource consent, there are two options to deal with existing drains: 1. Map all existing drains and allow for their clearance as a permitted activity. 2. Create a wetlands committee which can assess activities relating to wetlands under permitted or controlled activity rules.
↳ Contact Energy Limited	107	Oppose submission 22, Ref. 45		• See reasons in Contact's submission.
Otago Conservation Board	27	Support	Strongly support setting the default activity status of activities that affect wetlands as 'non-complying'.	•Essential that all remaining wetlands receive highest level of protection.
↳ Trustpower Limited	102	Oppose submission 27, Ref. 45		• Relief being sought is inconsistent with Trustpower's submission.
↳ Federated Farmers of New Zealand	105	Oppose in part submission 27, Ref. 45		• Non-complying status too onerous. A balance needs to be achieved between enabling social and economic wellbeing and the protection of the environment.
↳ Contact Energy Limited	107	Oppose submission 27, Ref. 45		• Non-complying activity status is inappropriate for the reasons outlined in Contact's submission.
Federated Farmers of New Zealand	29	Amend	Amend the activity status to a restricted discretionary activity.	•Unnecessary, and adds needless expense and time compared to restricted discretionary.
↳ Trustpower Limited	102	Support submission 29, Ref. 45		• Relief being sought is consistent with Trustpower's submission.
↳ Otago Fish & Game Council	103	Support in part submission 29, Ref. 45		•Can only support the amendment provided that the matters under which Council has discretion include: a) Effects on water quality and quantity after abstraction b) Effects on water level and hydrological functioning of the wetland or aquifer; c) Wetland recharge effects, and d) Effects on gamebird habitat resulting from any loss of open water.
↳ Royal Forest and Bird Protection Society of New Zealand Inc	106	Oppose submission 29, Ref. 45		• Full non-complying status is essential to provide robust protection of wetlands.
↳ Department of Conservation	108	Oppose submission 29, Ref. 45		• The current class of activity accords wetlands greater legal protection.
Contact Energy Limited	30	Amend	That the non-complying activity status proposed for activities controlled by Chapter 12 be not approved and that such activities remain as discretionary activities.	•Non-complying status is too onerous, especially given concerns on artificial wetlands, and the lack of robustness in the process classifying the wetlands as regionally significant. •Activity with an adverse effect on a wetland value may still be

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
				appropriate. •Discretionary status allows robust examination, and the possibility of declining activities.
↳ Trustpower Limited	102	Support submission 30, Ref. 45		• Relief being sought is consistent with Trustpower's submission.
↳ Otago Fish & Game Council	103	Oppose submission 30, Ref. 45		•Non-complying status sends a strong signal.
↳ Federated Farmers of New Zealand	105	Support in part submission 30, Ref. 45		• A robust examination can still occur and Council can still exercise discretion as to whether to accept or decline consent without need for a non-complying activity status. • There will be instances, particularly given concerns on artificial wetlands, where activity with an adverse affect on a wetlands value may still be appropriate – particularly in the area of water take and storage.
↳ Royal Forest and Bird Protection Society of New Zealand Inc	106	Oppose submission 30, Ref. 45		• Full non-complying status is essential to provide robust protection of wetlands.
↳ Department of Conservation	108	Oppose submission 30, Ref. 45		• The current class of activity accords wetlands greater legal protection.
TrustPower Limited	40	Oppose	Delete rule. Takes and uses that are not covered by other specified rules should have discretionary status.	•Minor takes and uses from Regionally Significant Wetlands may be required and should not be non-complying.
↳ Otago Fish & Game Council	103	Oppose submission 40, Ref. 45		No reason given.
↳ Federated Farmers of New Zealand	105	Support in part submission 40, Ref. 45		• Non-complying status not necessary. Purpose can be achieved more efficiently with a restricted discretionary status.
↳ Contact Energy Limited	107	Support submission 40, Ref. 45		• Non-complying activity status is inappropriate for the reasons outlined in Contact's submission.
↳ Department of Conservation	108	Oppose submission 40, Ref. 45		• Seeks to weaken standard of wetland protection.

#### 48 Rule 12.2.2.5 - Take and use of groundwater for no more than 3 days

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Amend 12.2.2.5(b): "The water is not taken from and there is no change to the water level or hydrological function, or no damage to the indigenous flora, fauna or its habitat, in or on any Regionally Significant Wetland, or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria."	•Deletion of 'water is not taken from' alters intent of rule. •Rule doesn't cover non-assessed and non-scheduled wetlands.
↳ Meridian Energy Limited	101	Oppose submission 47, Ref. 48		•Amendments continue to result in the clause failing to provide sufficient certainty to enable a determination to be made as to whether an activity is permitted or not.
↳ Trustpower Limited	102	Oppose in part submission 47, Ref. 48		•Opposes all aspects of this submission, except the inclusion of "indigenous" as this is consistent with RMA principles. • "no change to the water level or hydrological function, or no damage to the flora, fauna or its habitat" does not meet the requirements for a permitted activity standard. •The wording "the water is not taken from" may replace this wording, but not that it applies in addition as this would be grossly inefficient. •Council did not intend for non-scheduled wetlands to be included in the regionally significant wetland provisions.
↳ Otago Fish & Game Council	103	Support submission 47, Ref. 48		No reason given.
↳ Federated Farmers of New Zealand	105	Oppose submission 47, Ref. 48		• Would bring a lack of certainty and clarity. • Beyond scope of Plan Change.
↳ Department of Conservation	108	Support submission 47, Ref. 48		• Strengthens wetland protection requirements.

#### 49 Rule 12.2.2.6 - Take and use of groundwater from Schedule 2C aquifer or within 100m of any wetland, lake or river

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Amend 12.2.2.6(a): <i>"The water is not taken from and there is no change to the water level or hydrological function, or no damage to the indigenous flora, fauna or its habitat, in or on any Regionally Significant Wetland, or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria."</i>	<ul style="list-style-type: none"> <li>• Deletion of 'water is not taken from' alters intent of rule.</li> <li>• Rule doesn't cover non-assessed and non-scheduled wetlands.</li> </ul>
↳ Meridian Energy Limited	101	Oppose submission 47, Ref. 49		• Amendments continue to result in the clause failing to provide sufficient certainty to enable a determination to be made as to whether an activity is permitted or not.
↳ Trustpower Limited	102	Oppose in part submission 47, Ref. 49		<ul style="list-style-type: none"> <li>• Opposes all aspects of this submission, except the inclusion of "indigenous" as this is consistent with RMA principles.</li> <li>• "no change to the water level or hydrological function, or no damage to the flora, fauna or its habitat" does not meet the requirements for a permitted activity standard.</li> <li>• The wording "the water is not taken from" may replace this wording, but not that it applies in addition as this would be grossly inefficient.</li> <li>• Council did not intend for non-scheduled wetlands to be included in the regionally significant wetland provisions.</li> </ul>
↳ Otago Fish & Game Council	103	Support submission 47, Ref. 49		No reason given.
↳ Federated Farmers of New Zealand	105	Oppose submission 47, Ref. 49		<ul style="list-style-type: none"> <li>• Would bring a lack of certainty and clarity.</li> <li>• Beyond scope of Plan Change.</li> </ul>

#### 50 Rule 12.2.2A.1 - Take and use of groundwater for community water supply - controlled activity

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Amend 12.2.2A1(g): <i>"Any effect on and Regionally Significant Wetland or on any regionally significant wetland value or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria."</i>  Add new matters of control: <i>"(h) Effects on biological diversity and ecological values; and (i) Effects on the natural character of wetlands and their margins."</i>	<ul style="list-style-type: none"> <li>• Council responsibilities are greater than the identification of significant wetlands; need to consider adverse effects on all wetlands.</li> <li>• Possible not all significant wetlands have been captured in Schedule 9.</li> <li>• Gives effect to Part 2 RMA.</li> </ul>
↳ Trustpower Limited	102	Oppose submission 47, Ref. 50		<ul style="list-style-type: none"> <li>• Council did not intend for non-scheduled wetlands to be included in the regionally significant wetland provisions.</li> <li>• Proposed additional matters of control do not make sense and are too subjective to be included in any Rules.</li> </ul>
↳ Otago Fish & Game Council	103	Support submission 47, Ref. 50		No reason given.
↳ Federated Farmers of New Zealand	105	Oppose submission 47, Ref. 50		• Proposed Plan Change applies rules to wetlands with certain regionally significant wetland values. To extend similar protection to all wetlands goes beyond scope of plan change.
↳ Department of Conservation	108	Support submission 47, Ref. 50		• Strengthens wetland protection requirements.

#### 53 Rule 12.2.3.4 - Take and use of groundwater - restricted discretionary activity

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Federated Farmers of New Zealand	29	Amend	Amend: <i>"Any adverse effect on any Regionally Significant Wetland or on any regionally significant wetland value"</i>	• Implementation uncertain; means standard farming practices may be captured.
↳ Trustpower Limited	102	Support submission 29, Ref. 53		No reason given.

Summary of Decisions Requested (submissions and further submissions) on Proposed Plan Change 2 (Regionally Significant Wetlands)  
Regional Plan: Water for Otago 23 November 2011

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
↳ Otago Fish & Game Council	103	Oppose submission 29, Ref. 53		<ul style="list-style-type: none"> <li>Wetlands cannot be easily created or transferred, and so to subject them to a test that is anything less than "adverse" will run the risk of offsetting or limited mitigation packages that ultimately add up to a loss or trading of individual wetland values.</li> <li>Further submitter wants to see the area of wetlands to increase, and at worst case, remain static, rather than continue to endure a decline.</li> </ul>
↳ Royal Forest and Bird Protection Society of New Zealand Inc	106	Oppose submission 29, Ref. 53		<ul style="list-style-type: none"> <li>Council needs to consider all effects on regionally significant wetlands.</li> </ul>
↳ Department of Conservation	108	Oppose submission 29, Ref. 53		<ul style="list-style-type: none"> <li>Rule as written allows ORC to consider all effects on wetlands, not just adverse effects</li> </ul>
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	<p>Amend (xiii):  <i>"Any effect on and Regionally Significant Wetland or on any regionally significant wetland value or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria."</i></p> <p>Add new matters of discretion:  <i>"(a) Effects on biological diversity and ecological values; and (b) Effects on the natural character of wetlands and their margins."</i></p>	<ul style="list-style-type: none"> <li>Council responsibilities are greater than the identification of significant wetlands; need to consider adverse effects on all wetlands.</li> <li>Possible not all significant wetlands have been captured in Schedule 9.</li> <li>Gives effect to Part 2 RMA.</li> </ul>
↳ Meridian Energy Limited	101	Oppose submission 47, Ref. 53		<ul style="list-style-type: none"> <li>Rule already enables consideration of 'any' potential adverse effects on any Regionally Significant Wetland or regionally significant wetland value. As such, relief sought by submitter is considered unnecessary.</li> </ul>
↳ Trustpower Limited	102	Oppose submission 47, Ref. 53		<ul style="list-style-type: none"> <li>Council did not intend for non-scheduled wetlands to be included in the regionally significant wetland provisions.</li> <li>Proposed additional matters of control do not make sense and are too subjective to be included in any Rules.</li> </ul>
↳ Otago Fish & Game Council	103	Support submission 47, Ref. 53		No reason given.
↳ Federated Farmers of New Zealand	105	Oppose submission 47, Ref. 53		<ul style="list-style-type: none"> <li>Proposed Plan Change applies rules to wetlands with certain regionally significant wetland values. To extend similar protection to all wetlands goes beyond scope of plan change.</li> </ul>
↳ Department of Conservation	108	Support submission 47, Ref. 53		<ul style="list-style-type: none"> <li>Strengthens wetland protection requirements.</li> </ul>

## 60 Rule 12.3.1A.1 - Damming or diversion of water: Regionally Significant Wetland

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Gavan James Herlihy	22	Support	New drains should require consent.	No reason given.
↳ Otago Fish & Game Council	103	Support submission 22, Ref. 60		<ul style="list-style-type: none"> <li>While new drains in wetlands should require resource consent, there are two options to deal with existing drains: <ol style="list-style-type: none"> <li>Map all existing drains and allow for their clearance as a permitted activity.</li> <li>Create a wetlands committee which can assess activities relating to wetlands under permitted or controlled activity rules.</li> </ol> </li> </ul>
↳ Contact Energy Limited	107	Oppose submission 22, Ref. 60		<ul style="list-style-type: none"> <li>Non-complying activity status is inappropriate for the reasons outlined in Contact's submission.</li> </ul>
Otago Conservation Board	27	Support	Strongly support setting the default activity status of activities that affect wetlands as 'non-complying'.	<ul style="list-style-type: none"> <li>Essential that all remaining wetlands receive highest level of protection.</li> </ul>
↳ Trustpower Limited	102	Oppose submission 27, Ref. 60		<ul style="list-style-type: none"> <li>Relief being sought is inconsistent with Trustpower's submission.</li> </ul>
↳ Federated Farmers of New Zealand	105	Oppose in part submission 27, Ref. 60		<ul style="list-style-type: none"> <li>Non-complying status too onerous. A balance needs to be achieved between enabling social and economic wellbeing and the protection of the environment.</li> </ul>
↳ Contact Energy Limited	107	Oppose submission 27, Ref. 60		<ul style="list-style-type: none"> <li>Non-complying activity status is inappropriate for the reasons outlined in Contact's submission.</li> </ul>
↳ Department of Conservation	108	Support submission 27, Ref. 60		No reason given.

Summary of Decisions Requested (submissions and further submissions) on Proposed Plan Change 2 (Regionally Significant Wetlands)  
Regional Plan: Water for Otago 23 November 2011

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Federated Farmers of New Zealand	29	Amend	Amend the activity status to a restricted discretionary activity.	•Unnecessary, and adds needless expense and time compared to restricted discretionary.
↳ Trustpower Limited	102	Support submission 29, Ref. 60		No reason given.
↳ Otago Fish & Game Council	103	Support in part submission 29, Ref. 60		•Can only support the amendment provided that the matters under which Council has discretion include: a) Effects on water quality and quantity after abstraction b) Effects on water level and hydrological functioning of the wetland or aquifer; c) Wetland recharge effects, and d) Effects on gamebird habitat resulting from any loss of open water.
↳ Royal Forest and Bird Protection Society of New Zealand Inc	106	Oppose submission 29, Ref. 60		• These activities have significant adverse effects on wetlands and it is appropriate they are non complying, to give certainty for the protection of wetlands.
↳ Department of Conservation	108	Oppose submission 29, Ref. 60		• Non-complying allows for the ORC to assess an application against all the relevant plan provisions and also allows all environmental effects to be considered.
Contact Energy Limited	30	Amend	That the non-complying activity status proposed for activities controlled by Chapter 12 be not approved and that such activities remain as discretionary activities.	•Non-complying status is too onerous, especially given concerns on artificial wetlands, and the lack of robustness in the process classifying the wetlands as regionally significant •Activity with an adverse effect on a wetland value may still be appropriate. •Discretionary status allows robust examination, and the possibility of declining activities.
↳ Meridian Energy Limited	101	Support submission 30, Ref. 60		•Activity with an adverse effect on a wetland value may still be appropriate. •Discretionary status still allows robust examination of consent applications.
↳ Trustpower Limited	102	Support submission 30, Ref. 60		No reason given.
↳ Otago Fish & Game Council	103	Oppose submission 30, Ref. 60		•Non-complying status sends a strong signal.
↳ Royal Forest and Bird Protection Society of New Zealand Inc	106	Oppose submission 30, Ref. 60		• These activities have significant adverse effects on wetlands and it is appropriate they are non complying, to give certainty for the protection of wetlands.
↳ Department of Conservation	108	Oppose submission 30, Ref. 60		• Non-complying allows for the ORC to assess an application against all the relevant plan provisions and also allows all environmental effects to be considered.
Meridian Energy Limited	32	Amend	Amend Rule 12.3.1A.1: "Unless covered by Rules 12.3.1.1 to 12.3.1.4, and 12.3.3.1(i): (i) The direct <del>damming or</del> diversion of water <del>from or</del> within any Regionally Significant Wetland; (ii) <del>The damming or diversion of water that affects the water level of any Regionally Significant Wetland;</del> is a non-complying activity."	•Determination as to whether a diversion will 'affect' the water level requires subjective analysis and is not suitable for determining non-compliance. •Unclear why diversion is treated differently to (direct) take and use of surface water. Given many resource consents involve the take and diversion of water, inappropriate to treat differently. •Many Regionally Significant Wetlands form part of rivers or lakes; the rule should be explicit that only water diverted directly from/to the area identified as Regionally Significant Wetland is non-complying. •Non-complying activity overly restrictive: diversion may improve water flow enabling the enhancement of wetland values.
↳ Trustpower Limited	102	Support submission 32, Ref. 60		No reason given.
↳ Otago Fish & Game Council	103	Support submission 32, Ref. 60		• May allow for the enhancement of wetlands.
↳ Federated Farmers of New Zealand	105	Support in part submission 32, Ref. 60		• A lesser activity status can still achieve purpose of provision. An activity with an adverse effect on a wetland value may still be appropriate. In some areas, damming and storing water has the potential to take pressure off other water resources.

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
↳ Contact Energy Limited	107	Oppose submission 32, Ref. 60		• Non-complying activity status is inappropriate for the reasons outlined in Contact's submission.
↳ Department of Conservation	108	Oppose submission 32, Ref. 60		• Water may be dammed by indirect means and still cause effects to wetlands. • Underlining is incorrect in ORC's summary
TrustPower Limited	40	Amend	Amend: "Unless covered by Rules 12.3.1.1 to 12.3.1.4, <del>and</del> 12.3.3.1(i) or 12.3.2.0: (i) The diversion of water from or within any Regionally Significant Wetland, <del>or</del> (ii) <del>The damming or diversion of water that affects the water level of any Regionally Significant Wetland,</del> is a <b>non-complying</b> activity."  And a comprehensive assessment in terms of water allocation for a particular water body should be undertaken to determine whether the water level of any Regionally Significant Wetland is adversely affected, rather than a blanket rule that provides for no effects on water level.	• Point (ii) is subjective and does not provide certainty to plan users.
↳ Otago Fish & Game Council	103	Oppose submission 40, Ref. 60		• Prefer a blanket rule, rather than yet another assessment of wetland values.
↳ Contact Energy Limited	107	Oppose submission 40, Ref. 60		• Non-complying activity status is inappropriate for the reasons outlined in Contact's submission.
↳ Royal Forest and Bird Protection Society of New Zealand Inc	106	Oppose submission 40, Ref. 60		• These activities have significant adverse effects on wetlands and it is appropriate they are non complying, to give certainty for the protection of wetlands.
↳ Department of Conservation	108	Oppose submission 40, Ref. 60		• This approach is highly likely to cause adverse effects
Royal Forest and Bird Protection Society of New Zealand Inc	47	Support	Retain wording as proposed.	No reason given
↳ Trustpower Limited	102	Oppose submission 47, Ref. 60		• Relief being sought is inconsistent with Trustpower's submission.
↳ Otago Fish & Game Council	103	Support submission 47, Ref. 60		No reason given.
↳ Contact Energy Limited	107	Oppose submission 47, Ref. 60		• Non-complying activity status is inappropriate for the reasons outlined in Contact's submission.

### 63 Rule 12.3.2.1 - Damming or diversion of water general

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Amend 12.3.2.1(e): "It is <b>not within and</b> there is no change to the water level or hydrological function, or no damage to the flora, fauna or its habitat, in or on any Regionally Significant Wetland; and"	• Should be explicit that damming or diversion within a Regionally Significant Wetland is not permitted.
↳ Trustpower Limited	102	Neither support, nor oppose submission 47, Ref. 63		• "no change to the water level or hydrological function, or no damage to the flora, fauna or its habitat" does not meet the requirements for a permitted activity standard. • The wording "the water is not taken from" may replace this wording, but not that it applies in addition as this would be grossly inefficient.
↳ Otago Fish & Game Council	103	Support submission 47, Ref. 63		No reason given.
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Add new matters of discretion: " <b>(a) Effects on biological diversity and ecological values; and</b> <b>(b) Effects on the natural character of wetlands and their margins."</b>	• Need to sustainably manage all wetlands not just those considered significant.
↳ Meridian Energy Limited	101	Oppose submission 47, Ref. 63		• Conditions proposed are effectively assessment matters and do not fit within the framework of a permitted activity.
↳ Trustpower Limited	102	Oppose submission 47,		• Proposed additional matters do not make sense and are too subjective.

Summary of Decisions Requested (submissions and further submissions) on Proposed Plan Change 2 (Regionally Significant Wetlands)  
Regional Plan: Water for Otago 23 November 2011



SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
		Ref. 63		
↳ Otago Fish & Game Council	103	Support submission 47, Ref. 63		No reason given.
↳ Federated Farmers of New Zealand	105	Oppose submission 47, Ref. 63		• Proposed Plan Change applies rules to wetlands with certain regionally significant wetland values. To extend similar protection to all wetlands goes beyond scope of plan change.

#### 64 Rule 12.3.2.2 - Damming or diversion of water for land drainage

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Federated Farmers of New Zealand	29	Amend	Categorise the maintenance of an existing drain, including the clearing of any subsequent slumping, as a permitted activity.	• Land drainage has positive benefits, both locally and wider. • Unmaintained drainage systems risk flooding, erosion and discharges. • Requiring consent may deter maintenance.
↳ Trustpower Limited	102	Support submission 29, Ref. 64		No reason given.
↳ Otago Fish & Game Council	103	Support in part submission 29, Ref. 64		• Can only support the amendment to restricted discretionary provided that the matters under which Council has discretion include: e) Effects on water quality and quantity after abstraction a) Effects on water level and hydrological functioning of the wetland or aquifer; b) Wetland recharge effects, and c) Effects on gamebird habitat resulting from any loss of open water.
↳ Royal Forest and Bird Protection Society of New Zealand Inc	106	Oppose submission 29, Ref. 64		• Clearing of drains can have adverse effects and should require consent. This is an issue in the pollution of Waituna Lagoon in Southland.
↳ Department of Conservation	108	Oppose submission 29, Ref. 64		• Maintenance of existing drains should require a resource consent with conditions to protect wetlands and their values, as adverse effects similar to construction of new drains could be caused by this activity.
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Amend 12.3.2.2(a): "The water is not diverted from and there is no change to the water level or hydrological function, or no damage to the flora, fauna or its habitat, in or on any Regionally Significant Wetland; and"	• Should be explicit that damming or diversion within a Regionally Significant Wetland is not permitted.
↳ Trustpower Limited	102	Neither support, nor oppose submission 47, Ref. 64		• "no change to the water level or hydrological function, or no damage to the flora, fauna or its habitat" does not meet the requirements for a permitted activity standard. • The wording "the water is not taken from" may replace this wording, but not that it applies in addition as this would be grossly inefficient.
↳ Otago Fish & Game Council	103	Support submission 47, Ref. 64		No reason given.
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Add new matters of discretion: "(a) Effects on biological diversity and ecological values; and (b) Effects on the natural character of wetlands and their margins."	• Need to sustainably manage all wetlands not just those considered significant.
↳ Meridian Energy Limited	101	Oppose submission 47, Ref. 64		• Conditions proposed are effectively assessment matters and do not fit within the framework of a permitted activity.
↳ Trustpower Limited	102	Oppose submission 47, Ref. 64		• Proposed additional matters do not makesense and are too subjective.
↳ Otago Fish & Game Council	103	Support submission 47, Ref. 64		No reason given.
↳ Federated Farmers of New Zealand	105	Oppose submission 47, Ref. 64		• Proposed Plan Change applies rules to wetlands with certain regionally significant wetland values. To extend similar protection to all wetlands goes beyond scope of plan change.

**65 Rule 12.3.2.3 - Damming or diversion of water for erection, placement, repair or maintenance of structure**

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Add new matters of discretion: "(a) <u>Effects on biological diversity and ecological values;</u> and (b) <u>Effects on the natural character of wetlands and their margins.</u> "	•Need to sustainably manage all wetlands not just those considered significant.
↳ Meridian Energy Limited	101	Oppose submission 47, Ref. 65		•Conditions proposed are effectively assessment matters and do not fit within the framework of a permitted activity.
↳ Trustpower Limited	102	Oppose submission 47, Ref. 65		• Proposed additional matters do not makesense and are too subjective.
↳ Otago Fish & Game Council	103	Support submission 47, Ref. 65		No reason given.
↳ Federated Farmers of New Zealand	105	Oppose submission 47, Ref. 65		• Proposed Plan Change applies rules to wetlands with certain regionally significant wetland values. To extend similar protection to all wetlands goes beyond scope of plan change.
↳ Department of Conservation	108	Support submission 47, Ref. 65		• Strengthens wetland protection provisions.

**66 Rule 12.3.3.1 - Damming or diversion of water - restricted discretionary activity**

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Federated Farmers of New Zealand	29	Amend	Amend: "Any <u>adverse</u> effect on any Regionally Significant Wetland or on any regionally significant wetland value"	•Implementation uncertain; means standard farming practices may be captured.
↳ Trustpower Limited	102	Support submission 29, Ref. 66		No reason given.
↳ Otago Fish & Game Council	103	Oppose submission 29, Ref. 66		• Wetlands cannot be easily created or transferred, and so to subject them to a test that is anything less than "adverse" will run the risk of off-setting or limited mitigation packages that ultimately add up to a loss or trading of individual wetland values. • Further submitter wants to see the area of wetlands to increase, and at worst case, remain static, rather than continue to endure a decline.
↳ Department of Conservation	108	Oppose submission 29, Ref. 66		• Rule as written allows ORC to consider all effects on wetlands, not just adverse effects.
Contact Energy Limited	30	Support	The restricted discretionary activity status for the damming of water that has previously been carried out remains a restricted discretionary activity (Rule 12.3.3.1(i)).	No reason given.
↳ Trustpower Limited	102	Support submission 30, Ref. 66		No reason given.
↳ Otago Fish & Game Council	103	Support in part submission 30, Ref. 66		•Can only support the amendment provided that the matters under which Council has discretion include: a) Effects on water quality and quantity after abstraction b) Effects on water level and hydrological functioning of the wetland or aquifer; c) Wetland recharge effects, and d) Effects on gamebird habitat resulting from any loss of open water.
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Amend 12.3.3.1(aa): "Any effect on and Regionally Significant Wetland or on any regionally significant wetland value <u>or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria.</u> "  Add new matters of discretion: "(o) <u>Effects on biological diversity and ecological values.</u> "	•Matters of discretion don't address/protect non-scheduled wetlands.
↳ Meridian Energy Limited	101	Oppose submission 47, Ref. 66		•Rule already enables consideration of 'any' potential adverse effects on any Regionally Significant Wetland or regionally significant wetland value. As such, relief sought by submitter is considered unnecessary.

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
↳ Trustpower Limited	102	Oppose submission 47, Ref. 66		<ul style="list-style-type: none"> <li>• Council did not intend for non-scheduled wetlands to be included in the regionally significant wetland provisions.</li> <li>• Proposed additional matters of control do not make sense and are too subjective to be included in any Rules.</li> </ul>
↳ Otago Fish & Game Council	103	Support submission 47, Ref. 66		No reason given.
↳ Federated Farmers of New Zealand	105	Oppose submission 47, Ref. 66		<ul style="list-style-type: none"> <li>• Proposed Plan Change applies rules to wetlands with certain regionally significant wetland values. To extend similar protection to all wetlands goes beyond scope of plan change.</li> </ul>
↳ Contact Energy Limited	107	Oppose submission 47, Ref. 66		<ul style="list-style-type: none"> <li>• The matters over which discretion is retained appropriately address the potential effects on wetlands.</li> <li>• The changes sought by Forest and Bird undermine the intent of Plan Change 2.</li> </ul>
↳ Department of Conservation	108	Support submission 47, Ref. 66		<ul style="list-style-type: none"> <li>• Strengthens wetland protection requirements and follows on from support for Forest &amp; Birds submission in 153 Chap.10 above.</li> </ul>

## 72 Rule 12.4.1.1 - Discharge of stormwater general

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Amend (a)(i): "Any effect on and Regionally Significant Wetland or on any regionally significant wetland value or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria."	<ul style="list-style-type: none"> <li>• Need to sustainably manage all wetlands not just those scheduled.</li> </ul>
↳ Otago Fish & Game Council	103	Support submission 47, Ref. 72		No reason given.
↳ Federated Farmers of New Zealand	105	Oppose submission 47, Ref. 72		<ul style="list-style-type: none"> <li>• Proposed Plan Change applies rules to wetlands with certain regionally significant wetland values. To extend similar protection to all wetlands goes beyond scope of plan change.</li> </ul>
↳ Department of Conservation	108	Support submission 47, Ref. 72		<ul style="list-style-type: none"> <li>• Strengthens wetland protection requirements and follows on from support for Forest &amp; Birds submission in 153 Chap.10 above.</li> </ul>

## 73 Rule 12.4.2.1 - Discharge of stormwater to water, or onto or into land where it may enter water

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Federated Farmers of New Zealand	29	Amend	Amend: "Any <u>adverse</u> effect on any Regionally Significant Wetland or on any regionally significant wetland value"	<ul style="list-style-type: none"> <li>• Implementation uncertain; means standard farming practices may be captured.</li> </ul>
↳ Otago Fish & Game Council	103	Oppose submission 29, Ref. 73		<ul style="list-style-type: none"> <li>• Wetlands cannot be easily created or transferred, and so to subject them to a test that is anything less than "adverse" will run the risk of off-setting or limited mitigation packages that ultimately add up to a loss or trading of individual wetland values.</li> <li>• Further submitter wants to see the area of wetlands to increase, and at worst case, remain static, rather than continue to endure a decline.</li> </ul>
↳ Department of Conservation	108	Oppose submission 29, Ref. 73		<ul style="list-style-type: none"> <li>• Rule as written allows ORC to consider all effects on wetlands, not just adverse effects.</li> </ul>
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Amend 12.4.2.1(c): "Any effect on and Regionally Significant Wetland or on any regionally significant wetland value or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria."  Add new matter of discretion: "(o) Effects on biological diversity and ecological values."	<ul style="list-style-type: none"> <li>• Need to sustainably manage all wetlands not just those scheduled.</li> </ul>
↳ Meridian Energy Limited	101	Oppose submission 47, Ref. 73		<ul style="list-style-type: none"> <li>• Rule already enables consideration of 'any' potential adverse effects on any Regionally Significant Wetland or regionally significant wetland value. As such, relief sought by submitter is considered unnecessary.</li> </ul>

Summary of Decisions Requested (submissions and further submissions) on Proposed Plan Change 2 (Regionally Significant Wetlands)  
Regional Plan: Water for Otago 23 November 2011

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
↳ Otago Fish & Game Council	103	Support submission 47, Ref. 73		No reason given.
↳ Federated Farmers of New Zealand	105	Oppose submission 47, Ref. 73		• Proposed Plan Change applies rules to wetlands with certain regionally significant wetland values. To extend similar protection to all wetlands goes beyond scope of plan change.
↳ Department of Conservation	108	Support submission 47, Ref. 73		• Strengthens wetland protection requirements and follows on from support for Forest & Birds submission in 153 Chap.10 above.

#### 74 Rule 12.5.1.1 - Discharge of drainage water from any drain

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Amend 12.5.1.1(aa): "Discharge is not to enter into and there is to be no change in the water level or hydrological function, or no damage to the indigenous flora, fauna or its habitat, in or on any regionally significant wetland value or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria."	•Need to sustainably manage all wetlands not just those scheduled.
↳ Meridian Energy Limited	101	Oppose submission 47, Ref. 74		•Amendments continue to result in the clause failing to provide sufficient certainty to enable a determination to be made as to whether an activity is permitted or not.
↳ Otago Fish & Game Council	103	Support submission 47, Ref. 74		No reason given.
↳ Federated Farmers of New Zealand	105	Oppose submission 47, Ref. 74		• Proposed Plan Change applies rules to wetlands with certain regionally significant wetland values. To extend similar protection to all wetlands goes beyond scope of plan change.

#### 75 Rule 12.5.2.1 - Discharge of drainage water - restricted discretionary activity

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Federated Farmers of New Zealand	29	Amend	Amend: "Any adverse effect on any Regionally Significant Wetland or on any regionally significant wetland value"	•Implementation uncertain; means standard farming practices may be captured.
↳ Otago Fish & Game Council	103	Oppose submission 29, Ref. 75		• Wetlands cannot be easily created or transferred, and so to subject them to a test that is anything less than "adverse" will run the risk of off-setting or limited mitigation packages that ultimately add up to a loss or trading of individual wetland values. • Further submitter wants to see the area of wetlands to increase, and at worst case, remain static, rather than continue to endure a decline.
↳ Royal Forest and Bird Protection Society of New Zealand Inc	106	Oppose submission 29, Ref. 75		• Council needs to consider all effects on regionally significant wetlands.
↳ Department of Conservation	108	Oppose submission 29, Ref. 75		• Rule as written allows ORC to consider all effects on wetlands, not just adverse effects.
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Amend 12.5.2.1(b): "Discharge is not to enter into and there is to be no change in the water level or hydrological function, or no damage to the indigenous flora, fauna or its habitat, in or on any regionally significant wetland value or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria."  Add new matter of discretion: "(n) Effects on biological diversity and ecological values."	•Need to sustainably manage all wetlands not just those scheduled.
↳ Meridian Energy Limited	101	Oppose submission 47, Ref. 75		•Rule already enables consideration of 'any' potential adverse effects on any Regionally Significant Wetland or regionally significant wetland value. As such, relief sought by submitter is considered unnecessary.
↳ Otago Fish & Game Council	103	Support submission 47,		No reason given.

