



Waka Kotahi NZ Transport Agency further submission on notified proposal for the Proposed Otago Regional Policy Statement June 2021 under Clause 8 of Schedule 1 of the Resource Management Act 1991

12th November 2021

Otago Regional Council
Private Bag 1954
Dunedin

via email: RPS@orc.govt.nz

This is a further submission on a change proposed to the following plan:

Proposed Otago Regional Policy Statement June 2021.

Submitter ID number: 0305

The Waka Kotahi further submission is:

1. Waka Kotahi NZ Transport Agency (Waka Kotahi) is a Crown entity that takes an integrated approach to transport planning, investment and delivery. The statutory objectives of Waka Kotahi are to undertake its functions in a way that contributes to an effective, efficient and safe land transport system in the public interest. Our vision is for a sustainable, multi-modal land transport system where public transport, active or shared modes are the first choice for most daily transport needs.
2. Waka Kotahi has a mandate under the Land Transport Management Act 2003 (LTMA), the Government Rounding Powers Act 1989 (GRPA), and the Government Policy Statement on Land Transport 2021/22-2030/31 (GPS) to carry out its functions in a way that delivers on the transport outcomes set by the government.
3. In the 2021-2024 National Land Transport Programme, Waka Kotahi has allocated significant investment in the Otago Region to the improvement, operation and maintenance of the State Highway network, including public transport investment, walking and cycling and transport planning. In addition, Waka Kotahi is a co-funder of the local roading network and transport initiatives, as well as a significant investor in the infrastructure in the Otago Region for land use change and growth.
4. Overall, Waka Kotahi has an interest in the Proposed Otago Regional Policy Statement June 2021 as a result of its role as a:
 - Transport investor – to maximise effective, efficient and strategic returns for New Zealand;

- Planner of land transport networks – to ensure the effective integration of infrastructure and land use to support liveable communities and the development of an effective and resilient land transport network for customers;
 - Provide for access to and the use of the land transport system – to shape smart, efficient, safe and responsible transport choices; and
 - Manager of the state highway network – to deliver efficient, safe and responsible highway solutions for customers.
5. For these reasons it is considered that Waka Kotahi has an interest which is greater than the general public.
 6. Further points are summarised in Table 1, which forms the bulk of our submission. In general Waka Kotahi has not made a further submission on provisions already covered by its primary submission due to the volume of submissions received.
 7. Waka Kotahi could not gain an advantage in trade competition through this submission.

We seek the following decision from the local authority:

Amend the provisions of the Proposed Otago Regional Policy Statement June 2021 as detailed in Table 1 (attached) including such further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this further submission.

Waka Kotahi would like to be heard in support of its submission. If others make a similar submission, Waka Kotahi will consider presenting a joint case with them at a hearing.

Signature of person authorised to sign on behalf of Submitter:



Sarah Ho

Principal Planner – Poutiaki Taiao/Environmental Planning

Waka Kotahi NZ Transport Agency

Address for service:

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Table 1: Decisions Sought on the Proposed Otago Regional Policy Statement June 2021

This further submission is in relation to the submission of:	The particular submission point I/we support or oppose is:	My/our position on this submission point is:	The reasons for my/our support or opposition are:	I/we seek that the whole (or part [describe part]) of the submission be allowed (or disallowed) :
General				
Dunedin City Council	General submission (Submission Point 00139.001)	Support	Waka Kotahi are supportive of the comments made by Dunedin City Council and seek any relief required to address the concerns identified to enable the safe, effective and efficient establishment, operation and maintenance of transport infrastructure.	Accept submission
Part 1 – Introduction and General Provisions				
Interpretation				
Definitions				
Royal Forest and Bird Protection Society Inc	General Submission – Terminology (Submission point 00230.002)	Support	The term 'environmental limits' is used throughout the RPS, but it is not defined. It is unclear how this term is to be interpreted, and Waka Kotahi considers there is merit in replacing reference to environmental limits with the specific outcome sought.	Accept submission
Queenstown Lakes District Council	New definition - Affordability (Submission point 00138.205)	Support	Waka Kotahi supports inclusion of a definition around "Affordable Housing" to clarify what this constitutes.	Accept submission
Queenstown Lakes District Council	New definition - Biodiversity offsetting	Support in part	Waka Kotahi supports the inclusion of a definition for biodiversity offsetting.	A definition for 'biodiversity offsetting' be included in the Plan,

