

Appendix H – Policy Assessment

Where a provision is shaded blue, this indicates that it is under appeal.

Otago Regional Policy Statement 2019 (ORPS 2019)	
Provision	Assessment
Objective 1.1 Otago’s resources are used sustainably to promote economic, social, and cultural wellbeing for its people and communities	Consistent The proposal represents an improvement in the waste minimisation and management activities within this area of Otago. Waste minimisation has environmental, social, economic, and cultural benefits. The social impact assessment provided with the application finds that there will be moderate positive social benefits through reduction of waste going to landfill. The RRPP will be located at the existing Green Island Landfill site and will utilise leachate and stormwater infrastructure that is already in place, which is both economically and logistically sensible. Cultural wellbeing will be promoted by adopting the recommendations of mana whenua.
Policy 1.1.1 Economic wellbeing Provide for the economic wellbeing of Otago’s people and communities by enabling the resilient and sustainable use and development of natural and physical resources.	Consistent The siting of the RRPP at the existing landfill and use of the existing landfill infrastructure will minimise the economic impact of the construction and set-up of the RRPP. Waste minimisation activities at the site will continue to provide ongoing economic benefit to the community through employment opportunities and by avoiding additional expenses that would result from locating the RRPP at another site.
Policy 1.1.2 – Social and cultural wellbeing and health and safety Provide for the social and cultural wellbeing and health and safety of Otago’s people and communities when undertaking the subdivision, use, development and protection of natural and physical resources by all of the following: a) Recognising and providing for Kāi Tahu values; b) Taking into account the values of other cultures;	Consistent The Applicant has recognised and provided for Kāi Tahu values by adopting the recommendations made by mana whenua in the Green Island Landfill CIA and in the affected party approval letter. The values of other cultures and the diverse needs of Otago’s people and communities have been taken into account through the commissioning of a social impact assessment, through ongoing engagement with direct neighbours and the Green Island community, and through the design of the RRPP which will provide a range

<ul style="list-style-type: none"> c) Taking into account the diverse needs of Otago’s people and communities; d) Avoiding significant adverse effects of activities on human health; e) Promoting community resilience and the need to secure resources for the reasonable needs for human wellbeing; f) Promoting good quality and accessible infrastructure and public services. 	<p>of waste transfer and management facilities. Community resilience and securing of resources for reasonable wellbeing needs is promoted through the design of the RRPP which will minimise adverse impacts, by making use of existing infrastructure, and by providing a range of waste management and minimisation services. The RRPP facilities will provide a good quality accessible public service.</p>
<p>Objective 1.2 Recognise and provide for the integrated management of natural and physical resources to support the wellbeing of people and communities in Otago.</p>	<p>Consistent</p> <p>The Applicant has recognised the interconnectedness of land, water, and air resources, and that the use of one resource may adversely affect another. The RRPP activities will occur on land; leachate will be captured such that it does not impact on water; stormwater will be treated prior to discharge to water; and activities generating dust and odour will be managed in accordance with best practice while taking into account learnings from other similar facilities, to support the wellbeing of communities.</p>
<p>Policy 1.2.1 Integrated resource management</p> <p>Achieve integrated management of Otago’s natural and physical resources, by all of the following:</p> <ul style="list-style-type: none"> a) Coordinating the management of interconnected natural and physical resources; b) Taking into account the impacts of management of one natural or physical resource on the values of another, or on the environment; c) Recognising that the value and function of a natural or physical resource may extend beyond the immediate, or directly adjacent, area of interest; d) Ensuring that resource management approaches across administrative boundaries are consistent and complementary; e) Ensuring that effects of activities on the whole of a natural or physical resource are considered when that resource is managed as subunits. f) Managing adverse effects of activities to give effect to the objectives and policies of the Regional Policy Statement. 	<p>Consistent</p> <p>The Applicant has recognised and provided for the integrated management of resources, in particular in the management of stormwater, leachate, and odour, through the use of the existing landfill infrastructure, management plans that overlap with the landfill plans, and in proposing consent conditions that align with the landfill conditions, where appropriate.</p>

<p>g) Promoting healthy ecosystems and ecosystem services; h) Promoting methods that reduce or negate the risk of exceeding sustainable resource limits.</p>	
<p>Objective 2.1 The principles of Te Tiriti o Waitangi are taken into account in resource management processes and decisions</p>	<p>Consistent</p>
<p>Policy 2.1.2 Treaty principles Ensure that local authorities exercise their functions and powers, by:</p> <ul style="list-style-type: none"> a) Recognising Kāi Tahu’s status as a Treaty partner; and b) Involving Kāi Tahu in resource management processes implementation; c) Taking into account Kāi Tahu values in resource management decision-making processes and implementation; d) Recognising and providing for the relationship of Kāi Tahu’s culture and traditions with their ancestral lands, water, sites, wāhi tapu, and other taoka; e) Ensuring Kāi Tahu have the ability to: i. Identify their relationship with their ancestral lands, water, sites, wāhi tapu, and other taoka; ii. Determine how best to express that relationship; f) Having particular regard to the exercise of kaitiakitaka; g) Ensuring that district and regional plans: <ul style="list-style-type: none"> i. Give effect to the Ngāi Tahu Claims Settlement Act 1998; ii. Recognise and provide for statutory acknowledgement areas in Schedule 2; iii. Provide for other areas in Otago that are recognised as significant to Kāi Tahu; h) Taking into account iwi management plans. 	<p>The Applicant undertook engagement with Kāi Tahu and has adopted the conditions and recommendations put forth by Te Rūnanga o Ōtākou. In doing so, the Applicant is managing the natural environment to recognise and provide for Kāi Tahu cultural values, interests, and wellbeing. It is noted that Te Rūnanga o Ōtākou have provided an affected party approval to this application.</p>
<p>Objective 2.2 Kāi Tahu values, interests and customary resources are recognised and provided for.</p>	
<p>Policy 2.2.1 Manage the natural environment to support Kāi Tahu wellbeing by all of the following:</p>	

<ul style="list-style-type: none"> a) Recognising and providing for their customary uses and cultural values in Schedules 1A and B; and, b) Safeguarding the life-supporting capacity of natural resources. 	
<p>Policy 2.2.2 Recognising sites of cultural significance</p> <p>Recognise and provide for the protection of wāhi tūpuna, by all of the following:</p> <ul style="list-style-type: none"> a) Avoiding significant adverse effects on those values that contribute to the identified wāhi tūpuna being significant; b) Avoiding, remedying, or mitigating other adverse effects on the identified wāhi tūpuna; c) Managing the identified wāhi tūpuna sites in a culturally appropriate manner. 	
<p>Policy 2.2.3 Wāhi tūpuna and associated sites</p> <p>Enable Kāi Tahu relationships with wāhi tūpuna by all of the following:</p> <ul style="list-style-type: none"> a) Recognising that relationships between sites of cultural significance are an important element of wāhi tūpuna; b) Recognising and using traditional place names 	
<p>Objective 3.1 The values (including intrinsic values) of ecosystems and natural resources are recognised and maintained, or enhanced where degraded.</p>	<p>Partially Consistent</p> <p>The values of ecosystems and natural resources (as assessed in the relevant policies 3.1.1, 3.1.2, 3.1.5, 3.1.6, and 3.1.9) are recognised and maintained, with the possible exception of air quality where there may be a reduction in amenity values associated with the potential for increased odour at specific sensitive receptors.</p>
<p>Policy 3.1.1 Fresh water</p> <p>Safeguard the life-supporting capacity of fresh water and manage fresh water to:</p> <ul style="list-style-type: none"> a) Maintain good quality water and enhance water quality where it is degraded, including for: <ul style="list-style-type: none"> i. Important recreation values, including contact recreation; and, ii. Existing drinking and stock water supplies; b) Maintain or enhance aquatic: 	<p>Consistent</p> <p>The discharge of stormwater to the Kaikorai Stream and ultimately the Kaikorai Lagoon Swamp will maintain water quality in the receiving waters, and may contribute to enhancing the water quality due to installation of new stormwater treatment measures, noting that the contribution of stormwater from the RRPP is small in comparison to the size of the catchment. Aquatic ecosystem health and indigenous habitats and species will be maintained. The natural functioning of the Kaikorai Stream, the Kaikorai Lagoon and estuary will be maintained because the increased</p>

<ul style="list-style-type: none"> i. Ecosystem health; ii. Indigenous habitats; and, iii. Indigenous species and their migratory patterns. <p>c) Avoid aquifer compaction and seawater intrusion;</p> <p>d) Maintain or enhance, as far as practicable:</p> <ul style="list-style-type: none"> i. Natural functioning of rivers, lakes, and wetlands, their riparian margins, and aquifers; ii. Coastal values supported by fresh water; iii. The habitat of trout and salmon unless detrimental to indigenous biological diversity; and iv. Amenity and landscape values of rivers, lakes, and wetlands; <p>e) Control the adverse effects of pest species, prevent their introduction and reduce their spread;</p> <p>f) Avoid, remedy or mitigate the adverse effects of natural hazards, including flooding and erosion; and,</p> <p>g) Avoid, remedy or mitigate adverse effects on existing infrastructure that is reliant on fresh water.</p>	<p>volume of stormwater from the RRPP will be attenuated prior to discharge and there will be no decrease in water quality. Experiential landscape (natural character) values of the Kaikorai Stream/wetland will be temporarily reduced to a small degree during the construction phase of the RRPP, but thereafter will be enhanced as a result of the proposed vegetation restoration and management plan.</p>
<p>Policy 3.1.2 Beds of rivers, lakes, wetlands, and their margins Manage the beds of rivers, lakes, wetlands, their margins, and riparian vegetation to:</p> <ul style="list-style-type: none"> a) Safeguard the life supporting capacity of fresh water; b) Maintain good quality water, or enhance it where it has been degraded; c) Maintain or enhance bank stability; d) Maintain or enhance ecosystem health and indigenous biological diversity; e) Maintain or enhance, as far as practicable: <ul style="list-style-type: none"> i. Their natural functioning and character; and ii. Amenity values; f) Control the adverse effects of pest species, prevent their introduction and reduce their spread; and, g) Avoid, remedy or mitigate the adverse effects of natural hazards, including flooding and erosion. 	<p>Consistent</p> <p>The RRPP is located in close proximity to the margins of the Kaikorai Stream and Kaikorai Stream Lagoon. No works will occur in the beds or margins, and neither the life-supporting capacity of freshwater nor any ecosystem health or indigenous biodiversity will be negatively impacted by the stormwater discharges or the activities on land adjacent to the margins. Experiential aspects of natural character of the margins of the Kaikorai Stream will be temporarily reduced to a small degree during the construction phase of the RRPP, but thereafter will be enhanced. However, there is no public access to these areas. Post-construction, natural character is expected to be enhanced.</p> <p>The proposed waste transfer and composting operations have the potential to attract pest animals. Pest management procedures will be included in the Operations Management Plan and the Composting</p>