Summary of Decisions Requested (submissions and further submissions) on Proposed Plan Change 2 (Regionally Significant Wetlands)  
Regional Plan: Water for Otago 23 November 2011

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
		Ref. 75		

## 76 Rule 12.7.1.1 - Discharge of herbicide to water

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Lake Waihola Waipori Wetlands Society Inc.	20	Amend	Amend to provide for control of terrestrial weed species within wetlands.	<ul style="list-style-type: none"> <li>•Rule only relates to the control of aquatic plants, not terrestrial plants.</li> <li>•Many weeds within wetlands are terrestrial species (e.g. willow, elder).</li> </ul>
↳ Otago Fish & Game Council	103	Support submission 20, Ref. 76		•No reason given.
↳ Federated Farmers of New Zealand	105	Support in part submission 20, Ref. 76		<ul style="list-style-type: none"> <li>• Agree that weed control has positive effects on hydrology and sediment movement. As worded, rule looks at whether 'any' effects have occurred.</li> <li>• People controlling weeds may be penalised for creating positive changes. Rule needs to look at 'adverse' effects not 'any' effects.</li> </ul>

## 77 Rule 12.7.1.2 - Discharge of pesticide, land-based discharge onto land

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Lake Waihola Waipori Wetlands Society Inc.	20	Amend	Wetland restorative works and weed control must be made simpler.	<ul style="list-style-type: none"> <li>•Rule is confusing and makes wetland restorative efforts difficult to develop, plan and implement.</li> <li>•Weed control by herbicide application in wetlands is virtually impossible without short term effects on non-target species.</li> <li>•Weed control has positive effects on hydrology and sediment movement. Rule only looks at whether effects have occurred. People controlling weeds may be penalised for creating positive changes.</li> </ul>
↳ Otago Fish & Game Council	103	Support submission 20, Ref. 77		<ul style="list-style-type: none"> <li>•Plan as written appears to assume that all activities affecting wetlands will be for extractive use, rather than enhancement.</li> <li>•Raises the possibility of the establishment of a wetlands committee to advise on, under permitted or controlled activity status, the enhancement of wetlands.</li> <li>•Any poison that has a long term benefit (including short term negative effects on non-target species) and does not bioaccumulate should be supported when the goal is wetland enhancement or control of pest species.</li> </ul>
↳ Federated Farmers of New Zealand	105	Support in part submission 20, Ref. 77		<ul style="list-style-type: none"> <li>• Agree that weed control has positive effects on hydrology and sediment movement. As worded, rule looks at whether 'any' effects have occurred.</li> <li>• People controlling weeds may be penalised for creating positive changes. Rule needs to look at 'adverse' effects not 'any' effects.</li> </ul>
Department of Conservation	42	Amend	Amend: "(e) There is no change to the water level or hydrological function, or damage to the flora, <u>indigenous fauna</u> or its habitat, in or on any Regionally Significant Wetland."	•The discharge of pesticide may damage selected indigenous fauna.
↳ Otago Fish & Game Council	103	Support submission 42, Ref. 77		No reason given.
Beaton family of Berwick	45	Amend	Amend to include some control on spraying, and spray drift.	<ul style="list-style-type: none"> <li>•Have experienced people spraying planted trees (e.g., 25 years' old) along with willows.</li> <li>•Experience does not support the view that natural vegetation will regenerate by doing nothing after spraying.</li> </ul>
↳ Otago Fish & Game Council	103	Support in part submission 45, Ref. 77		<ul style="list-style-type: none"> <li>• Requested changes are all related to restoration work, or recreational use of wetlands.</li> <li>• Raises the possibility of establishing a Wetlands Committee that can advise on wetland works under permitted and controlled activity status.</li> </ul>
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Amend: "(e) There is no change to the water level or hydrological function, or	•Chemicals will be used to kill pest plants; under rule currently worded, a consent would be required.

Summary of Decisions Requested (submissions and further submissions) on Proposed Plan Change 2 (Regionally Significant Wetlands)  
Regional Plan: Water for Otago 23 November 2011

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
			<i>damage to the indigenous flora, fauna or its habitat, in or on any Regionally Significant Wetland."</i>	
↳ Otago Fish & Game Council	103	Support submission 47, Ref. 77		No reason given.

### 78 Rule 12.7.1.3 - Discharge of herbicide to air or land

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Lake Waihola Waipori Wetlands Society Inc.	20	Amend	Wetland restorative works and weed control must be made simpler.	<ul style="list-style-type: none"> <li>•Rule is confusing and makes wetland restorative efforts difficult to develop, plan and implement.</li> <li>•Weed control by herbicide application in wetlands is virtually impossible without short term effects on non-target species.</li> <li>•Weed control has positive effects on hydrology and sediment movement. Rule only looks at whether effects have occurred. People controlling weeds may be penalised for creating positive changes.</li> </ul>
↳ Otago Fish & Game Council	103	Support submission 20, Ref. 78		<ul style="list-style-type: none"> <li>•Plan as written appears to assume that all activities affecting wetlands will be for extractive use, rather than enhancement.</li> <li>•Raises the possibility of the establishment of a wetlands committee to advise on, under permitted or controlled activity status, the enhancement of wetlands.</li> <li>•Any poison that has a long term benefit (including short term negative effects on non-target species) and does not bioaccumulate should be supported when the goal is wetland enhancement or control of pest species.</li> </ul>
↳ Federated Farmers of New Zealand	105	Support in part submission 20, Ref. 78		<ul style="list-style-type: none"> <li>• Agree that weed control has positive effects on hydrology and sediment movement. As worded, rule looks at whether 'any' effects have occurred.</li> <li>• People controlling weeds may be penalised for creating positive changes. Rule needs to look at 'adverse' effects not 'any' effects.</li> </ul>
Department of Conservation	42	Amend	Amend: "(e) There is no change to the water level or hydrological function, or damage to the flora, <u>indigenous fauna</u> or its habitat, in or on any Regionally Significant Wetland."	<ul style="list-style-type: none"> <li>•The discharge of herbicide may damage selected indigenous flora.</li> </ul>
↳ Otago Fish & Game Council	103	Support submission 27, Ref. 78		No reason given.
Beaton family of Berwick	45	Amend	Amend to include some control on spraying, and spray drift.	<ul style="list-style-type: none"> <li>•Have experienced people spraying planted trees (e.g., 25 years' old) along with willows.</li> <li>•Experience does not support the view that natural vegetation will regenerate by doing nothing after spraying.</li> </ul>
↳ Otago Fish & Game Council	103	Support in part submission 45, Ref. 78		<ul style="list-style-type: none"> <li>• Requested changes are all related to restoration work, or recreational use of wetlands.</li> <li>• Raises the possibility of establishing a Wetlands Committee that can advise on wetland works under permitted and controlled activity status.</li> </ul>

### 79 Rule 12.7.1.4 - Discharge of pesticide, aerial discharge onto land

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Lake Waihola Waipori Wetlands Society Inc.	20	Amend	Wetland restorative works and weed control must be made simpler.	<ul style="list-style-type: none"> <li>•Rule is confusing and makes wetland restorative efforts difficult to develop, plan and implement.</li> <li>•Weed control by herbicide application in wetlands is virtually impossible without short term effects on non-target species.</li> <li>•Weed control has positive effects on hydrology and sediment movement. Rule only looks at whether effects have occurred. People controlling weeds may be penalised for creating positive changes.</li> </ul>
↳ Otago Fish & Game Council	103	Support submission 20,		<ul style="list-style-type: none"> <li>•Plan as written appears to assume that all activities affecting wetlands</li> </ul>

Summary of Decisions Requested (submissions and further submissions) on Proposed Plan Change 2 (Regionally Significant Wetlands)  
Regional Plan: Water for Otago 23 November 2011

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
		Ref. 79		will be for extractive use, rather than enhancement. •Raises the possibility of the establishment of a wetlands committee to advise on, under permitted or controlled activity status, the enhancement of wetlands. •Any poison that has a long term benefit (including short term negative effects on non-target species) and does not bioaccumulate should be supported when the goal is wetland enhancement or control of pest species.
↳ Federated Farmers of New Zealand	105	Support in part submission 20, Ref. 79		• Agree that weed control has positive effects on hydrology and sediment movement. As worded, rule looks at whether 'any' effects have occurred. • People controlling weeds may be penalised for creating positive changes. Rule needs to look at 'adverse' effects not 'any' effects.
Department of Conservation	42	Amend	Amend: "(e) There is no change to the water level or hydrological function, or damage to the flora, <u>indigenous fauna</u> or its habitat, in or on any Regionally Significant Wetland."	•The discharge of pesticide may damage selected indigenous fauna.
↳ Otago Fish & Game Council	103	Support submission 42, Ref. 79		No reason given.
Beaton family of Berwick	45	Amend	Amend to include some control on spraying, and spray drift.	•Have experienced people spraying planted trees (e.g., 25 years' old) along with willows. •Experience does not support the view that natural vegetation will regenerate by doing nothing after spraying.
↳ Otago Fish & Game Council	103	Support in part submission 45, Ref. 79		• Requested changes are all related to restoration work, or recreational use of wetlands. • Raises the possibility of establishing a Wetlands Committee that can advise on wetland works under permitted and controlled activity status.

#### 80 Rule 12.8.1.1 - Discharge of animal dip material

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Amend 12.8.1.1(k): "There is no change to the water level or hydrological function, or no damage to the <u>indigenous flora and fauna</u> or its habitat, in or on any Regionally Significant Wetland, or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria."	•Agricultural waste and fertiliser can be toxic to wetlands, and rule should cover more than just scheduled wetlands.
↳ Otago Fish & Game Council	103	Support submission 47, Ref. 80		No reason given.
↳ Federated Farmers of New Zealand	105	Oppose submission 47, Ref. 80		• Proposed Plan Change applies rules to wetlands with certain regionally significant wetland values. To extend similar protection to all wetlands goes beyond scope of plan change.

#### 81 Rule 12.8.1.2 - Discharge of contaminants collected in animal waste collection system in Zone A of Lower Waitaki Plains Groundwater Protection Zone

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Three Creeks Farm	19	Amend	If Te Hua Taki Wetland (Map F66, #171) is retained as a regionally significant wetland then provide that there are no setbacks from the wetland for the application of Farm Dairy Effluent.	•We have farmed alongside the wetland and in harmony with its values for a number of years, it is fenced and kept in its natural state. •Our cowshed and milking platform are close to the wetland. •Identifying the wetland as regionally significant may affect the integrity and functioning of our dairy farm effluent system.
↳ Otago Fish & Game Council	103	Support in part submission 19, Ref. 81		• Accepts that the wetland might be used for existing dairy farm effluent. •Might be possible to accept this wetland without a setback provided that the effluent flowing into the wetland (if any) is within environmentally acceptable limits.
↳ Federated Farmers of New Zealand	105	Support submission 19,		• Supports full consultation in ascertaining what is a Regionally

Summary of Decisions Requested (submissions and further submissions) on Proposed Plan Change 2 (Regionally Significant Wetlands)  
Regional Plan: Water for Otago 23 November 2011

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
		Ref. 81		Significant Wetland and supports any restrictions on activities being limited to within a Regionally Significant Wetland itself.
Department of Conservation	42	Amend	Amend: "(c) The discharge occurs more than 50 metres from any surface water body, <u>Regionally Significant Wetland</u> , or mean high water springs:"	•The addition of nutrients directly to Regionally Significant Wetlands should be restrained, as it is highly likely to cause adverse effects. •Gives effect to NPS Freshwater Management.
↳ Otago Fish & Game Council	103	Support submission 42, Ref. 81		No reason given.
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Amend 12.8.1.2(l): "There is no change to the water level or hydrological function, or no damage to the <u>indigenous</u> flora and fauna or its habitat, in or on any Regionally Significant Wetland, or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria."	•Agricultural waste and fertiliser can be toxic to wetlands, and rule should cover more than just scheduled wetlands.
↳ Otago Fish & Game Council	103	Support submission 47, Ref. 81		No reason given.
↳ Federated Farmers of New Zealand	105	Oppose submission 47, Ref. 81		• Proposed Plan Change applies rules to wetlands with certain regionally significant wetland values. To extend similar protection to all wetlands goes beyond scope of plan change.
↳ Department of Conservation	108	Support submission 47, Ref. 81		• Similar to DOC submission

### 82 Rule 12.8.1.3 - Discharge of contaminants collected in animal waste collection system not in Zone A of a Groundwater Protection Zone

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Department of Conservation	42	Amend	Amend: "(c) The discharge occurs more than 50 metres from any surface water body, <u>Regionally Significant Wetland</u> , or mean high water springs:"	•The addition of nutrients directly to Regionally Significant Wetlands should be restrained, as it is highly likely to cause adverse effects. •Gives effect to NPS Freshwater Management.
↳ Otago Fish & Game Council	103	Support submission 42, Ref. 82		No reason given.
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Amend 12.8.1.3(l): "There is no change to the water level or hydrological function, or no damage to the <u>indigenous</u> flora and fauna or its habitat, in or on any Regionally Significant Wetland, or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria."	•Agricultural waste and fertiliser can be toxic to wetlands, and rule should cover more than just scheduled wetlands.
↳ Otago Fish & Game Council	103	Support submission 47, Ref. 82		No reason given.
↳ Federated Farmers of New Zealand	105	Oppose submission 47, Ref. 82		• Proposed Plan Change applies rules to wetlands with certain regionally significant wetland values. To extend similar protection to all wetlands goes beyond scope of plan change.
↳ Department of Conservation	108	Support submission 47, Ref. 82		• Similar to DOC submission

### 83 Rule 12.8.1.5 - Discharge of fertiliser onto production land where it may enter water

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Amend 12.8.1.5(c): "There is no change to the water level or hydrological function, or no damage to the <u>indigenous</u> flora and fauna or its habitat, in or on any Regionally Significant Wetland, or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria."	•Agricultural waste and fertiliser can be toxic to wetlands, and rule should cover more than just scheduled wetlands.
↳ Otago Fish & Game Council	103	Support submission 47, Ref. 83		No reason given.
↳ Federated Farmers of New Zealand	105	Oppose submission 47, Ref. 83		• Proposed Plan Change applies rules to wetlands with certain regionally significant wetland values. To extend similar protection to all wetlands goes beyond scope of plan change.
↳ Department of Conservation	108	Support submission 47,		• Similar to DOC submission

Summary of Decisions Requested (submissions and further submissions) on Proposed Plan Change 2 (Regionally Significant Wetlands)  
Regional Plan: Water for Otago 23 November 2011



SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
		Ref. 83		

#### 84 Rule 12.8.2.1 - Discharge of contaminants collected in animal waste collection system in Zone A Groundwater Protection Zones on Maps C10-C12 and C15

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Federated Farmers of New Zealand	29	Amend	Amend: "Any <u>adverse effect</u> on any Regionally Significant Wetland or on any regionally significant wetland value"	•Implementation uncertain; means standard farming practices may be captured.
↳ Otago Fish & Game Council	103	Oppose submission 29, Ref. 84		• Wetlands cannot be easily created or transferred, and so to subject them to a test that is anything less than "adverse" will run the risk of off-setting or limited mitigation packages that ultimately add up to a loss or trading of individual wetland values. • Further submitter wants to see the area of wetlands to increase, and at worst case, remain static, rather than continue to endure a decline.
↳ Royal Forest and Bird Protection Society of New Zealand Inc	106	Oppose submission 29, Ref. 84		• Council needs to consider all effects on regionally significant wetlands.
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Amend (aa): "Any effect on and Regionally Significant Wetland or on any regionally significant wetland value or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria."  Amend (a)(ii): "The natural character of any affected water body <u>and their margins</u> ."  Add new matter of discretion: "(o) Any effects on biological diversity and ecological values."	•Need to sustainably manage all wetlands not just those scheduled.
↳ Otago Fish & Game Council	103	Support submission 47, Ref. 84		No reason given.
↳ Federated Farmers of New Zealand	105	Oppose submission 47, Ref. 84		• Proposed Plan Change applies rules to wetlands with certain regionally significant wetland values. To extend similar protection to all wetlands goes beyond scope of plan change.
↳ Department of Conservation	108	Support submission 47, Ref. 84		• Strengthens wetland protection requirements and follows on from support for Forest & Birds submission in 153 Chap.10 above.

#### 85 Rule 12.9.1.1 - Discharge of water associated with down-hole pump testing

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Amend 12.9.1.1(a): "There is no change to the water level or hydrological function, or no damage to the <u>indigenous flora and fauna</u> or its habitat, in or on any Regionally Significant Wetland, or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria."  Add the following matters: "(a) Effects on biological diversity and ecological values; and (b) There is no discharge to any surface water body including wetlands; and (c) Effects on the natural character of wetlands and their margins."	•Need to sustainably manage all wetlands not just those scheduled.
↳ Otago Fish & Game Council	103	Support submission 47, Ref. 85		No reason given.
↳ Federated Farmers of New Zealand	105	Oppose submission 47, Ref. 85		• Proposed Plan Change applies rules to wetlands with certain regionally significant wetland values. To extend similar protection to all wetlands goes beyond scope of plan change.
↳ Department of Conservation	108	Support submission 47, Ref. 85		• Strengthens wetland protection requirements and follows on from support for Forest & Birds submission in 153 Chap.10 above.

Summary of Decisions Requested (submissions and further submissions) on Proposed Plan Change 2 (Regionally Significant Wetlands)  
Regional Plan: Water for Otago 23 November 2011

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
				• Similar to DOC submission re: indigenous flora.

### 86 Rule 12.9.1.2 - Discharge of contaminants associated with drilling

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Amend 12.9.1.2(a): "There is no change to the water level or hydrological function, or no damage to the <u>indigenous flora and fauna</u> or its habitat, in or on any Regionally Significant Wetland, or any wetland that meets the <u>significance criteria listed in Appendix XX Ecological Criteria.</u> "  Add the following matters: " <u>(a) Effects on biological diversity and ecological values; and</u> <u>(b) There is no discharge to any surface water body including wetlands; and</u> <u>(c) Effects on the natural character of wetlands and their margins.</u> "	•Need to sustainably manage all wetlands not just those scheduled.
↳ Otago Fish & Game Council	103	Support submission 47, Ref. 86		No reason given.
↳ Federated Farmers of New Zealand	105	Oppose submission 47, Ref. 86		• Proposed Plan Change applies rules to wetlands with certain regionally significant wetland values. To extend similar protection to all wetlands goes beyond scope of plan change.
↳ Department of Conservation	108	Support submission 47, Ref. 86		• Strengthens wetland protection requirements and follows on from support for Forest & Birds submission in 153 Chap.10 above. • Similar to DOC submission re: indigenous flora.

### 87 Rule 12.9.2.1 - Discharge of water or contaminants associated with down-hole pump testing or drilling - restricted discretionary activity

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Federated Farmers of New Zealand	29	Amend	Amend: "Any <u>adverse</u> effect on any Regionally Significant Wetland or on any regionally significant wetland value"	•Implementation uncertain; means standard farming practices may be captured.
↳ Otago Fish & Game Council	103	Oppose submission 29, Ref. 87		• Wetlands cannot be easily created or transferred, and so to subject them to a test that is anything less than "adverse" will run the risk of off-setting or limited mitigation packages that ultimately add up to a loss or trading of individual wetland values. • Further submitter wants to see the area of wetlands to increase, and at worst case, remain static, rather than continue to endure a decline.
↳ Royal Forest and Bird Protection Society of New Zealand Inc	106	Oppose submission 29, Ref. 87		• Council needs to consider all effects on regionally significant wetlands.
↳ Department of Conservation	108	Oppose submission 29, Ref. 87		• Rule as written allows ORC to consider all effects on wetlands, not just adverse effects.
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Amend (b): "Any effect on and Regionally Significant Wetland or on any regionally significant wetland value <u>or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria.</u> "  Amend (a)(ii): "The natural character of any affected water body <u>and their margins.</u> "  Add new matter of discretion: " <u>(o) Any effects on biological diversity and ecological values.</u> "	•Need to sustainably manage all wetlands not just those scheduled.
↳ Otago Fish & Game Council	103	Support submission 47, Ref. 87		No reason given.
↳ Federated Farmers of New Zealand	105	Oppose submission 47, Ref. 87		• Proposed Plan Change applies rules to wetlands with certain regionally significant wetland values. To extend similar protection to all wetlands

Summary of Decisions Requested (submissions and further submissions) on Proposed Plan Change 2 (Regionally Significant Wetlands)  
Regional Plan: Water for Otago 23 November 2011

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
				goes beyond scope of plan change.
↳ Department of Conservation	108	Support submission 47, Ref. 87		• Strengthens wetland protection requirements and follows on from support for Forest & Birds submission in 153 Chap.10 above.

#### 88 Rule 12.10.1.1 - Discharge of any contaminant or water from a vessel

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Amend (a): "There is no discharge into or change the water level or hydrological function, or no damage to the indigenous flora and fauna or its habitat, in or on any Regionally Significant Wetland, or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria."	•Current words do not provide Council with necessary control on potential adverse effects of contaminant discharge.
↳ Otago Fish & Game Council	103	Support submission 47, Ref. 88		No reason given.
↳ Federated Farmers of New Zealand	105	Oppose submission 47, Ref. 88		• Do not agree with extending the proposed plan change's protection to unidentified and unassessed wetlands.
↳ Department of Conservation	108	Support submission 47, Ref. 88		• Strengthens wetland protection requirements and follows on from support for Forest & Birds submission in 153 Chap.10 above.

#### 89 Rule 12.10.2.1 - Discharge of any contaminant or water from a vessel or from maintenance of vessel - restricted discretionary activity

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Amend (b): "Any effect on any Regionally Significant Wetland or on any regionally significant wetland value or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria."  Amend (a)(ii): "The natural character of any affected water body and their margins."  Add new matter of discretion: "(m) Any effects on biological diversity and ecological values."	•Current words do not provide Council with necessary control on potential adverse effects of contaminant discharge.
↳ Otago Fish & Game Council	103	Support submission 47, Ref. 89		No reason given.
↳ Federated Farmers of New Zealand	105	Oppose submission 47, Ref. 89		• Do not agree with extending the proposed plan change's protection to unidentified and unassessed wetlands
↳ Department of Conservation	108	Support submission 47, Ref. 89		• Strengthens wetland protection requirements and follows on from support for Forest & Birds submission in 153 Chap.10 above.

#### 90 Rule 12.11.2.1 - Discharge of sullage, cooling, drinking water supply reservoir, water supply pipeline or swimming pool water

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Amend 12.11.2.1(g): "There is no discharge into or change to the water level or hydrological function, or no damage to the indigenous flora and fauna or its habitat, in or on any Regionally Significant Wetland, or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria."	•Need to sustainably manage all wetlands not just those scheduled.
↳ Otago Fish & Game Council	103	Support submission 47, Ref. 90		No reason given.
↳ Federated Farmers of New Zealand	105	Oppose submission 47, Ref. 90		• Proposed Plan Change applies rules to wetlands with certain regionally significant wetland values. To extend similar protection to all wetlands goes beyond scope of plan change.
↳ Department of Conservation	108	Support submission 47,		• Strengthens wetland protection requirements and follows on from

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
		Ref. 90		support for Forest & Birds submission in 153 Chap.10 above.

## 91 Rule 12.11.2.2 - Discharge of water used for holding live organisms

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Amend 12.11.2.2(a): " <u>There is no discharge into or change to the water level or hydrological function, or no damage to the indigenous flora and fauna or its habitat, in or on any Regionally Significant Wetland, or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria.</u> "	•Need to sustainably manage all wetlands not just those scheduled.
↳ Otago Fish & Game Council	103	Support submission 47, Ref. 91		No reason given.
↳ Federated Farmers of New Zealand	105	Oppose submission 47, Ref. 91		• Proposed Plan Change applies rules to wetlands with certain regionally significant wetland values. To extend similar protection to all wetlands goes beyond scope of plan change.
↳ Department of Conservation	108	Support submission 47, Ref. 91		• Strengthens wetland protection requirements and follows on from support for Forest & Birds submission in 153 Chap.10 above.

## 92 Rule 12.11.2.3 - Discharge of any other water

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Amend 12.11.2.3(h): " <u>There is no discharge into or change to the water level or hydrological function, or no damage to the indigenous flora and fauna or its habitat, in or on any Regionally Significant Wetland, or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria.</u> "	•Need to sustainably manage all wetlands not just those scheduled.
↳ Otago Fish & Game Council	103	Support submission 47, Ref. 92		No reason given.
↳ Federated Farmers of New Zealand	105	Oppose submission 47, Ref. 92		• Proposed Plan Change applies rules to wetlands with certain regionally significant wetland values. To extend similar protection to all wetlands goes beyond scope of plan change.
↳ Department of Conservation	108	Support submission 47, Ref. 92		• Strengthens wetland protection requirements and follows on from support for Forest & Birds submission in 153 Chap.10 above.

## 156 Chapter 12 general

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Treble Cone Investments Limited	2	Amend	Amend clauses within 12.1 to provide for taking of surface water to be a permitted activity for wetlands within the Ski Area Sub Zones (areas currently designated as Ski Area Sub Zones in the Queenstown-Lakes District Plan).	No reason given.
↳ Otago Fish & Game Council	103	Oppose submission 2, Ref. 156		• Alpine wetlands are a threatened habitat for Paradise Shelduck. • There is no reason to remove alpine wetlands from the blanket protection on the basis of existing skifield operations in a few locations. • There is no reason to make the rules more permissive.
↳ Royal Forest and Bird Protection Society of New Zealand Inc	106	Oppose submission 2, Ref. 156		• Ski Areas include wetlands of regional significance and surface water takes can have adverse effects.
↳ Department of Conservation	108	Oppose submission 2, Ref. 156		• This approach is likely to cause adverse effects to wetlands.
Treble Cone Investments Limited	2	Amend	Amend clauses within 12.2, 12.3, 12.9, and 12.11 to provide for: •taking of ground water, and •damming and diversion of water, and •discharges from drilling and bore testing, and	No reason given.

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
			•discharges of water or tracer dye to be a permitted activity within the Ski Area Sub Zones (areas currently designated as Ski Area Sub Zones in the Queenstown-Lakes District Plan).	
↳ Otago Fish & Game Council	103	Support submission 2, Ref. 156		<ul style="list-style-type: none"> <li>• Alpine wetlands are a threatened habitat for Paradise Shelduck.</li> <li>• There is no reason to remove alpine wetlands from the blanket protection on the basis of existing skifield operations in a few locations.</li> <li>• There is no reason to make the rules more permissive.</li> </ul>
↳ Royal Forest and Bird Protection Society of New Zealand Inc	106	Oppose submission 2, Ref. 156		<ul style="list-style-type: none"> <li>• Ski Areas include wetlands of regional significance and these activities can have adverse effects.</li> </ul>
↳ Department of Conservation	108	Oppose submission 2, Ref. 156		<ul style="list-style-type: none"> <li>• This approach is likely to cause adverse effects to wetlands.</li> </ul>
Treble Cone Investments Limited	2	Amend	Clarify Discharge of Water provisions to confirm that any discharge of water associated with a snowmaking system is a permitted activity.	No reason given.
Otago Fish & Game Council	8	Amend	Would like the proposed plan to signal the following as criterion within the rules: Resource consent fee relief to protect, create, or enhance wetlands.	<ul style="list-style-type: none"> <li>•Resource consent fee relief is workable and proactive.</li> <li>•Creation/enhancement of a wetland should not have the same consent fees as an activity that will damage a wetland.</li> <li>•Current consent fees encourage non-compliance and illegal activity and discourage creation or enhancement of wetlands.</li> <li>•Also wants clarification how internal compliance/enforcement practices will change.</li> </ul>
↳ Lake Waihola Waipori Wetlands Society Inc.	104	Support submission 8, Ref. 156		<ul style="list-style-type: none"> <li>• Resource consent fees for enhancement and restoration are actually detrimental to the encouragement of wetland protection. Costs for consents must be kept at zero to encourage enhancement and restoration.</li> </ul>
↳ Federated Farmers of New Zealand	105	Support in part submission 8, Ref. 156		<ul style="list-style-type: none"> <li>• Current consent fees discourage creation or enhancement of wetlands and that resource consent fee relief is workable and proactive.</li> </ul>
↳ Royal Forest and Bird Protection Society of New Zealand Inc	106	Support submission 8, Ref. 156		<ul style="list-style-type: none"> <li>• Supports the encouragement of wetland creation and enhancement and this would be a small but significant means of doing that.</li> </ul>
↳ Department of Conservation	108	Support submission 8, Ref. 156		No reason given.
Otago Fish & Game Council	8	Support	Supports all rules within the proposed plan where the addition of the words "Regionally Significant Wetland" has been added to the previous rule which was related to lakes and rivers.	No reason given.
↳ Trustpower Limited	102	Oppose submission 8, Ref. 156		<ul style="list-style-type: none"> <li>• Relief being sought is inconsistent with Trustpower's submission.</li> </ul>
↳ Department of Conservation	108	Support submission 8, Ref. 156		No reason given.
Cardrona Alpine Resort	15	Amend	Amend clauses within 12.1 to provide for taking of surface water to be a permitted activity for wetlands within the Ski Area Sub Zones (areas currently designated as Ski Area Sub Zones in the Queenstown-Lakes District Plan).	<ul style="list-style-type: none"> <li>•Skifield operations have not been considered in the proposal, and are a vital part of the economy.</li> </ul>
↳ Otago Fish & Game Council	103	Oppose submission 15, Ref. 156		<ul style="list-style-type: none"> <li>• No case that that protecting all wetlands above 800m will affect the economics of the skifield industry.</li> <li>• It is likely that the skifield industry can afford to undertake proper planning of operations to limit their effects on alpine wetlands.</li> </ul>
↳ Department of Conservation	108	Oppose submission 15, Ref. 156		<ul style="list-style-type: none"> <li>• This approach is likely to cause adverse effects to wetlands.</li> </ul>
Cardrona Alpine Resort	15	Amend	Amend clauses within 12.2, 12.3, 12.9, and 12.11 to provide for: <ul style="list-style-type: none"> <li>•taking of ground water, and</li> <li>•damming and diversion of water, and</li> <li>•discharges from drilling and bore testing, and</li> <li>•discharges of water or tracer dye to be a permitted activity within the Ski Area Sub Zones (areas currently designated as Ski Area Sub Zones in the Queenstown-Lakes District Plan).</li> </ul>	<ul style="list-style-type: none"> <li>•Skifield operations have not been considered in the proposal, and are a vital part of the economy.</li> </ul>
↳ Otago Fish & Game Council	103	Oppose submission 15, Ref. 156		<ul style="list-style-type: none"> <li>• No case that that protecting all wetlands above 800m will affect the economics of the skifield industry.</li> </ul>

Summary of Decisions Requested (submissions and further submissions) on Proposed Plan Change 2 (Regionally Significant Wetlands)  
Regional Plan: Water for Otago 23 November 2011

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
				<ul style="list-style-type: none"> <li>It is likely that the skifield industry can afford to undertake proper planning of operations to limit their effects on alpine wetlands.</li> </ul>
↳ Department of Conservation	108	Oppose submission 15, Ref. 156		<ul style="list-style-type: none"> <li>This approach is likely to cause adverse effects to wetlands.</li> </ul>
Cardrona Alpine Resort	15	Amend	Clarify Discharge of Water provisions to confirm that any discharge of water associated with a snowmaking system is a permitted activity.	<ul style="list-style-type: none"> <li>Skifield operations have not been considered in the proposal, and are a vital part of the economy.</li> </ul>
↳ Otago Fish & Game Council	103	Oppose submission 15, Ref. 156		<ul style="list-style-type: none"> <li>No case that that protecting all wetlands above 800m will affect the economics of the skifield industry.</li> <li>It is likely that the skifield industry can afford to undertake proper planning of operations to limit their effects on alpine wetlands.</li> </ul>
Three Creeks Farm	19	Amend	If Te Hua Taki Wetland (Map F66, #171) is retained as a regionally significant wetland then provide that the taking of water from the wetland and taking of adjacent groundwater for stock, domestic and agricultural use is a permitted activity.	<ul style="list-style-type: none"> <li>Plan Change fails to provide for my economic wellbeing and that of the community around the affected area, as required by s 5 RMA.</li> <li>We have farmed alongside the wetland and in harmony with its values for a number of years.</li> <li>Our current water take is adjacent to the wetland.</li> </ul>
↳ Otago Fish & Game Council	103	Support in part submission 19, Ref. 156		<ul style="list-style-type: none"> <li>If the water take is from groundwater but occurs in the likely interface zone between the wetland and the aquifer, then it is possible that the take could affect the water level of the wetland.</li> <li>Further submitter would need to know more about the quantity of water extracted before being prepared to accept this as an existing water take.</li> </ul>
↳ Federated Farmers of New Zealand	105	Support in part submission 19, Ref. 156		<ul style="list-style-type: none"> <li>There has been a lack of consultation throughout resulting in an inaccurate inclusion of the wetland.</li> <li>Current farming activities on both the wetland and adjacent land would be affected if the wetland continues to be inaccurately included.</li> </ul>
D W Lyders	24	Did not specify	No decision requested.	<ul style="list-style-type: none"> <li>Concern that proposed rules will prevent or hamper the continuation of enhancement of Waipori/Waiholo Wetland (by spraying willow, alders, gorse or by creation of ponds for wildlife) by requiring costly and time consuming consent.</li> </ul>
↳ Otago Fish & Game Council	103	Support submission 24, Ref. 156		<ul style="list-style-type: none"> <li>Rules have to be changed to be either more permissive on restoration, and/or for resource consent fee relief.</li> <li>An alternative is a wetlands committee.</li> </ul>
↳ Lake Waiholo Waipori Wetlands Society Inc.	104	Support submission 24, Ref. 156		<ul style="list-style-type: none"> <li>The proposed rules will add an additional layer of cost and compliance to the process of wetland enhancement.</li> </ul>
Michael and Christine Holland	25	Amend	Want no changes to irrigation takes above the Waianakarua River Estuary Swamp (Map F65, #164).	<ul style="list-style-type: none"> <li>Do not want farming operation affected, wetland is already adequately protected by fencing.</li> </ul>
↳ Otago Fish & Game Council	103	Support submission 25, Ref. 156		<ul style="list-style-type: none"> <li>There shouldn't be any need for land use changes adjacent to the wetland if it is already fenced and if the farming operation isn't causing any discharge into the wetland.</li> </ul>
↳ Federated Farmers of New Zealand	105	Support in part submission 25, Ref. 156		<ul style="list-style-type: none"> <li>Landowner accepts the wetland itself being included but wants to ensure adjacent activities are not affected.</li> </ul>
Federated Farmers of New Zealand	29	Support	Supports the restructuring of wetland rules to make them more concise, clear and consistent.	No reason given.
↳ Otago Fish & Game Council	103	Oppose submission 29, Ref. 156		No reason given.
Federated Farmers of New Zealand	29	Amend	Reinstate the word 'adverse' in these provisions: 12.1.4.8, 12.2.3.4, 12.3.3.1, 12.4.2.1, 12.5.2.1, 12.8.2, 12.9.2.1.	<ul style="list-style-type: none"> <li>Implementation uncertain; means standard farming practices may be captured.</li> </ul>
↳ Otago Fish & Game Council	103	Oppose submission 29, Ref. 156		No reason given.
↳ Royal Forest and Bird Protection Society of New Zealand Inc	106	Amend submission 29, Ref. 156		<ul style="list-style-type: none"> <li>Council needs to consider all effects on regionally significant wetlands.</li> </ul>
↳ Department of Conservation	108	Oppose submission 29, Ref. 156		<ul style="list-style-type: none"> <li>Rule as written allows ORC to consider all effects on wetlands, not just adverse effects.</li> </ul>
Contact Energy Limited	30	Did not specify	The opportunity to mitigate or offset the effects of activities on Regionally Significant Wetlands be given recognition in the rules.	<ul style="list-style-type: none"> <li>Wetlands can be relocated and enhanced.</li> <li>Concerned by hierarchy of avoid, followed by remedy or mitigate - not endorsed in RMA.</li> </ul>
↳ Trustpower Limited	102	Support submission 30, Ref. 156		No reason given.
↳ Otago Fish & Game Council	103	Oppose submission 30,		<ul style="list-style-type: none"> <li>Wetlands cannot be moved or created elsewhere.</li> </ul>