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	(submission point 00138.028)			however the specifics of this definition need to be clarified.
Royal Forest and Bird Protection Society Inc	Hard protection structure (Submission Point 00230.006)	Oppose in part	Waka Kotahi considers that the inclusion of the word 'flooding' could unduly limit the application of the definition.	Reject inclusion of 'flooding' within the proposed definition.
Dunedin City Council	Regionally Significant Infrastructure (Submission Point 00139.007)	Support	Waka Kotahi agree with the Dunedin City Council that the definition should refer to the "One Network Framework" rather than the "One Network Road Classification".	Accept submission
Otago Fish and Game Council and the Central South Island Fish and Game Council	New definition – Minimise (submission point 00231.017)	Support	Waka Kotahi supports the inclusion of a definition for 'minimise'.	Accept submission
Otago Fish and Game Council and the Central South Island Fish and Game Council	New definition – Restore (submission point 00231.019)	Support	Waka Kotahi agrees that the term 'restore' is used throughout the Policy Statement and it is appropriate for a definition to be included, to provide certainty to plan users.	Accept submission
Director General of Conservation	Effects Management Hierarchy (Submission point 00137.009)	Support	Waka Kotahi agrees that the hierarchy of the approach to manage effects differs between the definition (avoid, <i>minimise</i> , remedy, offset, compensation - and is taken from the NPS-FM) and Policy ECO-P6 (avoid, remedy, <i>mitigate</i> , offset, compensation) and a consistent approach	Accept submission

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			is necessary to avoid uncertainty and ensure consistency.	
Network Waitaki Limited; Aurora Energy Limited; PowerNet Limited	New definition – Effects Management Hierarchy (other matters) (Submission points 00320.012, 00315.014, 00511.012)	Support	Waka Kotahi supports the inclusion of a new definition of Effects Management Hierarchy for other matters (not only for natural inland wetlands and rivers). It provides clear direction that all practicable steps shall be taken to address the effects of activities, but acknowledges that in some cases, it is not possible to avoid effects entirely (such as infrastructure which often has a functional or operational need to be located somewhere).	Accept submission
Part 2 – Resource Management Overview				
SRMR - Significant resource management issues				
Fulton Hogan Limited	SRMR – General (submission point 0322.004)	Support	Waka Kotahi supports Fulton Hogan’s submission, as aggregates are an essential element to the construction of regionally and nationally significant infrastructure. This is not to be undervalued and there is significant environmental benefit in being able to source resources locally resulting in resource efficiency, and reduction in carbon footprints.	Accept submission
Queenstown Lakes District Council	SRMR-I4 (submission point not summarised)	Support	Waka Kotahi supports QLDC submission that SRMR-I4 does not mention the impact of the form of urban growth on carbon emissions and Climate Change, as consolidation of growth and the way urban areas develop can increase the	Accept submission

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			need for people to travel by private motor vehicle, thereby increasing carbon emissions.	
Dunedin City Council	SRMR-I4 (Submission point 00139.017)	Support	Deaths and serious injuries can occur on all roads, not just rural state highways. Road to Zero – NZs Road Safety Strategy sets an initial target to reduce deaths and serious injuries on New Zealand’s roads, streets, cycleways and footpaths by 40 percent over the next 10 years (2020-2030).	Accept submission
IM - Integrated Management				
New Zealand Infrastructure Commission	IM – Integrated Management General (Submission point 00321.102)	Support	Waka Kotahi agrees that there is an inconsistency between taking a holistic, integrated management approach (ki uta ki tai) to managing the environment and resources in Otago, and placing a hierarchy of obligations, placing the environment ahead of people.	Accept submission
Fonterra Co-Operative Group Limited	IM – Integrated Management New Provision (Submission 00213.002)	Support	Waka Kotahi supports an additional objective which clearly provides for regionally significant infrastructure but would also seek to include nationally significant infrastructure.	Accept submission, but to also include the provision of nationally significant infrastructure
Port of Otago Ltd	IM-O1 (Submission point 00301.010)	Support	Waka Kotahi agrees that the objective should be amended to reflect section 5 of the RMA.	Accept submission