	<p>Management Plan to control pests. RRPP buildings have been designed to minimise opportunities for vermin entry.</p> <p>The site is not located within any natural hazard area identified by ORC or DCC.</p>
<p>Policy 3.1.5 Coastal water</p> <p>Manage coastal water to:</p> <ul style="list-style-type: none"> a) Maintain coastal water quality or enhance it where it has been degraded; b) Maintain healthy coastal ecosystems, the range of indigenous habitats provided by the coastal marine area, and the migratory patterns of indigenous coastal water species or enhance these values where they have been degraded; c) Maintain or enhance important recreation values; d) Maintain or enhance, as far as practicable: <ul style="list-style-type: none"> i. Coastal values; and ii. The habitats provided by the coastal marine area for trout and salmon unless detrimental to indigenous biological diversity. e) Control the adverse effects of pest species, prevent their introduction and reduce their spread. 	<p>Consistent</p> <p>The Kaikorai Stream, Kaikorai Lagoon Swamp, and the downstream Kaikorai Estuary are all hydrologically connected. The RRPP activities will not cause any degradation of coastal water quality, ecosystems, or values.</p>
<p>Policy 3.1.6 Air quality</p> <p>Manage air quality to achieve the following:</p> <ul style="list-style-type: none"> a) Maintain good ambient air quality that supports human health, or enhance air quality where it has been degraded; b) Maintain or enhance amenity values. 	<p>Partially consistent</p> <p>Taking into account the mitigation measures and operational controls proposed in the application, the RRPP is expected to have a small contribution to offsite odour effects, with ambient air quality and amenity unlikely to be affected for most receptors. However, for some nearby receptors (the parties identified as affected in the s95 Report), the combination of odour from the RRPP and the odour from the landfill (i.e. the cumulative odour effect) may cause a reduction in amenity. This assessment is considered conservative and likely to reflect the worst-case scenario for odour. The recommended conditions of consent will ensure that the mitigation and contingency measures are implemented and monitored appropriately. The discharge of odour is not expected to reduce air quality to the extent that it has any negative impact on human health,</p>

	and ambient air quality beyond the specific affected receptors will be maintained.
<p>Objective 3.2 Otago's significant and highly-valued natural resources are identified and protected, or enhanced where degraded</p>	<p>Consistent</p> <p>The margins of the Kaikorai Stream and Lagoon border the site to the north and west, and these are identified as a Regionally Significant Wetland in the RPW and an Area of Significant Biodiversity Value in the 2GP. These areas will be protected through the capture of all leachate from the RRPP and the treatment and attenuation of stormwater prior to its discharge into Kaikorai Stream.</p>
<p>Policy 3.2.2 Managing significant indigenous vegetation and habitats Protect and enhance areas of significant indigenous vegetation and significant habitats of indigenous fauna, by all of the following:</p> <p>a) In the coastal environment, avoiding adverse effects on:</p> <ul style="list-style-type: none"> i. The values that contribute to the area or habitat being significant; ii. Indigenous taxa that are listed as threatened or at risk in the New Zealand Threat Classification System lists; iii. Taxa that are listed by the International Union for Conservation of Nature and Natural Resources as threatened; iv. Indigenous ecosystems and vegetation types that are threatened in the coastal environment, or are naturally rare; v. Habitats of indigenous species where the species are at the limit of their natural range, or are naturally rare; vi. Areas containing nationally significant examples of indigenous community types; and vii. Areas set aside for full or partial protection of indigenous biological diversity under other legislation; <p>c) Beyond the coastal environment, and in the coastal environment in significant areas not captured by a) above, maintaining those values that contribute to the area or habitat being significant;</p>	<p>Consistent</p> <p>The application states that the wetland areas comprise areas of significant indigenous vegetation and significant habitats of indigenous fauna. The RRPP itself does not overlap with these areas, and the discharge of stormwater will not adversely affect ecological values or habitat because the stormwater will be treated prior to discharge and flows attenuated in ponds and constructed wetlands. There will be no discharge of leachate from the RRPP to land or water. The proposal will not result in any significant adverse effects on any values.</p>

<ul style="list-style-type: none"> d) Avoiding significant adverse effects on other values of the area or habitat; e) Remedying when other adverse effects cannot be avoided; f) Mitigating when other adverse effects cannot be avoided or remedied; g) Encouraging enhancement of those areas and values that contribute to the area or habitat being significant; h) Controlling the adverse effects of pest species, preventing their introduction and reducing their spread. 	
<p>Policy 3.2.16 Managing the values of wetlands Protect the function and values of wetlands by all of the following:</p> <ul style="list-style-type: none"> a) Maintaining the significant values of wetlands; b) Avoiding, remedying or mitigating other adverse effects; c) Controlling the adverse effects of pest species, preventing their introduction and reducing their spread; d) Encouraging enhancement that contributes to the values of the wetland; e) Encouraging the rehabilitation of degraded wetlands. 	<p>Consistent Adverse effects on wetlands values of the discharge of stormwater into Kaikorai Stream (and the connected Regionally Significant Wetland and areas of natural inland wetland) will be avoided or mitigated by treating and attenuating flows. Significant wetland values will be maintained. Experiential aspects of natural character associated with the wetland areas may be enhanced over time with the implementation of native succession planting on the perimeter of the RRPP site.</p>
<p>Objective 4.6 Hazardous substances, contaminated land and waste materials do not harm human health or the quality of the environment in Otago</p>	<p>Consistent Hazardous substances will be used in small quantities during construction for the refuelling of plant and equipment. These will be well managed in accordance with construction management plans such that there are no discharges to the environment and therefore no harm to human health or the quality of the environment. The RRPP will include a hazardous waste drop off and storage building, separated into two areas – one for the public to drop off hazardous wastes, and one for sorting and storage of such wastes. The building design and the operational use will prevent discharges to the environment and ensure there is no harm to human health or the quality of the environment.</p>
<p>Policy 4.6.2 Use, storage and disposal of hazardous substances Manage the use, storage and disposal of hazardous substances, by all of the following:</p>	<p>Consistent The hazardous waste drop off and storage building will incorporate various storage systems and to handle different types of hazardous materials and will include appropriate passive ventilation and an engineered subfloor</p>

<ul style="list-style-type: none"> a) Providing secure containment for the storage of hazardous substances; b) Minimising risk associated with natural hazard events; c) Ensuring the health and safety of people; d) Avoiding, remedying or mitigating adverse effects on the environment; e) Providing for the development of facilities to safely store, transfer, process, handle and dispose of hazardous substances; f) Ensuring hazardous substances are treated or disposed of in accordance with the relevant regulatory requirements; g) Restricting the location and intensification of activities that may result in reverse sensitivity effects near authorised facilities for hazardous substance bulk storage, treatment or disposal; h) Encouraging the use of best management practices. 	<p>design to prevent landfill gasses from entering the building, thereby ensuring the health and safety of people. The building design and operational practices will also prevent the discharge of hazardous substances into the environment.</p>
<p>Policy 4.6.3 Hazardous substance collection, disposal and recycling Promote and facilitate the establishment of hazardous substance collection, disposal and recycling services across the region.</p>	<p>Consistent The RRPP will provide for hazardous substance collection, disposal, and recycling.</p>
<p>Policy 4.6.4 Identifying contaminated land Identify sites of known or potentially contaminated land in Otago.</p>	<p>Consistent The RRPP is located over areas of historic buried waste and is located within the area designated as the Green Island Landfill. The wider site is identified on the HAIL register as verified HAIL.00502.01 category G3: Landfill sites. An Environmental Site Investigation has previously been undertaken on the RRPP site and has informed a CLMP.</p>
<p>Policy 4.6.5 Managing contaminated land Ensure contaminated or potentially contaminated land does not pose an unacceptable risk to people and the environment, by:</p> <ul style="list-style-type: none"> a) Assessing and, if required, monitoring contaminant levels and environmental risks; b) Protecting human health in accordance with regulatory requirements; c) Minimising adverse effects of the contaminants on the environment. 	<p>Consistent An Environmental Site Investigation has previously been undertaken on the RRPP site to assess the contaminated land risks and to inform a CLMP. The CLMP is intended to manage the risk to the health of workers, the onsite environment, and the offsite environment during the contaminated land disturbance works. The CLMP also contains protocols for the management of any 'unexpected' contaminants that are discovered during the earthworks. The CLMP, in conjunction with the CEMP and ESCP, is appropriate to ensure that human health is protected and effects on the environment area minimised.</p>

<p>Policy 4.6.6 Waste management Promote an integrated approach to the management of the use, storage and disposal of waste materials.</p>	<p>Consistent The RRPP will manage waste in an integrated way by providing waste transfer, recycling, and composting facilities for the varied types of waste generated in the Dunedin region.</p>
<p>Policy 4.6.7 Waste minimisation responses Encourage activities to give effect to the waste minimisation hierarchy of responses, by:</p> <ul style="list-style-type: none"> a) Giving preference to reducing waste generated; then b) Reusing waste; then c) Recycling waste; then d) Recovering resources from waste; then e) Treatment; then f) Disposing residual waste to a disposal facility 	<p>Consistent The RRPP is a key part of the Applicant's commitment to develop and improved and comprehensive waste management and diverted material system for Dunedin, which aligns with the applicant's responsibility under the Waste Minimisation Act 2008 '<i>to promote effective and efficient waste management and minimisation within its district</i>'. The RRPP will have facility to compost the organic waste that is collected in the kerbside collection service, thereby diverting this organic waste from landfill. The RRPP will also provide enhanced facilities for reuse, recycling, and materials recovery.</p>
<p>Policy 4.6.8 Waste storage, recycling, recovery, treatment and disposal Manage the storage, recycling, recovery, treatment and disposal of waste materials by undertaking all of the following:</p> <ul style="list-style-type: none"> a) Providing for the development of facilities and services for the storage, recycling, recovery, treatment and disposal of waste materials; b) Ensuring the health and safety of people; c) Minimising adverse effects on the environment; d) Minimising risk associated with natural hazard events; e) Restricting the location of activities that may result in reverse sensitivity effects near waste management facilities and services. 	<p>Consistent The RRPP is a new facility that will provide for the storage, recycling, recovery, treatment, and disposal of waste materials in a way that ensures the health and safety of people and minimises adverse effects on the environment. While the RRPP will be located in relatively close proximity to residential dwellings, reverse sensitivity issues are expected to be minimal because of the existing (and ongoing) operation of the landfill at the same location and because of the design of the facilities, in particular the choice of the open-air static pile system for the OPF, which is more effective at managing odour than composting within an enclosed building.</p>
<p>Objective 5.4 Adverse effects of using and enjoying Otago's natural and physical resources are minimised</p>	<p>Consistent The design and operation of the RRPP will avoid or minimise adverse effects.</p>
<p>Policy 5.4.1 Offensive or objectionable discharges Manage offensive or objectionable discharges to land, water and air by:</p> <ul style="list-style-type: none"> a) Avoiding significant adverse effects of those discharges; b) Avoiding significant adverse effects of discharges of human or animal waste directly, or in close proximity, to water or mahika kai sites; 	<p>Consistent The construction and operation of the RRPP will not involve any discharges that give rise to significant adverse effects. All other adverse effects will be avoided, remedied, or mitigated. There will be no discharge of leachate to land or water. Stormwater will be discharged to water but will be treated</p>

<p>c) Avoiding, remedying or mitigating other adverse effects of those discharges.</p>	<p>and attenuated (i.e. mitigated) such that adverse effects on water quality, quantity, and aquatic ecology are less than minor. The discharge of dust to air during construction and operation of the RRPP is not expected to result in offsite adverse effects, and the discharge of odour will be mitigated to the extent practicable through facility design and operational practices.</p>
<p>Policy 5.4.2 Adaptive management approach Apply an adaptive management approach, to avoid, remedy or mitigate actual and potential adverse effects that might arise and that can be remedied before they become irreversible, by both:</p> <ul style="list-style-type: none"> a) Setting appropriate indicators for effective monitoring of those adverse effects; and b) Setting thresholds to trigger remedial action before the effects result in irreversible damage. 	<p>Consistent Management plans will be utilised during construction and operation of the RRPP, and these will include a degree of adaptive management, for example the unexpected contamination protocol during construction, and the adaptive management that is built into the design of the automated composting system.</p>
<p>Policy 5.4.5 Pest plants and animals Control the adverse effects of pest species, prevent their introduction, reduce their spread and enable the removal and destruction of material for biosecurity purposes, to safeguard all of the following:</p> <ul style="list-style-type: none"> a) The viability of indigenous species and habitats for indigenous species; b) Ecosystem services that support economic activities; c) Water quality and water quantity; d) Soil quality; e) Human and animal health; f) Recreation values; g) Landscapes, seascapes and natural character; h) Primary production 	<p>Consistent Several submitters have raised concerns about the potential proliferation of vermin as a result of the RRPP. The adverse effects of pest animals will be controlled by building design, implementation of best practice operational procedures at the RRPP, fast turnaround of incoming organic waste streams, which will be reflected in the site management plan and in consent conditions. The operational management plans state that an accredited pest control contractor will be engaged to implement and service an ongoing pest control programme. Pest plant species are not intended to be introduced nor are they expected to proliferate as a result of any RRPP activity. The elements (a)-(h) will be safeguarded.</p>
<p>Proposed Otago Regional Policy Statement (P-ORPS 2021) and Proposed Otago Regional Policy Statement – Freshwater Instrument Components 2021</p>	
<p>MW-01 Principles of Te Tiriti o Waitangi The principles of Te Tiriti o Waitangi are given effect in resource management processes and decisions, utilising a partnership approach between councils and Papatipu Rūnaka to ensure that what is valued by mana whenua is actively protected in the region.</p>	<p>Consistent The Applicant undertook engagement with Kāi Tahu and has adopted the conditions and recommendations put forth by Te Rūnanga o Ōtākou. In doing so, the Applicant is giving effect to the principles of Te Tiriti o Waitangi, ensuring that what is valued by mana whenua is actively</p>