Summary of Decisions Requested (submissions and further submissions) on Proposed Plan Change 2 (Regionally Significant Wetlands)  
Regional Plan: Water for Otago 23 November 2011

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
		Ref. 156		
↳ Federated Farmers of New Zealand	105	Support in part submission 30, Ref. 156		• Agree that hierarchy of avoid, followed by remedy or mitigate not endorsed in RMA.
↳ Royal Forest and Bird Protection Society of New Zealand Inc	106	Neither support nor oppose submission 30, Ref. 156		• Neither offsetting or mitigation will result in the protection of regionally significant wetlands. Avoidance provides certainty and meets Part 2 and S 30 RMA requirements.
↳ Department of Conservation	108	Oppose submission 30, Ref. 156		• Avoidance as a first option is likely to give far more protection to wetlands than remedy or mitigate.
Transpower New Zealand Limited	37	Support	Retain the amendments to the discharge rules without further modification.	•With no structures within wetlands, there should be no need for Transpower to make any discharges.
Hawksbury Lagoon Inc	39	Amend	Default position on rules and policies should be a conserved wetland rather than create permitted activities (To keep faith with the objective to "avoid").	No reason given.
↳ OtagoNet Joint Venture	100	Oppose submission 39, Ref. 156		• Concerned with the primacy that has been given to avoiding adverse effects.
↳ Trustpower Limited	102	Oppose submission 39, Ref. 156		• Relief being sought is inconsistent with Trustpower's submission.
↳ Otago Fish & Game Council	103	Support in part submission 39, Ref. 156		• Permitted activities cannot exist without oversight, unless overseen by a Wetlands Committee.
↳ Federated Farmers of New Zealand	105	Oppose submission 39, Ref. 156		• Inconsistent with Part 5, RMA.
TrustPower Limited	40	Amend	Remove rules (or standards in rules) that seek to achieve no net change of any particular value(s).	•They do not enable compliance to be objectively assessed, and result in uncertainty over their application.
↳ Royal Forest and Bird Protection Society of New Zealand Inc	106	Oppose submission 40, Ref. 156		• Avoidance provides certainty and meets Part 2 and S 30 RMA requirements for wetland protection.
↳ Department of Conservation	108	Oppose submission 40, Ref. 156		• Likely to weaken wetland protection.
Department of Conservation	42	Support	For the following rules: 12.1.1A.1 - 12.1.1A.3; 12.1.2.4 - 12.1.2.6; 12.1.3.1; 12.2.1A.1; 12.2.1A.2, 12.2.2.5; 12.2.2.6; 12.2.2A.1; 12.2.3.1A; 12.2.3.2A; 12.2.3.4; 12.2.3.5; 12.2.4.1; 12.3.1A.1; 12.3.1A.2; 12.3.2.1 - 12.3.2.3; 12.3.3.1; 12.3.4.1; 12.4.1.1; 12.4.2.1; 12.5.1.1; 12.5.2.1; 12.7.1.1; 12.8.1.1; 12.8.1.5; 12.8.2.1; 12.9.1.1; 12.9.1.2; 12.10.1.1; 12.10.2.1; 12.11.2.1 - 12.11.2.3.  Retain with no amendments.	•Consistent with Part 2 RMA. •Gives guidance when considering activities in wetlands. •Manages discharges, the damming and diversion of water in a manner that protects the habitat of indigenous fish. •Maintains groundwater and surface flows in a manner that protects the habitat of indigenous fish. •Gives effect to the NPS Freshwater Management.
↳ OtagoNet Joint Venture	100	Oppose submission 42, Ref. 156		• Rules that seek to achieve no net change of any particular value(s) should not be included in the Water Plan. • Rules (or standards in rules) with a high degree of subjectivity should be revised and amended or deleted.
↳ Trustpower Limited	102	Oppose submission 42, Ref. 156		• Relief being sought is inconsistent with Trustpower's submission.
↳ Otago Fish & Game Council	103	Support submission 42, Ref. 156		No reason given.
↳ Contact Energy Limited	107	Oppose in part submission 42, Ref. 156		• Non-complying activity status is inappropriate for the reasons outlined in Contact's submission.
↳ Contact Energy Limited	107	Support in part submission 42, Ref. 156		• Restricted Discretionary Activity status is appropriate at 12.3.3.1(i).
OtagoNet Joint Venture	43	Amend	Rules (or standards in rules) that seek to achieve no net change of any particular value(s) should not be included in the Water Plan.	•Do not enable compliance to be objectively assessed. •Application is uncertain.
↳ Trustpower Limited	102	Support submission 43, Ref. 156		No reason given.
↳ Otago Fish & Game Council	103	Oppose in part submission 43, Ref. 156		• A Regional Wetlands Committee would be able to practically assess, often on site, how a proposed activity would affect a wetland. • If there is no wetlands committee, the permitted activity rules should stay as they are
↳ Royal Forest and Bird Protection Society of	106	Oppose submission 43,		• Avoidance provides certainty and meets Part 2 and S 30 RMA

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
New Zealand Inc		Ref. 156		requirements for wetland protection.
↳ Department of Conservation	108	Oppose submission 43, Ref. 156		• Likely to weaken wetland protection
OtagoNet Joint Venture	43	Amend	Amend or delete rules (or standards in rules) associated with a high degree of subjectivity.	No reason given.
↳ Trustpower Limited	102	Support submission 43, Ref. 156		No reason given.
↳ Otago Fish & Game Council	103	Oppose in part submission 43, Ref. 156		• A Regional Wetlands Committee would be able to practically assess, often on site, how a proposed activity would affect a wetland.
↳ Federated Farmers of New Zealand	105	Support in part submission 43, Ref. 156		• Landowners must have clarity and consistency as to the application of the rules.
↳ Department of Conservation	108	Oppose submission 43, Ref. 156		• Likely to weaken wetland protection.
New Zealand Railways Corporation	46	Amend	Add to 12.3.3, 12.4.2, 12.5.2, 12.9.2 a criterion which recognises the importance of existing land transport networks, such as rail where these are currently located within regionally significant wetlands such as: "Any positive effect derived from the function of the structure and/or activity in this location" or similar.  NB: Amending Schedule 1 as set out as requested would largely achieve the same relief.	•Criteria do not take into account location and importance of regionally (and nationally) important land transport networks which are, in places, incorporated within the new Regional Significant Wetland boundaries. •No balancing criteria, other than those in Part 2 RMA, which allow for the fixed location of land-based transport networks to be considered when they require replacement, or alteration along their current alignments.
↳ Trustpower Limited	102	Support submission 46, Ref. 156		No reason given.
↳ Otago Fish & Game Council	103	Support in part submission 46, Ref. 156		• Existing transport networks should be able to continue their operation. However, where the maintenance of those assets will have more than minor effects, the usual wetland rules should apply.
↳ Contact Energy Limited	107	Support in part submission 46, Ref. 156		• Supports NZRC in principle – the positive effects of existing structures/resources should be considered in applications for consents to continue to use those structures/resources.
New Zealand Railways Corporation	46	Amend	Add to 12.3.3, 12.4.2, 12.5.2, 12.9.2 a criterion to recognise that transport infrastructure is particularly important for enabling people and communities to provide for their social, economic, and cultural wellbeing and for their health and safety.	•Criteria do not take into account location and importance of regionally (and nationally) important land transport networks which are, in places, incorporated within the new Regional Significant Wetland boundaries. •No balancing criteria, other than those in Part 2 RMA, which allow for the fixed location of land-based transport networks to be considered when they require replacement, or alteration along their current alignments.
↳ Otago Fish & Game Council	103	Support in part submission 46, Ref. 156		• Existing transport networks should be able to continue their operation. However, where the maintenance of those assets will have more than minor effects, the usual wetland rules should apply.
↳ Contact Energy Limited	107	Support in part submission 46, Ref. 156		• The positive effects of existing structures/resources should be considered in applications for consents to continue to use those structures/resources.



## Chapter 13 – Rules: Land Use on Lake or River Beds and Regionally Significant Wetlands

### 96 Rule 13.2.1.1 - Erection or placement of fence, pipe, line or cable over the bed

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Federated Farmers of New Zealand	29	Support	Adopt 13.2.1.1 as proposed.	<ul style="list-style-type: none"> <li>•Supports continuing as permitted activity the activities covered by the rule.</li> <li>•Supports no requirement to fence wetlands.</li> </ul>
↳ OtagoNet Joint Venture	100	Oppose submission 29, Ref. 96		• Amendments to this rule proposed by OtagoNet provide greater certainty to the users of the plan.
↳ Otago Fish & Game Council	103	Support submission 29, Ref. 96		No reason given.
↳ Department of Conservation	108	Oppose submission 29, Ref. 96		• The DOC submission requested amendment to this rule.
Department of Conservation	42	Amend	Amend: "The erection or placement of any fence, pipe (used solely for the carrying of domestic and/or stock water), line or cable over the bed....."	<ul style="list-style-type: none"> <li>•Current non-definition of pipes would allow erection or placement of "pipes" such as tile drains which could be used to take water from a wetland.</li> <li>•Gives effect to Part 2 RMA.</li> <li>•Gives effect to NPS Freshwater Management.</li> </ul>
↳ Otago Fish & Game Council	103	Support submission 42, Ref. 96		No reason given.
OtagoNet Joint Venture	43	Amend	Amend: "(h) The fence, pipe, line or cable is maintained in good repair such that it does not present a hazard to persons or their property."	•High degree of subjectivity.
↳ Otago Fish & Game Council	103	Support submission 43, Ref. 96		No reason given.
OtagoNet Joint Venture	43	Amend	Pipe, lines or cables should only be prevented from extending below the underside of a lawful structure if the lawful structure is within two metres of the 1 percent probability flood limit.	•Is uncertain of the purpose of 13.2.1.1(d).
↳ Otago Fish & Game Council	103	Support submission 43, Ref. 96		No reason given.
OtagoNet Joint Venture	43	Amend	Amend: "(f) The fence, pipe, line or cable does not interfere with established navigation routes; and"	•Subjective and difficult to decipher regarding effects on wetlands.
↳ Otago Fish & Game Council	103	Support submission 43, Ref. 96		No reason given.

### 97 Rule 13.2.1.2 - Erection or placement of pipe, line or cable on or under the bed

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Federated Farmers of New Zealand	29	Support	Adopt 13.2.1.2 as proposed.	<ul style="list-style-type: none"> <li>•Supports continuing as permitted activity the activities covered by the rule.</li> </ul>
↳ Otago Fish & Game Council	103	Support submission 29, Ref. 97		No reason given.
↳ Department of Conservation	108	Oppose submission 29, Ref. 97		<ul style="list-style-type: none"> <li>• The DOC submission requested amendment.</li> <li>• As proposed this provision would allow for tile drains (which could be used to drain a wetland) to be installed without adequate assessment into Regionally Significant wetlands.</li> </ul>
Department of Conservation	42	Amend	Amend: "The erection or placement of any fence, pipe (used solely for the carrying of domestic and/or stock water), line or cable over the bed....."	<ul style="list-style-type: none"> <li>•Current non-definition of pipes would allow erection or placement of "pipes" such as tile drains which could be used to take water from a wetland.</li> <li>•Gives effect to Part 2 RMA.</li> <li>•Gives effect to NPS Freshwater Management.</li> </ul>
↳ Otago Fish & Game Council	103	Support submission 42, Ref. 97		No reason given.
OtagoNet Joint Venture	43	Amend	Amend:	•High degree of subjectivity.

Summary of Decisions Requested (submissions and further submissions) on Proposed Plan Change 2 (Regionally Significant Wetlands)  
Regional Plan: Water for Otago 23 November 2011

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
			"(c) The pipe, line or cable is maintained in good repair such that it does not present a hazard to persons or their property."	
↳ Otago Fish & Game Council	103	Support submission 43, Ref. 97		No reason given.

#### 99 Rule 13.2.1.5 - Erection or placement of maimai

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Federated Farmers of New Zealand	29	Amend	Amend: "...Is a <b>permitted</b> activity, providing that for the bed of any lake, river or <u>Regionally Significant Wetland</u> ..."	<ul style="list-style-type: none"> <li>•Supports Council permitting erection or placement of maimai, whitebait stand or eel trap in/on Regionally Significant Wetland.</li> <li>•As written, interpretation is uncertain.</li> </ul>
↳ Otago Fish & Game Council	103	Support submission 29, Ref. 99		No reason given.
↳ Department of Conservation	108	Support submission 29, Ref. 99		<ul style="list-style-type: none"> <li>• Provides for limits to the extent of maimai construction, hence limits to effects on wetlands.</li> </ul>
Beaton family of Berwick	45	Amend	Amend to reflect following position: "We think maimais should be temporary structures, particularly in some areas."	<ul style="list-style-type: none"> <li>•Shooters and whitebaiters shouldn't be allowed to squat in wetland area.</li> </ul>
↳ Otago Fish & Game Council	103	Support in part submission 45, Ref. 99		<ul style="list-style-type: none"> <li>• Requested changes are all related to restoration work, or recreational use of wetlands.</li> <li>• Raises the possibility of establishing a Wetlands Committee that can advise on wetland works under permitted and controlled activity status.</li> </ul>

#### 100 Rule 13.2.1.6 - Erection or placement of whitebait stand or eel trap

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Federated Farmers of New Zealand	29	Amend	Amend: "...Is a <b>permitted</b> activity, providing that for the bed of any lake, river or <u>Regionally Significant Wetland</u> ..."	<ul style="list-style-type: none"> <li>•Supports Council permitting erection or placement of maimai, whitebait stand or eel trap in/on Regionally Significant Wetland.</li> <li>•As written, interpretation is uncertain.</li> </ul>
↳ Department of Conservation	108	Support submission 29, Ref. 100		<ul style="list-style-type: none"> <li>• Provides for limits to the extent of whitebait or eel stand construction, hence limits to adverse effects on wetlands.</li> </ul>

#### 101 Rule 13.2.1.7 - Erection or placement of bridge, boardwalk or culvert

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	<p>Amend 13.2.1.7: "The erection or placement of any bridge, <del>boardwalk</del> or culvert in, on or over the bed of a lake or river, <del>or any Regionally Significant Wetland</del> is a permitted activity, providing:"</p> <p>Amend (b) to delete "boardwalk".</p> <p>Add the following permitted activity conditions:  <u>"(a) The structure is not in a Regionally Significant Wetland or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria.</u>  <u>(b) Effects on biological diversity and ecological values; and</u>  <u>(c) Effects on the natural character of wetlands and their margins."</u></p> <p>Add a new rule:  <u>"The erection or placement of any boardwalk in, on or over the bed of a lake or river, or any Regionally Significant Wetland, is a <b>permitted</b></u></p>	<ul style="list-style-type: none"> <li>•Permitted activity inappropriate for bridge or culvert as Council cannot control adverse effects on other wetlands - should be discretionary..</li> <li>•Support boardwalks being permitted (if for recreation or science) - need separate rule to culverts/bridges.</li> </ul>

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
			<u>activity, providing:</u> <u>(a) The boardwalk is for recreational or scientific purposes and its erection or placement, does not cause any flooding, nor cause any erosion of the bed or banks of a Regionally Significant Wetland, and</u> <u>(b) The site is left tidy following the erection or placement."</u>	
↳ Otago Fish & Game Council	103	Support submission 47, Ref. 101		No reason given.
↳ Federated Farmers of New Zealand	105	Oppose submission 47, Ref. 101		• Proposed Plan Change applies rules to wetlands with certain regionally significant wetland values. To extend similar protection to all wetlands goes beyond scope of plan change.

### 103 Rule 13.2.2.1 - Erection or placement - restricted discretionary activity

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Federated Farmers of New Zealand	29	Amend	Amend: "Any <u>adverse effect</u> on any Regionally Significant Wetland or on any regionally significant wetland value"	•Implementation uncertain; means standard farming practices may be captured.
↳ Otago Fish & Game Council	103	Oppose submission 29, Ref. 103		• Wetlands cannot be easily created or transferred, and so to subject them to a test that is anything less than "adverse" will run the risk of off-setting or limited mitigation packages that ultimately add up to a loss or trading of individual wetland values. • Further submitter wants to see the area of wetlands to increase, and at worst case, remain static, rather than continue to endure a decline.
↳ Royal Forest and Bird Protection Society of New Zealand Inc	106	Support submission 29, Ref. 103		• Council needs to consider all effects on regionally significant wetlands.
↳ Department of Conservation	108	Oppose submission 29, Ref. 103		• Rule as written allows ORC to consider all effects on wetlands, not just adverse effects.
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Amend (aa): "Any effect on any Regionally Significant Wetland or on any regionally significant wetland value or any wetland that <u>meets the significance criteria listed in Appendix XX Ecological Criteria."</u>  Amend (a)(ii): "The natural character of any affected water body <u>and their margins."</u>  Add new matter of discretion: " <u>(m) Any effects on biological diversity and ecological values."</u>	•Current words do not provide Council with necessary control on potential adverse effects of contaminant discharge.
↳ Meridian Energy Limited	101	Oppose submission 47, Ref. 103		•Rule already enables consideration of 'any' potential adverse effects on any Regionally Significant Wetland or regionally significant wetland value. As such, relief sought by submitter is considered unnecessary.
↳ Otago Fish & Game Council	103	Support submission 47, Ref. 103		No reason given.
↳ Federated Farmers of New Zealand	105	Oppose submission 47, Ref. 103		• Proposed Plan Change applies rules to wetlands with certain regionally significant wetland values. To extend similar protection to all wetlands goes beyond scope of plan change.
↳ Department of Conservation	108	Support submission 47, Ref. 103		• Better encapsulates Sec. 6(a) RMA requirements in respect to wetland protection. • Strengthens wetland protection requirements and follows on from support for Forest & Birds sub. In 153 Chap.10 above

### 106 Rule 13.3.1.1 - Repair or maintenance of structure

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
OtagoNet Joint Venture	43	Support	Support.	•This should be permitted.

### 107 Rule 13.3.1.2 - Extension, alteration, replacement or reconstruction of structure

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
OtagoNet Joint Venture	43	Amend	Amend: "(a) In the case of a replacement or reconstruction, the structure is replaced or reconstructed in <u>approximately</u> the same location as the original structure; and"	•To avoid minor re-locations unnecessarily needing consent.
↳ Otago Fish & Game Council	103	Support submission 43, Ref. 107		No reason given.
↳ Royal Forest and Bird Protection Society of New Zealand Inc	106	Oppose submission 43, Ref. 107		• The requested words create uncertainty.

### 108 Rule 13.3.2.1 - Extension, alteration, replacement or reconstruction of structure - restricted discretionary activity

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Federated Farmers of New Zealand	29	Amend	Amend: "Any <u>adverse</u> effect on any Regionally Significant Wetland or on any regionally significant wetland value"	•Implementation uncertain; means standard farming practices may be captured.
↳ Otago Fish & Game Council	103	Oppose submission 29, Ref. 108		• Wetlands cannot be easily created or transferred, and so to subject them to a test that is anything less than "adverse" will run the risk of off-setting or limited mitigation packages that ultimately add up to a loss or trading of individual wetland values. • Further submitter wants to see the area of wetlands to increase, and at worst case, remain static, rather than continue to endure a decline.
↳ Royal Forest and Bird Protection Society of New Zealand Inc	106	Support submission 29, Ref. 108		• Council needs to consider all effects on regionally significant wetlands.
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Delete " <del>or any Regional Significant</del> " from the introduction to the rule.  Amend (aa): "Any effect on any Regionally Significant Wetland or on any regionally significant wetland that <u>meets the significance criteria listed in Appendix XX Ecological Criteria</u> ; and"  Add new matter of discretion: "(m) Any effects on biological diversity and ecological values."	•Values for other wetlands should be assessed against best practice.
↳ Meridian Energy Limited	101	Oppose submission 47, Ref. 108		•Removal of the words "or any regionally significant" should not be adopted as Plan Change 2 is primarily concerned with managing the effects of activities on wetlands that are classified as 'significant' in Otago. •The amendment proposed by the submitter would broaden the scope of Rule 13.3.2.1 in a manner that is not supported by the objectives and policies in Proposed Plan Change 2.
↳ Otago Fish & Game Council	103	Support submission 47, Ref. 108		No reason given.
↳ Federated Farmers of New Zealand	105	Oppose submission 47, Ref. 108		• Proposed Plan Change applies rules to wetlands with certain regionally significant wetland values. To extend similar protection to all wetlands goes beyond scope of plan change.

### 110 Rule 13.4.1.1 - Demolition or removal of a structure

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Delete " <del>or any Regional Significant</del> " from the introduction to the rule.  Amend (f): "There is no change to the water level or hydrological function, <del>or no</del> and damage to the <u>indigenous</u> flora, fauna or its habitat, in or on any	•Current words do not provide Council with necessary control on potential adverse effects of contaminant discharge.

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
			<del>Regional Significant Wetland</del> wetland is managed."	
↳ Otago Fish & Game Council	103	Support submission 47, Ref. 110		No reason given.
↳ Federated Farmers of New Zealand	105	Oppose submission 47, Ref. 110		<ul style="list-style-type: none"> <li>Proposed Plan Change applies rules to wetlands with certain regionally significant wetland values. To extend similar protection to all wetlands goes beyond scope of plan change.</li> </ul>

#### 111 Rule 13.4.2.1 - Demolition or removal of a structure - restricted discretionary activity

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Federated Farmers of New Zealand	29	Amend	Amend: "Any <u>adverse</u> effect on any Regionally Significant Wetland or on any regionally significant wetland value"	• Implementation uncertain; means standard farming practices may be captured.
↳ Otago Fish & Game Council	103	Oppose submission 29, Ref. 111		<ul style="list-style-type: none"> <li>Wetlands cannot be easily created or transferred, and so to subject them to a test that is anything less than "adverse" will run the risk of off-setting or limited mitigation packages that ultimately add up to a loss or trading of individual wetland values.</li> <li>Further submitter wants to see the area of wetlands to increase, and at worst case, remain static, rather than continue to endure a decline.</li> </ul>
↳ Royal Forest and Bird Protection Society of New Zealand Inc	106	Support submission 29, Ref. 111		• Council needs to consider all effects on regionally significant wetlands.
↳ Department of Conservation	108	Oppose submission 29, Ref. 111		• Rule as written allows ORC to consider all effects on wetlands, not just adverse effects.
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Delete " <del>or any Regionally Significant</del> " from the introduction to the rule.  Amend (aa): "Any effect on any Regionally Significant Wetland or on any regionally significant wetland value <u>or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria.</u> "  Amend (a)(ii): "The natural character of any affected water body <u>and their margins</u> "  Add new matter of discretion: " <u>(m) Any effects on biological diversity and ecological values.</u> "	• Current words do not provide Council with necessary control on potential adverse effects of contaminant discharge.
↳ Otago Fish & Game Council	103	Support submission 47, Ref. 111		No reason given.
↳ Federated Farmers of New Zealand	105	Oppose submission 47, Ref. 111		• Proposed Plan Change applies rules to wetlands with certain regionally significant wetland values. To extend similar protection to all wetlands goes beyond scope of plan change.
↳ Department of Conservation	108	Support submission 47, Ref. 111		<ul style="list-style-type: none"> <li>Better encapsulates S 6(a) RMA requirements in respect to wetland protection.</li> <li>Strengthens wetland protection requirements and follows on from support for Forest &amp; Birds sub. In 153 Chap.10 above.</li> </ul>

#### 114 Rule 13.5.1.1 - Disturbance of the bed general

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Amend (i): "Except for activities covered by Rules 13.2.1.5, 13.2.1.6, or 13.2.1.8, there is no change to the water level or hydrological function, or no damage to the <u>indigenous</u> flora, fauna or its habitat, in or on any Regional Significant Wetland, <u>or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria</u> "	• Current words do not provide Council with necessary control on potential adverse effects of contaminant discharge.

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
			Amend 13.5.1.1(f) as follows: "...of sediment to the lake, river or wetland..."	
↳ Trustpower Limited	102	Oppose in part submission 47, Ref. 114		<ul style="list-style-type: none"> <li>•Opposes all aspects of this submission, except the inclusion of "indigenous" as this is consistent with RMA principles.</li> <li>•Council did not intend for non-scheduled wetlands to be included in the regionally significant wetland provisions.</li> </ul>
↳ Otago Fish & Game Council	103	Support submission 47, Ref. 114		No reason given.
↳ Federated Farmers of New Zealand	105	Oppose submission 47, Ref. 114		<ul style="list-style-type: none"> <li>• Proposed Plan Change applies rules to wetlands with certain regionally significant wetland values. To extend similar protection to all wetlands goes beyond scope of plan change.</li> </ul>
↳ Department of Conservation	108	Support submission 47, Ref. 114		<ul style="list-style-type: none"> <li>• Better encapsulates S 6(a) RMA requirements in respect to wetland protection.</li> <li>• Strengthens wetland protection requirements and follows on from support for Forest &amp; Birds sub. In 153 Chap.10 above.</li> </ul>

#### 116 Rule 13.5.1.5A - Alteration of Regionally Significant Wetland associated with plant material

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
TrustPower Limited	40	Support	Supports this rule.	No reason given.
Beaton family of Berwick	45	Amend	Amend to provide for some hump and hollow modification to allow some planting to take place out of the water.	<ul style="list-style-type: none"> <li>•Many of the plants put in to wet soil have died.</li> <li>•Natural wetland would have mix of firmer ground, mainly next to channels, with interfluvial swamps between.</li> <li>•E.g. Titri wetland has been modified by farming and abandoned. Natural soil conditions may need to be reinstated before successful diverse vegetation may be reinstated.</li> </ul>
↳ Otago Fish & Game Council	103	Support in part submission 45, Ref. 116		<ul style="list-style-type: none"> <li>• Requested changes are all related to restoration work, or recreational use of wetlands.</li> <li>• Raises the possibility of establishing a Wetlands Committee that can advise on wetland works under permitted and controlled activity status.</li> </ul>
↳ Federated Farmers of New Zealand	105	Support in part submission 45, Ref. 116		<ul style="list-style-type: none"> <li>• Consider that before a wetland can be properly restored or enhanced, some activities may be necessary to prepare the area.</li> </ul>

#### 117 Rule 13.5.1.6 - Extraction of alluvium

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
TrustPower Limited	40	Support	Supports this rule.	No reason given.

#### 118 Rule 13.5.1.8 - Disturbance by livestock

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Otago Fish & Game Council	8	Amend	Remove the word "conspicuous" 13.5.1.8(b) unless guidance can be given on what constitutes "conspicuous".	<ul style="list-style-type: none"> <li>•All stock use of waterway or wetland margins will cause pugging and erosion and the proposed plan offers no guidance on this.</li> </ul>
↳ Department of Conservation	108	Support submission 8, Ref. 118		No reason given.
Lake Waiholo Waipori Wetlands Society Inc.	20	Amend	Amend to encourage farmers not to graze wetlands and to encourage options for protection.	<ul style="list-style-type: none"> <li>•Stock in wetlands will damage native species - counter to goal of protecting wetland values.</li> <li>•Rule sets threshold only when grazing severely damages the wetland, and could result in debate over levels of damage.</li> </ul>
↳ Otago Fish & Game Council	103	Support submission 20, Ref. 118		<ul style="list-style-type: none"> <li>•Grazing in wetlands need to be tightly controlled</li> </ul>
↳ Federated Farmers of New Zealand	105	Oppose in part submission 20, Ref. 118		<ul style="list-style-type: none"> <li>• Light grazing of stock can have benefits to wetlands regeneration and is appropriately permitted where no obvious negative changes have</li> </ul>

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
				<i>resulted.</i>
↳ Royal Forest and Bird Protection Society of New Zealand Inc	106	Support submission 20, Ref. 118		• Grazing damages the life supporting capacity of wetlands.
↳ Department of Conservation	108	Support submission 20, Ref. 118		• Better protects wetland values – but note that short-duration grazing can be useful in wetland management
Gavan James Herlihy	22	Amend	Need greater clarity to what is "conspicuous" in 13.5.1.8(b)	•Unclear as to whether stock will be able to still run on the Upper Taieri River Flats.
↳ Otago Fish & Game Council	103	Support submission 22, Ref. 118		•Further submitter needs some more clarification on this issue, as to exclude all grazing from wetlands, even light grazing at particular times of the year, may actually work against having landowner involvement in wetlands:
↳ Federated Farmers of New Zealand	105	Support in part submission 22, Ref. 118		• Greater clarity would assist farmers as to what activities they can be permitted to carry out on the wetland.
Gavan James Herlihy	22	Amend	13.5.1.8(d) needs greater clarity or higher threshold as to what constitutes "damage".	•Literal interpretation could exclude all stock any time, as any grazing will do some damage.
↳ Otago Fish & Game Council	103	Support submission 22, Ref. 118		•Further submitter needs some more clarification on this issue, as to exclude all grazing from wetlands, even light grazing at particular times of the year, may actually work against having landowner involvement in wetlands.
↳ Federated Farmers of New Zealand	105	Support in part submission 22, Ref. 118		• Greater clarity would assist farmers as to what activities they can be permitted to carry out on the wetland.
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Delete " <del>or any Regionally Significant</del> " from the introduction to the rule.  Delete permitted condition (d).  Amend (e): "The activity does not <del>significantly disturb</del> <u>adversely affect</u> indigenous..."  Add new condition: "The activity is not within any Regionally Significant Wetland identified in Schedule 9 or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria."	•Grazing degrades wetlands, and is inconsistent with sustainable management and protection of wetlands; should not rely on permitted rule. •Regionally significant wetlands should be fenced.
↳ Otago Fish & Game Council	103	Support submission 47, Ref. 118		No reason given.
↳ Federated Farmers of New Zealand	105	Oppose submission 47, Ref. 118		• Consider the permitted activity is appropriate. Do not agree with extending the proposed plan change's protection to unidentified and unassessed wetlands
↳ Department of Conservation	108	Support submission 47, Ref. 118		• Better encapsulates S 6(a) RMA requirements in respect to wetland protection. • Strengthens wetland protection requirements and follows on from support for Forest & Birds sub. In 153 Chap.10 above.
Herbert Heritage Society	48	Amend	All wetlands/rivers/estuaries must be fenced off from livestock unless the grazing through the wetland can be considered to be proven beneficial to the wetland in question or that the procedure for fencing would be detrimental to the said wetland.	•Unreasonable for the public to be responsible for observing detrimental effects on the environment (neither time nor money), nor the DOC or ORC (neither manpower or budget). •Farmers can't be expected to self-police their activities when it results in financial benefits/costs. •Rule may be grumbled about but accepted, whereas community pressure for selfless/environmental actions from farmers only results in fracturing a community into conservationists and land developers.
↳ Otago Fish & Game Council	103	Support submission 49, Ref. 118		•Concern over how the ORC will cope with the increased compliance responsibilities of these new rules.
↳ Federated Farmers of New Zealand	105	Oppose in part submission 48, Ref. 118		• Considerable cost in fencing off all wetlands, rivers and estuaries. • Scope of proposed plan is to Regionally Significant Wetlands not all wetlands.
↳ Royal Forest and Bird Protection Society of New Zealand Inc	106	Support submission 48, Ref. 118		• Grazing damages the life supporting capacity of wetlands.
↳ Department of Conservation	108	Support submission 48, Ref. 118		• Better protects wetland values and provides for short-duration grazing where it would benefit wetlands.