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Te Waihanga New Zealand Infrastructure Commission	IM-O2 (Submission Point 00321.015)	Support	Waka Kotahi agrees that the objective should be amended to recognise the benefits that infrastructure provides to the environment.	Accept submission
Ravensdown	IM-O3 (submission point 00121.017)	Support	Waka Kotahi supports the proposed amended wording which better aligns with the purpose of the RMA.	Accept submission
Te Ao Marama	IM-04 (submission point 00223.054)	Support	Waka Kotahi supports the proposed amended wording.	Accept submission
Christchurch International Airport Limited	IM-P2 (Submission Point 00307.006)	Support	Waka Kotahi supports the proposed amendments to remove the reference to the terms firstly, secondly and thirdly in this policy, and thereby remove the decision-making hierarchy it creates. The proposed amendments will better reflect Part 2 of the RMA.	Accept submission
Dunedin City Council	IM-P2 (Submission Point 00139.027)			
Queenstown Lakes District Council	IM-P2 (submission point 00138.008)	Support	Waka Kotahi supports QLDC approach that the 'decision priority' framework in IM – P2 be limited to decisions made on freshwater/those matters managed under the NPSFM 2020, however a more balanced approach to other environments.	Accept submission
Director General of Conservation	IM-P4 (submission point 00137.041)	Oppose	The proposed inclusion of the term 'enhances' creates uncertainty in respect of what "enhances" means in this context and the potential implications for the operation and	Reject submission

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			maintenance of regionally and nationally significant infrastructure.	
Kāi Tahu ki Otago	IM-P4 (submission point 00226.092)	Support	The proposed amendment clarifies that climate change is included in this policy	Accept submission
Wise Response Society Inc	IM-P5 (Submission point 00509.035)	Oppose	The amendments to the policy proposed will change its intent and will potentially have implications for the operation and maintenance of regionally and nationally significant infrastructure.	Reject submission
Dunedin City Council	IM-P5 (submission point 00139.030)	Support	Waka Kotahi supports to retain the policy as notified.	Accept submission
Contact Energy Ltd; Trustpower Ltd	IM-P12 (submission points 00318.009, 00311.011)	Support	The proposed amendments provide better clarity and are considered appropriate	Accept submissions
Royal Forest and Bird Protection Society Inc	IM-P12 (submission point 00230.036)	Oppose	Waka Kotahi opposes the proposed amendment in particular the deletion of the offsetting and compensation measures in clause (3). The inclusion of the term 'reasonable alternative' in proposed clause (6) creates uncertainty as to what is considered 'reasonable'.	Reject submission
Otago Fish & Game Council and the Central South Island Fish & Game Council	IM-P13 (submission point 00231.039)	Oppose in part	Waka Kotahi opposes the removal of the term "natural and physical resources" and its proposed replacement with "the environment". Case law recognises the state highway network	Reject proposed amendment relating to "natural and physical resources"

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			as a 'physical resource'. Removal of the reference to physical resources eliminates this connection to the state highway.	
Christchurch International Airport Limited	IM-P14 (Submission point 00307.012)	Support	Waka Kotahi agree that the Policy should be amended to recognise the importance of regionally significant infrastructure. Waka Kotahi agree that the policy also requires amendment to provide clearer guidance as to the purpose for setting limits and the state of environment which the limit is aiming to achieve or move towards.	Accept submission or amend the policy as raised by other submitters to IM-P14 below.
Transpower New Zealand Limited; Aurora Energy Limited; Contact Energy Limited; Network Waitaki Limited; PowerNet Limited; Queenstown Airport Corporation Limited	IM-P14 (Submission Points 00314.012, 00315.017, 00318.010, 00320.014, 00511.014, 00313.007)	Support in part	Waka Kotahi agree with the submitters that introducing the concept of "environmental limits" from the consultation draft of the proposed Natural and Built Environments Bill is premature. There is uncertainty as to what the "environmental limits" are intended for – i.e. consenting triggers or bottom lines.	Accept submission to provide clarification of environmental limits.
Transpower New Zealand Limited;	IM-P15 (Submission points 00314.013,	Support in part	Waka Kotahi agree that the policy creates uncertainty, particularly due to the effects never really being understood or known due to the science still developing around certain	Amend Policy IM-P15 to provide more certainty