<p>MW-P3 Supporting Kāi Tahu well-being</p> <p>The natural environment is managed to support Kāi Tahu well-being by:</p> <p>(1) protecting customary uses, Kāi Tahu values and relationships of Kāi Tahu to resources and areas of significance, and restoring these uses and values where they have been degraded by human activities,</p> <p>(2) safeguarding the mauri and life-supporting capacity of natural resources, and</p> <p>(3) working with Kāi Tahu to incorporate mātauraka in resource management.</p>	<p>protected in the region, and supporting Kāi Tahu wellbeing. It is noted that Te Rūnanga o Ōtākou have provided an affected party approval to this application.</p>
<p>IM-O1 Long term vision</p> <p>The management of natural and physical resources in Otago, by and for the people of Otago, including Kāi Tahu, and as expressed in all resource management plans and decision making, achieves healthy, resilient, and safeguarded natural systems, and the ecosystem services they offer, and supports the well-being of present and future generations, mō tātou, ā, mō kā uri ā muri ake nei.</p>	<p>Consistent</p> <p>The proposal will ensure that natural systems, and the ecosystem services that they offer, are healthy, resilient, and safeguarded, and the wellbeing of present and future generations supported, through the design and operation of the RRPP which will minimise adverse impacts and provide a range of waste reduction, recycling, and recovery services.</p>
<p>IM-O2 Ki uta ki tai</p> <p>Natural and physical resource management and decision making in Otago embraces ki uta ki tai, recognising that the environment is an interconnected system, which depends on its connections to flourish, and must be considered as an interdependent whole.</p>	<p>Consistent</p> <p>The Applicant has recognised the interconnectedness of natural and physical resources, in particular that land-based activities can impact upon water and air resources, and in the management of stormwater and the interaction with natural watercourses and wetlands.</p>
<p>IM-O3 Environmentally sustainable impact</p> <p>Otago's communities carry out their activities in a way that preserves environmental integrity, form, function, and resilience, so that the life-supporting capacities of air, water, soil, ecosystems, and indigenous biodiversity endure for future generations.</p>	<p>Consistent</p> <p>The endurance of the life-supporting capacity of air, water, soil, ecosystems, and indigenous biodiversity will not be impeded by the proposal.</p>
<p>IM-P3 Providing for mana whenua cultural values in achieving integrated management</p> <p>Recognise and provide for Kāi Tahu's relationship with natural resources by:</p> <p>(1) enabling mana whenua to exercise rakatirataka and kaitiakitaka,</p>	<p>Consistent</p> <p>The Applicant undertook engagement with Kāi Tahu and has adopted the conditions and recommendations put forth by Te Rūnanga o Ōtākou.</p>

<p>(2) facilitating active participation of mana whenua in resource management decision making, (3) incorporating mātauraka Māori in decision making, and (4) ensuring resource management provides for the connections of Kāi Tahu to wāhi tūpuna, water and water bodies, the coastal environment, mahika kai and habitats of taoka species</p>	
<p>IM-P13 Managing cumulative effects Otago's environmental integrity, form, function, and resilience, and opportunities for future generations, are protected by recognising and specifically managing the cumulative effects of activities on natural and physical resources in plans and explicitly accounting for these effects in other resource management decisions.</p>	<p>Consistent Cumulative effects are of particular relevance to this application where the RRPP is located within the wider landfill site, and both operations contribute to adverse odour effects. The assessment as to odour effects has specifically taken this into account and as a result specific persons were considered affected and were consulted. Cumulative effects with respect to leachate are avoided, by collecting and piping all leachate to the GIWWTP, with no discharge to land or water. Cumulative effects with respect to stormwater are minimal, due to the contribution from the RRPP being small in comparison to the wider landfill catchment, and in relation to the Kaikorai Stream catchment, and because of the treatment and attenuation prior to discharge.</p>
<p>AIR-O1 Ambient air quality Ambient air quality provides for the health and well-being of the people of Otago, amenity and mana whenua values, and the life-supporting capacity of ecosystems.</p>	<p>Partially consistent Ambient air quality will continue to provide for the health and wellbeing needs of people, and the life-supporting capacity of ecosystems. Amenity values, and potentially mana whenua values, may be adversely impacted by odour effects to a small degree.</p>
<p>AIR-O2 Discharges to air Human health, amenity and mana whenua values and the life-supporting capacity of ecosystems are protected from the adverse effects of discharges to air.</p>	<p>Partially consistent Taking into account the mitigation measures and operational controls proposed in the application, the RRPP is expected to have a small contribution to offsite odour effects, with ambient air quality and amenity unlikely to be affected for most receptors. However, inherent uncertainty in this assessment and the presence of the landfill as a background odour source means that for some nearby receptors (the parties identified as affected in the s95 Report), the combination of odour from the RRPP and</p>

	<p>the odour from the landfill (i.e. the cumulative odour effect) may cause a reduction in amenity. This assessment is considered conservative and likely to reflect the worst-case scenario for odour.</p> <p>Air discharges can in general impact on mana whenua values. The discharge of odour cannot be totally avoided and the RRPP is in close proximity to an area that has significant value to mana whenua, but there are no specific conditions, recommendations, or objections raised in the written approval or CIA that relate to air quality or odour.</p> <p>The recommended conditions of consent will ensure that the mitigation and contingency measures are implemented and monitored appropriately such that amenity and mana whenua values are protected to the extent possible.</p> <p>The discharge of odour is not expected to reduce air quality to the extent that it has any negative impact on human health or on the life-supporting capacity of ecosystems.</p>
<p>AIR-P1 Maintain good ambient air quality</p> <p>Good ambient air quality is maintained across Otago by:</p> <p>(1) ensuring discharges to air comply with ambient air quality limits where those limits have been set, and</p> <p>(2) where limits have not been set, only allowing discharges to air if the adverse effects on ambient air quality are no more than minor.</p>	<p>Inconsistent</p> <p>(1) Not applicable, as there are no relevant limits to consider for odour.</p> <p>(2) The adverse odour effects from the OPF and the BWTS, when considered cumulatively with the landfill odour, could be at least minor for specific sensitive receptors that are adjacent to the site. This is a conservative assessment, as odours from the RRPP are generally expected to be weak, infrequent, and of short duration, and the recommended conditions of consent will ensure that the mitigation and contingency measures are implemented and monitored appropriately. Ambient air quality in the wider (but still local) area will not be affected to this degree.</p> <p>In my opinion, the proposal is inconsistent with, but not contrary to, this policy.</p>
<p>AIR-P3 Providing for discharges to air</p> <p>Allow discharges to air provided they do not adversely affect human health, amenity and mana whenua values and the life supporting capacity of ecosystems.</p>	<p>Partially Consistent</p> <p>The discharge of odour to air will not impact human health, nor the life-supporting capacity of ecosystems. Amenity values, and potentially mana whenua values, may be adversely impacted. This policy, as written, it does</p>

	<p>not appear to allow for any level of adverse effect on the listed elements. In my opinion, the proposal is partially consistent with this policy because amenity and potentially mana whenua values may be impacted, but human health and the life-supporting capacity of ecosystems will not be adversely affected.</p>
<p>AIR-P4 Avoiding certain discharges Avoid discharges to air that cause offensive, objectionable, noxious or dangerous effects.</p>	<p>Partially Consistent</p> <p>Subject to the proposed mitigations measures being implemented and being as effective as expected, odours attributable to the RRPP are likely to be weak, infrequent, and of short duration for most offsite receptors, and have a low likelihood of being categorised as offensive or objectionable. However, inherent uncertainty in this assessment and the presence of the landfill as a background odour source means that for some nearby receptors, the combination of odour from the RRPP and the odour from the landfill (i.e. the cumulative odour effect) could be offensive and/or objectionable odour on occasion, even if the odour from the RRPP were not offensive or objectionable in its own capacity. This is considered to be a conservative assessment representative of the worst-case scenario. The odour will not be noxious or dangerous (assuming that noxious means <i>'harmful, poisonous, or very unpleasant'</i>).</p> <p>Overall, offensive and/or objectionable cumulative odours are unlikely to occur but cannot conclusively be avoided, but there will be no noxious or dangerous effects, I consider that the proposal is partially consistent with this policy.</p>
<p>AIR-P5 Managing certain discharges Manage the effects of discharges to air beyond the boundary of the property of origin from activities that include but are not limited to: (1) outdoor burning of organic material, (2) agricultural and fertiliser spraying, (3) farming activities, (4) activities that produce dust, and (5) industrial and trade activities.</p>	<p>Consistent</p> <p>The construction and operation of the RRPP will produce dust. This will be well managed and is not expected to result in any offsite effects. Taking a conservative approach in assuming that the RRPP is an industrial or trade activity (not fully defined in this RPS), all other discharges to air (odour, and landfill gas during construction) will be managed in accordance with best practice and site-specific management plans and will be appropriately monitored.</p>

<p>AIR-P6 Impacts on mana whenua values Avoid discharges to air that adversely affect mana whenua values by having particular regard to values and areas of significance to mana whenua.</p>	<p>Partially consistent</p> <p>The letter accompanying the written approval from Te Rūnanga o Ōtākou does not discuss air quality or odour. However, the CIA prepared for the Green Island landfill, to which the letter does refer, does identify that discharges to air can adversely affect health and mana whenua values, and may be culturally offensive, particularly when occurring near to Kāi Tahu ki Otago sites of significance. Kaikarae Estuary, Kaikarae Stream, and other associated waterways make up an area which has traditional significance to mana whenua, in particular for cultural activities relating to water.</p> <p>No conditions relating to air quality are put forth by Te Rūnanga o Ōtākou in either the letter for the RRPP or the CIA for the landfill. Discharges of dust will be well controlled and are not expected to have offsite effects. Discharges of odour during the operation of the RRPP will be minimised to the extent practicable. Landfill gas will be monitored during earthworks.</p> <p>Taking all of this information into account, I conclude that the proposal is partially consistent with this policy, because air discharges can in general impact on mana whenua values, the discharge of odour cannot be totally avoided, and the RRPP is near an area that has significant value to mana whenua. On balance, there are no specific conditions, recommendations, or objections raised in the written approval or CIA that relate to air quality or odour, so I surmise that effects on mana whenau values are acceptable.</p>
<p>LF-WAI-O1 – Te Mana o te Wai The mauri of Otago’s water bodies and their health and well-being is protected, and restored where it is degraded, and the management of land and water recognises and reflects that: (1) water is the foundation and source of all life – na te wai ko te hauora o ngā mea katoa, (2) there is an integral kinship relationship between water and Kāi Tahu whānui, and this relationship endures through time, connecting past, present and future,</p>	<p>Consistent</p> <p>These LF-WAI objectives and policies implement the key direction from the NPS-FM.</p> <p>Stormwater discharges will be managed such there not be any change to the form, function, or character of the receiving Kaikorai Stream or the Kaikorai Lagoon Swamp. The mauri of Kaikorai Stream, Lagoon Swamp, and estuary are protected.</p>

<p>(3) each water body has a unique whakapapa and characteristics, (4) water and land have a connectedness that supports and perpetuates life, and (5) Kāi Tahu exercise rakatirataka, manaakitaka and their kaitiakitaka duty of care and attention over wai and all the life it supports.</p>	<p>The proposal is largely aligned with the third priority; however, the health and wellbeing of freshwater bodies and ecosystems have been prioritised in the design of the RRPP facilities, particularly by avoiding all leachate discharges to land and water, and in the management of stormwater. Further, there will be no impacts on the health and wellbeing needs of people.</p>
<p>LF-WAI-P1 – Prioritisation In all management of fresh water in Otago, prioritise: (1) first, the health and well-being of water bodies and freshwater ecosystems, te hauora o te wai and te hauora o te taiao, and the exercise of mana whenua to uphold these, (2) second, the health and well-being needs of people, te hauora o te tangata; interacting with water through ingestion (such as drinking water and consuming harvested resources) and immersive activities (such as harvesting resources and bathing), and (3) third, the ability of people and communities to provide for their social, economic, and cultural wellbeing, now and in the future.</p>	<p>The Applicant involved mana whenua in the application process and has adopted the recommendations of Te Rūnanga o Ōtākou, thereby given practical effect to Kāi Tahu rakatirataka in respect of freshwater.</p> <p>The Applicant recognises the connections between waterbodies, in particular the Kaikorai Stream, Kaikorai Lagoon Swamp, Kaikorai Estuary, and coastal water and the proposal sustains these connections and interactions and maintains water quality and habitat.</p>
<p>LF-WAI-P2 Mana whakahaere Recognise and give practical effect to Kāi Tahu rakatirataka in respect of fresh water by: (1) facilitating partnership with, and the active involvement of, mana whenua in freshwater management and decision-making processes, (2) sustaining the environmental, social, cultural and economic relationships of Kāi Tahu with water bodies, (3) providing for a range of customary uses, including mahika kai, specific to each water body, and (4) incorporating mātauraka into decision making, management and monitoring processes.</p>	<p><i>Note: Section 104(2F) of the RMA only directs that consent authorities must not have regard to clause 1.3(5) or 2.1 of the NPSFM 2020 (which relates to the hierarchy of obligations in the NPSFM 2020). However, it does not otherwise direct that consent authorities must not have regard to provisions of other planning documents, such as regional policy statements, that similarly relate to the hierarchy of obligations. For completeness, LF-WAI-P1 has been given regard to for the purposes of this proposal, but in any case, consideration of this policy, or not, does not have any substantial impact on the recommendation in respect of the proposal.</i></p>
<p>LF-WAI-P3 Integrated management/ki uta ki tai Manage the use of fresh water and land in accordance with tikaka and kawa, using an integrated approach that:</p>	