Summary of Decisions Requested (submissions and further submissions) on Proposed Plan Change 2 (Regionally Significant Wetlands)  
Regional Plan: Water for Otago 23 November 2011

### 119 Rule 13.5.2.1 - Extraction of alluvium - restricted discretionary activity

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Federated Farmers of New Zealand	29	Amend	Amend: "Any <u>adverse effect</u> on any Regionally Significant Wetland or on any regionally significant wetland value"	•Implementation uncertain; means standard farming practices may be captured.
↳ Otago Fish & Game Council	103	Oppose submission 29, Ref. 119		• Wetlands cannot be easily created or transferred, and so to subject them to a test that is anything less than "adverse" will run the risk of off-setting or limited mitigation packages that ultimately add up to a loss or trading of individual wetland values. • Further submitter wants to see the area of wetlands to increase, and at worst case, remain static, rather than continue to endure a decline.
↳ Royal Forest and Bird Protection Society of New Zealand Inc	106	Oppose submission 29, Ref. 119		• Council needs to consider all effects on regionally significant wetlands.
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Delete " <del>or any Regional Significant</del> " from the introduction to the rule  Amend (aa): "Any effect on and Regionally Significant Wetland or on any regionally significant wetland value <u>or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria.</u> "  Amend (a)(ii): "The natural character of any affected water body <u>and their margins</u> "  Add new matter of discretion: " <u>(m) Any effects on biological diversity and ecological values.</u> "	•Current words do not provide Council with necessary control on potential adverse effects of contaminant discharge.
↳ Trustpower Limited	102	Oppose submission 47, Ref. 119		•Council did not intend for non-scheduled wetlands to be included in the regionally significant wetland provisions. •The proposed new matter is already captured under (aa).
↳ Otago Fish & Game Council	103	Support submission 47, Ref. 119		No reason given.
↳ Federated Farmers of New Zealand	105	Oppose submission 47, Ref. 119		• Proposed Plan Change applies rules to wetlands with certain regionally significant wetland values. To extend similar protection to all wetlands goes beyond scope of plan change.

### 120 Rule 13.5.3.2 - Alteration of Regionally Significant Wetland - discretionary activity

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Gavan James Herlihy	22	Support	New drains should require consent.	No reason given.
↳ Otago Fish & Game Council	103	Support submission 22, Ref. 120		•While new drains in wetlands should require resource consent, there are two options to deal with existing drains: 1. Map all existing drains and allow for their clearance as a permitted activity. 2. Create a wetlands committee which can assess activities relating to wetlands under permitted or controlled activity rules.
Federated Farmers of New Zealand	29	Support	Adopt 13.5.3.2 as proposed.	No reason given.
↳ Trustpower Limited	102	Support submission 29, Ref. 120		No reason given.
TrustPower Limited	40	Support	Supports this rule.	No reason given.

### 121 Rule 13.6.1.1 - Introduction of pest plants general

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Lake Waihola Waipori Wetlands Society Inc.	20	Amend	Include list of prohibited species in proposed rule 13.6.1. List should	•These species are invasive and have negative impacts on wetlands.

Summary of Decisions Requested (submissions and further submissions) on Proposed Plan Change 2 (Regionally Significant Wetlands)  
Regional Plan: Water for Otago 23 November 2011



SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
			reflect that terrestrial species have a greater impact on the health of wetlands than the list of aquatic species in the proposed plan.	
↳ Otago Fish & Game Council	103	Support submission 20, Ref. 121		<ul style="list-style-type: none"> <li>•Aquatic and terrestrial pests need to be included within this wetland plan.</li> <li>•At the very least, the plan could reference the Regional Pest management Strategy.</li> </ul>
↳ Department of Conservation	108	Support submission 20, Ref. 121		<ul style="list-style-type: none"> <li>• Similar to DOC submission</li> </ul>
Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou, and Hokonui Runanga	38	Support	Supports addition of regionally significant wetlands to this provision.	No reason given.
Department of Conservation	42	Amend	Amend: "The introduction of material of the following species: (i) Lagarosiphon ( <i>Lagarosiphon major</i> ); or (ii) Eel Grass ( <i>Vallisneria spiralis</i> ); or .... <u>(xi) Glyceria species</u> <u>(xii) Alder (<i>Alnus</i>) species;</u> <u>(xiii) Crack willow;</u> <u>(xiv) Gray willow.</u> To the bed of any Otago Lake...."	<ul style="list-style-type: none"> <li>•The 4 species proposed for inclusion have potential to adversely effect Regionally Significant Wetlands and/or Regionally Significant Wetland Values.</li> <li>•Amendment is consistent with Part 2 RMA.</li> <li>•Amendment gives effect to NPS Freshwater Management.</li> </ul>
↳ Otago Fish & Game Council	103	Support submission 42, Ref. 121		No reason given.
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Amend: "...to the bed or water of any Otago lakes, river or any <del>Regionally Significant</del> Wetland, is a prohibited activity for which no resource consent will be granted."  Add the following species: <u>Glyceria species</u> <u>Alder (<i>Alnus</i> species)</u> <u>Crack Willow</u> <u>Gray Willow</u>	<ul style="list-style-type: none"> <li>•Inappropriate to prohibit in Regionally Significant Wetlands only.</li> </ul>
↳ Otago Fish & Game Council	103	Support submission 47, Ref. 121		No reason given.
↳ Federated Farmers of New Zealand	105	Oppose in part submission 47, Ref. 121		<ul style="list-style-type: none"> <li>• Proposed Plan Change applies rules to wetlands with certain regionally significant wetland values. To extend similar protection to all wetlands goes beyond scope of plan change.</li> </ul>
↳ Department of Conservation	108	Support submission 47, Ref. 121		<ul style="list-style-type: none"> <li>• Better provides for the protection of the natural character of wetlands (S 6(a))</li> </ul>

## 122 Rule 13.6.2.0 - Introduction or planting of New Zealand native plant

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Lake Waihola Waipori Wetlands Society Inc.	20	Support	Supports rule in principle.	Allows for planting of native species in wetlands without resource consent being required
↳ Trustpower Limited	102	Support submission 20, Ref. 122		No reason given.
↳ Otago Fish & Game Council	103	Support submission 20, Ref. 122		<ul style="list-style-type: none"> <li>•Native plantings in wetlands must be able to be carried out without resource consent being required, except in open water due to their importance for waterfowl habitat.</li> </ul>
Federated Farmers of New Zealand	29	Support	Adopt 13.6.2.0 as proposed.	No reason given.
↳ Trustpower Limited	102	Support submission 29, Ref. 122		No reason given.
Clutha District Council	34	Amend	Either: <ul style="list-style-type: none"> <li>• Restrict native plants to wetland species which are native to the area;</li> <li>or</li> </ul>	<ul style="list-style-type: none"> <li>•Rule allows planting of any native plant, and some native plants can be inappropriate in wetlands (e.g., non-wetland species which could be invasive or encourage succession away from wetland species, or non-</li> </ul>

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
			• Add new condition "(d) There is no change to the water level or hydrological function, or no damage to the flora, fauna and its habitat, in or on any Regionally Significant Wetland".	local genetic stock).
↳ Trustpower Limited	102	Oppose submission 34, Ref. 122		• Not appropriate that in planting native species such criteria is required to be assessed..
↳ Otago Fish & Game Council	103	Support in part submission 34, Ref. 122		• Understands the submitter's concerns, but a planning document cannot provide the flexibility required to enhance a wetland. • Raises the possibility of establishing a Wetlands Committee that can advise on wetland issues and sign off on existing activities and enhancement projects.
↳ Department of Conservation	108	Support submission 34, Ref. 122		• Better protects wetlands and provides for local ecological values of same
Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou, and Hokonui Runanga	38	Support	Supports addition: "The introduction or planting of any New Zealand native plant to any Regionally Significant Wetland, is a permitted activity providing: (a) . . ."	•May assist in the future restoration of wetlands.
↳ Trustpower Limited	102	Support submission 38, Ref. 122		No reason given.
TrustPower Limited	40	Support	Supports this rule.	No reason given.
Beaton family of Berwick	45	Amend	Amend to provide for some hump and hollow modification to allow some planting to take place out of the water.	•Many of the plants put in to wet soil have died. •Natural wetland would have mix of firmer ground, mainly next to channels, with interfluvial swamps between. •E.g.Titri wetland has been modified by farming and abandoned. Natural soil conditions may need to be reinstated before successful diverse vegetation may be reinstated.
Beaton family of Berwick	45	Amend	A schedule of species suitable next to rivers might be appropriate.	•Planting next to a river would need to take into account requirements for flood river flow [13.6.2.0(b)], therefore permitted planting of any native wouldn't necessarily apply.
↳ Otago Fish & Game Council	103	Support in part submission 45, Ref. 122		• Requested changes are all related to restoration work, or recreational use of wetlands. • Raises the possibility of establishing a Wetlands Committee that can advise on wetland works under permitted and controlled activity status.
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Add the following permitted rule condition: "All plants and seeds are eco-sourced and appropriate for the specific wetland ecosystem."	•Wetland restoration would be enhanced if permitted plants were eco-sourced (native plants from local seed sources) and appropriate for wetland ecosystem.
↳ Otago Fish & Game Council	103	Support submission 47, Ref. 122		No reason given.
↳ Federated Farmers of New Zealand	105	Oppose in part submission 47, Ref. 122		• Difficulty and added expense in obtaining eco-sourced plants and sees from local seed sources.
↳ Department of Conservation	108	Support submission 47, Ref. 122		• Better protects wetlands and provides for local ecological values of same.

### 123 Rule 13.6.3.1 - Introduction or planting of vegetation - discretionary activity

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Amend: "...or any Regional Significant Wetland or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria..."	•Current words do not provide Council with necessary control on potential adverse effects of contaminant discharge.
↳ Trustpower Limited	102	Oppose submission 47, Ref. 123		•Council did not intend for non-scheduled wetlands to be included in the regionally significant wetland provisions, and they should not be included.
↳ Otago Fish & Game Council	103	Support submission 47, Ref. 123		No reason given.
↳ Federated Farmers of New Zealand	105	Oppose submission 47, Ref. 123		• Proposed Plan Change applies rules to wetlands with certain regionally significant wetland values. To extend similar protection to all wetlands goes beyond scope of plan change.

## 124 Rule 13.7.1.2 - Removal or clearance of exotic plant material

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
William Thomas Begg	17	Amend	If Stirling Marsh Complex is retained as a Regionally Significant Wetland then provide for the harvesting of exotic species occurring in the wetland as a permitted activity.	<ul style="list-style-type: none"> <li>Part of the wetland area on my property is planted in poplar trees for timber.</li> <li>Plan Change fails to provide for my economic wellbeing and that of the surrounding community (required by s 5 RMA).</li> </ul>
↳ Otago Fish & Game Council	103	Support in part submission 17, Ref. 124		<ul style="list-style-type: none"> <li>Request appears reasonable.</li> <li>Removal of exotic material from wetlands could be considered as for controlled activity status provided that certain requirements were met around damage to sensitive banks from heavy machinery.</li> </ul>
↳ Federated Farmers of New Zealand	105	Support submission 17, Ref. 124		<ul style="list-style-type: none"> <li>The exotic species already exist within the wetland now identified. It is consistent with the principles of the proposed plan to allow for their removal.</li> </ul>
Federated Farmers of New Zealand	29	Support	Adopt 13.7.1.2 as proposed.	No reason given.
↳ Trustpower Limited	102	Support submission 29, Ref. 124		No reason given.
TrustPower Limited	40	Support	Supports this rule.	No reason given.
Department of Conservation	42	Amend	Amend: "(c) The wetland alteration is limited to that which is necessary, <u>the use of best practice methods</u> , for the removal or clearance of the plant material."	<ul style="list-style-type: none"> <li>Amendment sought so that the removal or clearance of exotic plant material cannot be used as a pretext to damage Regionally Significant Wetlands or Regionally Significant Wetland Values.</li> </ul>
↳ Trustpower Limited	102	Oppose submission 42, Ref. 124		<ul style="list-style-type: none"> <li>Unnecessary to specifically assess which techniques will be used to remove plants given that wetland alteration is already limited to that which is necessary.</li> </ul>
↳ Otago Fish & Game Council	103	Support submission 42, Ref. 124		No reason given.
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Amend: "The removal or clearance... <del>Regional Significant wetlands</del> , is a permitted activity providing."  Add the following condition: " <u>Damage to indigenous flora and habitats or indigenous fauna managed.</u> "	<ul style="list-style-type: none"> <li>Current words do not provide Council with necessary control on potential adverse effects of contaminant discharge.</li> </ul>
↳ Trustpower Limited	102	Oppose submission 47, Ref. 124		<ul style="list-style-type: none"> <li>Proposed additional condition is not necessary given the Rule already limits the wetland alteration to that which is necessary.</li> </ul>
↳ Otago Fish & Game Council	103	Support submission 47, Ref. 124		No reason given.
↳ Federated Farmers of New Zealand	105	Oppose submission 47, Ref. 124		<ul style="list-style-type: none"> <li>Do not agree with extending the proposed plan change's protection to unidentified and unassessed wetlands.</li> </ul>

## 125 Rule 13.7.2.1 - Removal of pest plants - controlled activity

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Lake Waihola Waipori Wetlands Society Inc.	20	Amend	Amend to include; Reed Sweetgrass Glyceria maxima, Crack Willow Salix fragilis, Grey Willow Salix cinerea, Black Alder Alnus glutinosa, Red Alder Alnus rubra, Pine Pinus radiata.	<ul style="list-style-type: none"> <li>Makes consent always be granted for the removal of these species.</li> </ul>
↳ Trustpower Limited	102	Support submission 20, Ref. 125		No reason given.
↳ Otago Fish & Game Council	103	Support submission 20, Ref. 125		<ul style="list-style-type: none"> <li>Support this list of pest plants being included as a controlled activity.</li> <li>A provision for resource consent fee relief for enhancement work must be placed within this plan, or in other ORC documents.</li> </ul>
↳ Department of Conservation	108	Support submission 20, Ref. 125		<ul style="list-style-type: none"> <li>Better protects wetlands and provides for local ecological values of same.</li> </ul>
TrustPower Limited	40	Support	Supports this rule.	No reason given.
Department of Conservation	42	Amend	Amend:	<ul style="list-style-type: none"> <li>The 4 species proposed for inclusion have potential to adversely effect</li> </ul>

Summary of Decisions Requested (submissions and further submissions) on Proposed Plan Change 2 (Regionally Significant Wetlands)  
Regional Plan: Water for Otago 23 November 2011

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
			"Except as provided for by Rules 13.7.1.1..... (i) <u>Lagarosiphon (Lagarosiphon major)</u> ; or (ii) <u>Eel Grass (Vallisneria spiralis)</u> ; or .... (xv) <u>Glyceria species</u> (xvi) <u>Alder (Alnus) species</u> ; (xvii) <u>Crack willow</u> ; (xviii) <u>Gray willow</u> , from the bed of any lake or river, or from....."	Regionally Significant Wetlands and/or Regionally Significant Wetland Values. •Amendment is consistent with Part 2 RMA. •Amendment gives effect to NPS Freshwater Management.
↳ Trustpower Limited	102	Support submission 42, Ref. 125		No reason given.
↳ Otago Fish & Game Council	103	Support submission 42, Ref. 125		No reason given.
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Amend: "...from the bed of any lake or river, or any <del>Regional Significant</del> wetland, is a ..."  Add the following species: "Glyceria species Alder (Alnus species) Crack Willow Gray Willow Alder (Alnus species) Crack Willow Gray Willow"	•Support removal of all weeds from wetlands.
↳ Otago Fish & Game Council	103	Support submission 47, Ref. 125		No reason given.
↳ Department of Conservation	108	Support submission 47, Ref. 125		• Better provides for the protection of the natural character of wetlands (S 6(a))

## 126 Rule 13.7.3.1 - Removal or clearance of plant material - discretionary activity

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
TrustPower Limited	40	Support	Supports this rule.	No reason given.
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Add the word exotic: " <u>Unless covered by Rules 13.7.1.1 to 13.7.2.1, removal or clearance of exotic plant material from any Regionally Significant Wetland, is a discretionary activity.</u> "	•Agrees may be a need for discretionary consents for some removal of exotic species from significant wetlands, but removal of indigenous vegetation should be avoided and should be non-complying.
↳ Trustpower Limited	102	Oppose submission 47, Ref. 126		•Discretionary activity is appropriate for the removal of any plant material from a regionally significant wetland that is not captured by the permitted or controlled activity rules.
↳ Otago Fish & Game Council	103	Support submission 47, Ref. 126		No reason given.

## 155 Chapter 13 general

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Treble Cone Investments Limited	2	Amend	Amend clauses within 13.2, 13.3, 13.4, 13.5, 13.6 and 13.7 to provide for: •erection, placement, extension, alteration, reconstruction, demolition or removal of structures and •alteration of a wetland and •introduction, planting or removal of vegetation to be a permitted activity for wetlands within the Ski Area Sub Zones (areas currently designated as Ski Area Sub Zones in the Queenstown-Lakes District Plan).	No reason given.

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
↳ Otago Fish & Game Council	103	Oppose submission 2, Ref. 155		<ul style="list-style-type: none"> <li>Alpine wetlands are a threatened habitat for Paradise Shelduck.</li> <li>There is no reason to remove alpine wetlands from the blanket protection on the basis of existing skifield operations in a few locations.</li> <li>There is no reason to make the rules more permissive.</li> </ul>
↳ Royal Forest and Bird Protection Society of New Zealand Inc	106	Oppose submission 2, Ref. 155		<ul style="list-style-type: none"> <li>Ski field activities and developments can cause significant adverse effects to wetlands and these activities should not be exempt from planning restrictions.</li> </ul>
↳ Department of Conservation	108	Oppose submission 2, Ref. 155		<ul style="list-style-type: none"> <li>These activities will allow damage to occur to wetlands within Ski Areas which may cause adverse effects.</li> </ul>
Otago Fish & Game Council	8	Support	Supports all rules within the proposed plan where the addition of the words "Regionally Significant Wetland" has been added to the previous rule which was related to lakes and rivers.	No reason given.
↳ Trustpower Limited	102	Oppose in part submission 8, Ref. 155		<ul style="list-style-type: none"> <li>See reasons in Trustpower's submission..</li> </ul>
↳ Department of Conservation	108	Support submission 8, Ref. 155		<ul style="list-style-type: none"> <li>Aligns with DOC submission</li> </ul>
Otago Fish & Game Council	8	Amend	Would like the proposed plan to signal the following as criterion within the rules: Resource consent fee relief to protect, create, or enhance wetlands.	<ul style="list-style-type: none"> <li>Resource consent fee relief is workable and proactive.</li> <li>Creation/enhancement of a wetland should not have the same consent fees as an activity that will damage a wetland.</li> <li>Current consent fees encourage non-compliance and illegal activity and discourage creation or enhancement of wetlands.</li> <li>Also wants clarification how internal compliance/enforcement practices will change.</li> </ul>
↳ Lake Waiholo Waipori Wetlands Society Inc.	104	Support submission 8, Ref. 155		<ul style="list-style-type: none"> <li>Resource consent fees for enhancement and restoration are actually detrimental to the encouragement of wetland protection. Costs for consents must be kept at zero to encourage enhancement and restoration.</li> </ul>
↳ Federated Farmers of New Zealand	105	Support in part submission 8, Ref. 155		<ul style="list-style-type: none"> <li>Agree that current consent fees discourage creation or enhancement of wetlands and that resource consent fee relief is workable and proactive.</li> </ul>
↳ Royal Forest and Bird Protection Society of New Zealand Inc	106	Support submission 8, Ref. 155		<ul style="list-style-type: none"> <li>Supports the encouragement of wetland creation and enhancement and this would be a small but significant means of doing that.</li> </ul>
↳ Department of Conservation	108	Support submission 8, Ref. 155		<ul style="list-style-type: none"> <li>Will assist agencies and individuals which/who wish to restore wetlands, by removing a potential barrier.</li> </ul>
Cardrona Alpine Resort	15	Amend	Amend clauses within 13.2, 13.3, 13.4, 13.5, 13.6 and 13.7 to provide for: <ul style="list-style-type: none"> <li>erection, placement, extension, alteration, reconstruction, demolition or removal of structures and</li> <li>alteration of a wetland and</li> <li>introduction, planting or removal of vegetation</li> </ul> to be a permitted activity for wetlands within the Ski Area Sub Zones (areas currently designated as Ski Area Sub Zones in the Queenstown-Lakes District Plan).	<ul style="list-style-type: none"> <li>Skifield operations have not been considered in the proposal, and are a vital part of the economy.</li> </ul>
↳ Otago Fish & Game Council	103	Oppose submission 15, Ref. 155		<ul style="list-style-type: none"> <li>No case that that protecting all wetlands above 800m will affect the economics of the skifield industry.</li> <li>It is likely that the skifield industry can afford to undertake proper planning of operations to limit their effects on alpine wetlands.</li> </ul>
↳ Department of Conservation	108	Oppose submission 15, Ref. 155		<ul style="list-style-type: none"> <li>These activities will allow damage to occur to wetlands within Ski Areas which may cause adverse effects.</li> </ul>
Three Creeks Farm	19	Amend	If Te Hua Taki Wetland (Map F66, #171) is retained as a regionally significant wetland then provide that there are no arbitrary setbacks on structures or buildings occurring on or near the wetland.	<ul style="list-style-type: none"> <li>Plan Change fails to provide for my economic wellbeing and that of the community around the affected area, as required by s 5 RMA.</li> <li>We have farmed alongside the wetland and in harmony with its values for a number of years.</li> <li>Our cowshed and milking platform are close to the wetland.</li> </ul>
↳ Otago Fish & Game Council	103	Oppose submission 19, Ref. 155		No reason given.
↳ Federated Farmers of New Zealand	105	Support in part submission 19, Ref. 155		<ul style="list-style-type: none"> <li>There has been a lack of consultation throughout resulting in an inaccurate inclusion of the wetland.</li> </ul>

Summary of Decisions Requested (submissions and further submissions) on Proposed Plan Change 2 (Regionally Significant Wetlands)  
Regional Plan: Water for Otago 23 November 2011

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
				• Current farming activities on both the wetland and adjacent land would be affected if the wetland continues to be inaccurately included.
D W Lyders	24	Did not specify	No decision requested.	•Concern that proposed rules will prevent or hamper the continuation of enhancement of Waipori/Waiholā Wetland (by spraying willow, alders, gorse or by creation of ponds for wildlife) by requiring costly and time consuming consent.
↳ Otago Fish & Game Council	103	Support submission 24, Ref. 155		• Rules have to be changed to be either more permissive on restoration, and/or for resource consent fee relief. • An alternative is a wetlands committee.
↳ Lake Waiholā Waipori Wetlands Society Inc.	104	Support submission 24, Ref. 155		• The proposed rules will add an additional layer of cost and compliance to the process of wetland enhancement.
Michael and Christine Holland	25	Amend	Want no changes to land use adjacent to the Waiānākara River Estuary Swamp (Map F65, #164).	•Do not want farming operation affected, wetland is already adequately protected by fencing.
↳ Otago Fish & Game Council	103	Support submission 25, Ref. 155		• There shouldn't be any need for land use changes adjacent to the wetland if it is already fenced and if the farming operation isn't causing any discharge into the wetland.
Federated Farmers of New Zealand	29	Support	Supports the restructuring of wetland rules to make them more concise, clear and consistent.	No reason given.
↳ Otago Fish & Game Council	103	Oppose submission 29, Ref. 155		No reason given.
Federated Farmers of New Zealand	29	Amend	Reinstate the word 'adverse' in these provisions: 13.2.2.1, 13.3.2.1, 13.4.2.1, 13.5.2.1.	•Implementation uncertain; means standard farming practices may be captured.
↳ Otago Fish & Game Council	103	Oppose submission 29, Ref. 155		No reason given.
↳ Royal Forest and Bird Protection Society of New Zealand Inc	106	Oppose submission 29, Ref. 155		• Council needs to consider all effects on regionally significant wetlands.
↳ Department of Conservation	108	Oppose submission 29, Ref. 155		• Rule as written allows ORC to consider all effects.
Contact Energy Limited	30	Did not specify	The opportunity to mitigate or offset the effects of activities on Regionally Significant Wetlands be given recognition in the rules.	•Wetlands can be relocated and enhanced. •Concerned by hierarchy of avoid, followed by remedy or mitigate - not endorsed in RMA.
↳ OtagoNet Joint Venture	100	Support submission 30, Ref. 155		No reason given.
↳ Trustpower Limited	102	Support submission 30, Ref. 155		No reason given.
↳ Otago Fish & Game Council	103	Oppose submission 30, Ref. 155		• Wetlands cannot be moved or created elsewhere.
↳ Royal Forest and Bird Protection Society of New Zealand Inc	106	Oppose submission 30, Ref. 155		• Neither offsetting or mitigation will result in the protection of regionally significant wetlands. Avoidance provides certainty and meets Part 2 and S 30 RMA requirements.
↳ Department of Conservation	108	Oppose submission 30, Ref. 155		• Avoidance should be the primary consideration.
Contact Energy Limited	30	Amend	That controls on the use of the beds of wetlands are not duplicated by the Regional and District Plans.	•Queries Chapter 13 rules applying to wetlands. •Especially relevant to Central Otago District Plan.
↳ Trustpower Limited	102	Support submission 30, Ref. 155		No reason given.
↳ Otago Fish & Game Council	103	Support in part submission 30, Ref. 155		• Supports any streamlining, but only if the purpose is to achieve better management.
↳ Royal Forest and Bird Protection Society of New Zealand Inc	106	Oppose submission 30, Ref. 155		• District and regional plans need to be consistent but can have regard to different matters.
↳ Department of Conservation	108	Oppose submission 30, Ref. 155		• Essential that consistent controls are applied across all relevant planning instruments, in order to ensure protection of wetlands and their values.
Clutha District Council	34	Support	Strongly support the addition of Regionally Significant Wetlands into existing rules controlling activities in lake and river beds.	•Addresses existing gap between Regional Council and Territorial Authority functions, which allowed significant impacts on wetlands from activities such as the erection of structures, disturbance, planting and vegetation removal.

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
↳ Trustpower Limited	102	Support in part submission 34, Ref. 155		No reason given.
Transpower New Zealand Limited	37	Amend	Provide for the "use" of existing structures in Rule 13.1.1.1 by including after the words "any lake or river" the word "or any Regionally Significant Wetlands".	<ul style="list-style-type: none"> <li>It is important to clearly sanction the operation of existing lawfully established structures in or over wetlands.</li> <li>Not including wetlands in this rule creates uncertainty (when they are included in other rules - e.g. 13.2, 13.3).</li> </ul>
↳ Trustpower Limited	102	Support submission 37, Ref. 155		No reason given.
Transpower New Zealand Limited	37	Support	Retain rules 13.2 to 13.7 without further modification.	<ul style="list-style-type: none"> <li>Vegetation trimming undertaken to protect lines, not included in "removal and clearance of vegetation".</li> <li>Electricity (Hazards from Trees) Regulations 2003 and NES Electricity Transmission Activities 2009 are relevant to vegetation control.</li> <li>Not immediate issue as wetlands generally have low growing plants.</li> </ul>
Transpower New Zealand Limited	37	Amend	In relation to Rules 13.7.1.2, 13.7.2.1 and 13.7.3.1: Further consideration required in terms of adequate provision provided for vegetation removal around transmission lines.	<ul style="list-style-type: none"> <li>Vegetation trimming undertaken to protect lines, not included in "removal and clearance of vegetation".</li> <li>Electricity (Hazards from Trees) Regulations 2003 and NES Electricity Transmission Activities 2009 are relevant to vegetation control.</li> <li>Not immediate issue as wetlands generally have low growing plants.</li> </ul>
↳ Trustpower Limited	102	Support submission 37, Ref. 155		No reason given.
Hawksbury Lagoon Inc	39	Amend	Default position on rules and policies should be a conserved wetland rather than create permitted activities (To keep faith with the objective to "avoid").	No reason given.
↳ OtagoNet Joint Venture	100	Oppose submission 39, Ref. 155		• Position of submitter does not align with the principle of sustainable management which seeks to avoid, remedy, or mitigate adverse effects on the environment.
↳ Trustpower Limited	102	Oppose submission 39, Ref. 155		• See reasons in TrustPower's submission on Policy 10.4.2.
↳ Otago Fish & Game Council	103	Support in part submission 39, Ref. 155		• Permitted activities cannot exist without oversight, unless overseen by a Wetlands Committee.
TrustPower Limited	40	Amend	Remove rules (or standards in rules) that seek to achieve no net change of any particular value(s).	<ul style="list-style-type: none"> <li>They do not enable compliance to be objectively assessed, and result in uncertainty over their application.</li> <li>Wetland values should either be maintained or enhanced. No net change is uncertain and could provide for degradation or adverse effects on wetlands.</li> </ul>
↳ Royal Forest and Bird Protection Society of New Zealand Inc	106	Oppose submission 40, Ref. 155		• Wetland values should either be maintained or enhanced. No net change is uncertain and could provide for degradation or adverse effects on wetlands.
Department of Conservation	42	Amend	<p>Adopt new Rule 13.7.2.1A in full and apply only to the proposed extensions to:</p> <ul style="list-style-type: none"> <li>the Upper Taieri Wetlands Complex as contained and described (on maps 22-28) in Appendix 2 of this submission, and</li> <li>the map describing the extent of the Ida Valley Kettle Holes as contained and described in Appendix 3 of this submission.</li> </ul> <p><b><u>"13.7.2.1A: Permitted activity: No resource consent required</u></b></p> <p><b><u>13.7.2.1A The removal of vegetation by haying from both the proposed extensions to the Upper Taieri Wetlands Complex (as contained in Appendix 2) and the Ida Valley Kettle Holes (as contained in Appendix 3) is a permitted activity providing:</u></b></p> <p><b><u>(a) The wetland alteration is limited to that necessary for the removal of hay material.</u></b></p> <p><b><u>(b) All reasonable steps are taken to minimise the release of sediment to the wetland during haying and there is no conspicuous change in colour or visual clarity of the water body."</u></b></p>	<ul style="list-style-type: none"> <li>These areas of the Upper Taieri Wetland Complex act as buffer zones for the wetland.</li> <li>Ida Valley Kettle Holes are collectively significant.</li> <li>Regionally Significant Wetland Values of both these areas are not threatened by vegetation removal such as haying.</li> </ul>
↳ OtagoNet Joint Venture	100	Oppose submission 42, Ref. 155		• Position of submitter does not align with the principle of sustainable management which seeks to avoid, remedy, or mitigate adverse effects on the environment.
↳ Otago Fish & Game Council	103	Support submission 42, Ref. 155		No reason given.