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Aurora Energy Limited; Trustpower Limited	00315.018, 00311.012)		environmental aspects (i.e. groundwater and surface water).	
Otago Fish & Game Council and the Central South Island Fish & Game Council	IM-M1 (submission point 00231.032)	Oppose	Fish and Game seeks to amend provision (4) to replace 'natural and physical resources' with 'natural environment'. Case law recognises the state highway network as a 'physical resource'. Removal of the reference to physical resources eliminates this connection to the state highway.	Reject submission
Part 3 – Domains and Topics				
Domains				
CE – Coastal Environment				
Royal Forest and Bird Protection Society of NZ Inc	New Provision (Submission Point 00230.023b)	Oppose in part	Waka Kotahi recognises that hard protection structures can restrict coastal habitats and prevent migration of coastal habitats and ecosystems. We would wish to see any new policy, as suggested, also recognise that hard protection structures also can provide benefit to creating new ecological habitats in some cases, protecting property and safety of the transport network.	Reject submission or if a new provision is included, to recognise also the benefits of creating hard protection structures.
Te Rūnanga o Ngāi Tahu	CE- General (submission point 00234.013)	Support	Waka Kotahi agrees with Te Rūnanga o Ngāi Tahu submission, in particular to make the structure of the chapter clearer and easier to read and understand, with better alignment with other air, land, and freshwater provisions.	Accept submission

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Kai Tahu ki Otago	CE- New Provision (submission 00226.130)	Support	Waka Kotahi agrees that "te mauri o te moana" should take precedence as the first objective for the coastal provisions.	Accept submission
Kai Tahu ki Otago	CE- New Provision (Submissions 00226.016 00226.149)	Neutral	Kai Tahu ki Otago seeks policy guidance in relation to discharges, dredging and sedimentation. Waka Kotahi are interested in all new provisions which may arise from this submission. In particular, the attenuation and treatment of stormwater prior to discharge into coastal waters, as it applies to existing infrastructure due to the significant implications this may have.	If new provisions are included, Waka Kotahi seeks that its interests are protected.
Kai Tahu ki Otago	New Provision (Submission point 00226.150)	Neutral	Kai Tahu ki Otago seek to insert a new policy(s) to provide guidance on activities that directly modify the land, freshwater, and coastal marine area interface, and to respond to the activities of concern raised in their submission. Waka Kotahi is not opposed to this but cautions that earthworks are a common occurrence and will need to be appropriately managed appropriately within the coastal environment.	If a new provision is provided, Waka Kotahi seeks that its interests are protected and for earthworks to be appropriately managed.
Director General of Conservation	CE-O1 (submission point 00137.049)	Oppose in part	It is unclear what the 'enhancement' of the mauri of coastal water would entail and the implication for activities undertaken by Waka Kotahi. It is also considered that it is not always necessary or appropriate to enhance natural biological and physical processes in the coastal environment, and should remain as "maintained or enhanced"	Reject proposed amendments to clauses 1 and 3

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Director General of Conservation	CE-02 (submission point 00137.050)	Oppose	Waka Kotahi considers the original wording is appropriate and should remain as "maintain or enhance".	Reject submission
Director General of Conservation	CE-03 (submission Point 00137.051)	Oppose	There may be circumstances where areas of natural character, natural features, landscapes and seascapes within the coastal environment have been compromised as a result of state highway infrastructure being located in these areas due to a functional or operational need. The proposed amendment to this objective seeks to require restoration, rather than encourage restoration, in these circumstances.	Reject submission
Aurora Energy Limited	CE-05 (Submission point 00315.021)	Support	Amendment provides sufficient certainty that infrastructure with a functional or operational need is provided for.	Accept submission
Kai Tahu ki Otago Te Runanga o Ngai Tahu	CE-05 (Submission Points 00226.135, 00226.135)	Support in part	Waka is supportive of enabling infrastructure which is of operational or functional need in the coastal environment, and for cultural values to be preserved. However, Waka Kotahi seeks amendments to remove "avoid" as an absolute, with preference to minimise or similar due to the practicalities of being able meet this in all cases.	Accept submission however remove any wording relating to "avoid" with a preference to minimise or similar.
Kai Tahu ki Otago	CE-P1 (Submission point 00226.136)	Support in part	There is merit in taking an integrated approach to the coastal environment, but consideration needs to be had for regionally and nationally significant infrastructure.	Accept submission, however provision to be made for regionally and nationally significant infrastructure

