

Proposed Otago Regional Policy Statement 2021

Information for Submitters

Submissions must be in the prescribed form (Form 5) specified by the Resource Management Act and must be received by Otago Regional Council
by 3 pm Friday 3 September 2021

Privacy: Be aware that **all submissions are considered public**, including your name and address which will be uploaded to ORC website as part of this process. The Council and further submitters will use your name and contact details for correspondence in relation to the making of the Regional Policy Statement.

LODGE A SUBMISSION MANUALLY (*USING FORM BELOW*)

A template complying with the requirements of Form 5 is provided below. Once completed, please forward to ORC by one of the following:

Email: rps@orc.govt.nz Submissions in MS Word or other editable format are preferred, if possible

Post: Otago Regional Council, Private Bag 1954, Dunedin 9054. Att: ORC Policy Team

Hand Delivery at

Dunedin: Otago Regional Council Office, 70 Stafford St, Dunedin, Att: ORC Policy Team

Queenstown: Terrace Junction, 1092 Frankton Road, Queenstown, Att: ORC Policy Team

Alexandra: William Fraser Building, Dunorling Street, Alexandra. Att: ORC Policy Team

INQUIRIES

Email: rps@orc.govt.nz

Phone: ORC Call Centre: 0800 474 082, Monday - Friday, 8am-5pm

Written Submission on Proposed Otago Regional Policy Statement 2021

(Submissions must be received by Otago Regional Council by 3 pm Friday 3 September 2021)

To: Otago Regional Council

1. **Name of submitter** *(full name of person/persons or organisation making the submission. Note: The submissions will be referred to by the name of the submitter)*

Matthew Sole

2. This is a submission on the **Proposed Otago Regional Policy Statement 2021**.
3. I **could not** *(Select one)* gain an advantage in trade competition through this submission. *(See notes to person making submission)*
4. I **am not** *(Select one)* directly affected by an effect of the subject matter of the submission that
- a. adversely affects the environment; and
 - b. does not relate to trade competition or the effects of trade competition *(See notes to person making submission)*
5. I **wish** *(Select one)* to be heard in support of my submission
6. If others make a similar submission, I **will** *(Select one)* consider presenting a joint case with them at a hearing
7. **Submitter Details**

- a. **Signature of submitter** *(or person authorised to sign on behalf of submitter)*

M J Sole

- b. **Signatory name, position, and organisation** *(if signatory is acting on behalf of a submitter organisation or group referred to at Point 1 above)*

Name

Position

Organisation

- c. **Date**

5th Sept 2021

Address for service of submitter *(This is where all correspondence will be directed)*

d. Contact person *(name and designation, if applicable)*

Matthew Sole

e. Email:

solem@xtra.co.nz

f. Telephone:

027 4367444

g. Postal address *(or alternative method of service under [section 352](#) of the Act):*

1936a Omakau Chatto Creek Road, RD 3, Alexandra, 9393

8. I have made this submission late after the 3 09 2021 close off, can I request for a time waiver for lateness?

9. **My submission is:**

General

1. I support the general tenor and direction of the PORPS 2021 however it focuses on addressing symptoms as opposed to the underlying causes. In Otago we are pressing hard up against environmental limits. We have 9 planetary boundaries and we have exceeded three being the nitrogen cycle, climate change and biodiversity loss and extinctions.
2. We need to identify, understand and set benchmarks across our regions biosphere limits to inform our approach to environmental stewardship and as a means of measuring our progress towards environmental goals. What is our ecological carrying capacity? For example the list of significant issues does not address the underlying causes such as limits to and declining water quality and loss of biodiversity being the result of inappropriate land use and management. The approach adopted tends to lead to addressing the symptom rather than the underlying cause.
3. I submit that the PORPS 2021 will be improved if it adopts concepts of Te Mana o te Wai (TMOTW) for the whole environment. Specifically, by:

- a. creating a clear and directive hierarchy, with the natural environment as the priority;
 - b. imbuing the anthropogenic concepts of health, well-being and resilience upon the natural environment; and
 - c. ensuring all actions support the health, well-being and resilience of the natural environment.
4. PORPS 2021 authors have gone quite some way to embodying these principles and this is supported. However I seek further improvements over and above the notified wording.
5. The PORPS 2021 uses wording which creates uncertainty as to the direction it is providing. Phrases like 'sustain', 'encourage', 'promote', 'practicable' or 'wherever possible' does not provide clear direction to the decision-maker and undermines the effectiveness of the provision.
6. Similarly, other phrases used in the PORPS 2021, such as 'improve', 'maintain' or 'enhance' provide a general sense of direction but not specific detail on what is intended. Identifying the scale of improvement required is then difficult and often politically fraught. It is recommended to seek the wording 'protect and restore', with a definition provided for restoration to aid in clarity of outcome to be achieved. In the context of a degraded ecosystem, such as a heavily abstracted river where a decision maker is considering activities against a naturalised flow, the protection of habitat might require that habitat be improved from the status quo.
7. Multiple points within the PORPS 2021 use wording that is akin to limits, such as 'environmental limits', 'bottom lines' or 'environmental constraints'. I submit that 'environmental limits' is most suitable as it aligns with commonly used terminology, including that in the NPS-FM 2020. Language should be clear and consistent and direct that environmental limits be determined for the region to an adequate standard, or to achieve specific aims, and that resource use and all activities must be within those limits.
8. Within the PORPS 2021 wording used to discuss the protection, enhancement or restoration of ecosystems and habitat can be focused on those which are exclusively indigenous or native. My interpretation is that references to indigenous habitats and native ecosystems in the PORPS 2021 direct that habitats and ecosystems that are not wholly native or indigenous are not to be considered at all. I submit that this isn't representative of Otago's ecosystems indigenous biodiversity and habitats. Even within DOC conservation areas these are not all indigenous. A diverse range of introduced flora

and fauna exist among our indigenous systems, and provide habitat for indigenous species, contributing to regeneration and are widely interspersed within Otago ecosystems.

9. I support the protection of ecosystems and indigenous biodiversity and recommend that these concepts are included in the ORPS 2021 to achieve the outcomes.

10. I seek relief that will:

- a. provide protection for Otago’s ecosystems, indigenous biodiversity and habitats; and
- b. define the term natural environment so it is meaningful in the Otago Region.

11. I generally support the submissions to the Proposed Otago Regional Policy Statement 2021 of

- a. Central Otago Environmental Society (COES)
- b. Central Otago Heritage Trust
- c. Forest & Bird
- d. Otago Fish & Game Council and the Central South Island Fish & Game Council
- e. Heritage New Zealand Pouhere Taonga

<i>Column 1</i>	<i>Column 2</i>	<i>Column 3</i>	<i>Column 4</i>
<p>The <i>specific provisions</i> of the proposal that my submission relates to are:</p> <p><i>(Please enter the relevant objective, policy, method, or ‘other’ provision reference where possible. For example, ‘AIR-O1’.)</i></p>	<p>I <i>support</i> or <i>oppose</i> the specific provisions or wish to have them <i>amended</i>.</p> <p><i>(Please indicate “support” or “oppose” or “amend”)</i></p>	<p>The <i>reasons</i> for my views are:</p>	<p>I seek the following <i>decision</i> from the local authority:</p> <p><i>(Please be as clear as possible – for example, include any alternative wording for specific provision amendments.)</i></p>

<p>LF-VM-01 – Otago wide vision</p>	<p>New provision</p>	<p>I support Forest & Bird new provision requiring a more ambitious and clear on what the outcomes to be achieved are</p>	<p>Add a new overarching vision to apply to all FMUs in Otago as follows: <u>“LF-VM-01 – All of Otago catchment vision</u> <u>By no later than 2040, in all Otago catchments:</u> <u>(1) water bodies are protected at, or restored to a state of good health, well- being and resilience,</u> <u>(2) activities relating to water support the health, well-being and resilience of affected water bodies,</u> <u>(3) the natural form and function of water bodies, including with respect to water quality, sedimentation and flows, mimics that of their natural behaviour, (4)</u> <u>ecosystem connections between freshwater, wetlands and the coastal environment are protected and restored,</u> <u>(5) wetland, estuary and lagoon extent has been restored as much as practical where it has been lost, and their quality is protected and restored,</u> <u>(6) the habitat of indigenous species is protected and restored, and indigenous species are able to migrate easily within and between catchments,</u> <u>(7) food is available to be harvested from water bodies in abundance and is safe to consume,</u> <u>(8) people have abundant, quality</u></p>

			<p><u>opportunities to connect with and recreate within or close to a wide range of water bodies,</u> <u>(9) there are no direct discharges of waste water to water bodies, and</u> <u>(10) fresh water is managed in accordance with the LF-WAI objectives and policies.”</u></p> <p><i>Make the required consequential amendments to specific FMU visions in LF-VM-02 to LF-VM-06 to ensure the overarching vision above applies to all of them while retaining FMU specific provisions and timeframes where appropriate to be stronger than provided for in LF-VM-01.</i></p>
<p>Note: Additional rows for each separate provision or submission point should be added as required.</p>			