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
↳ Federated Farmers of New Zealand	105	Support in part submission 42, Ref. 155		• In the area identified, this activity is consistent with the proper enhancing and maintaining of the wetland values.
Department of Conservation	42	Support	For the following rules: 13.2.1.4 - 13.2.1.8; 13.2.2.1; 13.2.3.1; 13.3.1.1; 13.3.1.2; 13.3.2.1; 13.4.1.1; 13.4.2.1; 13.5.1.1; 13.5.1.3; 13.5.1.5A; 13.5.1.6; 13.5.1.8; 13.5.2.1; 13.5.3.2; 13.6.2.0; 13.6.3.1 and 13.7.3.1.  Retain with no amendments.	<ul style="list-style-type: none"> <li>• Consistent with Part 2 RMA.</li> <li>• Gives Regionally Significant Wetlands the same recognition as the region's rivers and lakes</li> <li>• Protects wetland flora</li> <li>• Enables the maintenance and restoration of regionally significant wetlands.</li> <li>• Gives effect to NPS Freshwater Management.</li> </ul>
↳ OtagoNet Joint Venture	100	Oppose submission 42, Ref. 155		<ul style="list-style-type: none"> <li>• Rules that seek to achieve no net change of any particular value(s) should not be included in the Water Plan.</li> <li>• Rules (or standards in rules) with a high degree of subjectivity should be revised and amended or deleted.</li> </ul>
↳ Trustpower Limited	102	Oppose submission 42, Ref. 155		• Relief sought is inconsistent with Trustpower's submission.
↳ Otago Fish & Game Council	103	Support submission 42, Ref. 155		No reason given.
OtagoNet Joint Venture	43	Oppose	Generally opposes proposed permitted activity rules.	• Superfluous resource consents are likely to be required under proposed provisions. Could impede OtagoNet's operations and risk the security of it's network.
↳ Otago Fish & Game Council	103	Oppose in part submission 43, Ref. 155		<ul style="list-style-type: none"> <li>• A Regional Wetlands Committee would be able to practically assess, often on site, how a proposed activity would affect a wetland.</li> <li>• If there is no committee, permitted activity rules should remain as they are.</li> </ul>
OtagoNet Joint Venture	43	Amend	Rules (or standards in rules) that seek to achieve no net change of any particular value(s) should not be included in the Water Plan.	<ul style="list-style-type: none"> <li>• Do not enable compliance to be objectively assessed.</li> <li>• Application is uncertain.</li> </ul>
↳ Trustpower Limited	102	Support submission 43, Ref. 155		No reason given.
↳ Otago Fish & Game Council	103	Oppose in part submission 43, Ref. 155		<ul style="list-style-type: none"> <li>• A Regional Wetlands Committee would be able to practically assess, often on site, how a proposed activity would affect a wetland.</li> <li>• If there is no committee, permitted activity rules should remain as they are.</li> </ul>
↳ Royal Forest and Bird Protection Society of New Zealand Inc	106	Oppose submission 43, Ref. 155		• Wetland values should either be maintained or enhanced. No net change is uncertain and could provide for degradation or adverse effects on wetlands.
↳ Department of Conservation	108	Oppose submission 43, Ref. 155		• Wetlands are a threatened ecosystem type and further adverse effects on them should be avoided – S 6 (a).
OtagoNet Joint Venture	43	Amend	Amend or delete rules (or standards in rules) associated with a high degree of subjectivity.	No reasons given.
↳ Trustpower Limited	102	Support submission 43, Ref. 155		No reason given.
↳ Otago Fish & Game Council	103	Oppose in part submission 43, Ref. 155		• A Regional Wetlands Committee would be able to practically assess, often on site, how a proposed activity would affect a wetland.
↳ Department of Conservation	108	Oppose submission 43, Ref. 155		• Rules provide for protection of regionally significant wetlands and their values.
New Zealand Railways Corporation	46	Amend	Add to 13.2.2, 13.3.2, 13.4.2, and 13.5.2 a criterion which recognises the importance of existing land transport networks, such as rail where these are currently located within regionally significant wetlands such as: "Any positive effect derived from the function of the structure and/or activity in this location" or similar.  NB: Amending Schedule 1 as set out as requested would largely achieve the same relief.	<ul style="list-style-type: none"> <li>• Criteria do not take into account location and importance of regionally (and nationally) important land transport networks which are, in places, incorporated within the new Regional Significant Wetland boundaries.</li> <li>• No balancing criteria, other than those in Part 2 RMA, which allow for the fixed location of land-based transport networks to be considered when they require replacement, or alteration along their current alignments.</li> </ul>
↳ Trustpower Limited	102	Support submission 46, Ref. 155		No reason given.
↳ Otago Fish & Game Council	103	Support in part submission 46, Ref. 155		<ul style="list-style-type: none"> <li>• Supports existing transport networks being enabled to continue operations.</li> <li>• Where maintenance of assets will have more than minor effects, the</li> </ul>

Summary of Decisions Requested (submissions and further submissions) on Proposed Plan Change 2 (Regionally Significant Wetlands)  
Regional Plan: Water for Otago 23 November 2011



SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
				<i>usual wetland rules should apply.</i>
New Zealand Railways Corporation	46	Amend	Add to 13.2.2, 13.3.2, 13.4.2, and 13.5.2 a criterion to recognise that transport infrastructure is particularly important for enabling people and communities to provide for their social, economic, and cultural wellbeing and for their health and safety.	<ul style="list-style-type: none"> <li>•Criteria do not take into account location and importance of regionally (and nationally) important land transport networks which are, in places, incorporated within the new Regional Significant Wetland boundaries.</li> <li>•No balancing criteria, other than those in Part 2 RMA, which allow for the fixed location of land-based transport networks to be considered when they require replacement, or alteration along their current alignments.</li> </ul>
↳ Otago Fish & Game Council	103	Support in part submission 46, Ref. 155		<ul style="list-style-type: none"> <li>• Supports existing transport networks being enabled to continue operations.</li> <li>• Where maintenance of assets will have more than minor effects, the usual wetland rules should apply.</li> </ul>
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Amend Rules 13.2.1.1; 13.2.1.2; 13.2.1.4; 13.2.1.5; 13.2.1.6 and 13.2.1.8: <del>"The ...bed of a lake or river, or any Regionally Significant Wetland is a permitted activity, providing:"</del>  Add the following permitted activity conditions: <u>"(a) The structure is not in a Regionally Significant Wetland or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria.</u> <u>(b) Effects on biological diversity and ecological values; and</u> <u>(c) Effects on the natural character of wetlands and their margins."</u>	<ul style="list-style-type: none"> <li>•Fences shouldn't be erected in wetlands as animals tend to congregate along them, and regionally significant wetlands shouldn't be grazed.</li> <li>•Digging of wetlands for pipe, line and cable placement can cause irreversible damage.</li> <li>•Erection of structures over wetlands can adversely affect them.</li> </ul>
↳ OtagoNet Joint Venture	100	Oppose submission 47, Ref. 155		<ul style="list-style-type: none"> <li>• New permitted activity conditions proposed by the Royal Forest and Bird Society are not measurable conditions and do not allow for compliance to be objectively assessed.</li> </ul>
↳ Trustpower Limited	102	Oppose submission 47, Ref. 155		<ul style="list-style-type: none"> <li>•Council did not intend for non-scheduled wetlands to be included in the regionally significant wetland provisions.</li> </ul>
↳ Otago Fish & Game Council	103	Support submission 47, Ref. 155		No reason given.
↳ Department of Conservation	108	Support submission 47, Ref. 155		<ul style="list-style-type: none"> <li>• Better provides for the protection of the natural character of all wetlands (S. 6(a)).</li> </ul>
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Add new non-complying rule: <u>"Removal or clearance of native plant material from any Regionally Significant Wetland, or any wetland that meets the significance criteria listed in Schedule #; and is a non-complying activity."</u>	<ul style="list-style-type: none"> <li>•Removal of indigenous vegetation should be avoided and should be non-complying.</li> </ul>
↳ Trustpower Limited	102	Oppose submission 47, Ref. 155		<ul style="list-style-type: none"> <li>•Discretionary activity is appropriate for the removal of indigenous vegetation. In some cases indigenous removal would be incidental to other activities and would generate minor or less than minor effects, and such removal does not warrant non-complying activity status.</li> </ul>
↳ Otago Fish & Game Council	103	Support submission 47, Ref. 155		No reason given.
↳ Federated Farmers of New Zealand	105	Oppose in part submission 47, Ref. 155		<ul style="list-style-type: none"> <li>• Do not agree with extending the proposed plan change's protection to unidentified and unassessed wetlands.</li> </ul>
↳ Department of Conservation	108	Oppose submission 47, Ref. 155		<ul style="list-style-type: none"> <li>• There may be occasions during wetland restoration when some clearance of native vegetation would benefit overall restoration objectives – also, during willow (and other weed) spraying operations, some collateral damage will occur to native vegetation, but this is generally short-term, followed by recovery, and is more than balanced-out by the re-growth of native vegetation previously prevented by willow (and other weed) coverage.</li> </ul>

## Protection general

### 157 Drain maintenance

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Three Creeks Farm	19	Amend	If Te Hua Taki Wetland (Map F66, #171) is retained as a regionally significant wetland then: •Provide for the maintenance of existing drains into and out of the wetland as a permitted activity. •If consents are required include a non notification clause, include the consents as a controlled activity, that there is no fee on the consent.	•Drains in and out of the wetland need regular maintenance, which is an important part of how the wetland currently functions. Getting consent for drain maintenance will have a significant effect on my farming operation (cost and uncertainty). •Plan Change fails to provide for my economic wellbeing and that of the community around the affected area, as required by s 5 RMA.
↳ Otago Fish & Game Council	103	Support in part submission 19, Ref. 157		• Could be remedied by mapping the existing drains at a fine scale and allowing for their maintenance as a permitted activity. Otherwise cost of maintenance will be prohibitive and farmers may not seek consent..
↳ Federated Farmers of New Zealand	105	Support submission 19, Ref. 157		• Land drainage has positive effects beyond increasing the productivity of land and providing for better land management, including reducing the incidence of localised flooding. • Where land drainage systems are already in place and are not properly maintained, there is further potential for flooding, erosion and discharge of sediment and other contaminants. • Requiring consent may deter necessary maintenance.
↳ Department of Conservation	108	Oppose submission 19, Ref. 157		• Maintenance of existing drains can cause adverse effects of a similar scale to the construction of new drains within wetlands. • Maintenance of existing drains should require a resource consent with conditions – the ability to refuse a consent needs to be available in order to deal with the worst cases of potential damage.
Gavan James Herlihy	22	Amend	Maintenance of existing drains to be a permitted activity.	No reason given.
↳ Otago Fish & Game Council	103	Support submission 22, Ref. 157		•While new drains in wetlands should require resource consent, there are two options to deal with existing drains: 1. Map all existing drains and allow for their clearance as a permitted activity. 2. Create a wetlands committee which can assess activities relating to wetlands under permitted or controlled activity rules.
↳ Federated Farmers of New Zealand	105	Support submission 22, Ref. 157		• Land drainage has positive effects beyond increasing the productivity of land and providing for better land management, including reducing the incidence of localised flooding. • Where land drainage systems are already in place and are not properly maintained, there is further potential for flooding, erosion and discharge of sediment and other contaminants. • Requiring consent may deter necessary maintenance.
↳ Royal Forest and Bird Protection Society of New Zealand Inc	106	Oppose submission 22, Ref. 157		• Clearing of drains can have adverse effects and should require a consent. This is an issue in the pollution of Waituna Lagoon in Southland.
↳ Department of Conservation	108	Oppose submission 22, Ref. 157		• Maintenance of existing drains can cause adverse effects of a similar scale to the construction of new drains within wetlands.
Karl Frank Burgess	49	Oppose	Oppose having to get resource consent to clean existing ditches to keep them safe for stock. If I have to get consent I do not want to get consent every year and consent should last for 35 years.	•Ditches need to be safe so the stock can graze grazeable land above the wetland.
↳ Otago Fish & Game Council	103	Support in part submission 49, Ref. 157		•Understands the submitter's concerns and proposes to create a wetlands committee which can assess activities relating to wetlands, such as the maintenance of existing drains, under permitted or controlled activity rules.
↳ Federated Farmers of New Zealand	105	Support submission 49, Ref. 157		• Land drainage has positive effects beyond increasing the productivity of land and providing for better land management, including reducing the incidence of localised flooding. • Where land drainage systems are already in place and are not properly maintained, there is further potential for flooding, erosion and discharge of sediment and other contaminants.

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
				<ul style="list-style-type: none"> <li>• Requiring consent may deter necessary maintenance.</li> </ul>
↳ Royal Forest and Bird Protection Society of New Zealand Inc	106	Oppose submission 49, Ref. 157		<ul style="list-style-type: none"> <li>• Clearing of drains can have adverse effects and should require a consent. This is an issue in the pollution of Waituna Lagoon in Southland.</li> </ul>
↳ Department of Conservation	108	Oppose submission 49, Ref. 157		<ul style="list-style-type: none"> <li>• Maintenance of existing drains can cause adverse effects of a similar scale to the construction of new drains within wetlands.</li> </ul>

## 161 Protection general

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Treble Cone Investments Limited	2	Amend	Specific note should be made in assessment criteria and background as to the substantial positive effects created by Snowmaking Systems and the water use associated with these systems.	No reason given.
↳ Otago Fish & Game Council	103	Oppose submission 2, Ref. 161		<ul style="list-style-type: none"> <li>• Alpine wetlands are a threatened habitat for Paradise Shelduck.</li> <li>• There is no reason to remove alpine wetlands from the blanket protection on the basis of existing skifield operations in a few locations.</li> <li>• There is no reason to make the rules more permissive.</li> </ul>
SH Andrews and Sons Ltd	7	Amend	Honour ORC staff assurances given at public meetings that existing farm practises continue within the new boundary.	<ul style="list-style-type: none"> <li>• Would have accepted proposed changes when assured that current farming practices could continue.</li> <li>• Assurances incorrect with maintenance of drains and oversowing of clover seed now requiring consent.</li> </ul>
↳ Otago Fish & Game Council	103	Oppose submission 7, Ref. 161		<ul style="list-style-type: none"> <li>• Further submitter could support existing drain clearance as a permitted activity if better quality mapping would allow these existing drains to be defined on a fine scale. However, new drains are often built around wetlands, and whilst this continues, the further submitter must support the tougher rule.</li> </ul>
↳ Federated Farmers of New Zealand	105	Support submission 7, Ref. 161		<ul style="list-style-type: none"> <li>• At public meetings throughout the region, ORC staff assured landowners that current farming practises could continue as currently, despite new boundaries and classifications for RSWs. These assurances gave farmers a false sense of security and may have resulted in lesser submissions against the plan.</li> <li>• It is important for maintenance of drains to continue to be permitted activities.</li> </ul>
Cardrona Alpine Resort	15	Amend	Specific note should be made in assessment criteria and background as to the substantial positive effects created by Snowmaking Systems and the water use associated with these systems.	<ul style="list-style-type: none"> <li>• Skifield operations have not been considered in the proposal, and are a vital part of the economy.</li> </ul>
↳ Otago Fish & Game Council	103	Neither support, nor Oppose submission 15, Ref. 161		<ul style="list-style-type: none"> <li>• Further submitter would like to understand more about the possible positive effects of snowmaking systems on alpine wetlands.</li> </ul>
Contact Energy Limited	30	Support	The opportunity to mitigate or offset the effects of activities on Regionally Significant Wetlands be given recognition in the objectives, policies, and rules.	<ul style="list-style-type: none"> <li>• Wetlands can be relocated and enhanced.</li> <li>• Concerned by hierarchy of avoid, followed by remedy or mitigate - not endorsed in RMA.</li> </ul>
↳ Meridian Energy Limited	101	Support in part submission 30, Ref. 161		<ul style="list-style-type: none"> <li>• The objectives, policies and rules of Proposed Plan Change 2 should be sufficiently flexible to allow for the mitigation or offsetting of adverse effects on Regionally Significant Wetlands.</li> </ul>
↳ Trustpower Limited	102	Support submission 30, Ref. 161		No reason given.
↳ Otago Fish & Game Council	103	Oppose submission 30, Ref. 161		<ul style="list-style-type: none"> <li>• Wetlands cannot be moved or created elsewhere.</li> </ul>
↳ Royal Forest and Bird Protection Society of New Zealand Inc	106	Oppose submission 30, Ref. 161		<ul style="list-style-type: none"> <li>• Neither offsetting or mitigation will result in the protection of regionally significant wetlands. Avoidance provides certainty and meets Part 2 and section 30 RMA requirements.</li> </ul>
↳ Department of Conservation	108	Oppose submission 30, Ref. 161		<ul style="list-style-type: none"> <li>• Avoidance should be the primary consideration.</li> </ul>
TrustPower Limited	40	Amend	Establish Management Zone for the Waipori Hydro Scheme and the Loch Luella and Loch Loudon Fen Complexes which recognises and	<ul style="list-style-type: none"> <li>• Waipori Hydro Scheme is a key electricity generating asset for the region which warrants protection under policy B of NPS Renewable</li> </ul>

Summary of Decisions Requested (submissions and further submissions) on Proposed Plan Change 2 (Regionally Significant Wetlands)  
Regional Plan: Water for Otago 23 November 2011

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
			provides for the longstanding human use influences on these wetlands and the potential for such influences to change. [Submission includes a draft management zone, with objectives, policies and rules, to be conjointly developed by submitter and Council].	Energy Generation. •Plan Change 2 has the potential to unduly compromise its operating regime and future consenting requirements, which does not meet sustainable management.
↳ Otago Fish & Game Council	103	Oppose submission 40, Ref. 161		• Large scale activities that affect waterways should remain as non-complying.
↳ Royal Forest and Bird Protection Society of New Zealand Inc	106	Oppose submission 40, Ref. 161		• Proposal does not meet RMA Part 2 and S 30 requirements. Non-complying is appropriate status for activities that are likely to have significant and large scale effects, e.g. the extension, replacement or reconstruction of structures. Any further proposed rules would require a plan change.
↳ Contact Energy Limited	107	Support submission 40, Ref. 161		• Supports approach of submission in principle. • Hydro generation should be adequately recognised and its ongoing operation safeguarded – this is in accordance with the NPS Renewable Energy Generation (sets out matters of national significance). • Needs to be consistency of activity status for renewable generation activities.

## 162 Generic permitted activity condition for wetlands protection

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Federated Farmers of New Zealand	29	Amend	Delete: "There is no change to the water level or hydrological function, or no damage to the flora, fauna or its habitat, in or on any Regionally Significant Wetland." In rules 12.1.2.4, 12.1.2.5, 12.1.2.6, 12.2.2.5, 12.2.2.6, 12.3.2.1, 12.3.2.2, 12.3.2.3, 13.4.1.1, 13.5.1.1, 13.5.1.3, 13.5.1.8.	•Since other provisions control water in Regionally Significant Wetlands and wetlands are mapped, unsure of need for condition. •Concerned that implementation of rule is uncertain near mapped areas.
↳ Trustpower Limited	102	Support submission 29, Ref. 162		No reason given.
↳ Otago Fish & Game Council	103	Oppose submission 29, Ref. 162		• Generic permitted activity status should remain.
↳ Royal Forest and Bird Protection Society of New Zealand Inc	106	Oppose submission 29, Ref. 162		• Changes to water levels, hydrologic function, damage to flora and fauna can degrade and destroy wetlands. Activities that result in such changes should not be permitted.
↳ Department of Conservation	108	Oppose submission 29, Ref. 162		• Rules provide for protection of regionally significant wetlands and their values.
Meridian Energy Limited	32	Amend	Delete: "There is no change to the water level or hydrological function, or no damage to the flora, fauna or its habitats, in or on any Regionally Significant Wetland" In rules 12.1.2.4, 12.1.2.5, 12.1.2.6, 12.2.2.5, 12.2.2.6, 12.3.2.1, 12.3.2.2, 12.3.2.3, 12.5.1.1 and 13.5.1.3	•Condition doesn't provide certainty to enable compliance to be objectively assessed (e.g., take of water affecting hydrological function or damaging habitat requires subjective analysis and not suitable as a permitted activity).
↳ Trustpower Limited	102	Support submission 32, Ref. 162		No reason given.
↳ Otago Fish & Game Council	103	Support submission 32, Ref. 162		No reason given.
↳ Federated Farmers of New Zealand	105	Support submission 32, Ref. 162		• Agree that condition doesn't provide certainty to enable an objective achievement – analysis is subjective. Too uncertain in interpretation and application.
↳ Royal Forest and Bird Protection Society of New Zealand Inc	106	Oppose submission 32, Ref. 162		• Changes to water levels, hydrologic function, damage to flora and fauna can degrade and destroy wetlands. Activities that result in such changes should not be permitted.
↳ Department of Conservation	108	Oppose submission 32, Ref. 162		• Rules provide for protection of regionally significant wetlands and their values.
Te Runanga o Moeraki, Kati Huirapa Runaka ki	38	Support	Support the addition throughout the Plan of:	•Note, want independent assessment to determine whether there are

Summary of Decisions Requested (submissions and further submissions) on Proposed Plan Change 2 (Regionally Significant Wetlands)  
Regional Plan: Water for Otago 23 November 2011

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Puketeraki, Te Runanga o Otakou, and Hokonui Runanga			"There is no change to the water level or hydrological function, or no damage to the flora, fauna or its habitat, in or on any Regionally Significant Wetland."	changes to regionally significant wetlands. •Want clarification on how an assessment would be done, who would do it, and whether the causes of these changes can be established. •Risk that cumulative effects are missed, and only marked changes are picked up.
↳ Trustpower Limited	102	Oppose submission 38, Ref. 162		• Relief sought is inconsistent with Trustpower's submission.
↳ Department of Conservation	108	Support submission 38, Ref. 162		• Better provides for the protection of regionally significant wetlands.
Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou, and Hokonui Runanga	38	Oppose	Do not support the permissive nature of this change to the plan as in many places within the plan this provision: "There is no change to the water level or hydrological function, or no damage to the flora, fauna or its habitat, in or on any Regionally Significant Wetland." has replaced the following provisions as a permitted activity: "The water is not taken from any wetlands identified in Schedule 9 or any wetland higher than 800 metres above sea level; and" or "The discharge is not to any wetland identified in Schedule 9"	•Proposed changes reduce the protection of regionally significant wetlands.
↳ Otago Fish & Game Council	103	Oppose submission 38, Ref. 162		• Old rules were focused purely on effects on water, whereas the new rules are focused on the whole wetland environment.
↳ Otago Fish & Game Council	103	Support in part submission 38, Ref. 162		• If a wetlands committee is established to oversee permitted activities then further submitter is happy for the permitted activity rule to exist as is. If not, then submitter's suggestion of a stronger policy for permitted activities should be applied.
Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou, and Hokonui Runanga	38	Amend	Add provision to all permitted activities where it concerns permanent structures in or possible effects on regionally significant wetlands: "That there is no change to the water level or hydrological function, or no damage to the flora, fauna or its habitat, in or on any Regionally Significant Wetland."	•There are now activities permitted within Regionally Significant Wetlands that may have a permanent impact.
↳ OtagoNet Joint Venture	100	Oppose submission 38, Ref. 162		• Proposed rule does not allow to compliance be objectively determined and the rule is also outside of the scope of Section 6(c) of the Act.
↳ Trustpower Limited	102	Oppose submission 38, Ref. 162		• Relief sought is inconsistent with Trustpower's submission.
↳ Otago Fish & Game Council	103	Support in part submission 38, Ref. 162		• If a wetlands committee is established to oversee permitted activities then further submitter is happy for the permitted activity rule to exist as is. If not, then submitter's suggestion of a stronger policy for permitted activities should be applied.
↳ Department of Conservation	108	Support submission 38, Ref. 162		• Better provides for the protection of regionally significant wetlands.
TrustPower Limited	40	Amend	Delete: " <del>There is no change to the water level or hydrological function, or no damage to the flora, fauna or its habitat, in or on any Regionally Significant Wetland</del> " in rules 12.1.2.4, 12.1.2.5, 12.1.2.6, 12.2.2.5, 12.2.2.6, 12.3.2.1, 12.3.2.2, 12.3.2.3, 13.4.1.1, 13.5.1.1, 13.5.1.3.  Rules 12.1.2.4, 12.1.2.5, 12.2.2.5, and 12.2.2.6 may include an alternative standard that provides that water is not taken from any Regionally Significant Wetland.  May be appropriate to include a maximum allocation value in rules 12.1.2.5 and 12.2.2.6 to control takes that may affect the water level of any particular Regionally Significant Wetland.	•Does not enable compliance to be objectively assessed, resulting in uncertainty in application of this standard.
↳ Otago Fish & Game Council	103	Oppose submission 40, Ref. 162		No reason given.
↳ Federated Farmers of New Zealand	105	Support submission 40, Ref. 162		• Agree that condition doesn't provide certainty to enable an objective achievement – analysis is subjective. Too uncertain in interpretation and application.
↳ Royal Forest and Bird Protection Society of	106	Oppose submission 40,		• Changes to water levels, hydrologic function, damage to flora and

Summary of Decisions Requested (submissions and further submissions) on Proposed Plan Change 2 (Regionally Significant Wetlands)  
Regional Plan: Water for Otago 23 November 2011

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
New Zealand Inc		Ref. 162		fauna can degrade and destroy wetlands. Activities that result in such changes should not be permitted.
↳ Department of Conservation	108	Oppose submission 40, Ref. 162		• Rules provide for protection of regionally significant wetlands and their values.
OtagoNet Joint Venture	43	Amend	Delete permitted activity standard in Rules 13.4.1.1, 13.5.1.1 and 13.5.1.3: "There is no change in water level or hydrological function, or no damage to the flora, fauna or its habitat, in or on any Regionally Significant Wetland."	•Does not enable compliance to be objectively assessed. •Precludes any development in a Regionally Significant Wetland without consent. •Inconsistent with s 5(2) RMA. •Extends protection for flora and fauna beyond s 6(c) RMA.
↳ Trustpower Limited	102	Support submission 43, Ref. 162		No reason given.
↳ Otago Fish & Game Council	103	Oppose in part submission 43, Ref. 162		• A Regional Wetlands Committee would be able to practically assess, often on site, how a proposed activity would affect a wetland. • If there is no wetlands committee, the permitted activity rules should remain as they are.
↳ Federated Farmers of New Zealand	105	Support submission 43, Ref. 162		• Agree that compliance cannot be objectively assessed and provision is not consistent with s5(2) RMA.
↳ Royal Forest and Bird Protection Society of New Zealand Inc	106	Oppose submission 43, Ref. 162		• Changes to water levels, hydrologic function, damage to flora and fauna can degrade and destroy wetlands. Activities that result in such changes should not be permitted.
↳ Department of Conservation	108	Oppose submission 43, Ref. 162		• Rules provide for protection of regionally significant wetlands and their values.

## Financial contributions

### 10 Financial contributions policy (Policy 10.4.2A and Ch.17)

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Otago Fish & Game Council	8	Support	Support for 10.4.2A	No reason given.
↳ Contact Energy Limited	107	Oppose submission 8, Ref. 10		• 10.4.2A should be amended to clarify that only more than minor residual effects (rather than all effects) that are not avoided, remedies or mitigated are required to be addressed with financial contribution or environmental compensation. • Appropriate clarification of the circumstances, purpose and method of determining the contribution amount should be provided. • Provision for offsetting effects should be recognised in the objectives, policies and rules
Federated Farmers of New Zealand	29	Oppose	Opposes in part 10.4.2A and the Introduction to Chapter 17 in part.	No reason given.
↳ Trustpower Limited	102	Oppose submission 29, Ref. 10		• Relief sought is inconsistent with Trustpower's submission.
Contact Energy Limited	30	Amend	That the new policy 10.4.2A on financial contributions be amended to clarify that not every effect not avoided, remedied or mitigated is required to be addressed by way of financial contribution for environmental compensation, but only those residual effects above a certain threshold - being more than minor effects. Appropriate clarification of the circumstances, purpose and method of determining the contribution amount should also be provided.	•Not every effect needs to be addressed. •The policy implies a "no net loss" approach, which is not taken in RMA.
↳ Meridian Energy Limited	101	Support in part/Oppose in part submission 30, Ref. 10		•Agrees with the submitter that Proposed Plan Change 2 and Policy 10.4.2A provide greater clarity as to the circumstances when financial contributions may be required. •Does not accept the concept that all residual adverse effects that are more than minor need to be addressed via a financial contribution.
↳ Trustpower Limited	102	Support submission 30, Ref. 10		No reason given.
↳ Otago Fish & Game Council	103	Oppose submission 30,		•Preservation of wetlands is a matter of national importance under s 6

Summary of Decisions Requested (submissions and further submissions) on Proposed Plan Change 2 (Regionally Significant Wetlands)  
Regional Plan: Water for Otago 23 November 2011

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
		Ref. 10		RMA. •Makes little sense to further reduce the definition of negative effects that have to be addressed if a wetland is used or modified. • Requests that policy contributions policy be left as it is.
↳ Federated Farmers of New Zealand	105	Support in part submission 30, Ref. 10		• The financial contribution policy does need amendment to ensure it is consistent with RMA.
Meridian Energy Limited	32	Amend	Amend the sixth paragraph of Section 17.1: "Works and services apply to remediation or mitigation activities, while financial contributions may apply to the offsetting of adverse effects that cannot be <u>directly fully avoided, or completely remedied or, in the Council's opinion, adequately mitigated, perhaps due to the nature of activity that needs to occur within the vicinity of the Regionally Significant Wetland.</u> "	•Explanation suggests financial contributions will be used to address residual effects that cannot be avoided, remedied or mitigated; not consistent with Policy 10.4.2A. •Given RMA is not a 'no effects' statute, 17.1 requires amendment to reflect direction provided in 10.4.2A.
↳ Trustpower Limited	102	Support submission 32, Ref. 10		No reason given.
↳ Otago Fish & Game Council	103	Support submission 32, Ref. 10		•Better reflects the intent of the RMA.
↳ Federated Farmers of New Zealand	105	Support in part submission 32, Ref. 10		• The financial contribution policy does need amendment to ensure it is consistent with RMA.
↳ Royal Forest and Bird Protection Society of New Zealand Inc	106	Oppose submission 32, Ref. 10		• Proposed amendments create uncertainty and are contrary to RMA part 2 and S 30.
Clutha District Council	34	Support	Supports the use of financial contributions to offset adverse effects	•Can help ensure the best environmental outcome.
↳ Trustpower Limited	102	Support submission 34, Ref. 10		No reason given.
↳ Contact Energy Limited	107	Oppose submission 34, Ref. 10		• 10.4.2A should be amended to clarify that only more than minor residual effects (rather than all effects) that are not avoided, remedies or mitigated are required to be addressed with financial contribution or environmental compensation. • Appropriate clarification of the circumstances, purpose and method of determining the contribution amount should be provided.
Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou, and Hokonui Runanga	38	Amend	Amend policy 10.4.2A: "Where the avoidance, remedy or mitigation of adverse effects is not possible (agreed upon by stakeholders including nga Runanga), financial contribution may be required to: (a) Restore or rehabilitate regionally significant wetlands or regionally significant values where those have been degraded; and (b) Restore or rehabilitate regionally significant wetlands or regionally significant values where those have been lost."	•Want clarity on the process for triggering the mitigation listed in policy 10.4.2A. Nga Runanga as kaiiaki should be consulted before a decision is reached that mitigation of adverse effects is not possible. •Seeks to focus on improving wetlands rather than just restoring them to their past state. •Seeks to achieve the outcomes using all resources available to stakeholders.
↳ Meridian Energy Limited	101	Oppose submission 38, Ref. 10		•Determination of whether avoiding, remedying or mitigating adverse effects is possible does not require the input of stakeholders.
↳ Otago Fish & Game Council	103	Support submission 38, Ref. 10		• Ngai Tahu's consultation could come as part of a Wetlands Committee.
↳ Contact Energy Limited	107	Oppose submission 38, Ref. 10		•Assessment of whether effects are able to be avoided, remedied or mitigated should not be made by stakeholders. •Iwi concerns are addressed in Sections 6 and 7.
TrustPower Limited	40	Amend	Include more specific guidelines as to how a financial contribution may be constructively applied.	•Generally supports the intent of this policy in terms of offsetting adverse environmental effects. •Would be helpful to plan users.
↳ Otago Fish & Game Council	103	Support submission 40, Ref. 10		No reason given.
Department of Conservation	42	Support	Retain policy 10.4.2A with no amendments.	•Consistent with Part 2 RMA. •Gives guidance when considering activities in wetlands. •Maintains flows in streams sourced from wetlands which protects habitat of indigenous threatened fish. •Gives effect to the NPS Freshwater Management.
↳ Trustpower Limited	102	Support in part submission 42, Ref. 10		• Relief sought is consistent with Trustpower's submission.
↳ Contact Energy Limited	107	Oppose submission 42,		• 10.4.2A should be amended to clarify that only more than minor

Summary of Decisions Requested (submissions and further submissions) on Proposed Plan Change 2 (Regionally Significant Wetlands)  
Regional Plan: Water for Otago 23 November 2011

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
		Ref. 10		<i>residual effects (rather than all effects) that are not avoided, remedies or mitigated are required to be addressed with financial contribution or environmental compensation.</i> • <i>Appropriate clarification of the circumstances, purpose and method of determining the contribution amount should be provided.</i>
↳ Otago Fish & Game Council	103	Support submission 42, Ref. 10		No reason given.
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Delete policy 10.4.2A.	• Financial contributions inappropriate given large-scale loss or modification of wetlands, and inconsistent with Part 2 RMA and NPS Freshwater. • Assessment criteria inadequate to assess viability in any offsetting.
↳ Trustpower Limited	102	Oppose submission 47, Ref. 162		• Relief sought is inconsistent with Trustpower's submission.
↳ Otago Fish & Game Council	103	Support submission 47, Ref. 10		No reason given.
↳ Federated Farmers of New Zealand	105	Oppose in part submission 47, Ref. 10		• Agree that policy 10.4.2A needs amendment but do not agree that financial contributions are always inappropriate.
↳ Contact Energy Limited	107	Oppose submission 47, Ref. 10		• Financial contributions are a legitimate and appropriate tool. • Supports the use of financial contributions and environmental off-sets, subject to Contact's submission.

## 165 Financial contributions rules

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Meridian Energy Limited	32	Amend	Delete clause regarding the consideration of the need for a financial contribution and replace with: <i>"In circumstances where adverse effects on Regionally Significant Wetlands cannot be avoided, remedied or mitigated, whether a financial contribution is necessary and the appropriate value of any contribution."</i>	• Should more accurately reflect Policy 10.4.2A. • Note: Relevant to Rules 12.1.4.8, 12.2.3.4, 12.3.3.1, 12.4.2.1, 12.5.2.1, 13.2.2.1, 13.3.2.1
↳ Trustpower Limited	102	Support submission 32, Ref. 165		No reason given.
↳ Otago Fish & Game Council	103	Support submission 32, Ref. 165		No reason given.
↳ Federated Farmers of New Zealand	105	Support in part submission 32, Ref. 165		• There will be circumstances where a financial contribution may not be necessary or of actual benefit and this should be appropriately reflected in the rules.
↳ Royal Forest and Bird Protection Society of New Zealand Inc	106	Oppose submission 32, Ref. 165		• Provision for financial contributions are inconsistent with Part 2 RMA and the NPS on Freshwater Objectives B1 and B2.
TrustPower Limited	40	Amend	The proposed rules should guide financial contributions only where they are necessary, such as when adverse effects cannot be avoided, remedied or mitigated to ensure they have tangible benefits.	No reason given.
↳ Meridian Energy Limited	101	Support submission 40, Ref. 165		• Greater clarity should be given on when financial contributions may be required..
↳ Otago Fish & Game Council	103	Support submission 40, Ref. 165		• Financial contributions are necessary and a standard part of large-scale developments.
↳ Royal Forest and Bird Protection Society of New Zealand Inc	106	Oppose submission 40, Ref. 165		• Provision for financial contributions are inconsistent with Part 2 RMA and the NPS on Freshwater Objectives B1 and B2
TrustPower Limited	40	Amend	Consideration should be given to whether a financial contribution is necessary, and at what scale it would be required to ensure any financial contribution is constructive.  Amend: <del>"13.3.2.1(k) A financial contribution if the structure is a dam, or for regionally significant wetland values or Regionally Significant Wetlands that are adversely affected-Whether and at what scale a financial contribution is necessary, such as when adverse effects on regionally</del>	No reason given.



SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
			<u>significant wetlands cannot be avoided, remedied or mitigated; and"</u>  Amend 13.4.2.1(k) and 13.5.2.1(b): <u>"Any financial contribution for regionally significant wetland values or Regionally Significant Wetlands that are adversely affected. Whether and at what scale a financial contribution is necessary, such as when adverse effects on regionally significant wetlands cannot be avoided, remedied or mitigated."</u>	
↳ Otago Fish & Game Council	103	Oppose submission 40, Ref. 165		• Financial contributions are necessary and a standard part of large-scale developments that will affect wetlands.
↳ Federated Farmers of New Zealand	105	Support in part submission 40, Ref. 165		• There will be circumstances where a financial contribution may not be necessary or of actual benefit and this should be appropriately reflected in the rules.
↳ Royal Forest and Bird Protection Society of New Zealand Inc	106	Oppose submission 40, Ref. 165		• Provision for financial contributions are inconsistent with Part 2 RMA and the NPS on Freshwater Objectives B1 and B2
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Delete all provisions for financial contributions for regionally significant wetlands and values in all rules.	• Financial contributions inappropriate given large-scale loss or modification of wetlands, and inconsistent with Part 2 RMA and NPS Freshwater Management. • Assessment criteria inadequate to assess viability in any offsetting.
↳ Trustpower Limited	102	Oppose submission 47, Ref. 165		• Relief sought is inconsistent with Trustpower's submission.
↳ Otago Fish & Game Council	103	Support submission 47, Ref. 165		No reason given.