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Dunedin City Council	CE-P4 (submission point 00139.065)	Support	Agree that the use "avoid" as an absolute term needs to be used sparingly, and in this case, should be amended.	Accept submission
Aurora Energy Ltd	CE-P4 (submission point 00315.023)	Support in part	Agree that an effects management hierarchy approach should be taken, however this should apply to all regionally and nationally significant infrastructure, not just existing infrastructure.	Accept submission as it applies to regionally and national infrastructure
Kai Tahu ki Otago	CE-P5 (submission point 00226.140)	Support	Waka Kotahi agrees that it does not make sense to have a separate policy for coastal indigenous biodiversity and this should be reconciled with the ECO policies.	Accept submission
Meridian Energy Limited	CE-P6 (submission point 00306.030)	Support	Amendments to the provision simplify and clarify application of the policy.	Accept submission
Royal Forest and Bird Protection Society of NZ Inc	CE-P8 (submission point 00230.058)	Oppose	The change to the preamble by adding "adjacent to" would raise some potential issues as there could be a range of permitted activities or activities approved by designation which could be compromised by the change in (9). There is uncertainty of the effect of the changes proposed to activities required for operation and maintenance of strategic infrastructure in the coastal environment.	Reject submission
Royal Forest and Bird Protection Society of NZ Inc	CE-M1 (submission point 00230.061)	Oppose	Royal Forest and Bird seek an additional clause that undermines the mapping to be provided in clause (1), by seeking case-by-case consideration of whether an activity is actually in	Reject submission

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			the coastal environment. This is not considered appropriate.	
LF – Land and freshwater				
Royal Forest and Bird Protection Society of NZ incorporated	New provision (Submission point 00230.078)	Oppose	The introduction of a new overarching provision will lead to uncertainty as to how it should be applied in relation to other provisions in the plan.	Reject submission
Otago Fish & Game Council and the South Island Fish & Game Council	LF-WAI-P3 (submission point 00231.047)	Oppose	The proposed amendments create uncertainty with potential implications on how Waka Kotahi manages its infrastructure.	Reject submission
Director General of Conservation	LF-FW-O8 (Submission point 00137.070)	Support in part	Waka Kotahi agrees in principle with the proposed amendment but would request that those provisions seeking to inflexibly 'protect' are amended to include 'where practicable'.	Accept submission however the provisions be amended "protect where practicable".
Otago Fish & Game Council and the South Island Fish & Game Council	LF-FW-O8 (submission point 00231.053)	Support in part	While Waka Kotahi supports, in principle, the intent of the proposed new clause A1, a balance needs to be achieved between ensuring the health, well-being and resilience of a water body and the operational and functional needs to nationally significant infrastructure.	Accept submission however the provisions be amended to ensure the operational and functional needs of nationally significant infrastructure.
Kai Tahu ki Otago	LF FW-P7 (submission point 00226.182)	Support	The proposed wording changes provide better clarity	Accept submission

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Otago Fish & Game Council and the South Island Fish & Game Council	LF-FW-P7 (submission point 00231.055)	Oppose	The proposed amendments create uncertainty with potential implications on how Waka Kotahi manages its infrastructure.	Reject submission
Royal Forest and Bird Protection Society of NZ incorporated	LF-FW-P10 (submission point 00230.090)	Oppose	The proposed amendments create uncertainty with potential implications on how Waka Kotahi manages its infrastructure.	Reject submission
Royal Forest and Bird Protection Society of NZ incorporated	LF-FW-P14 (submission point 00230.093)	Oppose	Amending the wording from 'promote' to 'require' (restoration of natural character of lakes and rivers and their margins) alters the intent of this provision.	Reject submission
Otago Fish & Game Council and the South Island Fish & Game Council	LF-FW-M6 (submission point 00231.06)	Oppose	Proposed clause (4)(ca) seeks protection of trout and salmon habitat and potential for restoration of that habitat, and, in doing so, makes this provision more onerous.	Reject submission
Royal Forest and Bird Protection Society of NZ incorporated	LF-LS-M12 (submission point 00230.095)	Oppose	The proposed amendment would require avoidance, rather than minimisation, therefore making the provision more onerous.	Reject submission
Topics				
ECO – Ecosystems and indigenous biodiversity				
Otago Fish & Game Council and the South Island Fish & Game Council	New provision ECO-P11 (Submission point 00231.075)	Oppose	The proposed policy requires the habitat of trout and salmon to be 'protected' and 'restored' in a manner consistent with the protection and restoration of habitat of indigenous freshwater species. This makes the consequences of this provision uncertain.	Reject submission