<p>(1) recognises and sustains the connections and interactions between water bodies (large and small, surface and ground, fresh and coastal, permanently flowing, intermittent and ephemeral),</p> <p>(2) sustains and, wherever possible, restores the connections and interactions between land and water, from the mountains to the sea,</p> <p>(3) sustains and, wherever possible, restores the habitats of mahika kai and indigenous species, including taoka species associated with the water body,</p> <p>(4) manages the effects of the use and development of land to maintain or enhance the health and well-being of fresh water and coastal water,</p> <p>(5) encourages the coordination and sequencing of regional or urban growth to ensure it is sustainable,</p> <p>(6) has regard to foreseeable climate change risks, and</p> <p>(7) has regard to cumulative effects and the need to apply a precautionary approach where there is limited available information or uncertainty about potential adverse effects.</p>	
<p>LF-VM-O5 – Dunedin & Coast FMU vision By 2040 in the Dunedin & Coast FMU:</p> <p>(1) fresh water is managed in accordance with the LF-WAI objectives and policies,</p> <p>(2) the ongoing relationship of Kāi Tahu with wāhi tūpuna is sustained,</p> <p>(3) healthy estuaries, lagoons and coastal waters support thriving mahika kai and downstream coastal ecosystems, and indigenous species can migrate easily and as naturally as possible to and from these areas,</p> <p>(4) there is no further modification of the shape and behaviour of the water bodies and opportunities to restore the natural form and function of water bodies are promoted wherever possible, and</p> <p>(5) discharges of contaminants from urban environments are reduced so that water bodies are safe for human contact.</p>	<p>Consistent</p> <p>The proposal will not impede this vision. Stormwater will be treated and attenuated prior to discharge such that it does not impact upon healthy ecosystems, the shape and behaviour of waterbodies, or mana whenua values. This may represent a small improvement as compared with the current scenario. There will be no discharge of leachate to land or water from the RRPP.</p>
<p>LF-VM-O7 – Integrated management Land and water management apply the ethic of ki uta ki tai and are managed as integrated natural resources, recognising the connections and</p>	<p>Consistent</p> <p>The proposal recognises the connections and interactions of land and water and the coastal environment and, to the extent that it is practicable,</p>

<p>interactions between fresh water, land and the coastal environment, and between surface water, groundwater and coastal water.</p>	<p>manages these in an integrated fashion with the similar activities that occur at the landfill.</p>
<p>LF-FW-O8 Fresh water In Otago's water bodies and their catchments:</p> <ol style="list-style-type: none"> (1) the health of the wai supports the health of the people and thriving mahika kai, (2) water flow is continuous throughout the whole system, (3) the interconnection of fresh water (including groundwater) and coastal waters is recognised, (4) native fish can migrate easily and as naturally as possible and taoka species and their habitats are protected, and (5) the significant and outstanding values of Otago's outstanding water bodies are identified and protected. 	<p>Consistent The proposal will not negatively impact the health of the wai, the health of people, or thriving mahika kai, noting that the Kaikorai Stream and Kaikorai Lagoon Swamp already have poor water quality. The continuous water flow within the catchment will not be impeded by the RRPP activities, nor will the migration of native fish. Habitats and values of the freshwater system will be protected. The significant values of the Kaikorai Lagoon Swamp and estuary have been identified and will be protected.</p>
<p>LF-FW-O9 Natural wetlands Otago's natural wetlands are protected or restored so that:</p> <ol style="list-style-type: none"> (1) mahika kai and other mana whenua values are sustained and enhanced now and for future generations, (2) there is no decrease in the range and diversity of indigenous ecosystem types and habitats in natural wetlands, (3) there is no reduction in their ecosystem health, hydrological functioning, amenity values, extent or water quality, and if degraded they are improved, and (4) their flood attenuation capacity is maintained. 	<p>Consistent The values, ecosystems, functioning, and flood attenuation capacity of the Regionally Significant Kaikorai Lagoon Swamp, including areas of natural inland wetland, will be protected.</p>
<p>LF-FW-O10 Natural character The natural character of wetlands, lakes and rivers and their margins is preserved and protected from inappropriate subdivision, use and development.</p>	<p>Consistent The RRPP is an appropriate development in the area designated as the Green Island Landfill. Natural character of the margins of the Kaikorai Stream and Lagoon will be temporarily adversely impacted during construction but will be preserved and improved over time.</p>
<p>LF-FW-P9 Protecting natural wetlands Protect natural wetlands by:</p> <ol style="list-style-type: none"> (1) avoiding a reduction in their values or extent unless: <ol style="list-style-type: none"> a) the loss of values or extent arises from: 	<p>Consistent The proposal will not result in a reduction in the extent or values of the areas of natural wetland.</p>

<ul style="list-style-type: none"> i. the customary harvest of food or resources undertaken in accordance with tikaka Māori, ii. restoration activities, iii. scientific research, iv. the sustainable harvest of sphagnum moss, v. the construction or maintenance of wetland utility structures, vi. the maintenance of operation of specific infrastructure, or other infrastructure, vii. natural hazard works, or <p>b) the Regional Council is satisfied that:</p> <ul style="list-style-type: none"> i. the activity is necessary for the construction or upgrade of specified infrastructure, ii. the specified infrastructure will provide significant national or regional benefits, iii. there is a functional need for the specified infrastructure in that location, iv. the effects of the activity on indigenous biodiversity are managed by applying either ECO-P3 or ECO-P6 (whichever is applicable), and v. the other effects of the activity (excluding those managed under (1)(b)(iv)) are managed by applying the effects management hierarchy, and <p>(2) not granting resource consents for activities under (1)(b) unless the Regional Council is satisfied that:</p> <ul style="list-style-type: none"> a) the application demonstrates how each step of the effects management hierarchies in (1)(b)(iv) and (1)(b)(v) will be applied to the loss of values or extent of the natural wetland, and b) any consent is granted subject to conditions that apply the effects management hierarchies in (1)(b)(iv) and (1)(b)(v). 	
<p>LF-FW-P13 – Preserving natural character Preserve the natural character of lakes and rivers and their beds and margins by:</p>	<p>Consistent There will be no loss of extent of the Kaikorai Stream nor any loss of indigenous biodiversity values, ecosystem values, hydrological</p>

<p>(1) avoiding the loss of values or extent of a river, unless:</p> <ul style="list-style-type: none"> a) there is a functional need for the activity in that location, and b) the effects of the activity are managed by applying: <ul style="list-style-type: none"> i. for effects on indigenous biodiversity, either ECO-P3 or ECO-P6 (whichever is applicable), and ii. for other effects, the effects management hierarchy, <p>(2) not granting resource consent for activities in (1) unless Otago Regional Council is satisfied that:</p> <ul style="list-style-type: none"> a) the application demonstrates how each step of the effects management hierarchies in (1)(b) will be applied to the loss of values or extent of the river, and b) any consent is granted subject to conditions that apply the effects management hierarchies in (1)(b), <p>(3) establishing environmental flow and level regimes and water quality standards that support the health and well-being of the water body,</p> <p>(4) wherever possible, sustaining the form and function of a water body that reflects its natural behaviours,</p> <p>(5) recognising and implementing the restrictions in Water Conservation Orders,</p> <p>(6) preventing the impounding or control of the level of Lake Wanaka,</p> <p>(7) preventing modification that would reduce the braided character of a river, and</p> <p>(8) controlling the use of water and land that would adversely affect the natural character of the water body.</p>	<p>functioning, or Kāi Tahu values. Experiential aspects of natural character associated with the margins of the Kaikorai Stream will be temporarily adversely affected during construction but will improve and have positive effects over time, including during the consent term. The proposal will not legibly reduce the abiotic or biotic aspects of natural character further on site or within the wider context, particularly in terms of the adjoining waterbodies. While the RRPP has an operational need, rather than a functional need, to be located in the proposed location, the RRPP will avoid any areas of outstanding natural character. Where effects cannot be completely avoided, natural character effects will be minimised by retaining existing screening planting, and also remedied via native succession planting in accordance with a Vegetation Restoration and Management Plan. The form, function, and flow of the Kaikorai Stream will not be impacted to any measurable extent by the stormwater discharges.</p>
<p>LF-FW-P15 – Stormwater and wastewater discharges</p> <p>Minimise the adverse effects of direct and indirect discharges of stormwater and wastewater to fresh water by:</p> <p>(1) except as required by LF-VM-O2 and LF-VM-O4, preferring discharges of wastewater to land over discharges to water, unless adverse effects associated with a discharge to land are greater than a discharge to water, and</p> <p>(2) requiring:</p>	<p>Consistent</p> <p>Stormwater is discharged into a reticulated system local to the landfill, which ultimately discharges into the Kaikorai Stream. Stormwater will be treated and attenuated prior to discharge and will not impede achievement of any water quality standards that may be set for the FMU.</p>

<ul style="list-style-type: none"> a) all sewage, industrial or trade waste to be discharged into a reticulated wastewater system, where one is available, b) all stormwater to be discharged into a reticulated system, where one is available, c) implementation of methods to progressively reduce the frequency and volume of wet weather overflows and minimise the likelihood of dry weather overflows occurring for reticulated stormwater and wastewater systems, d) on-site wastewater systems to be designed and operated in accordance with best practice standards, e) stormwater and wastewater discharges to meet any applicable water quality standards set for FMUs and/or rohe, and f) the use of water sensitive urban design techniques to avoid or mitigate the potential adverse effects of contaminants on receiving water bodies from the subdivision, use or development of land, wherever practicable, and <p>(3) promoting the reticulation of stormwater and wastewater in urban areas.</p>	
<p>LF-LS-O12 – Use of land</p> <p>The use of land in Otago maintains soil quality and contributes to achieving environmental outcomes for fresh water</p>	<p>Consistent</p> <p>The construction earthworks will be managed such that erosion and subsequent sedimentation will be avoided or minimised and will prevent the achievement of any environmental outcomes for freshwater. Maintenance of soil quality at an operating landfill/known contaminated site is of limited importance; regardless, any imported soil or construction fill will be clean fill.</p>
<p>LF-LS-P18 – Soil erosion</p> <p>Minimise soil erosion, and the associated risk of sedimentation in water bodies, resulting from land use activities by:</p> <p>(1) implementing effective management practices to retain topsoil in-situ and minimise the potential for soil to be discharged to water bodies, including by controlling the timing, duration, scale and location of soil exposure,</p>	<p>Consistent</p> <p>The disturbance of a contaminated site by earthworks will be managed in accordance with various management plans, including a specific erosion and sediment control plan. Erosion and sediment controls will be in accordance with Auckland Council’s Erosion and Sediment Control Guide for Land Disturbing Activities in the Auckland Region Guidelines Document 2016/005 (GD05), which is considered industry best practice. The proposal</p>