## Part 3: Schedules and maps

### Schedule 9 general

#### 200 Schedule 9

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Otago Fish & Game Council	8	Support	Welcomes the addition of many of the wetlands from the former Schedule 9 into Schedule 10.	<ul style="list-style-type: none"> <li>•No reason given.</li> <li>•Notes that approx. 1/3 of the wetlands in Schedule 10 now receive no protection or identification under this plan.</li> </ul>
↳ Contact Energy Limited	107	Oppose submission 8, Ref. 200		<ul style="list-style-type: none"> <li>•Schedule 9 lacks robustness in the process classifying the wetlands as regionally significant.</li> <li>•Seeks that Schedule 9 be not approved.</li> </ul>
The Yellow-eyed Penguin Trust	26	Support	Commends the addition of 24 new wetlands.	No reason given.
↳ Otago Fish & Game Council	103	Support submission 26, Ref. 200		<ul style="list-style-type: none"> <li>•The wetland plan needs a non-regulatory list of former Schedule 10 wetlands not included in the new schedule, plus any new wetlands that are identified.</li> </ul>
↳ Contact Energy Limited	107	Oppose submission 26, Ref. 200		<ul style="list-style-type: none"> <li>•Schedule 9 lacks robustness in the process classifying the wetlands as regionally significant.</li> <li>•Seeks that Schedule 9 be not approved.</li> </ul>
The Yellow-eyed Penguin Trust	26	Amend	Inclusion in Schedule 9 of Tavora Wetland at Bobbys Head.	<ul style="list-style-type: none"> <li>•Wetland has been restored to improve wetland function.</li> <li>•Council has funded signs on wetland and vegetation - it gets lots of visitors, wetland is important for public education.</li> <li>•Notes the plan change offers little protection for "lesser" wetlands, which may be equally important in the wider scheme.</li> </ul>
↳ Otago Fish & Game Council	103	Support submission 26, Ref. 200		<ul style="list-style-type: none"> <li>•The wetland plan needs a non-regulatory list of former Schedule 10 wetlands not included in the new schedule, plus any new wetlands that are identified.</li> </ul>
↳ Royal Forest and Bird Protection Society of New Zealand Inc	106	Support submission 26, Ref. 200		<ul style="list-style-type: none"> <li>• Wetland would meet Plans and Environment Court endorsed criteria for wetland of significance.</li> </ul>
Otago Conservation Board	27	Support	Strongly supports the addition of new wetlands to the list of protected wetlands.	No reason given.
↳ Contact Energy Limited	107	Oppose submission 27, Ref. 200		<ul style="list-style-type: none"> <li>•Schedule 9 lacks robustness in the process classifying the wetlands as regionally significant.</li> <li>•Seeks that Schedule 9 be not approved.</li> </ul>
Federated Farmers of New Zealand	29	Amend	Remove any wetlands inaccurately identified as Regionally Significant Wetlands included within Schedule 9 maps as identified by individual submitters.	<ul style="list-style-type: none"> <li>•Applying for consent for normal farming activities that have little/no effect on wetland values is unfair for landowners of inaccurately identified wetland areas.</li> <li>•Insufficient consultation</li> </ul>
↳ Otago Fish & Game Council	103	Oppose submission 29, Ref. 200		<ul style="list-style-type: none"> <li>• Cannot support any redefinition of wetland boundaries without consultation with further submitter first.</li> </ul>
↳ Royal Forest and Bird Protection Society of New Zealand Inc	106	Oppose submission 29, Ref. 200		<ul style="list-style-type: none"> <li>• Any alterations to wetland boundaries must involve independent advice from an ecologist, preferably a freshwater ecologist.</li> </ul>
↳ Department of Conservation	108	Oppose submission 29, Ref. 200		<ul style="list-style-type: none"> <li>• Oppose, unless independent advice from a competent ecologist supports the views of such submitters.</li> </ul>
Contact Energy Limited	30	Oppose	That Schedule 9 be not approved.	<ul style="list-style-type: none"> <li>•Process classifying the wetlands as regionally significant was not robust, had low level of investigation and assessment, which is not justified with the restrictive objectives and policies.</li> </ul>
↳ Otago Fish & Game Council	103	Oppose submission 30, Ref. 200		<ul style="list-style-type: none"> <li>• Wetlands currently in Schedule 9 or 10 do not need further ecological assessment and should be added to the plan as is.</li> </ul>
↳ Federated Farmers of New Zealand	105	Support in part submission 30, Ref. 200		<ul style="list-style-type: none"> <li>• There are wetlands that have not been accurately included in Schedule 9.</li> </ul>

Summary of Decisions Requested (submissions and further submissions) on Proposed Plan Change 2 (Regionally Significant Wetlands)  
Regional Plan: Water for Otago 23 November 2011

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
				• There was inadequate consultation and on-site assessment before their inclusion and as a result landowners will be at a loss given the restrictive nature of the rules.
↳ Royal Forest and Bird Protection Society of New Zealand Inc	106	Oppose submission 30, Ref. 200		• Schedule 9 is required for Council to meet its RMA part 2 and S 30 responsibilities.
↳ Department of Conservation	108	Oppose submission 30, Ref. 200		• Schedule 9 is fundamental for the provision of the sustainable management of the regions significant wetlands.
Contact Energy Limited	30	Amend	Clarify statement "Schedule 9 is not exhaustive" and make it explicit in order to provide certainty.	•Meaning of this is not clear. •Additional wetlands cannot be added to the Schedule without a formal plan change process.
↳ Meridian Energy Limited	101	Support submission 30, Ref. 200		•Statement that "Schedule 9 is not exhaustive" creates uncertainty.
↳ Federated Farmers of New Zealand	105	Support submission 30, Ref. 200		• As written, the statement leaves substantial uncertainty to other landowners. Greater clarification is required.
Clutha District Council	34	Support	Supports the inclusion of additional wetlands in the Clutha District, recognising that the affected landowners need to be involved in finalising the details of wetland boundaries.	•No reason given.
↳ Federated Farmers of New Zealand	105	Support in part submission 34, Ref. 200		• Currently there has not been a consistent process of consultation with landowners. Landowners should be involved in finalising wetland boundaries.
↳ Royal Forest and Bird Protection Society of New Zealand Inc	106	Oppose in part submission 34, Ref. 200		• Alteration of boundaries must involve independent advice from an ecologist, preferably a freshwater ecologist.
↳ Department of Conservation	108	Support submission 34, Ref. 200		• Support the part re: inclusion of additional wetlands – but when landowners are involved in finalising wetland boundaries this inevitably results in losses of wetland margins.
Gregory Kerr	35	Amend	Pleasing to see local wetlands included and expanded in Proposed Plan Change. May be better to regard them as one 'complex', interconnected to each other and to the sea - the salt marsh system of the Waikouaiti River Estuary / Hawksbury Lagoon.	•Vital link with lifecycles of species.
↳ Otago Fish & Game Council	103	Support submission 35, Ref. 200		No reason given.
Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou, and Hokonui Runanga	38	Amend	Nga Runanga need to know that the wetlands in Schedule 9 - regionally significant wetlands include all wetlands significant to them. If not there needs to be a process or a mechanism to achieve this.	•Added protection for wetlands is irrelevant if wetlands that are wahi taonga are not in Schedule 9.
↳ Otago Fish & Game Council	103	Support submission 38, Ref. 200		• Not enough metrics on wetlands added, lost and the overall change in hectares of wetland protected resulting from the change from old Schedule 9 to this new list.
Department of Conservation	42	Amend	Include Ida Valley Kettle Holes in Schedule 9 and the F-Series Maps	•Wetland contains Regionally Significant Wetland Values •Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
↳ Otago Fish & Game Council	103	Support submission 42, Ref. 200		No reason given.
↳ Federated Farmers of New Zealand	105	Oppose submission 42, Ref. 200		• It has been ascertained that these wetlands do not hold sufficient regionally significant wetlands values (10.4.1) to require the level of protection within the Plan Change. They have been appropriately excluded from Sch. 9.
Department of Conservation	42	Amend	Include current Schedule 10 wetland Silver Peak Swamp (Schedule 10, #80) in Schedule 9.	•Contains Regionally Significant Wetland Values •Consistent with Part 2 RMA, NPS Freshwater Management, and reflects ORC's functions under s 30 RMA.
↳ Otago Fish & Game Council	103	Support submission 42, Ref. 200		No reason given.
↳ Federated Farmers of New Zealand	105	Oppose submission 42, Ref. 200		• It has been ascertained that these wetlands do not hold sufficient regionally significant wetlands values (10.4.1) to require the level of protection within the Plan Change. They have been appropriately excluded from Sch. 9.
Department of Conservation	42	Amend	Include current Schedule 10 wetland Upper Waipahi River Swamp (Schedule 10, #99) in Schedule 9.	•Contains Regionally Significant Wetland Values •Consistent with Part 2 RMA, NPS Freshwater Management, and reflects ORC's functions under s 30 RMA.

Summary of Decisions Requested (submissions and further submissions) on Proposed Plan Change 2 (Regionally Significant Wetlands)  
Regional Plan: Water for Otago 23 November 2011

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
↳ Otago Fish & Game Council	103	Support submission 42, Ref. 200		No reason given.
↳ Federated Farmers of New Zealand	105	Oppose submission 42, Ref. 200		• It has been ascertained that these wetlands do not hold sufficient regionally significant wetlands values (10.4.1) to require the level of protection within the Plan Change. They have been appropriately excluded from Sch. 9.
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Additional Wetland to be added to Schedule 9: Daphne Tarwood Peat Dome G46 325178	• Welcomes the plan change proposal to add many of the wetlands in Schedule 10, plus 24 newly identified wetlands to Schedule 9. • Wetland dominated by characteristic bog plants and contains threatened species Coprosma elatirioides. • See image in the original submission.
↳ Otago Fish & Game Council	103	Support submission 47, Ref. 200		No reason given.

## Mapping of Schedule 9 wetlands general

### 199 Mapping of Schedule 9 wetlands general

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Otago Fish & Game Council	8	Amend	Place detailed aerial photograph-based maps with cadastral boundaries of wetlands overlaid alongside the topographical maps within this plan.	• Maps do not show level of detail needed to assess effect of changes, or to give effect to the proposed plan. • Maps in the Wetland Inventory will not be sufficient as it doesn't have legal force.
↳ Trustpower Limited	102	Support submission 8, Ref. 199		No reason given.
Waitaki District Council	14	Support	Support the refined mapping for Schedule 9 wetlands.	• Will assist in determining compliance with Waitaki DC's Rural Zone Site Development Standard 4.4.7.
↳ Otago Fish & Game Council	103	Support in part submission 14, Ref. 199		• Support the improved mapping, but still does not go far enough to alleviate concerns of the further submitter or those of landowners.
The Yellow-eyed Penguin Trust	26	Support	Commends more accurate definition of wetland areas.	No reason given.
Otago Conservation Board	27	Amend	Detailed maps and their base aerial photographs should be used in the new Schedule.	• Wetlands are often small areas with complicated boundaries • 1:50,000 maps inadequate
↳ Trustpower Limited	102	Support submission 27, Ref. 199		No reason given.
↳ Federated Farmers of New Zealand	105	Support in part submission 27, Ref. 200		• There should be greater emphasis on ensuring ONLY wetlands with RSW values are included. • Currently marginal land & dryland is included in mapped areas and aerial photographs will ensure greater accuracy in identifying and including only wetlands with RSW values.
Contact Energy Limited	30	Support	Supports all wetlands classified as Regionally Significant being accurately plotted/mapped before inclusion in the Regional Plan.	No reason given.
↳ Trustpower Limited	102	Support submission 30, Ref. 199		No reason given.
↳ Otago Fish & Game Council	103	Oppose submission 30, Ref. 199		• Wetlands currently in Schedule 9 or 10 do not need further ecological assessment and should be added to the plan as is.
New Zealand Railways Corporation	46	Amend	a.) All proposed maps to remove railways corridor(s) from regionally significant wetland areas; or b.) All proposed maps to ensure that rail formation 'above' the permanent regionally significant wetland areas are not subject to Plan Change 2	No reason given.
↳ Otago Fish & Game Council	103	Oppose submission 46, Ref. 199		• Wetlands should not be cut up simply because a transport network intersects them.
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	All regionally significant wetlands, including those above 800m be mapped using detailed current aerial photographs and cadastral boundaries.	• Topographical maps inadequate to delineate wetlands and ensure adequate buffer margins. • Current aerial photographs important for rule understanding and enforcement.

Summary of Decisions Requested (submissions and further submissions) on Proposed Plan Change 2 (Regionally Significant Wetlands)  
Regional Plan: Water for Otago 23 November 2011

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
↳ Otago Fish & Game Council	103	Support submission 47, Ref. 199		No reason given.

## Schedule 10 and non-Regionally Significant Wetlands

### 600 Schedule 10 and non-Regionally Significant Wetlands

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Save the Otago Peninsula Inc Society	21	Oppose	Oppose the deletion of Schedule 10.	<ul style="list-style-type: none"> <li>•Deletion of Schedule 10 would contribute to the loss and degradation of small wetlands.</li> <li>•Some small wetlands on the Otago Peninsula are collectively very important as habitat for wading birds - they are gradually being drained and filled.</li> <li>•Wetlands at the head of Papanui Inlet were once on the Wetland of Ecological and National Importance database, and are now almost non-existent.</li> </ul>
↳ Trustpower Limited	102	Oppose submission 21, Ref. 600		•Supports the streamlining and simplifying.
↳ Otago Fish & Game Council	103	Support submission 21, Ref. 600		•Remnant wetlands formerly in Schedule 10 could still be listed in a non-regulatory wetland inventory. This non-regulatory schedule can be referred to any time resource consent is applied for adjacent to that wetland, although of course the regionally significant wetland rules will not apply.
Save the Otago Peninsula Inc Society	21	Amend	Raupo swamp at Otakou provides example of a small wetland that should be considered for recognition in Schedule 10.	<ul style="list-style-type: none"> <li>•Has ecological value, and is significant locally, but maybe not regionally.</li> <li>•Tomahawk Lagoon is the only other site for raupo on the Otago Peninsula.</li> </ul>
↳ Otago Fish & Game Council	103	Support submission 21, Ref. 600		•Supports the inclusion of Raupo swamp at Otakou
Save the Otago Peninsula Inc Society	21	Amend	Include schedule of locally important wetlands in the Water Plan.	No reasons given.
↳ Trustpower Limited	102	Oppose submission 21, Ref. 600		•Further submitter supports the streamlining and simplifying.
Otago Conservation Board	27	Amend	Schedule 10 areas which are not going to be added into Schedule 9 should be re-evaluated and, where appropriate, given protection.	•Not including will mean fewer wetlands protected.
↳ Meridian Energy Limited	101	Oppose submission 27, Ref. 600		<ul style="list-style-type: none"> <li>•ORC has already undertaken a process of determining which wetlands are 'regionally significant' and should be included in Schedule 9.</li> <li>•Would be inappropriate to include wetlands that are not "regionally significant" in Schedule 9.</li> </ul>
↳ Trustpower Limited	102	Oppose submission 27, Ref. 600		<ul style="list-style-type: none"> <li>•Schedule 10 wetlands have already been evaluated by ORC.</li> <li>•Supports the streamlining and simplifying.</li> </ul>
↳ Royal Forest and Bird Protection Society of New Zealand Inc	106	Support submission 27, Ref. 600		•Deletion of schedule 10 would remove protection for wetlands and this is contrary to part 2 and S 30 RMA.
Hawksbury Lagoon Inc	39	Amend	Would like to see as many as possible of the remaining wetlands, classified as significant or not, preserved.	<ul style="list-style-type: none"> <li>•Wetlands play important role in sustaining diverse ecology, filtering water and providing interest to our landscapes.</li> <li>•The extent of loss makes all remaining wetlands significant.</li> </ul>
↳ Trustpower Limited	102	Oppose submission 39, Ref. 600		<ul style="list-style-type: none"> <li>•Schedule 10 wetlands have already been evaluated by ORC.</li> <li>•Supports the streamlining and simplifying.</li> </ul>
↳ Otago Fish & Game Council	103	Support submission 39, Ref. 600		•Proposes a non-regulatory schedule of other wetlands, including those formerly in Schedule 10.
OtagoNet Joint Venture	43	Support	Supports repeal of Schedule 10.	•Streamlines wetland provisions, conducive to people using the Water Plan.
↳ Trustpower Limited	102	Support submission 43, Ref. 600		No reason given.
↳ Otago Fish & Game Council	103	Support in part submission 43, Ref. 600		•Non-regulatory list of the old Schedule 10 wetlands should be included.

Summary of Decisions Requested (submissions and further submissions) on Proposed Plan Change 2 (Regionally Significant Wetlands)  
Regional Plan: Water for Otago 23 November 2011

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
↳ Federated Farmers of New Zealand	105	Support submission 43, Ref. 600		• Removal of schedule 10 streamlines wetland provisions and ensures only wetlands with RSW values are included within the rules.

## Specific Schedule 9 wetlands

### 201 Schedule 9 - Akatore Creek Swamp (#1, Map F46)

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Deanne and Steve Amende	1	Amend	Re-negotiate the boundaries of the Akatore Creek Swamp on our property.	• This is not a significant wetland. • There has not been enough thought put into the boundary.
↳ Otago Fish & Game Council	103	Oppose submission 1, Ref. 201		• Wetland is regionally significant, especially due to its coastal location. Therefore, it should remain under its current boundaries.
↳ Federated Farmers of New Zealand	105	Support submission 1, Ref. 201		• Landowners have not been adequately involved in the process of including their wetland within Schedule 9. • There has been little input, consultation or on-site visits and a more adequate assessment of the wetland values should have taken place.
↳ Royal Forest and Bird Protection Society of New Zealand Inc	106	Oppose submission 1, Ref. 201		• Alteration of boundaries must involve independent advice from an ecologist, preferably a freshwater ecologist.
Wenita Forest Products Limited	3	Amend	Review mapping and redefine the actual ground areas affected by the Akatore Creek Swamp to show those areas. "Do not include areas already established in trees by Wenita".	• Map includes areas that are not swamp or estuary. • Map includes areas with established trees - inclusion will affect Wenita's operations.
↳ Otago Fish & Game Council	103	Support submission 3, Ref. 201		• Supports attempts to redefine the boundary of the wetland away from existing trees, but only if this boundary can be agreed, and if the resultant change to the wetland is small.
↳ Royal Forest and Bird Protection Society of New Zealand Inc	106	Oppose submission 3, Ref. 201		• Alteration of boundaries must involve independent advice from an ecologist, preferably a freshwater ecologist.
Department of Conservation	42	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
↳ Otago Fish & Game Council	103	Support submission 42, Ref. 201		No reason given.

### 208 Schedule 9 - Big Boggy Swamp (#8, Map F1)

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Department of Conservation	42	Amend	Retain wetland and amend mapping to reflect that in Appendix 2.	• Additional area shown in Appendix 2 contains Regionally Significant Wetland Values. • Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
↳ Otago Fish & Game Council	103	Support submission 42, Ref. 208		No reason given.

### 223 Schedule 9 - Chapman Road Inland Saline Wetland (#23, Map F18)

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Herb Fox	36	Amend	Map to accurately reflect the position of the "wetlands" of Dry Gully as the area is known.	• Mapped area covers driveway, and exceeds area that could be considered wetland when viewed on site.
↳ Otago Fish & Game Council	103	Support submission 36, Ref. 223		No reason given.
↳ Federated Farmers of New Zealand	105	Support submission 36, Ref. 223		• Mapped areas should accurately reflect wetlands with actual 10.4.1. RSW values. Inadequate consultation with landowners has resulted in inaccurate mapping and in incorrect inclusion within Schedule 9 and

Summary of Decisions Requested (submissions and further submissions) on Proposed Plan Change 2 (Regionally Significant Wetlands)  
Regional Plan: Water for Otago 23 November 2011

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
				<i>mapping.</i>
Department of Conservation	42	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
↳ Otago Fish & Game Council	103	Support submission 42, Ref. 223		No reason given.

### 232 Schedule 9 - Cross Eden Creek Marsh Complex (#32, Map F16)

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Maniototo Homestead	23	Oppose	Status quo.	<ul style="list-style-type: none"> <li>•Could cause management issues.</li> <li>•The plants mentioned in the ecologist report on wetland values have long lived in harmony with farming practise.</li> </ul>
↳ Otago Fish & Game Council	103	Oppose submission 23, Ref. 232		<ul style="list-style-type: none"> <li>• Should be included within the plan with current boundaries.</li> </ul>
↳ Federated Farmers of New Zealand	105	Support submission 23, Ref. 232		<ul style="list-style-type: none"> <li>• Mapped areas should accurately reflect wetlands with actual 10.4.1. RSW values. Inadequate consultation with landowners has resulted in inaccurate mapping and in incorrect inclusion within Schedule 9 and mapping.</li> </ul>
↳ Royal Forest and Bird Protection Society of New Zealand Inc	106	Oppose submission 23, Ref. 232		<ul style="list-style-type: none"> <li>• Alteration of boundaries must involve independent advice from an ecologist, preferably a freshwater ecologist.</li> </ul>
↳ Department of Conservation	108	Oppose submission 23, Ref. 232		<ul style="list-style-type: none"> <li>• Oppose, unless independent advice from a competent ecologist supports the views of the submitter.</li> </ul>
Department of Conservation	42	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
↳ Otago Fish & Game Council	103	Support submission 42, Ref. 232		No reason given.

### 235 Schedule 9 - Diamond Lake Wetland (#35, Map F3)

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Geoffrey Thomson	6	Amend	Amend the boundaries of wetland which is on parts of my farm property.	<ul style="list-style-type: none"> <li>•Maps show areas that are not significant wetland, they need to be changed.</li> <li>•Wants a site visit to establish better boundaries.</li> </ul>
↳ Otago Fish & Game Council	103	Oppose submission 6, Ref. 235		<ul style="list-style-type: none"> <li>• Further encroachment on this regionally significant trout fishery would be harmful to its values.</li> </ul>
↳ Federated Farmers of New Zealand	105	Support submission 6, Ref. 235		<ul style="list-style-type: none"> <li>• Support the accurate and appropriate mapping and inclusion of wetlands within Sch.9. On-site consultation should be undertaken and assessment to ensure boundaries and inclusions are appropriate prior to adopting plan change.</li> </ul>
↳ Royal Forest and Bird Protection Society of New Zealand Inc	106	Oppose submission 6, Ref. 235		<ul style="list-style-type: none"> <li>• Alteration of boundaries must involve independent advice from an ecologist, preferably a freshwater ecologist.</li> </ul>
↳ Department of Conservation	108	Oppose submission 23, Ref. 235		<ul style="list-style-type: none"> <li>• Oppose, unless independent advice from a competent ecologist supports the views of the submitter.</li> </ul>
Department of Conservation	42	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
↳ Otago Fish & Game Council	103	Support submission 42, Ref. 235		No reason given.

### 236 Schedule 9 - Dingle Lagoon (#36, Map F1)

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Department of Conservation	42	Amend	Retain wetland and amend mapping to reflect that in Appendix 2.	•Additional area shown in Appendix 2 contains Regionally Significant Wetland Values.

Summary of Decisions Requested (submissions and further submissions) on Proposed Plan Change 2 (Regionally Significant Wetlands)  
Regional Plan: Water for Otago 23 November 2011

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
				•Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
↳ Otago Fish & Game Council	103	Support submission 42, Ref. 236		No reason given.

#### 240 Schedule 9 - Ellison Saltmarsh (#40, Map F61)

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
River-Estuary Care: Waikouaiti-Karitane	13	Support	Inclusion of wetland commended.	•Areas are valuable in themselves and as areas with special biodiversity value.
↳ Otago Fish & Game Council	103	Support submission 13, Ref. 240		•Commands the inclusion of the wetland into Schedule 9.
Department of Conservation	42	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
↳ Otago Fish & Game Council	103	Support submission 42, Ref. 240		No reason given.

#### 244 Schedule 9 - Flat Top Hill Ephemeral Wetlands (#44, Map F19)

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Department of Conservation	42	Amend	Retain inclusion of Flat Top Hill Ephemeral Wetlands, and amend mapping of wetland.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
↳ Otago Fish & Game Council	103	Support submission 42, Ref. 244		No reason given.

#### 252 Schedule 9 - Glenorchy Lagoon Wetland (#52, Map F9)

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Department of Conservation	42	Amend	Retain wetland and amend mapping to reflect that in Appendix 2.	•Additional area shown in Appendix 2 contains Regionally Significant Wetland Values. •Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
↳ Otago Fish & Game Council	103	Support submission 42, Ref. 252		No reason given.

#### 255 Schedule 9 - Great Moss Swamp (#55, Maps F29 & F30)

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Meridian Energy Limited	32	Support	Retain Maps F29 and F30 as notified.	•Boundaries now more accurately reflect existing human influences in the area, particularly roads.
↳ Otago Fish & Game Council	103	Support submission 32, Ref. 255		No reason given.
↳ Federated Farmers of New Zealand	105	Support in part submission 32, Ref. 255		• Boundaries are better defined under current mapping and reflect certain dryland areas (roads) that are rightly excluded. However, there is concern as to the extent of the wetland included and as to whether an accurate assessment of values has occurred.
Department of Conservation	42	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
↳ Otago Fish & Game Council	103	Support submission 42, Ref. 255		No reason given.
↳ Federated Farmers of New Zealand	105	Oppose in part		• There is concern as to the extent of the wetland included and as to



SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
		submission 42, Ref. 255		whether an accurate assessment of values has occurred.

### 261 Schedule 9 - Hoopers Inlet Swamp (#61, Map F58)

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Save the Otago Peninsula Inc Society	21	Support	Support the new, more accurate boundaries of the wetland.	•Important ecological values are recognised.
↳ Otago Fish & Game Council	103	Support submission 21, Ref. 261		No reason given.
Department of Conservation	42	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
↳ Otago Fish & Game Council	103	Support submission 42, Ref. 261		No reason given.

### 270 Schedule 9 - Kemp Road Lagoon (#70, Map F65)

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Trevor and Vivien Nimmo	18	Amend	Remove wetland from Schedule 9.	<ul style="list-style-type: none"> <li>•The lagoon is not regionally significant, it has none of the values listed in policy 10.4.1, and is not a freshwater lagoon.</li> <li>•Inclusion in Schedule 9 would be a barrier to possible future development.</li> <li>•Insufficient consultation.</li> </ul>
↳ Otago Fish & Game Council	103	Oppose submission 18, Ref. 270		• Important estuarine habitat for gamebirds.
↳ Federated Farmers of New Zealand	105	Support submission 18, Ref. 270		<ul style="list-style-type: none"> <li>• Mapped areas should accurately reflect wetlands with actual 10.4.1. RSW values. Inadequate consultation with landowners has resulted in inaccurate mapping and in incorrect inclusion within Schedule 9 and mapping.</li> <li>• Further conversation should occur with the landowner prior to adopting the plan change.</li> </ul>
↳ Royal Forest and Bird Protection Society of New Zealand Inc	106	Oppose submission 18, Ref. 270		• Should not be removed unless upon independent advice from an ecologist, preferably a freshwater ecologist.
↳ Department of Conservation	108	Oppose submission 18, Ref. 270		• Oppose, unless independent advice from a competent ecologist supports the views of the submitter.
Department of Conservation	42	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
↳ Otago Fish & Game Council	103	Support submission 42, Ref. 270		No reason given.

### 276 Schedule 9 - Lake Reid Wetland (#76, Map F3)

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Geoffrey Thomson	6	Amend	Amend the boundaries of wetland, which is on parts of my farm property.	<ul style="list-style-type: none"> <li>•Maps show areas that are not significant wetland, they need to be changed.</li> <li>•Wants a site visit to establish better boundaries.</li> </ul>
↳ Otago Fish & Game Council	103	Oppose submission 6, Ref. 276		• Further encroachment on this regionally significant trout fishery would be harmful to its values.
↳ Federated Farmers of New Zealand	105	Support submission 6, Ref. 276		<ul style="list-style-type: none"> <li>• Mapped areas should accurately reflect wetlands with actual 10.4.1. Regionally Significant Wetland values. Inadequate consultation with landowners has resulted in inaccurate mapping and in incorrect inclusion within Schedule 9 and mapping.</li> <li>• Further conversation should occur with the landowner prior to adopting the plan change.</li> </ul>
↳ Royal Forest and Bird Protection Society of	106	Oppose submission 6,		• Alteration of boundaries must involve independent advice from an

Summary of Decisions Requested (submissions and further submissions) on Proposed Plan Change 2 (Regionally Significant Wetlands)  
Regional Plan: Water for Otago 23 November 2011

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
New Zealand Inc		Ref. 276		ecologist, preferably a freshwater ecologist.
↳ Department of Conservation	108	Oppose submission 18, Ref. 276		• Oppose, unless independent advice from a competent ecologist supports the views of the submitter.
Department of Conservation	42	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
↳ Otago Fish & Game Council	103	Support submission 42, Ref. 276		No reason given.

## 277 Schedule 9 - Lake Tuakitoto Wetland (#77, Map F43)

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Brookhouse Farm Ltd	31	Amend	Some of the land on the far Western boundary of the wetland should not be classified as regionally significant wetland. Proposed an alternative boundary on an attached copy of Map F43 and the area of concern is marked 'a'.	<ul style="list-style-type: none"> <li>• Minimum water levels will never result in area 'a' being used "for natural beauty or wetland".</li> <li>• Aerial photos show area 'a' is not the same vegetation. On ground, only sparse rushes and grass, because area 'a' higher than rest: waterlogged during wet periods and floods once or twice a year.</li> <li>• Have managed area 'a' as intensively as soil conditions allowed.</li> <li>• Rest of western boundary should stay undisturbed with no animal access.</li> </ul>
↳ Otago Fish & Game Council	103	Oppose submission 31, Ref. 277		• Ideally the land cleared should be returned to the wetland.
↳ Federated Farmers of New Zealand	105	Support submission 31, Ref. 277		<ul style="list-style-type: none"> <li>• Landowner supports the inclusion of the part of the wetland that meets 10.4.1 Regionally Significant Wetland values. There has been some land included however that does not have the necessary values and more appropriate mapping and assessment for that part of the wetland is necessary.</li> <li>• Further conversation should occur with the landowner prior to adopting the plan change</li> </ul>
↳ Royal Forest and Bird Protection Society of New Zealand Inc	106	Oppose submission 31, Ref. 277		• Alteration of boundaries must involve independent advice from an ecologist, preferably a freshwater ecologist.
↳ Department of Conservation	108	Oppose submission 31, Ref. 277		• Oppose, unless independent advice from a competent ecologist supports the views of the submitter.
Department of Conservation	42	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
↳ Otago Fish & Game Council	103	Support submission 42, Ref. 277		No reason given.
↳ Contact Energy Limited	107	Oppose submission 42, Ref. 277		<ul style="list-style-type: none"> <li>• Schedule 9 lacks robustness in the process classifying the wetlands as regionally significant.</li> <li>• Seeks that Schedule 9 be not approved.</li> </ul>

## 284 Schedule 9 - Loch Loudon Fen Complex (#84, Map F50)

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
TrustPower Limited	40	Amend	Establish a Management Zone for the Waipori Hydro Scheme and Loch Loudon Fen Complex which recognises and provides for the longstanding human use influences on this wetland and the potential for such influences to change. [Submission includes a draft management zone, with objectives, policies and rules, to be jointly developed by submitter and Council].	<ul style="list-style-type: none"> <li>• Waipori Hydro Scheme is a key electricity generating asset for the region which warrants protection under policy B of NPS Renewable Energy Generation.</li> <li>• Plan Change 2 has the potential to unduly compromise its operating regime and future consenting requirements, which does not meet sustainable management.</li> </ul>
↳ Otago Fish & Game Council	103	Oppose submission 40, Ref. 284		• Large scale activities that affect waterways should remain as non-complying.
↳ Royal Forest and Bird Protection Society of New Zealand Inc	106	Oppose submission 40, Ref. 284		• Proposal does not meet RMA Part 2 and s 30 requirements. Non-complying is appropriate status for activities that are likely to have significant and large scale effects, e.g. the extension, replacement or reconstruction of structures. Any further proposed rules would require a

Summary of Decisions Requested (submissions and further submissions) on Proposed Plan Change 2 (Regionally Significant Wetlands)  
Regional Plan: Water for Otago 23 November 2011

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
				<i>plan change.</i>
↳ Department of Conservation	108	Oppose submission 40, Ref. 284		• Oppose, unless independent advice from a competent ecologist supports the views of the submitter.
Department of Conservation	42	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
↳ Trustpower Limited	102	Oppose submission 42, Ref. 284		• Relief sought is inconsistent with Trustpower's submission.
↳ Otago Fish & Game Council	103	Support submission 42, Ref. 284		No reason given.

## 285 Schedule 9 - Loch Luella Fen Complex (#85, Maps F50 & F51)

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
TrustPower Limited	40	Amend	Establish Management Zone for the Waipori Hydro Scheme and Loch Luella Fen Complex which recognises and provides for the longstanding human use influences on this wetland and the potential for such influences to change. [Submission includes a draft management zone, with objectives, policies and rules, to be conjointly developed by submitter and Council].	• Waipori Hydro Scheme is a key electricity generating asset for the region which warrants protection under policy B of NPS Renewable Energy Generation. • Plan Change 2 has the potential to unduly compromise its operating regime and future consenting requirements, which does not meet sustainable management.
↳ Otago Fish & Game Council	103	Oppose submission 40, Ref. 285		• Large scale activities that affect waterways should remain as non-complying.
↳ Royal Forest and Bird Protection Society of New Zealand Inc	106	Oppose submission 40, Ref. 285		• Proposal does not meet RMA Part 2 and s 30 requirements. Non-complying is appropriate status for activities that are likely to have significant and large scale effects, e.g. the extension, replacement or reconstruction of structures. Any further proposed rules would require a plan change.
↳ Department of Conservation	108	Oppose submission 40, Ref. 285		• Oppose, unless independent advice from a competent ecologist supports the views of the submitter.
Department of Conservation	42	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
↳ Trustpower Limited	102	Oppose submission 42, Ref. 285		• Relief sought is inconsistent with Trustpower's submission.
↳ Otago Fish & Game Council	103	Support submission 42, Ref. 285		No reason given.