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Kai Tahu ki Otago	ECO-P3 (submission point 00226.189)	Support	"biodiversity values" helps provide clarification in the policy.	Accept submission
Royal Forest and Bird Protection Society of NZ Incorporated	ECO-P3 (submission Point 00230.102)	Oppose	Waka Kotahi is opposed to the proposed deletion of references to the exceptions provided for by policies ECO-P4 and ECO-P5, as these policies recognise and provide for the development or upgrade of nationally and regionally significant infrastructure, such as state highways, in significant natural areas or where they may adversely affect indigenous species and ecosystem that are taoka, and for existing activities in significant natural areas.	Reject submission
EIT – Energy, infrastructure and transport				
Transpower New Zealand Limited; Aurora Energy Limited; Contact Energy Limited; Te Waihangā New Zealand Infrastructure Commission; Queenstown Airport Corporation Limited;	EIT-INF-04 (Submission Points 00314.033, 00315.043, 00318.031, 00321.051, 00313.015, 00301.032, 00310.004, 00320.023, 00511.023)	Support	Waka Kotahi agree that using the concept of "environmental limits" from the consultation draft of the Natural and Built Environments Bill is inappropriate as the Proposed Otago RPS has been notified under the RMA. In addition, the concept of environmental limits is still unknown and it is not clear how infrastructure is to be managed within "environmental limits".	Accept submission

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Port of Otago Limited; Chorus New Zealand Limited, Spark New Zealand Trading Limited, and Vodafone New Zealand; Network Waitaki Limited PowerNet Limited				
Christchurch International Airport Ltd (CIAL)	EIT-INF-04 (Submission point 00307.015)	Support	Waka Kotahi supports the suggested amendment to acknowledge the public benefits, lifeline utility role and the functional and operational constraints that infrastructure has to work within. The amendment of the objective to include "safe" also better reflects the statutory objective of Waka Kotahi.	Accept submission
Maryhill Limited	EIT-TRAN-07 (Submission point 00118.050)	Oppose	Waka Kotahi considers it is appropriate for development proposals to address resulting transportation impacts including, where required, upgrades to affected infrastructure.	Reject submission
Maryhill Limited	EIT-TRAN-08 (Submission point 00118.051)	Oppose	Waka Kotahi considers it is appropriate for development proposals to address resulting transportation impacts including, where required, upgrades to affected infrastructure.	Reject submission

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Royal Forest and Bird Protection Society of NZ incorporated	EIT-INF-P11 (Submission Point 00230.129)	Oppose	Waka Kotahi considers that some of the wording sought will fundamentally change the interpretation and application of the policy.	Reject submission
Queenstown Lakes District Council	EIT-INF-P12 (submission point 00138.118) EIT-INF-P14 (submission point 00138.120)	Support	Waka Kotahi agrees that there could be better clarification as to what policy applies to regionally and nationally significant infrastructure vs other infrastructure. Consider combining EIT-INF-P12 and P14 together.	Accept submission
Maryhill Limited	EIT-TRAN-P18 (Submission point 00118.052)	Oppose	Waka Kotahi considers it is appropriate for development proposals to address resulting transportation impacts including, where required, upgrades to affected infrastructure.	Reject submission
Maryhill Limited	EIT-TRAN-P19 (Submission point 00118.053)	Oppose	Waka Kotahi considers it is appropriate for development proposals to address resulting transportation impacts including, where required upgrades, to affected infrastructure.	Reject submission
Dunedin City Council	EIT-TRAN-M8 (Submission point 00139.187)	Support	Waka Kotahi agrees that a definition for "high trip generating" activities would provide certainty regarding the application of the provision.	Accept submission
HAZ – Hazards and risks				