<p>(2) maintaining vegetative cover on erosion-prone land, and (3) promoting activities that enhance soil retention.</p>	<p>is consistent with the intent of this policy, to minimise erosion and subsequent sedimentation in water bodies, and is consistent with part (1) of this policy. The land is not inherently erosion prone, and ongoing activities will not affect soil retention because the vast majority of the RRPP site will be capped so parts (2) and (3) are not of particular relevance.</p>
<p>LF-LS-P21 – Land use and fresh water Achieve the improvement or maintenance of fresh water quantity or quality to meet environmental outcomes set for Freshwater Management Units and/or rohe by: (1) reducing direct and indirect discharges of contaminants to water from the use and development of land, and (2) managing land uses that may have adverse effects on the flow of water in surface water bodies or the recharge of groundwater</p>	<p>Consistent There will be no discharge of operational RRPP leachate to land or water. Any contaminated construction stormwater will be treated as leachate and not discharged into the environment. Operational-phase stormwater may entrain contaminants as it runs across surfaces, but the proposal includes installation of stormwater treatment devices and all stormwater will be attenuated in ponds and/or constructed wetlands, which will further remove sediment. So the use and development of the land for the RRPP will reduce the direct discharge of contaminants to water. The development of the RRPP will involve diversions of stormwater into ponds/constructed wetland for the purpose of treating and attenuating flows, but this water will ultimately be discharged into Kaikorai Stream and will not adversely impact upon the flow of the stream.</p> <p>For the avoidance of doubt, while the local groundwater flow patterns are strongly influenced by the landfill and existing leachate collection trench and associated pumping, these activities and associated effects are not within the scope of this application. RRPP leachate will be pumped directly to one of three existing pump stations and will not be discharged to land or to water or to the leachate trench.</p>
<p>ECO-O1 – Indigenous biodiversity Otago’s indigenous biodiversity is healthy and thriving and any decline in quality, quantity and diversity is halted.</p>	<p>Consistent There will be no effect on indigenous biodiversity from this proposal.</p>

<p>ECO-O3 – Kaitiakiaka and stewardship</p> <p>Mana whenua are recognised as kaitiaki of Otago’s indigenous biodiversity, and Otago’s communities are recognised as stewards, who are responsible for:</p> <p>(1) te hauora o te koiora (the health of indigenous biodiversity), te hauora o te taoka (the health of species and ecosystems that are taoka), and te hauora o te taiao (the health of the wider environment), while</p> <p>(2) providing for te hauora o te takata (the health of the people).</p>	<p>Consistent</p> <p>Mana whenua are recognised as kaitiaki of Otago’s indigenous biodiversity. Te Rūnanga o Ōtākou have provided feedback on the proposal and these recommendations have been adopted by the Applicant.</p>
<p>ECO-P1 – Kaitiakitaka</p> <p>Recognise the role of Kāi Tahu as kaitiaki of Otago’s indigenous biodiversity by:</p> <p>(1) involving Kāi Tahu in the management of indigenous biodiversity and the identification of indigenous species and ecosystems that are taoka,</p> <p>(2) incorporating the use of mātauraka Māori in the management and monitoring of indigenous biodiversity, and</p> <p>(3) providing for access to and use of indigenous biodiversity by Kāi Tahu, including mahika kai, according to tikaka.</p>	
<p>ECO-P4 – Provision for new activities</p> <p>Maintain Otago’s indigenous biodiversity by following the sequential steps in the effects management hierarchy set out in ECO–P6 when making decisions on plans, applications for resource consent or notices of requirement for the following activities in significant natural areas, or where they may adversely affect indigenous species and ecosystems that are taoka:</p> <p>(1) the development or upgrade of nationally and regionally significant infrastructure that has a functional or operational need to locate within the relevant significant natural area(s) or where they may adversely affect indigenous species or ecosystems that are taoka,</p> <p>(2) the development of papakāika, marae and ancillary facilities associated with customary activities on Māori land,</p> <p>(3) the use of Māori land in a way that will make a significant contribution to enhancing the social, cultural or economic well-being of takata whenua,</p>	<p>Consistent</p> <p>Indigenous biodiversity is maintained because there will be no adverse effects on indigenous biodiversity from this proposal.</p>

<p>(4) activities that are for the purpose of protecting, restoring or enhancing a significant natural area or indigenous species or ecosystems that are taoka, or</p> <p>(5) activities that are for the purpose of addressing a severe and immediate risk to public health or safety.</p>	
<p>ECO-P6 – Maintaining indigenous biodiversity</p> <p>Maintain Otago’s indigenous biodiversity (excluding the coastal environment and areas managed under ECO-P3) by applying the following biodiversity effects management hierarchy in decision-making on applications for resource consent and notices of requirement:</p> <ol style="list-style-type: none"> (1) avoid adverse effects as the first priority, (2) where adverse effects demonstrably cannot be completely avoided, they are remedied, (3) where adverse effects demonstrably cannot be completely avoided or remedied, they are mitigated, (4) where there are residual adverse effects after avoidance, remediation, and mitigation, then the residual adverse effects are offset in accordance with APP3, and (5) if biodiversity offsetting of residual adverse effects is not possible, then: <ol style="list-style-type: none"> a) the residual adverse effects are compensated for in accordance with APP4, and b) if the residual adverse effects cannot be compensated for in accordance with APP4, the activity is avoided. 	
<p>HAZ-CL-O3 – Contaminated land</p> <p>Contaminated land and waste materials are managed to protect human health, mana whenua values and the environment in Otago</p>	<p>Consistent</p> <p>The disturbance of a contaminated site will be undertaken in accordance with several management plans that adopt best industry practice for the management of potential adverse effects, including on human health, mana whenua values, and the environment.</p>
<p>HAZ-CL-P14 – Managing contaminated land</p>	<p>Consistent</p>

<p>Actively manage contaminated or potentially contaminated land so that it does not pose an unacceptable risk to people and the environment, by:</p> <ol style="list-style-type: none"> (1) assessing and monitoring contaminant levels and environmental risks, (2) protecting human health in accordance with regulatory requirements, (3) avoiding, as the first priority, and only where avoidance is not practicable, mitigating or remediating, adverse effects of the contaminants on the environment, and (4) requiring closed landfills to be managed in accordance with a closure plan that sets out monitoring requirements and, where necessary, any remedial actions required to address ongoing risks 	<p>During the construction phase, contaminated land will be managed such that it doesn't pose unacceptable risk to people or the environment. Contamination at the RRPP is generally well understood, and there is provision for discovery of unexpected contaminants within the management plans. Erosion of soils by water and wind will be managed such that dust generation and sedimentation are avoided where practicable, and otherwise mitigated.</p>
<p>HAZ-CL-P16 Waste minimisation responses</p> <p>Apply the principles of the waste management hierarchy (reduce, reuse, recycle, recover, residual waste management) to the management of all waste streams.</p>	<p>Consistent</p> <p>The RRPP is being developed as part of an improved and comprehensive waste management and diverted material system for Dunedin, which aligns with the Applicant's responsibility under the Waste Minimisation Act 2008 <i>'to promote effective and efficient waste management and minimisation within its district.'</i></p>
<p>HAZ-CL-P17 – Disposal of waste materials</p> <p>Provide for the development and operation of facilities and services for the storage, recycling, recovery and treatment of waste materials but only for the disposal of waste materials if those materials cannot be recycled, recovered or treated for re-use.</p>	<p>Consistent</p> <p>The RRPP will function as a waste transfer station for any waste that cannot be recycled, recovered, or treated for reuse.</p>
<p>HAZ-CL-P18 – Waste facilities and services</p> <p>When providing for the development of facilities and services for the storage, recycling, recovery, treatment and disposal of waste materials:</p> <ol style="list-style-type: none"> (1) avoid adverse effects on the health and safety of people, (2) minimise the potential for adverse effects on the environment to occur, (3) minimise risk associated with natural hazard events, and (4) restrict the establishment of activities that may result in reverse sensitivity effects near waste management facilities and services. 	<p>Consistent</p> <p>The RRPP is a new facility that will provide for the storage, recycling, recovery, treatment, and disposal of waste materials in a way that avoids adverse effects on the health and safety of people and minimises adverse effects on the environment. The site is not located within any natural hazard area identified by ORC or DCC. While the RRPP will be located in relatively close proximity to residential dwellings, reverse sensitivity issues are expected to be minimal because of the existing (and ongoing) operation of the landfill at the same location (i.e. the presence of a pre-existing long-duration odour source) and because of the design of the facilities, in particular the choice of the open-air static pile system for the</p>

	OPF, which is more effective at managing odour than composting within an enclosed building, as well as the design of the BWTS and built in measures to mitigate dust and odour.
Regional Plan: Water for Otago (RPW)	
Objective 5.3.2 To maintain or enhance the spiritual and cultural beliefs, values and uses of significance to Kāi Tahu, identified in Schedule 1D, as these relate to Otago's lakes and rivers.	Consistent Kaikorai Stream is identified in Schedule 1D as providing for a wide range of Kāi Tahu values. Te Rūnanga o Ōtākou have provided feedback on the proposal and these recommendations have been adopted by the Applicant. Te Rūnanga o Ōtākou also provided a written approval to the application. Based on this, I consider that spiritual and cultural beliefs, values and uses of significance to Kāi Tahu will be maintained.
Objective 5.3.3 To protect the natural character of Otago's lakes and rivers and their margins from inappropriate subdivision, use or development.	Consistent The RRPP is an appropriate development in the area designated as the Green Island Landfill. Natural character of the margins of the Kaikorai Stream and Lagoon will be temporarily adversely impacted during construction but will be preserved and improved over time.
Policy 5.4.1 To identify the following natural and human use values supported by Otago's lakes and rivers, as expressed in Schedule 1: (a) Outstanding natural features and landscapes; (b) Areas with a high degree of naturalness; (c) Areas of significant indigenous vegetation, significant habitats of indigenous fauna, and significant habitats of trout and salmon; (d) Ecosystem values; (e) Water supply values; (f) Registered historic places; and (g) Spiritual and cultural beliefs, values and uses of significance to Kāi Tahu.	Consistent The margins of the Kaikorai Stream and Lagoon border the site to the north and west, and these are identified as a Regionally Significant Wetland in the RPW and an Area of Significant Biodiversity Value in the 2GP. The wetland areas comprise areas of significant indigenous vegetation and significant habitats of indigenous fauna. The Kaikorai Stream, Lagoon Swamp, and Estuary hold important mana whenua values.
Policy 5.4.2 In the management of any activity involving surface water, groundwater or the bed or margin of any lake or river, to give priority to avoiding, in preference to remedying or mitigating:	Consistent As identified for 5.4.1 above, the margins of Kaikorai Stream and the wetland areas have important values. The RRPP itself does not overlap with these areas, and the discharge of stormwater will not adversely affect

<p>(1) Adverse effects on:</p> <ul style="list-style-type: none"> a) Natural values identified in Schedule 1A; b) Water supply values identified in Schedule 1B; c) Registered historic places identified in Schedule 1C, or archaeological sites in, on, under or over the bed or margin of a lake or river; d) Spiritual and cultural beliefs, values and uses of significance to Kāi Tahu identified in Schedule 1D; e) The natural character of any lake or river, or its margins; f) Amenity values supported by any water body; and <p>(2) Causing or exacerbating flooding, erosion, land instability, sedimentation or property damage.</p>	<p>ecological values or habitat because the stormwater will be treated prior to discharge and flows attenuated in ponds and constructed wetlands. There will be no discharge of leachate from the RRPP to land or water. The RRPP will avoid any areas of outstanding natural character or landscape. Changes to natural character are very limited due to separation from riparian margins, management of contaminants, and the fact that activities will occur in the context of an established landfill. Experiential aspects of natural character of the margins of the Kaikorai Stream and Lagoon will be temporarily adversely impacted during construction but will be preserved and improved over time. Where natural character effects cannot be completely avoided, they will be minimised by retaining existing screening planting, and also remedied via native succession planting in accordance with a Vegetation Restoration and Management Plan. The development and operation of the RRPP will not cause or exacerbate flooding, erosion, land instability, sedimentation, or property damage.</p>
<p>Policy 5.4.2A</p> <p>The loss of river extent and values is avoided, unless the council is satisfied:</p> <ul style="list-style-type: none"> (a) That there is a functional need for the activity in that location; and (b) The effects of the activity are managed by applying the effects management hierarchy. 	<p>Consistent</p> <p>There will be no loss of extent of the Kaikorai Stream nor any loss of indigenous biodiversity values, ecosystem values, hydrological functioning, or Kāi Tahu values. Natural character values associated with the margins of the Kaikorai Stream will be temporarily adversely affected during construction but will improve and have positive effects over time, including during the consent term. While the RRPP has an operational need, rather than a functional need, to be located in the proposed location, the RRPP will avoid any areas of outstanding natural character. Where effects cannot be completely avoided, experiential natural character effects will be minimised by retaining existing screening planting, and also remedied via native succession planting in accordance with a Vegetation Restoration and Management Plan. Experiential natural character will be improved over time. The form, function, and flow of the Kaikorai Stream will not be impacted to any measurable extent by the stormwater discharges.</p>
<p>Policy 5.4.3</p>	<p>Consistent</p>