## 287 Schedule 9 - Lower Coutts Gully Swamp (#87, Map F46)

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Martin and Barbara Palmer	4	Amend	Change name of the wetland from the "Lower Coutts Gully Swamp" to the "Coutts Gully Wetland".	• Suggested name is better known.
↳ Otago Fish & Game Council	103	Support submission 4, Ref. 287		• Coutts Gully Wetland is a more appropriate name.
↳ Federated Farmers of New Zealand	105	Support submission 4, Ref. 287		• Mapped areas should accurately reflect wetlands with actual 10.4.1. RSW values. Inadequate consultation with landowners has resulted in inaccurate mapping and in incorrect inclusion within Schedule 9 and mapping. • Further conversation should occur with the landowner prior to adopting the plan change
Martin and Barbara Palmer	4	Amend	Map F46 is reduced in extent within the Palmer property as shown on the annotated attached map.	• Mapped extent does not accurately reflect wetland area accurately. • Map includes areas of operational farm land, including stock gateway (in use for over 50 years) that is not damaging the wetland. • Difficult to determine the actual boundary from the map.
↳ Otago Fish & Game Council	103	Support submission 4, Ref. 287		• Can support an amended boundary, but only after a site visit to determine that the areas grazed are not affecting the wetland. • Mapping needs to be done at a scale that allows landowners to

Summary of Decisions Requested (submissions and further submissions) on Proposed Plan Change 2 (Regionally Significant Wetlands)  
Regional Plan: Water for Otago 23 November 2011

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
				<i>understand where their responsibilities are.</i>
↳ Federated Farmers of New Zealand	105	Support submission 4, Ref. 287		<ul style="list-style-type: none"> <li>• Mapped areas should accurately reflect wetlands with actual 10.4.1. Regionally Significant Wetland values. Inadequate consultation with landowners has resulted in inaccurate mapping and in incorrect inclusion within Schedule 9 and mapping.</li> <li>• Further conversation should occur with the landowner prior to adopting the plan change</li> </ul>
↳ Royal Forest and Bird Protection Society of New Zealand Inc	106	Oppose submission 4, Ref. 287		<ul style="list-style-type: none"> <li>• Alteration of boundaries must involve independent advice from an ecologist, preferably a freshwater ecologist.</li> </ul>
↳ Department of Conservation	108	Oppose submission 4, Ref. 287		<ul style="list-style-type: none"> <li>• Oppose, unless independent advice from a competent ecologist supports the views of the submitter.</li> </ul>
Department of Conservation	42	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
↳ Otago Fish & Game Council	103	Support submission 42, Ref. 287		<i>No reason given.</i>

### 288 Schedule 9 - Lower Manorburn Dam Margins (#88, Map F15)

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Galloway Irrigation Society Incorporated	41	Oppose	Wetland not to be classified as a Significant Wetland and not included in Schedule 9.	<ul style="list-style-type: none"> <li>• Lower Manorburn Dam is artificial dam to supply irrigation water. May not be possible to maintain wetland values.</li> <li>• Plan change does not describe wetland values that have contributed to scheduling.</li> <li>• Use of dam lowers water level during the irrigation season. The Ref.ore GIS cannot comply with the general regulation in Proposed Plan Change 2 that "there is no change to the water level or hydrological function, or no damage to the flora, fauna or its habitat, in or on any regionally significant wetland".</li> <li>• Problematic for other activities such as maintenance on dam wall, construction of structures (water level or flow measuring devices), discharge of the top race into dam for temporary storage, and maintaining an easement for a water race along north side of dam.</li> <li>• Lower Manorburn Dam is not excluded from Rule 12.1.1A.1 by Rule 12.1.2.3 because Rule 12.3.2.1 and the prior "General Authorisation" refer to small dams (i.e., less than 3m in height, less than 20,000 m3 and less than 50 ha upstream).</li> </ul>
↳ Otago Fish & Game Council	103	Support submission 41, Ref. 288		<ul style="list-style-type: none"> <li>• GIS is correct – Lower Manorburn Dam is an artificial wetland with a primary purpose of providing irrigation water.</li> </ul>
↳ Federated Farmers of New Zealand	105	Support submission 41, Ref. 288		<ul style="list-style-type: none"> <li>• Mapped areas should accurately reflect wetlands with actual 10.4.1. RSW values. The area in question is an artificial dam with the purpose of supplying irrigation water – there would be substantial difficulty in applying the Proposed Plan Change rules to this wetland.</li> </ul>
↳ Royal Forest and Bird Protection Society of New Zealand Inc	106	Oppose submission 41, Ref. 288		<ul style="list-style-type: none"> <li>• Alteration of boundaries must involve independent advice from an ecologist, preferably a freshwater ecologist.</li> </ul>
↳ Department of Conservation	108	Oppose submission 41, Ref. 288		<ul style="list-style-type: none"> <li>• Oppose, unless independent advice from a competent ecologist supports the views of the submitter.</li> </ul>
Department of Conservation	42	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
↳ Otago Fish & Game Council	103	Support submission 42, Ref. 288		<i>No reason given.</i>

### 293 Schedule 9 - Makarora Flat Swamp Complex (#93, Map F1)

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Department of Conservation	42	Amend	Retain wetland and amend mapping to reflect that in Appendix 2.	• Additional area shown in Appendix 2 contains Regionally Significant

Summary of Decisions Requested (submissions and further submissions) on Proposed Plan Change 2 (Regionally Significant Wetlands)  
Regional Plan: Water for Otago 23 November 2011

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
				Wetland Values. •Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
↳ Otago Fish & Game Council	103	Support submission 42, Ref. 293		No reason given.

### 300 Schedule 9 - McGregor Swamp (#100, Map F61)

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
River-Estuary Care: Waikouaiti-Karitane	13	Support	Inclusion of wetland commended.	•Areas are valuable in themselves and as areas with special biodiversity value.
↳ Otago Fish & Game Council	103	Support submission 13, Ref. 300		•Commands the inclusion of the wetland into Schedule 9.
Department of Conservation	42	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
↳ Otago Fish & Game Council	103	Support submission 42, Ref. 300		No reason given.

### 302 Schedule 9 - McLachlan Road Marsh (#102, Map F61)

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
River-Estuary Care: Waikouaiti-Karitane	13	Support	Inclusion of wetland commended.	•Areas are valuable in themselves and as areas with special biodiversity value.
↳ Otago Fish & Game Council	103	Support submission 13, Ref. 302		•Commands the inclusion of the wetland into Schedule 9.
Department of Conservation	42	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
↳ Otago Fish & Game Council	103	Support submission 42, Ref. 302		No reason given.

### 315 Schedule 9 - Okia Flat Wetland Management Area (#115, Map F68)

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
The Yellow-eyed Penguin Trust	26	Support	Approve of the wetland being a Wetland Management Area in Schedule 9.	No reason given.
Department of Conservation	42	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
↳ Otago Fish & Game Council	103	Support submission 42, Ref. 315		No reason given.

### 320 Schedule 9 - Papanui Inlet Saltmarsh (#120, Map F59)

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Save the Otago Peninsula Inc Society	21	Support	Support the inclusion of wetland in the Water Plan.	No reason given.
↳ Otago Fish & Game Council	103	Support submission 21, Ref. 320		No reason given.
The Yellow-eyed Penguin Trust	26	Support	Approve of the wetland being in Schedule 9.	No reason given.
Department of Conservation	42	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
↳ Otago Fish & Game Council	103	Support submission 42, Ref. 320		No reason given.

### 323 Schedule 9 - Pleasant River Estuary Wetland Complex (#123, Map F67)

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Graeme John Hagan	9	Oppose	Oppose changes.	No reason given.
↳ Otago Fish & Game Council	103	Oppose submission 9, Ref. 323		<ul style="list-style-type: none"> <li>• Wishes to see the current wetland boundary for the Pleasant River Estuary remain.</li> <li>• Raises the possibility of the establishment of a wetlands committee which can assess activities that take place on wetlands, such as the maintenance of drains, under permitted or controlled activity rules.</li> </ul>
↳ Royal Forest and Bird Protection Society of New Zealand Inc	106	Oppose submission 9, Ref. 323		<ul style="list-style-type: none"> <li>• Alteration of boundaries must involve independent advice from an ecologist, preferably a freshwater ecologist.</li> </ul>
↳ Department of Conservation	108	Oppose submission 9, Ref. 323		<ul style="list-style-type: none"> <li>• Oppose, unless independent advice from a competent ecologist supports the views of the submitter.</li> </ul>
Wayne Allan and Rochelle Anne Hagan	10	Oppose	Oppose changes.	<ul style="list-style-type: none"> <li>• Prepared for the ORC to use and monitor the land below the flood gates on our property as a wetland - but not above the flood gate.</li> <li>• Flood gate has been present for many years and that land is used/grazed as part of everyday farming operation.</li> <li>• Land within wetland boundary is used in farming operations, we should be able to keep using it the way we want.</li> <li>• Lack of consultation.</li> </ul>
↳ Otago Fish & Game Council	103	Oppose submission 10, Ref. 323		<ul style="list-style-type: none"> <li>• Wishes to see the current wetland boundary for the Pleasant River Estuary remain.</li> <li>• Raises the possibility of the establishment of a wetlands committee which can assess activities that take place on wetlands, such as the maintenance of drains, under permitted or controlled activity rules.</li> </ul>
↳ Federated Farmers of New Zealand	105	Support submission 10, Ref. 323		<ul style="list-style-type: none"> <li>• Mapped areas should accurately reflect wetlands with actual 10.4.1. RSW values. Inadequate consultation with the landowners has resulted in inaccurate mapping and in incorrect inclusion within Schedule 9 and mapping which will impact greatly on the landowner's everyday farming activities.</li> <li>• Further conversation should occur with the landowner prior to adopting the plan change.</li> </ul>
↳ Royal Forest and Bird Protection Society of New Zealand Inc	106	Oppose submission 10, Ref. 323		<ul style="list-style-type: none"> <li>• Alteration of boundaries must involve independent advice from an ecologist, preferably a freshwater ecologist.</li> </ul>
↳ Department of Conservation	108	Oppose submission 10, Ref. 323		<ul style="list-style-type: none"> <li>• Oppose, unless independent advice from a competent ecologist supports the views of the submitter.</li> </ul>
Department of Conservation	42	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
↳ Otago Fish & Game Council	103	Support submission 42, Ref. 323		No reason given.

### 337 Schedule 9 - Shotover River Confluence Swamp (#137, Map F5)

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Department of Conservation	42	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
↳ Otago Fish & Game Council	103	Support submission 42, Ref. 337		No reason given.
Ladies Mile Partnership	44	Oppose	<p>a.) Removal of wetland's categorisation as a regionally significant wetland; or</p> <p>b.) Reduction in the size of the area mapped in Map F5.</p>	<ul style="list-style-type: none"> <li>• Wetland does not have the values that would necessitate its status as regionally significant (specifically A1 and A3)</li> <li>• Plan Change 41 (before Queenstown-Lakes District Council) already provides sufficient protection to the wetland.</li> <li>• Categorising the wetland as regionally significant will not result in sustainable management under Part 2 RMA.</li> <li>• If Plan Change 41 is confirmed by Queenstown-Lakes DC, submitter may develop part of wetland as ecological and/or recreation area and</li> </ul>

Summary of Decisions Requested (submissions and further submissions) on Proposed Plan Change 2 (Regionally Significant Wetlands)  
Regional Plan: Water for Otago 23 November 2011

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
				may discharge stormwater to it. Plan Change 2 makes resource consent for this harder to obtain, is unnecessary and will not result in efficient use of resources. •Area mapped is inaccurate and exaggerated.
↳ Otago Fish & Game Council	103	Oppose submission 44, Ref. 337		• Wetland should be left in the plan as is.
↳ Federated Farmers of New Zealand	105	Support submission 44, Ref. 337		• Mapped areas should accurately reflect wetlands with actual 10.4.1. Regionally Significant Wetland values. • Further conversation should occur with the landowner prior to adopting the plan change.
↳ Royal Forest and Bird Protection Society of New Zealand Inc	106	Oppose submission 44, Ref. 337		• Alteration of boundaries must involve independent advice from an ecologist, preferably a freshwater ecologist.
↳ Department of Conservation	108	Oppose submission 44, Ref. 337		• Oppose, unless independent advice from a competent ecologist supports the views of the submitter.

### 339 Schedule 9 - Stirling Marsh Complex (#139, Map F43)

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
William Thomas Begg	17	Amend	Remove the areas identified as Stirling Marsh Complex that are on my property from proposed plan change 2.	•Areas of this wetland on my property do not meet the criteria of regional significance. They are used for intensive grazing, growing poplar trees for timber, and one area has gorse and is fenced to keep cattle out. •Insufficient consultation.
↳ Otago Fish & Game Council	103	Oppose submission 17, Ref. 339		• No need for this wetland boundary change to be made if the submitters request on ref 124 is granted. • Raises the possibility of the establishment of a wetlands committee which can assess activities that take place on wetlands, such as the maintenance of drains, under permitted or controlled activity rules.
↳ Federated Farmers of New Zealand	105	Support submission 17, Ref. 339		• Mapped areas should accurately reflect wetlands with actual 10.4.1. Regionally Significant Wetland values. Inadequate consultation with landowners has resulted in inaccurate mapping and in incorrect inclusion within Schedule 9 and mapping. • Further conversation should occur with the landowner prior to adopting the plan change
↳ Royal Forest and Bird Protection Society of New Zealand Inc	106	Oppose submission 17, Ref. 339		• Alteration of boundaries must involve independent advice from an ecologist, preferably a freshwater ecologist.
↳ Department of Conservation	108	Oppose submission 17, Ref. 339		• Oppose, unless independent advice from a competent ecologist supports the views of the submitter.
Department of Conservation	42	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
↳ Otago Fish & Game Council	103	Support submission 42, Ref. 339		No reason given.

### 345 Schedule 9 - Tahakopa Marsh Complex (#145, Map F4)

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Department of Conservation	42	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
↳ Otago Fish & Game Council	103	Support submission 42, Ref. 345		No reason given.
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Entirety of this wetland and surrounding area shown as wetland on the topo map needs to be listed in schedule 9 as a regionally significant wetland.	•Boundaries on Map F40 only partially cover wetland complex. •See image in the original submission.
↳ Otago Fish & Game Council	103	Support submission 47, Ref. 345		No reason given.

### 349 Schedule 9 - Te Matai Marsh Complex (#149, Map F68)

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
The Yellow-eyed Penguin Trust	26	Support	Approve of the wetland being in Schedule 9.	No reason given.
Department of Conservation	42	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
↳ Otago Fish & Game Council	103	Support submission 42, Ref. 349		No reason given.

### 351 Schedule 9 - Three Stones Fen Complex (#151, Map F53)

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
The Retreat Trust	28	Oppose	Oppose the proposed Plan Change. Take the tussock ground out of the fen system.	<ul style="list-style-type: none"> <li>• It is insignificant and not a wetland area.</li> <li>• Has ditches throughout tussock, needs periodic cleaning to maintain drain and stock entrapment.</li> </ul>
↳ Meridian Energy Limited	101	Support in part submission 28, Ref. 351		• If components of the wetlands identified on Map F53 do not meet the threshold of 'significant' they should be deleted from Schedule 9.
↳ Otago Fish & Game Council	103	Oppose submission 28, Ref. 351		• The wetland is regionally significant and tussock is part of this wetland.
↳ Royal Forest and Bird Protection Society of New Zealand Inc	106	Oppose submission 28, Ref. 351		• Alteration of boundaries must involve independent advice from an ecologist, preferably a freshwater ecologist.
↳ Department of Conservation	108	Oppose submission 28, Ref. 351		• Oppose, unless independent advice from a competent ecologist supports the views of the submitter.
Department of Conservation	42	Support	That the inclusion in Schedule 9 and the extent of the wetland be retained without amendment.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
↳ Otago Fish & Game Council	103	Support submission 42, Ref. 351		No reason given.

### 356 Schedule 9 - Trig Q Ephemeral Pool (#156, Map F55)

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
David Jopp	12	Oppose	Not include Trig Q Ephemeral Pool.	• Is not a true ephemeral wet area and only ponds during high rainfall winters and when receiving run-off.
↳ Otago Fish & Game Council	103	Oppose submission 12, Ref. 356		<ul style="list-style-type: none"> <li>• Strongly recommends that the wetland boundaries be left as they currently are.</li> <li>• Raises the possibility of the establishment of a wetlands committee which can assess activities that take place on wetlands, such as the maintenance of drains, under permitted or controlled activity rules.</li> </ul>
↳ Federated Farmers of New Zealand	105	Support submission 12, Ref. 356		• Only wetlands reflecting actual 10.4.1 RSW values should be included with Schedule 9 and mapping. The on-site visit resulted in advice that the wetland did not hold RSW values. • Further conversation should occur with the landowner prior to adopting the plan change
↳ Royal Forest and Bird Protection Society of New Zealand Inc	106	Oppose submission 12, Ref. 356		• Alteration of boundaries must involve independent advice from an ecologist, preferably a freshwater ecologist.
↳ Department of Conservation	108	Oppose submission 12, Ref. 356		• Oppose, unless independent advice from a competent ecologist supports the views of the submitter.
Department of Conservation	42	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
↳ Otago Fish & Game Council	103	Support submission 42, Ref. 356		No reason given.

### 361 Schedule 9 - Upper Taieri Wetlands Complex (#161, Maps F22 to F28)

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
---	----------------------	----------	--------------------	---------

Summary of Decisions Requested (submissions and further submissions) on Proposed Plan Change 2 (Regionally Significant Wetlands)  
Regional Plan: Water for Otago 23 November 2011



SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
SH Andrews and Sons Ltd	7	Amend	Redraw the map within our property to exclude additional areas that are not genuine wetlands.	•Much of the area is not a wetland, except during floods.
↳ Meridian Energy Limited	101	Support in part submission 7, Ref. 361		•If components of the wetlands identified on Map F53 do not meet the threshold of 'significant' they should be deleted from Schedule 9.
↳ Otago Fish & Game Council	103	Oppose submission 7, Ref. 361		• Strongly recommends that the wetland boundaries be left as they currently are. • One of the most important components of a wetland is storage of waters received during flood events.
↳ Federated Farmers of New Zealand	105	Support submission 7, Ref. 361		• Only wetlands reflecting actual 10.4.1 Regionally Significant Wetland values should be included with Schedule 9 and mapping. At public meetings, ORC provided inaccurate advice to landowners as to the continuation of their current farming practices on their wetland areas. • Further conversation should occur with the landowner prior to adopting the plan change.
↳ Royal Forest and Bird Protection Society of New Zealand Inc	106	Oppose submission 7, Ref. 361		• Alteration of boundaries must involve independent advice from an ecologist, preferably a freshwater ecologist.
↳ Department of Conservation	108	Oppose submission 7, Ref. 361		• Oppose, unless independent advice from a competent ecologist supports the views of the submitter.
Meridian Energy Limited	32	Amend	Amend boundary of Map F26 to reflect changes indicated in Annexure One to this submission (changes to boundary indicated in pink).	•South-eastern boundary defined in Map F26 not accurate: much area included is pasture and doesn't contain hydrological characteristics of a wetland or ecological or habitat values identified in Policy 10.4.1. •Amended area captures only areas with hydrological and ecological characteristics and aren't pasture.
↳ Otago Fish & Game Council	103	Oppose submission 32, Ref. 361		• The boundaries should remain as they are.
↳ Federated Farmers of New Zealand	105	Support submission 32, Ref. 361		• Only wetlands reflecting actual 10.4.1 RSW values should be included with Schedule 9 and mapping.
↳ Royal Forest and Bird Protection Society of New Zealand Inc	106	Oppose submission 32, Ref. 361		• Alteration of boundaries must involve independent advice from an ecologist, preferably a freshwater ecologist.
↳ Department of Conservation	108	Oppose submission 32, Ref. 361		• Oppose, unless independent advice from a competent ecologist supports the views of the submitter.
Department of Conservation	42	Amend	Retain wetland and amend mapping to reflect that in Appendix 2.	•Additional area shown in Appendix 2 contains Regionally Significant Wetland Values. •Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
↳ Meridian Energy Limited	101	Oppose submission 42, Ref. 361		•Submitters proposal does not accurately reflect the true extent of the wetland. •The boundaries of the wetlands in Schedule 9 should only include those wetland areas which contain hydrological and ecological values which contribute to a site being classified as a 'regionally significant wetland'.
↳ Otago Fish & Game Council	103	Support submission 42, Ref. 361		No reason given.

### 364 Schedule 9 - Waianakarua River Estuary Swamp (#164, Map F65)

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Michael and Christine Holland	25	Support	Support the identification of the wetland.	•Land is not farmed, and is fenced.
↳ Otago Fish & Game Council	103	Support submission 25, Ref. 364		No reason given.
Department of Conservation	42	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
↳ Otago Fish & Game Council	103	Support submission 42, Ref. 364		No reason given.

### 365 Schedule 9 - Waikouaiti River Estuary Wetland Complex (#165, Map F61)

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
River-Estuary Care: Waikouaiti-Karitane	13	Support	Inclusion of wetland commended.	•Areas are valuable in themselves and as areas with special biodiversity value.
↳ Otago Fish & Game Council	103	Support submission 13, Ref. 365		•Commands the inclusion of the wetland into Schedule 9.
Department of Conservation	42	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
↳ Otago Fish & Game Council	103	Support submission 42, Ref. 365		No reason given.

### 367 Schedule 9 - Waipori/Waihola Wetland Complex (#167, Maps F48 & F49)

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Transpower New Zealand Limited	37	Did not specify	Review the extent of the wetland complex at the location of transmission support structures for the GOR-HWB 110kV and NMA-TMH 220kV lines, and confirm that these structures are not contained within the Waipori/Waihola Wetland Complex.	•From the maps looks like these are within the wetland boundary. •Don't want to get unnecessary consent to maintain/upgrade assets. Effects from such works cannot be avoided, and do not want financial contributions to be required. •Need to appropriately provide for the national grid, recognise its benefits and be in accordance with NPS Electricity Transmission.
↳ Trustpower Limited	102	Support submission 37, Ref. 367		No reason given.
↳ Otago Fish & Game Council	103	Support submission 37, Ref. 367		•Should be possible to create a standard for the maintenance of transmission lines as a permitted or controlled activity.
↳ Federated Farmers of New Zealand	105	Support submission 37, Ref. 367		• It is important for maps to be accurate and for all areas identified as Regionally Significant Wetland to hold Regionally Significant Wetland 10.4.1 values.
↳ Royal Forest and Bird Protection Society of New Zealand Inc	106	Oppose submission 37, Ref. 367		• Alteration of boundaries must involve independent advice from an ecologist, preferably a freshwater ecologist.
Department of Conservation	42	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
↳ Otago Fish & Game Council	103	Support submission 42, Ref. 367		No reason given.
Beaton family of Berwick	45	Amend	ORC need to shift themselves to ground check the boundaries.	•Concerned that map does not clearly show whether one of our pumps and associated stop banks are included or excluded from the wetland area.
↳ Federated Farmers of New Zealand	105	Support submission 45, Ref. 367		• Mapped areas should accurately reflect wetlands with actual 10.4.1. Regionally Significant Wetland values. Inadequate consultation with landowners has resulted in inaccurate mapping and in incorrect inclusion within Schedule 9 and mapping. This has resulted in uncertainty as to boundaries and permitted activities. • Further conversation should occur with the landowner prior to adopting the plan change
↳ Royal Forest and Bird Protection Society of New Zealand Inc	106	Oppose submission 45, Ref. 367		• Alteration of boundaries must involve independent advice from an ecologist, preferably a freshwater ecologist.

### 371 Schedule 9 - Te Hua Taki Wetland (#171, Map F66)

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Three Creeks Farm	19	Oppose	Remove wetland from the proposed schedule of regionally significant wetlands.	•Areas of this wetland on my property do not meet the criteria of regional significance in policy 10.4.1, and have not previously been identified as regionally significant. •Plan Change fails to provide for my economic wellbeing and that of the community around the affected area, as required by s 5 RMA. •Insufficient consultation.

Summary of Decisions Requested (submissions and further submissions) on Proposed Plan Change 2 (Regionally Significant Wetlands)  
Regional Plan: Water for Otago 23 November 2011

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
↳ Otago Fish & Game Council	103	Oppose submission 19, Ref. 371		<ul style="list-style-type: none"> <li>No need to remove the wetland from the list if the "above changes" are made (comments by further submitter on submitters other points)..</li> <li>Raises the possibility of the establishment of a wetlands committee which can assess activities that take place on wetlands, such as the maintenance of drains, under permitted or controlled activity rules.</li> </ul>
↳ Federated Farmers of New Zealand	105	Support submission 19, Ref. 371		<ul style="list-style-type: none"> <li>Mapped areas should accurately reflect wetlands with actual 10.4.1. RSW values. Inadequate consultation with landowners has resulted in inaccurate mapping and in incorrect inclusion within Schedule 9 and mapping. This has resulted in uncertainty as to boundaries and permitted activities.</li> <li>Further conversation should occur with the landowner prior to adopting the plan change.</li> </ul>
↳ Royal Forest and Bird Protection Society of New Zealand Inc	106	Oppose submission 19, Ref. 371		<ul style="list-style-type: none"> <li>Alteration of boundaries must involve independent advice from an ecologist, preferably a freshwater ecologist.</li> </ul>
↳ Department of Conservation	108	Oppose submission 19, Ref. 371		<ul style="list-style-type: none"> <li>Oppose, unless independent advice from a competent ecologist supports the views of the submitter.</li> </ul>
Department of Conservation	42	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
↳ Otago Fish & Game Council	103	Support submission 42, Ref. 371		No reason given.

### 399 Schedule 9 - All other wetlands not otherwise listed

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Department of Conservation	42	Support	For Schedule 9 wetlands #2 - 7; 9 - 22; 24 - 31; 33; 34; 37 - 39; 41 - 43; 45 - 51; 53; 54; 56 - 60; 62 - 69; 71 - 75; 78 - 83; 86; 89 - 92; 94 - 99; 101; 103 - 114; 116 - 119; 121; 122; 124 - 136; 138; 140 - 144; 146 - 148; 150; 152 - 155; 157 - 160; 162; 163; 166; 168 - 170; 172:  That the inclusion in Schedule 9, and the extent of the wetlands be retained without amendment.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
↳ Otago Fish & Game Council	103	Support submission 42, Ref. 399		No reason given.
↳ Contact Energy Limited	107	Oppose submission 42, Ref. 399		<ul style="list-style-type: none"> <li>Schedule 9 lacks robustness in the process classifying the wetlands as regionally significant.</li> <li>Seeks that Schedule 9 be not approved.</li> </ul>

## Part 4: Methods other than Rules

### Promotion, information and funding

#### 14 Policy 10.4.6 - Promotion of wetlands

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Lake Waihola Waipori Wetlands Society Inc.	20	Support	Supports concepts in 10.4.6.	<ul style="list-style-type: none"> <li>•Notes lack of detail around how Council intend to educate, resource and fund the concepts in 10.4.6, and that there are no financial incentives for wetland restoration.</li> <li>•Notes lack of public presentation of wetland information.</li> </ul>
↳ Otago Fish & Game Council	103	Support submission 20, Ref. 14		<ul style="list-style-type: none"> <li>•Financial incentives must be included in the plan.</li> <li>•ORC must expand its efforts to educate the public on the benefits of wetlands.</li> </ul>
Clutha District Council	34	Support	Supports monitoring and provision of information, and suggests that this could usefully be done in conjunction with Territorial Authorities and other agencies.	No reason given.
Hawksbury Lagoon Inc	39	Amend	In promoting rehabilitation, ensure adequate weight is given to the pattern of wetlands in maintaining corridors and feeding sites for waterfowl.	No reason given.
↳ Otago Fish & Game Council	103	Support submission 39, Ref. 14		No reason given.
Hawksbury Lagoon Inc	39	Amend	Amend: (d) change 'and' for 'or'.	No reason given.
↳ Otago Fish & Game Council	103	Support submission 39, Ref. 14		No reason given.
TrustPower Limited	40	Amend	Amend: "To promote the <u>maintenance and conservation, creation and reinstatement</u> of wetland areas and enhancement of wetland values by: (a) Educating Otago's people and communities about land use activities that may result in the loss of wetlands and their values; (b) Initiating or supporting investigations and monitoring of wetlands and their values; (c) Supporting voluntary community and landholder programmes; or (d) Supporting the reinstatement of wetlands that have been drained or the creation of new wetlands where appropriate. <del>(e)</del> (e) Initiating or undertaking works in consultation with local communities.; or <del>(f)</del> (f) Providing general information on wetlands in a non-regulatory inventory and identifying Regionally Significant Wetland's <del>the</del> values in Schedule 9 to the Water Plan. (g) Providing information about wetlands in Otago in general, including those that are not regarded as Regionally Significant Wetlands where such information exists."	<ul style="list-style-type: none"> <li>•Creation of wetlands is of negligible ecological value.</li> <li>•Regionally Significant Wetlands values information should be contained in the Water Plan.</li> <li>•Providing information may lead to wetland maintenance and conservation.</li> </ul>
↳ Otago Fish & Game Council	103	Oppose submission 40, Ref. 14		<ul style="list-style-type: none"> <li>•Policy must give primacy to protecting those that remain, and creating new ones where possible.</li> </ul>
↳ Contact Energy Limited	107	Support in part submission 40, Ref. 14		<ul style="list-style-type: none"> <li>•Schedule 9 should not be approved as an inventory, especially one that can be updated without a public process.</li> <li>•Supports suggestion that Schedule 9 provide information on wetland values.</li> </ul>
Department of Conservation	42	Support	Retain with no amendments, except amend "(e): Providing information on wetlands and their values ecosystem services."	<ul style="list-style-type: none"> <li>•Consistent with Part 2 RMA.</li> <li>•Gives guidance when considering activities in wetlands.</li> <li>•Maintains flows in streams sourced from wetlands which protects habitat of indigenous threatened fish.</li> </ul>

Summary of Decisions Requested (submissions and further submissions) on Proposed Plan Change 2 (Regionally Significant Wetlands)  
Regional Plan: Water for Otago 23 November 2011

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
				<ul style="list-style-type: none"> <li>•Gives effect to the NPS Freshwater Management.</li> <li>•Monitoring of wetland condition is essential to ensure ORC is fulfilling its functions under s 30(1)(c)(iia) RMA.</li> <li>•Requests that the policy be amended to clarify the values of and services provided by wetlands.</li> </ul>
↳ Trustpower Limited	102	Oppose submission 42, Ref. 14		• Relief sought is inconsistent with Trustpower's submission.
↳ Otago Fish & Game Council	103	Support submission 42, Ref. 14		No reason given.
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Amend so that the 'or' is deleted from 10.4.6(d).	<ul style="list-style-type: none"> <li>•As policy (e) works alongside (a) to (d), 'or' is inappropriate.</li> <li>•Notes deletion of 15.4.3 makes implementation of 10.4.6 unclear.</li> </ul>
↳ Otago Fish & Game Council	103	Support submission 47, Ref. 14		No reason given.

## 148 Funding

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
SH Andrews and Sons Ltd	7	Did not specify	Compensate for the confiscation of freehold property rights.	•Believe this is a confiscation of property rights.
↳ Otago Fish & Game Council	103	Oppose submission 7, Ref. 148		• No precedent under the RMA for compensation due to "lost property rights".
Otago Fish & Game Council	8	Amend	State as criterion that financial support, resource consent fee relief or in-kind payments may be provided to protect, create, or enhance wetlands. Expertise, fencing materials, rates relief, or plants are suggested as options.	<ul style="list-style-type: none"> <li>•Resource consent fee relief is most workable and proactive.</li> <li>•Creation/enhancement of a wetland should not have the same consent fees as an activity that will damage a wetland.</li> <li>•Current consent fees encourage non-compliance and illegal activity and discourage creation or enhancement of wetlands.</li> <li>•Notes that plan provides little guidance on how wetland monitoring will be carried out.</li> </ul>
↳ Lake Waiholo Waipori Wetlands Society Inc.	104	Support submission 8, Ref. 148		• Resource consent fees for enhancement and restoration are actually detrimental to the encouragement of wetland protection. Costs for consents must be kept at zero to encourage enhancement and restoration.
↳ Federated Farmers of New Zealand	105	Support in part submission 8, Ref. 148		• To ensure wetland values are maintained and enhanced, Council should provide a method for allowing for rates relief, resource consent relief or provision of materials/plants.
William Thomas Begg	17	Amend	If Stirling Marsh Complex is retained as a Regionally Significant Wetland then provide rates relief of up to 50% of total rates for the property to recognise the cost of protection and fencing.	<ul style="list-style-type: none"> <li>•Plan Change fails to provide for my economic wellbeing and that of the surrounding community (required by s 5 RMA).</li> <li>•Measures are an infringement of my freehold property rights - compensation, fencing assistance or rate relief should be provided.</li> </ul>
↳ Otago Fish & Game Council	103	Oppose submission 17, Ref. 148		• With farming comes environmental responsibility , and whilst some assistance may be provided for fencing from various funds, requesting rates relief is a step too far.
↳ Federated Farmers of New Zealand	105	Support submission 17, Ref. 148		• To ensure wetland values are maintained and enhanced, Council should provide a method for allowing for rates relief, resource consent relief or provision of materials/plants.
William Thomas Begg	17	Amend	If Stirling Marsh Complex is retained as a Regionally Significant Wetland then provide a gorse and broom management/eradication plan for the wetland undertaken, implemented and funded by ORC.	•The areas of this wetland on my property are used for intensive grazing, and one area has gorse and is fenced to keep cattle out.
↳ Federated Farmers of New Zealand	105	Support submission 17, Ref. 148		• To ensure wetland values are maintained and enhanced, Council should provide a method for allowing for rates relief, resource consent relief or provision of materials/plants.
Three Creeks Farm	19	Amend	If Te Hua Taki Wetland (Map F66, #171) is retained as a regionally significant wetland then provide rates relief of up to 50% of total rates for the property to recognise the cost of management.	<ul style="list-style-type: none"> <li>•Plan Change fails to provide for my economic wellbeing and that of the community around the affected area, as required by s 5 RMA.</li> <li>•Identifying the we tland as regionally significant may affect the integrity and functioning of our dairy farm effluent system.</li> </ul>
↳ Otago Fish & Game Council	103	Oppose submission 19, Ref. 148		• Having a wetland on one's property cannot justify a claim for a 50% rates rebate.