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Transpower New Zealand Limited	HAZ-NH-P3 (Submission Point 00314.044)	Support	Waka Kotahi agree that the policy needs to provide for situations where nationally significant infrastructure, such as State Highways, cannot avoid locating in an area of significant hazard risk.	Accept submission
Aurora Energy Limited	HAZ-NH-P3 (Submission Point 00315.061)			
Dunedin City Council	HAZ-NH-P3 (Submission Point 00139.196)			
Dunedin City Council	HAZ-NH-P6 (Submission point 00139.199)	Support	Waka Kotahi supports the request to recognise that this policy should operate consistently with the infrastructure policies in the Plan. The maintenance and protection of infrastructure could include many modified features that contribute to mitigating the effects of natural hazards and climate change.	Accept submission
HCV – Historical and cultural values				
Director General of Conservation	HCV-HH-P5 (Submission Point 00137.145)	Support	Waka Kotahi agrees that the policy needs to provide greater clarity for plan users on how to determine whether historic heritage values or features are special or outstanding.	Accept submission
NFL – Natural Features and Landscapes				

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Queenstown Airport Corporation	NFL – 02 (submission point 00313.029)	Support	Waka Kotahi supports the amendments proposed as it provides greater certainty that significant infrastructure is recognised and can be provided.	Accept submission
Aurora Energy Ltd	NFL – 03 (submission point 00315.075)	Support	Waka Kotahi supports the amendments proposed as it provides greater clarification as to which policy takes preference.	Accept submission
UFD – Urban form and development				
Christchurch International Airport Limited (CIAL)	UFD-02 (submission point 00307.035)	Support	Waka Kotahi supports the suggested amendment to facilitate the development of future regionally significant infrastructure. The suggested amendment recognises that infrastructure needs will change through the life of the RPS and that more regionally significant infrastructure may be required in the future.	Accept submission
Daisy Link Garden Centres Limited	UFD-03 (submission point 00204.003)	Oppose	Waka Kotahi is opposed to the suggested amendment as Waka Kotahi considers that some of the wording sought will fundamentally change the interpretation and application of the policy. Strategic planning should occur before significant development of urban areas to ensure the necessary infrastructure can be planned, funded and delivered as required. The removal of the words <i>in advance of</i> will provide for significant out of sequence developments.	Reject submission
Sipka Holdings Limited	UFD-03	Oppose	Waka Kotahi is of the view that strategic planning needs to consider the views of many stakeholders including local and central	Reject submission

This further submission is in relation to the submission of:	The particular submission point I/we support or oppose is:	My/our position on this submission point is:	The reasons for my/our support or opposition are:	I/we seek that the whole (or part [describe part]) of the submission be allowed (or disallowed) :
	(submission point 00402.004)		government, infrastructure providers and others to encompass a district wide or regional view. This is not normally an exercise undertaken by individual proponents of private plan changes.	
Glenpanel Limited Partnership	UFD-O4 (submission point 00405.005)	Oppose	Waka Kotahi supports the retention of the requirement for urban expansion to only occur where this has been identified as appropriate through District Plan zoning or strategic planning. This will assist in providing functional urban forms and sustainable transport systems.	Reject submission
Kai Tahu ki Otago	UFD-O5 (Submission point 00226.311)	Support	The proposed working is helps to clarify that human actions contribute to climate change, and both need to be considered when managing urban development.	Accept submission
Daisy Link Garden Centres Limited	UFD-P1 (submission point 00204.005)	Oppose	Waka Kotahi suggests that out of sequence and unanticipated developments will not provide for the integration of land use and infrastructure and will not provide good environmental outcomes.	Reject submission
Queenstown Lakes District Council	UFD-P2 (submission point 00138.212)	Support	Waka Kotahi considers that providing sufficient housing and business development capacity in urban areas will reduce the need for out of zone urban sprawl which is difficult to service with sustainable transport solutions.	Accept submission
Queenstown Lakes District Council	UFD-P5 (submission point 00138.215)	Support	Waka Kotahi supports this provision. Having appropriately scaled commercial activities located in urban areas to service community needs can reduce the need to travel which will	Accept submission