<p>In the management of any activity involving surface water, groundwater or the bed or margin of any lake or river, to give priority to avoiding adverse effects on:</p> <p>(a) Existing lawful uses; and</p> <p>(b) Existing lawful priorities for the use, of lakes and rivers and their margins.</p>	<p>The stormwater discharge through the margins of Kaikorai Stream will not have adverse effects on any other lawful use of the Kaikorai Stream.</p>
<p>Policy 5.4.4</p> <p>To recognise Kāi Tahu's interests in Otago's lakes and rivers by promoting opportunities for their involvement in resource consent processing.</p>	<p>Consistent</p> <p>The Applicant undertook engagement with Kāi Tahu and has adopted the conditions and recommendations put forth by Te Rūnanga o Ōtākou who have also provided written approval to the application.</p>
<p>Policy 5.4.8</p> <p>To have particular regard to the following features of lakes and rivers, and their margins, when considering adverse effects on their natural character:</p> <p>(a) The topography, including the setting and bed form of the lake or river;</p> <p>(b) The natural flow characteristics of the river;</p> <p>(c) The natural water level of the lake and its fluctuation;</p> <p>(d) The natural water colour and clarity in the lake or river;</p> <p>(e) The ecology of the lake or river and its margins; and</p> <p>(f) The extent of use or development within the catchment, including the extent to which that use and development has influenced matters (a) to (e) above.</p>	<p>Consistent</p> <p>The Landscape Assessment provided by the Applicant had regard to these biotic and abiotic systems when considering effects on natural character. The assessment found that the proposal will not legibly reduce the abiotic or biotic aspects of natural character further on site or within the wider context, particularly in terms of the adjoining waterbodies.</p>
<p>Objective 7.A.1</p> <p>To maintain water quality in Otago lakes, rivers, wetlands, and groundwater, but enhance water quality where it is degraded.</p>	<p>Consistent</p> <p>The discharge of stormwater to the Kaikorai Stream and ultimately the Kaikorai Lagoon Swamp will maintain water quality and support natural, human use, and cultural values in the receiving waters, and may contribute to enhancing the water quality due to installation of new stormwater treatment measures, noting that the contribution of stormwater from the RRPP is small in comparison to the size of the catchment.</p>
<p>Objective 7.A.2</p> <p>To enable the discharge of water or contaminants to water or land, in a way that maintains water quality and supports natural and human use values, including Kāi Tahu values.</p>	
<p>Objective 7.A.3</p> <p>To have individuals and communities manage their discharges to reduce adverse effects, including cumulative effects, on water quality.</p>	
<p>Policy 7.B.1</p>	<p>Consistent</p>

<p>Manage the quality of water in Otago lakes, rivers, wetlands and groundwater by:</p> <p>(a) Describing, in Table 15.1 of Schedule 15, characteristics indicative of Good Quality Water; and</p> <p>(b) Setting, in Table 15.2 of Schedule 15, receiving water numerical limits and targets for achieving Good Quality Water; and</p> <p>(c) Maintaining, from the dates specified in Schedule 15, Good Quality Water; and</p> <p>(d) Enhancing water quality where it does not meet Schedule 15 limits, to meet those limits by the date specified in the Schedule; and</p> <p>(e) Recognising the differences in the effects and management of point and non-point source discharges; and</p> <p>(f) Recognising discharge effects on groundwater; and</p> <p>(g) Promoting the discharge of contaminants to land in preference to water.</p>	<p>'Kaikorai' (presumably, Kaikorai Stream) is listed in Receiving Water Group 1 of Schedule 15. The application provides a description of the receiving water quality with reference to various national guidelines, but no reference to Schedule 15 is made. In her audit on behalf of ORC, Dr Conwell stated that if the proposed stormwater treatment process is maintained and performs to intended operational design, stormwater discharging from the RRPP will not result in any change to receiving water quality, and that the effects of the RRPP are unlikely to be discernible above the effects contributed by other activities in the catchment. On this basis, I consider that the proposal is consistent with this policy, because maintenance of water quality in Kaikorai Stream will not be adversely impacted by the RRPP stormwater discharge, and in the situation where the Schedule 15 limits are not met for the stream, the stormwater treatment processes will contribute to the enhancement of water quality in the stream, to an extent that aligns with the small scale of the discharge.</p> <p>For avoidance of doubt, this assessment is made taking into account only the stormwater attributable to the RRPP, including the new treatment measures that will be applied to the RRPP stormwater. It is not an assessment that takes into account the quality of stormwater derived from the wider landfill, nor does it take into account any other water quality effects on Kaikorai Stream that may be attributable to the landfill activities.</p>
<p>Policy 7.B.3 Allow discharges of water or contaminants to Otago lakes, rivers, wetlands and groundwater that have minor effects or that are short-term discharges with short-term adverse effects.</p>	<p>Consistent The discharge of stormwater will have less than minor adverse effects.</p>
<p>Policy 7.B.4 When considering any discharge of water or contaminants to land, have regard to:</p> <p>(a) The ability of the land to assimilate the water or contaminants; and</p> <p>(b) Any potential soil contamination; and</p>	<p>Consistent The potential adverse effects on water quality associated with the stormwater discharge will be less than minor. There will be no adverse effects on the coastal marine area for contact recreation or seafood gathering.</p>

<p>(c) Any potential land instability; and (d) Any potential adverse effects on water quality; and (e) Any potential adverse effects on use of any proximate coastal marine area for contact recreation and seafood gathering.</p>	
<p>Policy 7.B.7 Encourage land management practices that reduce the adverse effects of water or contaminants discharged into water.</p>	<p>Consistent Construction activities will be managed such that dirty water (any water that runs across the active works area) will be treated as leachate and not discharged into the environment. Clean water (stormwater that doesn't enter the works area) will be diverted into the attenuation ponds/constructed wetland. During operation of the RRPP, additional stormwater treatment measures will be installed. These measures will reduce the adverse effects associated with the stormwater discharge.</p>
<p>Policy 7.C.5 Avoid significant adverse environmental effects and minimise other adverse effects on water bodies, with respect to discharges from any new stormwater reticulation system, or any extension to an existing stormwater reticulation system, by requiring: (a) The separation of sewage and stormwater; and (b) Measures to prevent contamination of the receiving environment by industrial or trade waste; and (c) The use of appropriate techniques to trap debris, sediments and nutrients present in runoff; and (d) Consideration of appropriate measures to reduce and/or attenuate stormwater being discharged from rain events; and (e) Consideration of appropriate measures for discharging to land, in preference to discharging directly to water, to address adverse effects on Kāi Tahu cultural and spiritual beliefs, values and uses.</p>	<p>Consistent Stormwater will be treated on land via a new system of sumps, filters, underground pipes, and open grass swales, followed by attenuation in sediment retention ponds and/or a constructed wetland prior to discharge into Kaikorai Stream. Significant adverse effects will be avoided, and other adverse effects will be minimised.</p>
<p>Policy 7.C.6 Reduce the adverse environmental effects from existing stormwater reticulation systems by: (a) Requiring the implementation of appropriate measures to progressively reduce sewage entering the stormwater reticulation system; and</p>	<p>Consistent This policy is relevant because the stormwater reticulation system will incorporate elements of an existing system, being the retention/attenuation ponds and the constructed wetland. Once collected, by the new stormwater infrastructure, stormwater will be piped to either</p>

<p>(b) Requiring consideration of appropriate measures to progressively improve the quality of water discharged from existing stormwater reticulation systems, including:</p> <ul style="list-style-type: none"> i. Measures to prevent contamination of the receiving environment by industrial or trade waste; and ii. The use of techniques to trap debris, sediments and nutrients present in runoff; and iii. Measures to reduce and/or attenuate stormwater being discharged from rain events; and iv. Measures for discharging to land, in preference to discharging directly to water, to address adverse effects on Kāi Tahu cultural and spiritual beliefs, values and uses. 	<p>the existing landfill Northern Leachate Pond or Eastern Sedimentation Pond for further retention and removal of sediments. These existing elements will operate in conjunction with the new system of sumps and filters.</p>
<p>Objective 8.3.1 To maintain:</p> <ul style="list-style-type: none"> (a) The stability and function of existing structures located in, on, under or over the bed or margin of any lake or river; (b) The stability of the bed and bank of any lake or river; and (c) The flood and sediment carrying capacity of any lake or river. 	<p>Consistent</p> <p>The discharge of stormwater to Kaikorai Stream will not affect the flood and sediment carrying capacity of the stream, nor will it have any effect on any existing structure, or the stability of the bed and bank of the stream.</p>
<p>Policy 8.4.1 When managing activities in, on, under or over the bed or margin of any lake or river, to give priority to avoiding changes in the nature of flow and sediment processes in those water bodies, where those changes will cause adverse effects:</p> <ul style="list-style-type: none"> (a) On the stability and function of existing structures located in, on, under or over the bed or margin of any lake or river; (b) Arising from associated erosion or sedimentation of the bed or margin of any lake or river, or land instability; or (c) Arising from any reduction in the flood carrying capacity of any lake or river 	
<p>Objective 9.3.3 To maintain the quality of Otago's groundwater.</p>	<p>Consistent</p> <p>There will be no adverse effects on groundwater quality from the construction or operation of the RRPP.</p>
<p>Objective 10.3.1</p>	<p>Consistent</p>

<p>Otago's wetlands and their individual and collective values and uses will be maintained or enhanced for present and future generations.</p>	<p>The margins of the Kaikorai Stream and Lagoon border the site to the north and west, and these are identified as a Regionally Significant Wetland in the RPW and natural inland wetland. The wetland areas comprise areas of significant indigenous vegetation and significant habitats of indigenous fauna. The values and uses of the wetland areas will be maintained.</p>
<p>Objective 10.3.2 Otago's Regionally Significant Wetlands and their values and uses are recognised and sustained.</p>	
<p>Policy 10.4.1 Otago's regionally significant wetland values are: A1 Habitat for nationally or internationally rare or threatened species or communities; A2 Critical habitat for the life cycles of indigenous fauna which are dependent on wetlands; A3 High diversity of wetland habitat types; A4 High degree of wetland naturalness; A5 Wetland scarce in Otago in terms of its ecological or physical character; A6 Wetland which is highly valued by Kāi Tahu for cultural and spiritual beliefs, values and uses, including waahi taoka and mahika kai; A7 High diversity of indigenous wetland flora and fauna; A8 Regionally significant wetland habitat for waterfowl; and A9 Significant hydrological values including maintaining water quality or low flows, or reducing flood flows.</p>	<p>Consistent Kaikorai Lagoon Swamp is listed in Schedule 9 as a Regionally Significant Wetland. ORC holds information that shows Kaikorai Lagoon swamp supports the following values: A1, A2, A4, A5, A6. Of these values, none will be adversely affected, with possible exception of A4 (high degree of wetland naturalness). The natural character assessment provided with the application found that the proposed development of the RRPP site will not legibly reduce the abiotic or biotic aspects of natural character further on site or within the wider context, particularly in terms of the adjoining waterbodies, but noted that effects on experiential aspects of natural character may be temporarily adverse (minor) during construction. On balance, natural character effects are assessed as very low with positive effects over time following implementation of the VMRP. Any adverse natural character effects that cannot strictly be avoided will be mitigated and remediated by the retention of existing screening planting during construction and implementation of the VRMP thereafter. This is appropriate because the RRPP will be partially incorporated into a lawfully established activity (the landfill), and the RRPP itself would be regionally significant infrastructure with operational constraints that mean it is most efficient to locate the RRPP at the landfill site.</p>
<p>Policy 10.4.1A A Regionally Significant Wetland is any wetland that is: (a) Listed in Schedule 9 and mapped in maps F1-F63; or (b) Within a wetland management area listed in Schedule 9 and mapped in maps F1-F63; or (c) Higher than 800 metres above sea level.</p>	
<p>Policy 10.4.2 Avoid the adverse effects of an activity on a Regionally Significant Wetland or a regionally significant wetland value, but allow remediation or mitigation of an adverse effect only when the activity: (a) Is lawfully established; or</p>	