Summary of Decisions Requested (submissions and further submissions) on Proposed Plan Change 2 (Regionally Significant Wetlands)  
Regional Plan: Water for Otago 23 November 2011

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
↳ Federated Farmers of New Zealand	105	Support submission 19, Ref. 148		• To ensure wetland values are maintained and enhanced, Council should provide a method for allowing for rates relief, resource consent relief or provision of materials/plants.
Three Creeks Farm	19	Amend	If Te Hua Taki Wetland (Map F66, #171) is retained as a regionally significant wetland and if consents are required for drain maintenance, provide that (a) there is no fee on the consent, (b) consents for drain maintenance are being processed as controlled activities, and (c) a non notification clause is included.	•Plan Change fails to provide for my economic wellbeing and that of the community around the affected area, as required by s 5 RMA.
↳ Federated Farmers of New Zealand	105	Support submission 19, Ref. 148		• To ensure wetland values are maintained and enhanced, Council should provide a method for allowing for rates relief, resource consent relief or provision of materials/plants.
Federated Farmers of New Zealand	29	Amend	An acknowledgement from Council that financial contribution or rates relief will be required in certain circumstances and that this be introduced as a non-regulatory method in the proposed plan change.	•Wetlands primarily protected for the public interest so Council should pay, e.g., for fencing where it is necessary.
↳ Otago Fish & Game Council	103	Support in part submission 29, Ref. 148		• Supports non-regulatory measures to encourage landowners to look after wetlands. However, landowners may have a responsibility to contribute something towards fencing.
Federated Farmers of New Zealand	29	Amend	That Council be responsible for undertaking, implementing and funding the management and eradication of exotic plants where required to maintain or enhance wetland values.	•Where wetlands primarily protected for the public interest Council should pay for weed management/eradication to prevent spread.
↳ Otago Fish & Game Council	103	Oppose submission 29, Ref. 148		• Suggests that wetlands have no benefits aside from public benefits and that the rural community does not care about wetlands.
Federated Farmers of New Zealand	29	Amend	Allow for a financial contribution or rates relief where a fence is considered necessary to protect wetland values by introducing appropriate non-regulatory methods.	•Fencing may be expensive or impractical, particularly for wetlands above 800m.
↳ Otago Fish & Game Council	103	Support in part submission 29, Ref. 148		• Supports non-regulatory measures to encourage landowners to look after wetlands. However, landowners may have a responsibility to contribute something towards fencing.
Federated Farmers of New Zealand	29	Amend	Introduce a non regulatory method that provides for Council to undertake, implement and fund weed management or eradication plans, where appropriate for regionally significant wetlands.	•Where wetlands primarily protected for the public interest Council should pay for weed management/eradication to prevent spread. •This will ensure wetland values are maintained and enhanced.
↳ Otago Fish & Game Council	103	Oppose submission 29, Ref. 148		• Suggests that wetlands have no benefits aside from public benefits and that the rural community does not care about wetlands.
Hawksbury Lagoon Inc	39	Amend	Providing financial assistance or rates incentives for landowners to fence off wetlands and fund revegetation would be of great value.	•Wetlands benefit everyone. •There are many small wetlands of great value that have not been identified as significant in this plan and which face an uncertain future. •Allows ORC to set timeframe for fencing off all significant wetlands in the knowledge it was not causing hardship for landowners.
↳ Otago Fish & Game Council	103	Support submission 39, Ref. 148		•Resource consent fee relief should be added.
↳ Federated Farmers of New Zealand	105	Support submission 39, Ref. 148		• To ensure wetland values are maintained and enhanced, Council should provide a method for allowing for rates relief, resource consent relief or provision of materials/plants.

## 164 Chapter 15 - Methods other than Rules

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Lake Waihola Waipori Wetlands Society Inc.	20	Amend	Provide education, information, and leadership on the right kind of plant species for wetland planting in Otago. Recognise acceptance of risk by the Lake Waihola Waipori Wetlands Society in the planning and resource management process, in ensuring that projects in wetland restoration are to mean the outcomes of 10.4.6. Be proactive in drawing attention to the need to control Reed Sweetgrass in our region.	•Choice of plants involves the selection of appropriate plant assemblages for differing wetlands throughout Otago. – •Critical information if biodiversity and wetland functionality are to be retained and enhanced. •Lake Waihola Waipori Wetlands Society has made a significant public commitment to the sustainable management of wetlands in its area. •Will improve our waterways, wetlands and the region. •Reed Sweetgrass is a significant threat to wetland and waterway health in the Waihola waipori Catchment.

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
↳ Otago Fish & Game Council	103	Support submission 20, Ref. 164		No reason given.

## Wetland values information and Wetland Inventory

### 151 Wetland Inventory

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Waitaki District Council	14	Support	Supports providing information in a non-regulatory inventory of wetlands.	<ul style="list-style-type: none"> <li>Allows the inventory to be more extensive, regularly updated, and freely accessible to all.</li> <li>Inventory information will be useful to the Waitaki DC's Ecological Study.</li> </ul>
↳ Trustpower Limited	102	Oppose submission 14, Ref. 151		No reason given.
↳ Otago Fish & Game Council	103	Support submission 14, Ref. 151		<ul style="list-style-type: none"> <li>Possible that the ephemeral wetlands formerly in Schedule 10 could still be listed in a non-regulatory wetland inventory that can be taken into account any time consent is applied for.</li> </ul>
↳ Contact Energy Limited	107	Oppose submission 14, Ref. 151		<ul style="list-style-type: none"> <li>Removing values from plan and making the inventory is ultra vires – non-public process assigns values to a wetland.</li> <li>Removes certainty for plan users.</li> <li>Not appropriate, especially when the values are the reason the non-complying category is used for anything with a more than minor effect on a wetland.</li> </ul>
Federated Farmers of New Zealand	29	Amend	Include only those values and wetlands already identified within the proposed plan to any non-regulatory inventory. Alternatively ensure that any changes or updating of any wetland inventory only occur in direct consultation with landowners concerned and that Council introduces a policy and method that provides for a process of consultation with the affected landowner(s).	<ul style="list-style-type: none"> <li>Values could be changed without plan change process and public consultation process.</li> <li>Affected farmers should be able to submit on inventory contents, and appeal to Environment Court if necessary.</li> <li>Concerned that inventory would be counterproductive to working positively unless landowners involved, and that ability to easily change inventory brings uncertainty to landowners.</li> </ul>
↳ Trustpower Limited	102	Support in part submission 29, Ref. 151		No reason given.
↳ Otago Fish & Game Council	103	Oppose submission 29, Ref. 151		<ul style="list-style-type: none"> <li>Better to place the lists of existing values where known into the plan.</li> </ul>
Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou, and Hokonui Runanga	38	Support	Support the intent of the following changes to the plan change; "providing better wetland information".	<ul style="list-style-type: none"> <li>Recognise the need for flexibility.</li> <li>Wish to be involved in process which helps inform the public about wetlands.</li> <li>But consider that the information may not assist in the protection and enhancement of wetland values, and need to know this will occur.</li> </ul>
TrustPower Limited	40	Amend	Amend the inventory to reflect the following change to policy 10.4.1: ". . . A8 Regionally significant habitat for <i>indigenous</i> waterfowl; and . . ."	<ul style="list-style-type: none"> <li>Better reflects s 6(c) RMA, and sets a practical threshold test.</li> </ul>
↳ Otago Fish & Game Council	103	Oppose submission 40, Ref. 151		<ul style="list-style-type: none"> <li>Wetlands are habitat for more than just indigenous waterfowl.</li> </ul>
TrustPower Limited	40	Amend	Identify, record and provide for human use influences on Regionally Significant Wetlands where they occur.	<ul style="list-style-type: none"> <li>Human use influences can positively influence ecology and play a significant role in sustaining the life-supporting capacity of certain wetlands, contribute significantly to economy, and have positive social effects.</li> <li>Can be provided for in the inventory, establishing boundaries and values of certain wetlands, Plan Change 2.</li> </ul>
OtagoNet Joint Venture	43	Amend	Give due consideration to existing and consented activities and infrastructure and any associated human use in establishing the non-regulatory inventory for Regionally Significant Wetlands. This may involve identifying activities and human use values within or surrounding scheduled Regionally Significant Wetlands.	<ul style="list-style-type: none"> <li>Enables protection of physical resources in a way which enables people and communities to provide for their social, economic and cultural wellbeing and for their health and safety pursuant to s 5 RMA</li> </ul>

Summary of Decisions Requested (submissions and further submissions) on Proposed Plan Change 2 (Regionally Significant Wetlands)  
Regional Plan: Water for Otago 23 November 2011

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
↳ Trustpower Limited	102	Support submission 43, Ref. 151		No reason given.
↳ Otago Fish & Game Council	103	Support in part submission 43, Ref. 151		• Support the non-regulatory wetland inventory containing a list of current human use values, but only if some ecological values are placed in the plan.
OtagoNet Joint Venture	43	Support	Supports the periodic surveying of wetlands and the general information contained in the non-regulatory inventory being kept up to date.	•Aware that ecology is subject to change.
↳ Otago Fish & Game Council	103	Support in part submission 43, Ref. 151		• Support the non-regulatory wetland inventory containing a list of current human use values, but only if some ecological values are placed in the plan.
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	It should be noted on the inventory of wetlands that Tahakopa Marsh Complex (Map F40, #145) is extremely threatened by an infestation of Alder which needs removal before it becomes an intractable weed in the wetlands and waterways. This should be noted on the inventory of wetlands.	No reason given.
↳ Otago Fish & Game Council	103	Support submission 47, Ref. 151		No reason given.

#### 400 Schedule 9 - Wetlands values in Schedule 9

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
River-Estuary Care: Waikouaiti-Karitane	13	Oppose	Certain sections of the Consultation Draft should be included in the final proposal, e.g. listing of the specific nature and values in each of the designated wetlands.	No reason given.
↳ Trustpower Limited	102	Support submission 13, Ref. 400		No reason given.
↳ Otago Fish & Game Council	103	Support submission 13, Ref. 400		No reason given.
Otago Conservation Board	27	Oppose	Information on wetland values should be retained and included in the new Schedule to be used for ongoing planning and protection.	•Planning decisions and protection improved by having ready access to values information.
↳ Trustpower Limited	102	Support submission 27, Ref. 400		No reason given.
↳ Otago Fish & Game Council	103	Support submission 27, Ref. 400		•Basic ecological information should be provided for each wetland. A non-statutory document is not sufficient.
↳ Contact Energy Limited	107	Support submission 27, Ref. 400		•Removing values from plan and making the inventory is ultra vires – non-public process assigns values to a wetland. •Removes certainty for plan users. •Not appropriate, especially when the values are the reason the non-complying category is used for anything with a more than minor effect on a wetland.
Contact Energy Limited	30	Oppose	Opposes the removal of all descriptive information on each listed wetland, and the development of a separate non-regulatory inventory.	•Removing values is ultra vires - allows non-public, non-contestable process to assign values to a wetland, removes certainty for plan users, and is not just - especially as these values trigger non-complying category.
↳ Trustpower Limited	102	Support submission 30, Ref. 400		No reason given.
↳ Meridian Energy Limited	101	Support submission 30, Ref. 400		•Would provide transparency and certainty for resource users to keep values information in Schedule 9.
↳ Otago Fish & Game Council	103	Support submission 30, Ref. 400		• Wetland values should be listed in the plan and not in a separate, non-regulatory document.
Hawksbury Lagoon Inc	39	Amend	Ensure there is an explicit requirement in the plan to keep wetland values up to date to use when considering applications for activities.	No reason given.
↳ Trustpower Limited	102	Support submission 39, Ref. 400		No reason given.
↳ Otago Fish & Game Council	103	Support in part submission 39, Ref. 400		• Permitted activities cannot exist without oversight, unless overseen by a Wetlands Committee.

Summary of Decisions Requested (submissions and further submissions) on Proposed Plan Change 2 (Regionally Significant Wetlands)  
Regional Plan: Water for Otago 23 November 2011



SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
TrustPower Limited	40	Oppose	Regionally significant values ascribed to each Regionally Significant Wetland should be included in Schedule 9 to the Water Plan.	<ul style="list-style-type: none"> <li>•There are likely to be issues in applying proposed provisions if values information is not listed in Water Plan.</li> <li>•Any change to regionally significant wetland values identified for a Regionally Significant Wetland should require a formal plan change.</li> <li>•Values are not mutually exclusive, and wetlands have any one or more values.</li> <li>•General information can go in non-regulatory inventory.</li> </ul>
↳ Meridian Energy Limited	101	Support submission 40, Ref. 400		<ul style="list-style-type: none"> <li>•Would provide transparency and certainty for resource users to keep values information in Schedule 9.</li> </ul>
↳ Otago Fish & Game Council	103	Support submission 40, Ref. 400		<ul style="list-style-type: none"> <li>• Values must be listed in the wetland plan.</li> </ul>
↳ Contact Energy Limited	107	Support submission 40, Ref. 400		<ul style="list-style-type: none"> <li>•Removing values from plan and making the inventory is ultra vires – non-public process assigns values to a wetland.</li> <li>•Removes certainty for plan users.</li> <li>•Not appropriate, especially when the values are the reason the non-complying category is used for anything with a more than minor effect on a wetland.</li> </ul>
OtagoNet Joint Venture	43	Amend	Include regionally significant wetland values ascribed to each Regionally Significant Wetland in Schedule 9.	<ul style="list-style-type: none"> <li>•There are likely to be issues in applying proposed provisions if values information is not listed in the Water Plan.</li> <li>•Any change to the regionally significant wetland values identified for a Regionally Significant Wetland should require a formal plan change.</li> <li>•General information can go in the non-regulatory inventory.</li> <li>•The non-regulatory inventory which is to contain regionally significant wetland values for scheduled Regionally Significant Wetlands should have been available to stakeholders and the public at least at the time Plan Change 2 was publicly notified.</li> <li>•For consideration in submission.</li> <li>•Method of assessing and mapping individual wetlands also has not been made available.</li> <li>•Lack of transparency is a significant shortcoming.</li> </ul>
↳ Trustpower Limited	102	Support submission 43, Ref. 400		No reason given.
↳ Otago Fish & Game Council	103	Support submission 43, Ref. 400		<ul style="list-style-type: none"> <li>• Strong support from a wide range of submitters.</li> </ul>
↳ Federated Farmers of New Zealand	105	Support in part submission 43, Ref. 400		<ul style="list-style-type: none"> <li>• There has been a lack of consultation in identifying many Regionally Significant Wetlands within Schedule 9 and mapped areas. The concern is that this lack of consultation will continue in the management of the non-regulatory inventory - impacting on landowners and creating uncertainty in the management of the wetland.</li> </ul>
↳ Contact Energy Limited	107	Support submission 43, Ref. 400		<ul style="list-style-type: none"> <li>•Removing values from plan and making the inventory is ultra vires – non-public process assigns values to a wetland.</li> <li>•Removes certainty for plan users.</li> <li>•Not appropriate, especially when the values are the reason the non-complying category is used for anything with a more than minor effect on a wetland.</li> </ul>

## Part 5: General

### Miscellaneous

#### 150 RMA streamlining and simplifying

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
River-Estuary Care: Waikouaiti-Karitane	13	Oppose	Certain sections of the Consultation Draft should be included in the final proposal, e.g. the Wetlands Introduction, the Issues section, and Section 10.5 Anticipated Environmental Results (especially the inclusion of the concept of "habitat and hydrological services").	<ul style="list-style-type: none"> <li>•Introduction clearly sets out the context, explains the types and values of wetlands in Otago.</li> <li>•Issues give clear reasons for the need for certain wetlands to have special consideration.</li> </ul>
↳ Otago Fish & Game Council	103	Support submission 13, Ref. 150		<ul style="list-style-type: none"> <li>• There is not enough information within the current proposed plan change on the ecological values of wetlands.</li> </ul>
Save the Otago Peninsula Inc Society	21	Oppose	Opposes the deletion of 10.2.3	No reason given
↳ Trustpower Limited	102	Oppose submission 21, Ref. 150		No reason given.
Vivienne Kerr	33	Amend	Introduction, Issues and Anticipated Environmental Results, as they appear in the draft document of May 2010, be re-instated in the final plan.	This has the effect of downplaying the essential role wetlands play in the ecosystems of the Otago region in the plan document and in the public mind.
↳ Otago Fish & Game Council	103	Support submission 33, Ref. 150		<ul style="list-style-type: none"> <li>• Wants this reinstated.</li> </ul>
Gregory Kerr	35	Amend	Chapter 10's Introduction, Issues and Anticipated Environmental Results sections should be reinstated.	<ul style="list-style-type: none"> <li>•Nationally 10% of wetlands remaining, with less than half protected.</li> </ul>
↳ Trustpower Limited	102	Oppose submission 35, Ref. 150		<ul style="list-style-type: none"> <li>•Supports the streamlining and simplifying.</li> </ul>
↳ Otago Fish & Game Council	103	Support submission 35, Ref. 150		No reason given.
Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou, and Hokonui Runanga	38	Support	Support the intent of "making provisions easier to read and understand", provided that important details are not lost through doing this.	No reason given.
↳ Trustpower Limited	102	Support submission 38, Ref. 150		No reason given.
Royal Forest and Bird Protection Society of New Zealand Inc	47	Oppose	Retain issues, Explanations, Principle Reasons, Anticipated Results, and cross references.	<ul style="list-style-type: none"> <li>•Removal doesn't make Plan easier to understand.</li> <li>•These assist decision-makers individuals better understand the Plan, educates, and helps understand whether consents are required.</li> </ul>
↳ Meridian Energy Limited	101	Support in part submission 47, Ref. 150		<ul style="list-style-type: none"> <li>•Would provide greater direction and certainty for plan users.</li> </ul>
↳ Trustpower Limited	102	Oppose submission 47, Ref. 150		<ul style="list-style-type: none"> <li>•Supports the streamlining and simplifying.</li> </ul>
↳ Otago Fish & Game Council	103	Support submission 47, Ref. 150		No reason given.

#### 143 Minor and consequential changes

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
NZSki Limited	11	Amend	Make any other amendments as may be necessary or expedient to give effect to the purpose and intent of the relief sought in the submission.	No reason given.
Contact Energy Limited	30	Amend	Give such other relief, including consequential relief, required to address the issues raised in this submission.	No reason given.
Meridian Energy Limited	32	Amend	Make any similar or consequential amendments to Plan Change 2 that stem from the submissions and general relief sought.	No reason given.
Transpower New Zealand Limited	37	Amend	Amend the notification statement to reference the current notification	<ul style="list-style-type: none"> <li>•Current sections referenced have been repealed.</li> </ul>

Summary of Decisions Requested (submissions and further submissions) on Proposed Plan Change 2 (Regionally Significant Wetlands)  
Regional Plan: Water for Otago 23 November 2011

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
			sections of the RMA.	•Note: Relevant to Rules 12.1.3.1, 12.1.4.8, 12.2.2A.1, 12.2.3.4, 12.5.2.1, 12.8.2.1, 12.9.2.1, 12.10.2.1, 13.2.2.1, 13.3.2.1, 13.4.2.1, 13.5.2.1, 13.7.2.1.
Transpower New Zealand Limited	37	Amend	Make any additions, deletions or consequential amendments necessary as a result of the matters raised in this submission. Adopt any other such relief as to give effect to this submission.	No reason given.
TrustPower Limited	40	Amend	Give such further or other relief as is appropriate or desirable in order to take account of the concerns expressed in this submission.	No reason given.
Department of Conservation	42	Amend	Make any other consequential amendments to the Plan required to explain or give effects to these changes to be made.	No reason given.
↳ Otago Fish & Game Council	103	Support submission 42, Ref. 143		No reason given.
Department of Conservation	42	Amend	Amend so that s 95 of the RMA is referred to.	•Reference is made to repealed s 93 and s 94(1) RMA. •Note: Relevant to Rules 12.1.3.1, 12.1.4.8, 12.2.2A.1, 12.2.3.4, 12.5.2.1, 12.8.2.1, 12.9.2.1, 12.10.2.1, 13.2.2.1, 13.3.2.1, 13.4.2.1, 13.5.2.1, 13.7.2.1.
↳ Meridian Energy Limited	101	Support in part submission 42, Ref. 143		•It is appropriate that rules in Proposed Plan Change 2 be updated to reflect the amendments that have been made to the RMA with respect to the notification of resource consent applications. •However the existing approach to the potential non-notification of resource consent applications should be retained.
↳ Otago Fish & Game Council	103	Support submission 42, Ref. 143		No reason given.
OtagoNet Joint Venture	43	Amend	That the amendments and addendums outlined in sections 4 and 5 [of this submission] are accepted and any necessary consequential amendments to Plan Change 2 are made. Also give such further or other relief as is appropriate or desirable in order to take account of the concerns expressed in this submission.	No reasons given.
↳ Otago Fish & Game Council	103	Support submission 43, Ref. 143		No reason given.
Ladies Mile Partnership	44	Amend	Give any other relief necessary to address the points raised in the submission	No reason given.
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Amend wording and numbering of retained issues, explanations, principle reasons, anticipated results and cross references to account for changes and delete words no longer relevant as a result of the removal of Schedule 10 and the term type A and Type.	No reason given.
↳ Otago Fish & Game Council	103	Support submission 47, Ref. 143		No reason given.

## 158 Glossary

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Department of Conservation	42	Amend	Add: "Ecosystem services: Are the benefits that people can obtain from ecosystems. These include provisioning, regulating, supporting and cultural services."	•As the term is not widely used, definition should be provided.
↳ Otago Fish & Game Council	103	Support submission 42, Ref. 158		No reason given.

## 154 Plan general

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Contact Energy Limited	30	Amend	That recognition be given to the fact that Regionally Significant Wetlands can be an outcome of legitimate resource development such as hydro power generation.	•Concerned that wetland origin (natural or man made) has not been appropriately considered in classifying wetlands, and in writing provisions.

Summary of Decisions Requested (submissions and further submissions) on Proposed Plan Change 2 (Regionally Significant Wetlands)  
Regional Plan: Water for Otago 23 November 2011

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
				•Plan change does not make allowance for the creation of new wetlands No reason given.
↳ Trustpower Limited	102	Support submission 30, Ref. 154		
↳ Otago Fish & Game Council	103	Support submission 30, Ref. 154		• Artificially created wetlands are significant habitat for waterfowl.
Meridian Energy Limited	32	Amend	Ensure there is an enabling policy framework for Renewable Energy Generation production when planning documents are being prepared and determined.	•Electricity is vital to everyday life •Reliability of supply is critical to economic growth and social well-being.
↳ Trustpower Limited	102	Support submission 32, Ref. 154		No reason given.
↳ Contact Energy Limited	107	Support submission 32, Ref. 154		•Support as relief is consistent with the NPS Renewable Energy Generation, which ORC has to give effect. Also see reasons in Contact's submission.
TrustPower Limited	40	Amend	Amend to give effect to the NPS Renewable Energy Generation.	No reason given.
↳ Otago Fish & Game Council	103	Oppose submission 40, Ref. 154		No reason given.
↳ Contact Energy Limited	107	Support submission 40, Ref. 154		•Support as ORC is required to give effect to the NPS Renewable Energy Generation.
TrustPower Limited	40	Amend	Provide for activities associated with the use and development of regionally significant infrastructure.	No reason given.
↳ Otago Fish & Game Council	103	Oppose submission 40, Ref. 154		No reason given.
OtagoNet Joint Venture	43	Did not specify	OtagoNet's existing lawfully established utility assets in and surrounding areas identified as Regionally Significant Wetlands, and the essential renewal of these assets should not be unduly compromised.	•ORC is required to protect regionally significant infrastructure under Part 2 RMA.
↳ Contact Energy Limited	107	Support submission 43, Ref. 154		•Supported for the reasons outlined in Contact's submission.

## General support and opposition

### 144 General opposition

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Deanne and Steve Amende	1	Oppose	Oppose proposed plan change 2	•Policies are open to interpretation - regarding restrictions on our land use. •Plan is unreasonable and unworkable. •Financial cost.
↳ Otago Fish & Game Council	103	Support submission 1, Ref. 144		• Rules do not encourage landowners who wish to enhance wetlands. • Landowners will incur significant resource consent costs over and above the cost of restoration. • One solution is a wetlands committee.
↳ Department of Conservation	108	Oppose submission 1, Ref. 144		• Proposed Plan Change 2 provides for the sustainable management of the regions significant wetlands.
Maniototo Homestead	23	Oppose	Status quo. Strongly oppose the need for the proposed plan change.	•Could cause management issues.
↳ Otago Fish & Game Council	103	Oppose submission 23, Ref. 144		• Rules are needed to protect Regionally Significant Wetlands.
↳ Department of Conservation	108	Oppose submission 23, Ref. 144		• Proposed Plan Change 2 provides for the sustainable management of the regions significant wetlands.
Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou, and Hokonui Runanga	38	Oppose	Oppose Plan Change, but support the intent of protecting more wetlands that are regionally significant, and strengthening protection for regionally significant wetlands.	•Does not adequately recognise and provide for the association of nga Runanga with their ancestral lands and waters. •Is in part contrary to Te Tiriti o Waitangi.
↳ Otago Fish & Game Council	103	Support in part submission 38, Ref. 144		• Support the plan being clearer on Treaty responsibilities, Ngai Tahu's connection to wetlands, and their role as kaitiaki.
TrustPower Limited	40	Oppose	Withdraw Plan Change in the event that the amendments set out in the submission are not implemented.	Generally opposes the Plan Change and has set out specific relief sought.

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
↳ Otago Fish & Game Council	103	Oppose submission 40, Ref. 144		No reason given
↳ Department of Conservation	108	Oppose submission 40, Ref. 144		• Proposed Plan Change 2, exclusive of the submitters proposed amendments, provides for the sustainable management of the regions significant wetlands.
Department of Conservation	42	Amend	That the Proposal be retained or amended as set out under the headings "Decision Sought" in Attachment One or to like effect	No reason given
↳ Otago Fish & Game Council	103	Support submission 42, Ref. 144		No reason given.
OtagoNet Joint Venture	43	Oppose	Plan Change 2 be withdrawn if the amendments and addendums set out in the submission are not implemented.	•Would be effects on existing infrastructure if the changes requested are not made.
↳ Otago Fish & Game Council	103	Oppose submission 43, Ref. 144		No reason given.
↳ Department of Conservation	108	Oppose submission 43, Ref. 144		• Proposed Plan Change 2, exclusive of the submitters proposed amendments, provides for the sustainable management of the regions significant wetlands.

## 145 General support

SUBMITTER NAME / FURTHER SUBMITTER NAME	SUB / FUR SUB NUMBER	POSITION	DECISION REQUESTED	REASONS
Wenita Forest Products Limited	3	Support	Support written content of the plan.	No reason given.
↳ Otago Fish & Game Council	103	Support submission 3, Ref. 145		No reason given.
Solid Energy New Zealand Ltd	5	Support	Generally support direction of plan change.	•Will provide more definitive identification of significant wetlands.
↳ Otago Fish & Game Council	103	Support submission 5, Ref. 145		No reason given
Otago Fish & Game Council	8	Support	Generally supports the proposed changes.	•Strengthens protection for regionally significant wetlands.
Waitaki District Council	14	Support	General support for plan change.	No reason given.
Lake Waihola Waipori Wetlands Society Inc.	20	Support	Supports increased focus on the protection, enhancement and restoration of wetlands.	No reason given.
↳ Otago Fish & Game Council	103	Support submission 20, Ref. 145		No reason given.
Otago Conservation Board	27	Support	Supports the proposed changes	•Will provide much needed protection for remaining wetlands.
Federated Farmers of New Zealand	29	Support	Supports general approach to management of wetlands in the region so that it is acceptable in social and economic terms to the ratepayers of the region.	No reason given.
Vivienne Kerr	33	Support	Support of the proposed plan change.	No reason given.
Clutha District Council	34	Support	Overall, CDC supports the proposed plan change.	•Wetlands have significant biodiversity values, and fulfil vital roles in catchment functioning.
Gregory Kerr	35	Support	Largely support the Proposal.	•Nationally 10% of wetlands remaining, with less than half protected. •Trustees of the Waikouaiti Maori Reserve were not informed of the proposed plan change.
↳ Otago Fish & Game Council	103	Support submission 35, Ref. 145		No reason given.
Transpower New Zealand Limited	37	Support	Overall approach generally supported.	•Identification of wetlands will help in route evaluating for any new transmission lines.
Hawksbury Lagoon Inc	39	Support	Endorses ORC's commitment to ongoing protection and promotion of wetlands, and education of all public as to their value.	•Submitter has benefited greatly from such support already.
Beaton family of Berwick	45	Support	Generally support the proposed document.	No reason given.
New Zealand Railways Corporation	46	Support	Plan Change 2 introduces a greater level of protection to the region's wetlands and this is generally supported.	No reason given



**Grouped by Submitter**  
**(Decision requested beyond the scope of the proposed plan change)**

## Decisions requested beyond the scope of the proposed plan change

### 17 William Thomas Begg

ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Matters beyond the scope of the plan change	152	Matters beyond the scope of the plan change	Not Applicable	If Stirling Marsh Complex is retained as a Regionally Significant Wetland then provide the following: <ul style="list-style-type: none"> <li>•Retention of grazing on ORC lease land.</li> <li>•The maintenance of existing ORC drains out of the wetland.</li> </ul>	<ul style="list-style-type: none"> <li>•The areas of this wetland on my property are used for intensive grazing, and one area has gorse and is fenced to keep cattle out.</li> <li>•Two areas of the wetland on my property contain scheduled ORC drains. Concerned that they may not be maintained to same level as previous. ORC should maintain drains where multiple properties are impacted.</li> <li>•There are other drains in the area, if a consent is needed to maintain these, the owners may not maintain them.</li> </ul>

### 20 Lake Waihola Waipori Wetlands Society Inc.

ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Matters beyond the scope of the plan change	152	Matters beyond the scope of the plan change	Not Applicable	Add <i>Glyceria maxima</i> [Reed Sweetgrass] to the ORC Pest Plant Strategy.	<ul style="list-style-type: none"> <li>•Is a matter of extreme importance for waterway and wetland biodiversity.</li> </ul>
Matters beyond the scope of the plan change	152	Matters beyond the scope of the plan change	Not Applicable	Seek progressive control of Reed Sweetgrass over a 5-7 year period of time within the Taieri Plains area and its associated tributaries and catchments.	<ul style="list-style-type: none"> <li>•Weed is a significant threat to wetland and waterway health in the Waihola Waipori Catchment.</li> <li>•Grows aggressively around waterways and nutrient rich wetlands, and disperses by water.</li> <li>•Catchment based approach to species control will benefit the region's waterways and wetland habitats.</li> </ul>

### 33 Vivienne Kerr

ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Matters beyond the scope of the plan change	152	Matters beyond the scope of the plan change	Not Applicable	A statement on the importance of wetlands be included in each and every consent	To ensure that the public are reminded of the essential part wetlands play in the ecology of the Otago region.
Matters beyond the scope of the plan change	152	Matters beyond the scope of the plan change	Not Applicable	A "register of interest", or similar, be established by which those with an interest in the ecological health (including, but not limited to owners and/or lessees of Regionally Significant Wetlands) be notified of all consent applications (new & renewed) in the (geographical) catchments of those wetlands that may impact on those wetlands.	No reason given.

### 35 Gregory Kerr

ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Matters beyond the scope of the plan change	152	Matters beyond the scope of the plan change	Not Applicable	The possibility of a notification process that would inform interested parties with regard to any new activity neighbouring or within the catchment of a Regionally Significant Wetland whether a Resource Consent is needed or not.	<ul style="list-style-type: none"> <li>•Would give a 'heads up' on any possible impacts.</li> </ul>

### 38 Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou, and Hokonui Runanga

ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Matters beyond the scope of the plan change	152	Matters beyond the scope of the plan change	Not Applicable	Commitment from ORC for addressing cumulative effects in the future.	<ul style="list-style-type: none"> <li>•Addressing cumulative effects at an early stage is more cost-effective than allowing cumulative degradation of wetlands to occur.</li> </ul>



**45 Beaton family of Berwick**

ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Matters beyond the scope of the plan change	152	Matters beyond the scope of the plan change	Not Applicable	Level of Lake Mahinerangi should be on web-site along with other hydrological information available from the ORC.	No reason given.

**46 New Zealand Railways Corporation**

ISSUE	REF.	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Matters beyond the scope of the plan change	152	Matters beyond the scope of the plan change	Amend	Add criteria to Schedule 1 which would apply to all wetland areas and state (or similar): The regional value of existing land transport networks, including rail, and their function.	<ul style="list-style-type: none"> <li>•Schedule does not contain any criteria which recognise location and importance of regionally (and nationally) important land transport networks which are, in places, incorporated within the new Regional Significant Wetland boundaries.</li> <li>•Reconciliation of competing objectives must be considered via Part 2 RMA. Water Plan does not provide a policy framework that allows full consideration of ways to address these competing outcomes.</li> <li>•Plan change does not allow for the fixed location of land-based transport networks to be weighed when they require replacement, or alteration within their alignments. Amending Schedule 1 will achieve the relief sought, which is to provide a balancing policy within which the retention and maintenance of existing infrastructure can be adequately considered in consent applications.</li> </ul>