This further submission is in relation to the submission of:	The particular submission point I/we support or oppose is:	My/our position on this submission point is:	The reasons for my/our support or opposition are:	I/we seek that the whole (or part [describe part]) of the submission be allowed (or disallowed) :
			contribute to the sustainable management of the transport system.	
Glenpanel Limited Partnership	UFD-P7 (submission point 00405.013)	Oppose	Waka Kotahi does not support the unplanned urban expansion into rural areas as it does not provide good urban outcomes and efficient integrated use of transport systems.	Reject submission
Waterfall Park Developments Limited	UFD-P8 (1) (submission point 00023.005)	Oppose	Waka Kotahi supports the retention of the requirement for the establishment, development or expansion of rural lifestyle and rural residential zones that are well connected to existing or planned urban areas with good access to employment and services. This will result in a more functional urban form and increases the potential for more sustainable transport options to be utilised.	Reject submission
Daisy Link Garden Centres Limited	UFD-M1 (submission point 00204.009)	Oppose	Waka Kotahi suggests that out of sequence and unanticipated developments will not provide for the integration of land use and infrastructure and will not provide sustainable environmental outcomes.	Reject submission
Tussock Rise Ltd	UFD-M2 (submission point 00401.012)	Oppose	Waka Kotahi supports development to occur as anticipated by Future Development Strategies as this provides certainty for infrastructure providers and ensures physical resources can be sustainably managed.	Reject submission
Part 5 – Appendices and Maps				
Appendices				

This further submission is in relation to the submission of:	The particular submission point I/we support or oppose is:	My/our position on this submission point is:	The reasons for my/our support or opposition are:	I/we seek that the whole (or part [describe part]) of the submission be allowed (or disallowed) :
Director General of Conservation	APP1 – Criteria for identifying outstanding waterbodies (submission point 00137.156)	Support	Waka Kotahi agrees that greater clarity is required to identify the values that constitute an outstanding waterbody.	Accept submission
Contact Energy Ltd, Network Waitaki Limited	APP2 – Significant criteria for indigenous biodiversity (submission point 00318.020 and 00320.020)	Support	Waka Kotahi agrees that the significance criteria for indigenous biodiversity needs to be amended to be targeted and avoid the inclusion of inappropriate areas.	Accept submission
Royal Forest and Bird Protection Society Inc	APP3 - Criteria for biodiversity offsetting (submission point 00230.148)	Oppose	Waka Kotahi do not support the inclusion of proposed clause 2(j) as it forecloses an option to consider offsetting, and potentially undermines the intent of the plan in relation to the effects management hierarchy.	Reject submission
Aurora Energy Limited, Contact Energy Ltd, Network Waitaki, Oceana Gold Ltd, Powernet Ltd, Queenstown Airport Corporation	APP3 – Criteria for biodiversity offsetting (submission points 0315.083, 00318.02, 00320.021, 00115.024)	Support	Waka Kotahi consider the criteria for biodiversity offsetting is too high. It agrees that clause 1 of the provision is unreasonable and should be deleted, and that the compensation criteria are amended to achieve consistency with national direction and pragmatism. In particular 2(e) has significant implications for transport infrastructure which will have a functional or	Accept submission

This further submission is in relation to the submission of:	The particular submission point I/we support or oppose is:	My/our position on this submission point is:	The reasons for my/our support or opposition are:	I/we seek that the whole (or part [describe part]) of the submission be allowed (or disallowed) :
			operational need to be in that location and may have no option but to offset biodiversity.	
Aurora Energy Limited, Contact Energy Ltd, Network Waitaki Ltd, Oceana Gold Ltd, Powernet, Queenstown Airport Corporation	APP4 – Criteria for biodiversity compensation (submissions 00315.084, 00318.022, 00320.022, 00115.025, 00511.022, 00313.035)	Support	Waka Kotahi consider that the criteria for biodiversity compensation is too high. It agreed that clause 1 of the provision is unreasonable and should be deleted, and that the compensation criteria are amended to achieve consistency with national direction and pragmatism.	Accept submission
Royal Forest and Bird Protection Society Inc	APP4 – Criteria for biodiversity compensation (submission point 00230.149)	Oppose	Waka Kotahi do not support the inclusion of proposed clause 2(x) as it forecloses an option to consider compensation, and potentially undermines the intent of the plan in relation to the effects management hierarchy.	Reject submission

RPS

From: Sarah Ho <Sarah.Ho@nzta.govt.nz>
Sent: Friday, 12 November 2021 8:14 a.m.
To: RPS
Cc: Helen Dempster; Richard Shaw
Subject: Waka Kotahi Further Submission to ORPS
Attachments: Waka Kotahi NZ Transport Agency Further Submission to ORPS.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: Further Submission

To whom it may concern,

Please find attached Waka Kotahi NZ Transport Agency Further submission to the Otago Regional Policy Statement.

Kind regards

Sarah Ho

Principal Planner - Poutiaki Taiao | Environmental Planning

System Design, Transport Services

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Out of Office: Fridays

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