<p>(b) Is nationally or regionally significant infrastructure, and has specific locational constraints; or</p> <p>(c) Has the purpose of maintaining or enhancing a Regionally Significant Wetland or a regionally significant wetland value.</p>	
<p>Policy 10.4.8 The loss of natural inland wetlands is avoided, their values are protected, and their restoration is promoted, except where:</p> <p>(a) The loss of extent or values arises from any of the following:</p> <ul style="list-style-type: none"> i. The customary harvest of food or resources undertaken in accordance with tikanga Maori ii. Restoration activities iii. Scientific research iv. The sustainable harvest of sphagnum moss v. The construction or maintenance of wetland utility structures (as defined in the Resource Management (National Environmental Standards for Freshwater) Regulations 2020 vi. The maintenance or operation of specified infrastructure, or other infrastructure (as defined in the Resource Management (National Environmental Standards for Freshwater) Regulations 2020 vii. Natural hazard works (as defined in the Resource Management (National Environmental Standards for Freshwater) Regulations 2020; or <p>(b) The regional council is satisfied that:</p> <ul style="list-style-type: none"> i. The activity is necessary for the construction or upgrade of specified infrastructure; and ii. The specified infrastructure will provide significant national or regional benefits; and iii. There is a functional need for the specified infrastructure in that location; and iv. The effects of the activity are managed through applying the effects management hierarchy. 	<p>Consistent</p> <p>The margins of Kaikorai Stream include areas of natural inland wetland as defined in the NPS-FM. There will be no loss of wetland extent as a result of the RRPP. The values of the natural inland wetland will be protected.</p>

Regional Plan: Waste for Otago (RPWaste)	
Objective 3.3.1 To ensure that the quality of Otago's natural and physical resources is not degraded by wastes.	<p>Consistent</p> <p>The RRPP is being developed as part of an improved and comprehensive waste management and diverted material system for Dunedin, which aligns with the Applicant's responsibility under the Waste Minimisation Act 2008 '<i>to promote effective and efficient waste management and minimisation within its district</i>'. It will provide for the storage, recycling, recovery, treatment, and disposal of waste materials. The RRPP will function as a waste transfer station for any waste that cannot be recycled, recovered, or treated for reuse and will include a purpose-built composting facility for organic waste. These functions will be carried out in a holistic way that ensures that Otago's natural and physical resources aren't degraded by waste and the mauri of resources is protected. Kāi Tahu values have been taken into account by the Applicant via consultation, and recommendations have been adopted.</p>
Objective 3.3.2 To protect the mauri of Otago's natural and physical resources and restore the mauri of waste-affected resources.	
Objective 3.3.3 To ensure waste management practices are compatible with Kāi Tahu values.	
Objective 3.3.4 To adopt a holistic approach to waste management which integrates Kāi Tahu cultural concepts.	
Objective 4.3.1 To minimise the amount of waste generated at source in Otago.	
Objective 4.3.2 To maximise the opportunities for the reuse, recycling and recovery of materials from the waste stream.	
Policy 4.4.1 To recognise and provide for the relationship Kāi Tahu have with natural and physical resources by: <ul style="list-style-type: none"> (a) Acknowledging that future generations will inherit the results of good and bad waste management practices; (b) Providing for the management of Otago's waste stream in a manner that takes into account Kāi Tahu cultural values; and (c) Maintaining consultation with Kāi Tahu on issues relating to waste minimisation. 	
Policy 4.4.2 To encourage, support and facilitate integrated waste management by (in order of priority): <ul style="list-style-type: none"> (a) Minimising the effects on the environment by reducing the quantity and/or toxicity of material entering the waste stream; (b) Reusing materials; (c) Recycling materials, where practicable, that cannot be reused; (d) Recovering resources from materials in the waste stream; and (e) Disposing of the residual waste in an environmentally safe manner. 	
Policy 4.4.4 To encourage the composting of appropriate organic waste material.	

<p>Objective 5.3.1 To avoid, remedy or mitigate any adverse effects of contaminated sites.</p>	<p>Consistent</p> <p>The RRPP site and the wider landfill site where waste has been placed is contaminated. Earthworks during the construction of the RRPP will disturb contaminated soils. Contaminated soils and any underlying waste material will be well managed in accordance with management plans that reflect best industry practice, including the MfE Contaminated Land Management Guidelines, which have superseded the ANZECC guidelines referenced in this RPWaste. The discharge of any contaminants to air during the earthworks will be similarly managed. Any imported soil or fill material will be clean fill.</p> <p>Adverse effects relating to contaminated land will be avoided or mitigated. There is no proposal to remediate the RRPP site because this application relates only to the construction and operation of the RRPP. Any proposed remediation of the wider landfill site will be addressed in the landfill closure application RM23.185.</p>
<p>Policy 5.4.1 To recognise and provide for the relationship Kāi Tahu have with Otago’s natural and physical resources through:</p> <p>(a) Carrying out investigations of, and works to remedy and mitigate, contaminated sites in a manner which takes into account Kāi Tahu cultural values;</p> <p>(b) Protecting waahi tapu and waahi taoka, and access to them by Kāi Tahu, from the effects of contamination;</p> <p>(c) Acknowledging that future generations will inherit the results of work carried out to remedy or mitigate contaminated sites; and</p> <p>(d) Maintaining consultation with Kāi Tahu on issues relating to site contamination.</p>	
<p>Policy 5.4.3 To contain contaminated sites and rehabilitate them to the extent that is practicable having regard to the use to which the land is to be put.</p>	
<p>Policy 5.4.4 To apply the Australia and New Zealand Conservation Council (ANZECC) “Guidelines for the Assessment and Management of Contaminated Sites” (January 1992) as a guide to determine the most appropriate course of action for a particular contaminated site.</p>	
<p>Objective 6.3.1 To avoid, remedy and mitigate the risk to the environment and human health from hazardous substances and hazardous wastes.</p>	<p>Consistent</p> <p>Hazardous substances will be used in small quantities during construction for the refuelling of plant and equipment. These will be well managed in accordance with construction management plans such that there are no discharges to the environment and therefore no harm to human health or the environment, including Kāi Tahu values. The RRPP will include a hazardous waste drop off and storage building, separated into two areas – one for the public to drop off hazardous wastes, and one for sorting and storage of such wastes. The hazardous waste drop off and storage building will incorporate various storage systems and to handle different types of hazardous materials and will include appropriate passive ventilation and an engineered subfloor design to prevent landfill gasses from entering the</p>
<p>Objective 6.3.2 To avoid, remedy and mitigate the harmful effects of hazardous substances and hazardous wastes on traditional water, land and mahika kai values of importance to Kāi Tahu.</p>	
<p>Policy 6.4.1 To promote the safe transportation, and the use, treatment, storage and disposal of hazardous substances and hazardous wastes in such a manner that avoids adverse environmental effects.</p>	
<p>Policy 6.4.12 To recognise and provide for the relationship Kāi Tahu have with Otago’s natural and physical resources through:</p>	

<p>(a) Providing for the management and disposal of Otago’s hazardous substances and hazardous wastes in a manner which takes into account Kāi Tahu cultural values; and</p> <p>(b) Supporting hazardous waste disposal methods which avoid, remedy or mitigate adverse effects on the environment and the mauri of its natural and physical resources; and</p> <p>(c) Protecting waahi tapu and waahi taoka from hazardous waste management practices; and</p> <p>(d) Ensuring that Kāi Tahu access to waahi tapu and waahi taoka is not compromised by waste management practices; and</p> <p>(e) Acknowledging that future generations will inherit the results of good and bad waste management practices; and</p> <p>(f) Maintaining consultation with Kāi Tahu on issues relating to hazardous substances and hazardous waste management.</p>	<p>building, thereby ensuring the health of people. The building design and operational practices will also prevent the discharge of hazardous substances into the environment.</p>
<p>Objective 7.3.3 To avoid, remedy or mitigate the adverse effects of discharges from composting and silage production.</p> <p>Policy 7.4.1 To recognise and provide for the relationship Kāi Tahu have with Otago’s natural and physical resources through:</p> <p>(a) Providing for the management and disposal of Otago’s wastes in a manner that takes into account Kāi Tahu cultural values; and</p> <p>(b) Supporting waste disposal methods which avoid, remedy or mitigate adverse effects on the environment and the mauri of its natural and physical resources; and</p> <p>(c) Protecting waahi tapu and waahi taoka from waste management practices; and</p> <p>(d) Ensuring that Kāi Tahu access to waahi tapu and waahi taoka is not compromised by waste management practices; and</p> <p>(e) Acknowledging that future generations will inherit the results of good and bad waste management practices; and</p> <p>(f) Maintaining consultation with Kāi Tahu on issues relating to landfill management.</p>	<p>Consistent</p> <p>The adverse effects of the proposed composting operation are limited to effects on air quality, specifically relating to odour. Measures to avoid, mitigate, and remedy adverse odour effects are largely built into the design and management of the OPF, and these include suitable feedstock, automated reversing aeration, use of a biofilter, minimum lengths of time for each stage of composting supported by an acceptable Solvita test, and restrictions on when movements of material can occur, and these are reflected in consent conditions. Regardless, residual adverse odour effects are anticipated for some sensitive receptors, noting that this assessment is considered conservative and likely to reflect the worst-case scenario for cumulative odour impacts of the RRPP (which includes sources of odour other than composting) and the landfill. Contingency measures for odour will be detailed in a composting management plan, and odour monitoring will be undertaken. The recommended conditions of consent will ensure that the mitigation and contingency measures are implemented and monitored appropriately.</p>

<p>Policy 7.4.3 To ensure that landfills and discharges from silage production and composting operations are sited at locations and managed in a manner whereby adverse effects on the environment are avoided, remedied, or mitigated.</p>	<p>There are operational, practical, and economic reasons for locating the RRPP, including the composting operation, at the proposed site. The location enables use of some existing landfill infrastructure and enables discharges of leachate to land or water from the composting operation (and the whole RRPP) to be avoided.</p> <p>While the RRPP is not an alternative to a landfill, it will facilitate waste minimisation practices.</p>
<p>Policy 7.4.4 To monitor discharges to land, water, and air from new, operating and closed landfills, and from silage production and composting.</p>	
<p>Policy 7.4.8 To promote alternatives to landfills as a means of waste disposal.</p>	
<p>Regional Plan: Air for Otago (RPA)</p>	
<p>Objective 6.1.2 To avoid adverse localised effects of contaminant discharges into air on:</p> <ul style="list-style-type: none"> (a) Human health; (b) Cultural, heritage and amenity values; (c) Ecosystems and the plants and animals within them; and (d) The life-supporting capacity of air. 	<p>Partially Consistent</p> <p>The relevant discharges are of contaminants to air from RRPP activities that are not otherwise captured by the RPWaste. These include discharges of dust and odour from the MRF, BWTS, and other buildings. Odour emissions may occur from the MRF and BWTS buildings via open doors and mechanical ventilation.</p> <p>Adverse effects will be avoided to the extent practicable through building design and operational management. Dust effects at sensitive receptors are expected to be less than minor i.e. offsite dust effects are almost completely avoided. The PDP Air Quality Report sets out odour control measures that will be implemented during typical MRF and BWTS operations as well as specific measures for highly odorous loads. These include waste acceptance criteria, staff odour training, collection of washdown waste into leachate collection pipes, setting of maximum residence times for putrescible wastes, and installation of a misting system for odour and dust suppression within the MRF and BWTS buildings, and these are generally expected to be effective at preventing (avoiding) odour. Despite this, the RRPP is expected to have a small contribution to offsite odour effects, with ambient air quality and amenity unlikely to be affected for most receptors. However, for some nearby receptors (the parties identified as affected in the s95 Report), the combination of odour from the RRPP and the odour from the landfill (i.e. the cumulative odour effect) may</p>

	<p>cause a reduction in amenity values. This assessment is considered conservative and likely to reflect the worst-case scenario for odour. The discharge of odour is not expected to reduce air quality to the extent that it has any negative impact on human health or on the life-supporting capacity of air or any ecosystems and the plants and animals within them. Amenity and potentially cultural values (noting that no recommendations were made in the CIA or approval letter) may be affected to small degree. In my opinion, the proposal is partially consistent with this objective.</p> <p>It is not clear to me how this objective, when considered in isolation, would enable any discharge to air activity in Otago to have any adverse effects. The note under this objective in the RPA states that “<i>this objective is implemented by all the policies in this plan.</i>” However, policies written to give effect to this objective do not require that all adverse effects be avoided.</p>
<p>Objective 6.1.3 To allow for the sustainable use of Otago’s air resource.</p>	<p>Consistent</p> <p>On balance, the effects of the proposal, including the discharge of dust and odour to air, are considered to be acceptable. On this basis I consider that the air resource is used sustainably.</p>
<p>Policy 7.1.1 To recognise and provide for the relationship Kāi Tahu have with the air resource through procedures that enable Kāi Tahu to participate in management of the air resource.</p>	<p>Consistent</p> <p>The Applicant undertook engagement with Kāi Tahu and has adopted the conditions and recommendations put forth by Te Rūnanga o Ōtākou.</p>
<p>Policy 8.1.1 To have regard to the Otago Goal Levels identified in Schedule 1 and comply with the Resource Management (National Environmental Standards Relating to Certain Air Pollutants, Dioxins and Other Toxics) Regulations 2004 in managing the region’s ambient air resource.</p>	<p>Consistent</p> <p>The application did not include an assessment against the Otago Goal Levels or the NES-AQ. The Goal Levels set a goal concentration for particular contaminants in areas of Otago where air quality may be degraded. The only contaminant of relevance to this application is PM₁₀. The PM₁₀ concentration for the Goal Level is 35 µg/m³ and the NES-AQ threshold is 50 µg/m³.</p> <p>Dust generated from the construction and operation of the RRPP is not expected to be discharged beyond the site boundary; therefore, the</p>

	<p>proposal will not contribute to any increase in PM₁₀ concentrations beyond the site boundary, and the granting of consent is not precluded by this NES-AQ.</p>
<p>Policy 8.2.3 In the consideration of any application to discharge contaminants into air, Council will have:</p> <p>(a) Particular regard to avoiding adverse effects including cumulative effects on:</p> <ul style="list-style-type: none"> i. Values of significance to Kāi Tahu; ii. The health and functioning of ecosystems, plants and animals; iii. Cultural, heritage and amenity values; iv. Human health; and v. Ambient air quality of any airshed; and <p>(b) Regard to any existing discharge from the site, into air, and its effects.</p>	<p>Consistent</p> <p>The assessment against Objective 6.1.2 describes the extent to which adverse effects can be avoided. Particular regard has been had at the design stage of the RRPP to avoiding adverse effects relating to air discharges on human health and the environment. The residual adverse odour effects are considered cumulatively with all aspects of the RRPP and the wider landfill. The RRPP activities will not reduce ambient air quality within the airshed.</p>
<p>Policy 8.2.8 To avoid discharges to air being noxious, dangerous, offensive or objectionable on the surrounding local environment.</p>	<p>Partially Consistent</p> <p>Subject to the proposed mitigations measures being implemented and being as effective as expected, odours attributable to the RRPP are likely to be weak, infrequent, and of short duration for most offsite receptors, and have a low likelihood of being categorised as offensive or objectionable. However, inherent uncertainty in this assessment and the presence of the landfill as a background odour source means that for some nearby receptors, the combination of odour from the RRPP and the odour from the landfill (i.e. the cumulative odour effect) could be offensive and/or objectionable odour on occasion, even if the odour from the RRPP was not offensive or objectionable in its own capacity. This is considered to be a conservative assessment representative of the worst-case scenario. The odour will not be noxious or dangerous (assuming that noxious means <i>'harmful, poisonous, or very unpleasant'</i>).</p> <p>Overall, offensive and/or objectionable cumulative odours are unlikely to occur but cannot conclusively be avoided, but there will be no noxious or dangerous effects, I consider that the proposal is partially consistent with this policy.</p>

<p>Policy 10.1.1 The Otago Regional Council will encourage:</p> <p>(a) People undertaking land use activities to adopt management practices to avoid, remedy or mitigate any adverse effects of dust beyond the boundary of the property; and</p> <p>(b) City and district councils to use land use planning mechanisms and other land management techniques to manage land use activities which have the potential to result in dust beyond the boundary of the property.</p>	<p>Consistent</p> <p>The construction earthworks will be undertaken in accordance with management plans and industry best-practice methods. The generation of dust will be avoided to the extent practicable, and otherwise mitigated. Dust is not expected to cause adverse effects beyond the site boundary.</p>
<p>Policy 11.1.1 To avoid or mitigate any adverse effects on human health or amenity values resulting from the discharge of offensive or objectionable odour through the use of:</p> <p>(a) Good management practices (including the use of codes of practice) and process technology that has an inherently low odour potential to ensure the amount of odorous contaminants generated by a process or activity is minimised;</p> <p>(b) Appropriate control technologies to reduce the emission of odorous contaminants;</p> <p>(c) Site planning mechanisms and other land use management techniques to reduce the potential for adverse off site effects; and</p> <p>(d) Tools and techniques that provide an objective assessment of odour, such as olfactometry, odour dose response assessments and community surveys.</p>	<p>Consistent</p> <p>This policy is assessed for the sake of completeness, noting that it only relates to the discharge of offensive or objectional odours (for which there is a low likelihood of occurrence).</p> <p>Measures to avoid, mitigate, and remedy adverse odour effects on human health and amenity are largely built into the design and management of the OPF, and these include suitable feedstock, automated reversing aeration, use of a biofilter, minimum lengths of time for each stage of composting supported by an acceptable Solvita test, and restrictions on when movements of material can occur, and these are reflected in consent conditions. Similarly, for the MRF and BWTS adverse effects will be avoided to the extent practicable through building design and operational management and otherwise mitigated. Regardless, residual adverse odour effects are anticipated for some sensitive receptors, noting that this assessment is considered conservative and likely to reflect the worst-case scenario for cumulative odour impacts of the RRPP (which includes sources of odour other than composting) and the landfill. Contingency measures for odour will be detailed in a composting management plan, and odour monitoring will be undertaken.</p>
<p>Kāi Tahu ki Otago Natural Resource Management Plan 2005</p>	

5.2 Overall Objectives

- i. The rakātirataka and kaitiakitaka of Kāi Tahu ki Otago is recognised and supported.
- ii. Ki Uta Ki Tai management of natural resources is adopted within the Otago region.
- iii. The mana of Kāi Tahu ki Otago is upheld through the management of natural, physical, and historic resources in the Otago Region.
- iv. Kāi Tahu ki Otago have effective participation in all resource management activities within the Otago Region.

5.3.3 Wai Māori General Objectives

- i. The spiritual and cultural significance of water to Kāi Tahu ki Otago is recognised in all water management.
- ii. The waters of the Otago Catchment are healthy and support Kāi Tahu ki Otago customs.
- iii. Contaminants being discharged directly or indirectly to water are reduced.
- iv. Flow regimes and water quality standards are consistent with the cultural values of Kāi Tahu ki Otago and are implemented throughout the Otago Region and lower Waitaki catchment.

5.3.4 Wai Māori General Policies

1. To require an assessment of instream values for all activities affecting water.
2. To promote the cultural importance of water to Kāi Tahu ki Otago in all water management within the Otago Region and Lower Waitaki Catchment.

Consistent

Mana whenua are best placed to speak to the cultural effects of activities. Via the CIA (provided for the related application RM23.185) and the written approval provided for this application, Te Rūnanga o Ōtākou have set out a series of recommendations that would ensure that core values of wai māori, mahika kai and biodiversity, and wāhi tūpuna are protected. Two consent conditions were also proposed by ka Rūnaka. The Applicant has adopted these recommendations and conditions. On this basis, I consider that the proposal is consistent with the relevant objectives and policies in this iwi management plan.

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| <ol style="list-style-type: none">3. To protect and restore the mauri of all water.4. To encourage the use of the Cultural Health Index as a tool for monitoring waterways.10. To encourage all stormwater be treated before being discharged.11. To encourage identification of non-point source pollution and mitigate, avoid or remedy adverse effects on Kāi Tahu ki Otago values.12. To encourage Kāi Tahu ki Otago input into the development of monitoring programmes.13. To require monitoring of all discharges be undertaken on a regular basis and all information, including an independent analysis of monitoring results, be made available to Kāi Tahu ki Otago.14. To encourage Management Plans for all discharge activities that detail the procedure for containing spills and including plans for extraordinary events.15. To require all discharge systems be well maintained and regularly serviced. Copies of all service and maintenance records should be available to Kāi Tahu ki Otago upon request.16. To require re-vegetation with locally sourced indigenous plants for all disturbed areas. Re-vegetation should be monitored by an assessment of the vegetative cover at one growing season after establishment and again at three seasons from establishment.17. To require visible signage informing people of the discharge area; such signs are to be written in Māori as well as English.18. To require groundwater monitoring for all discharges to land. | |
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54. To promote land use that suits the type of land and climatic conditions.
55. To oppose the draining of wetlands. All wetlands are to be protected.
56. To promote integrated riparian management throughout entire catchments.
57. To oppose the indiscriminate use of chemicals or poisons in or near waterways.

5.4.3 Wāhi Tapu Objectives

- i. All wahi tapu are protected from inappropriate activities.
- ii. Kāi Tahu ki Otago have access to wahi tapu.
- iii. Wahi tapu throughout the Otago region are protected in a culturally appropriate manner.

5.4.4 Wāhi Tapu General Policies

1. To require consultation with Kāi Tahu ki Otago for activities that have the potential to affect wāhi tapu.
5. To promote the use of Accidental Discovery Protocols for any earth disturbance work.
6. To require all Maori archaeological finds to remain the cultural property of Kāi Tahu ki Otago.
7. To discourage all discharges near wāhi tapu.

5.5.3 Mahika Kai and Biodiversity Objectives

- i. Habitats and the wider needs of mahika kai, taoka species and other species of importance to Kāi Tahu ki Otago are protected.
- ii. Mahika kai resources are healthy and abundant within the Otago Region.
- iii. Mahika kai is protected and managed in accordance with Kāi Tahu ki Otago tikaka.

- iv. Mahika kai sites and species are identified and recorded throughout the Otago Region.
- v. Indigenous plant and animal communities and the ecological processes that ensure their survival are recognised and protected to restore and improve indigenous biodiversity within the Otago Region.
- vi. To restore and enhance biodiversity with particular attention to fruiting trees so as to facilitate and encourage sustainable native bird populations.
- ix. To create a network of linked ecosystems for the retention of and sustainable utilisation by native flora and fauna.

5.5.4 Mahika Kai and Biodiversity General Policies

1. To promote catchment-based management programmes and models, such as Ki Uta Ki Tai.
3. To encourage collaborative research into indigenous biodiversity.
4. To require Kāi Tahu ki Otago participation in the management of mahika kai, both introduced and indigenous.
5. To identify mahika kai sites and species of importance to Kāi Tahu ki Otago.
6. To protect and enhance physical access for Kāi Tahu ki Otago to mahika kai sites.
7. To require that all assessments of effects on the environment include an assessment of the impacts of the proposed activity on mahika kai.
12. To protect and enhance existing wetlands, support the reinstatement of wetlands and promote assistance for landowners for fencing-off wetlands.
16. To require that hazardous operations and the use, transportation and storage of hazardous substances are not to impact mahika kai and other cultural values.

5.6.3 Cultural Landscapes Objectives

- i. The relationship that Kāi Tahu ki Otago have with land is recognised in all resource management activities and decisions.
- ii. The protection of significant cultural landscapes from inappropriate use and development.
- iii. The cultural landscape that reflects the long association of Kāi Tahu ki Otago resource use within the Otago region is maintained and enhanced.

5.6.4 Cultural Landscapes General Policies

1. To identify and protect the full range of landscape features of significance to Kai Tahu ki Otago.
6. To promote the identification of areas of historic heritage in collaboration with Local Government Agencies.
19. To require all earthworks, excavation, filling or the disposal of excavated material to:
 - i. Avoid adverse impacts on significant natural landforms and areas of indigenous vegetation;
 - ii. Avoid, remedy, or mitigate soil instability; and accelerated erosion;
 - iii. Mitigate all adverse effects.
24. To discourage the erection of structures, both temporary and permanent, in culturally significant landscapes, lakes, rivers or the coastal environment.

5.7.2 Air and Atmosphere Objectives

- i. Kai Tahu ki Otago sites of significance are free from odour, visual and other
- ii. pollutants.
- iii. Kai Tahu ki Otago are meaningfully involved in the management and protection of the air resource.

- iv. The life supporting capacity and mauri of air is maintained for future generations.

5.7.3 Air and Atmosphere Policies

1. To require earthworks and discharges to air consider the impact of dust and other air-borne contaminants on health, mahika kai, cultural landscapes, indigenous flora and fauna, wahi tapu and taoka.
3. To require Cultural Assessments for any discharges to air including agrochemical.
5. To promote the planting of indigenous plants to offset carbon emissions.