Resource Consent Application Form 10C

Land Use Consent – Defence Against Water

IMPORTANT NOTES TO THE APPLICANT

You must complete this form **and** Resource Consent Application Form 1 in full.

Use this form when applying for resource consent to erect, place, extend, alter, replace, reconstruct, demolish or remove any defence against water, other than on the bed of any lake or river.

A defence against water is defined as:

"Any dam, weir, bank, carriageway, groyne, or reservoir, and any structure or appliance of any kind which has or may have the effect of stopping, diverting, controlling, restricting, or otherwise regulating the flow or spread or subsidence, in or out of a water body, of water including flood waters, which is specifically established for the purpose of flood hazard mitigation."

This form only applies to defences against water outside the bed of a lake or river. A resource consent may also be required for the diversion of water - please refer to Form 3: Application to Divert Water. This can be found on the ORC website at https://www.orc.govt.nz/consents-and-compliance/ready-to-apply-for-a-consent .

It is crucial that you provide as much relevant information as possible with your application and in an understandable way. This will help ORC staff process it efficiently, and at the minimum cost.

If all the necessary information is not entered on the form or supplied with the application then Otago Regional Council may return your application, request further information or publicly notify your application. This will lead to delays in the processing of your application and may increase processing costs.

This application form, when properly completed, should provide an adequate "Assessment of Effects on the Environment" (AEE) where the adverse effects of a proposal are not significant. However, this can only be determined on application.

GENERAL

1. **Which of the following activities are you seeking to undertake?** (please tick)

- ☐ Erect or place a new defence against water
- ☐ Alter / extend an existing defence against water
- ☐ Replace / demolish an existing defence against water

2. **What is the purpose of the proposed works?**

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3. **Please provide an accurate GPS location of the proposed works in NZTM2000 (New Zealand Transverse Mercator) format:**

E N

(*Note: this should be two seven digit numbers e.g. E1415593 N4923363)*

4. **Describe the property on which the proposed works will take place.**

Full name(s) of owner(s)_____

Address _____

_____

Legal Description(s) *(as shown on Record of Title)*_____

Please also attach a Record of Title less than 3 months old

☐ Yes, Record of Title attached

5. **Please attach colour photographs of the site including:**

- Photos of any existing structures at the site
- Photos showing a cross section of the site

6. **Please provide a plan or map showing the location and layout of the site clearly marking the following:**

☐Site boundaries

☐Site features, including as appropriate (but not limited to) buildings, roads, fences, ground surfaces, topography, water bodies

☐All areas showing the extent of the defence against water

☐An arrow or area indicating the direction and diversion of floodwaters

☐Within and near the areas where the activity will occur, identify:

- Any waterways, including rivers, streams, lakes, drains, water races and ponds
- Any wetlands
- Any bores or soak holes
- Any existing vegetation
- Any fish or bird habitat or nesting areas
- Any Department of Conservation reserves
- Any public gathering areas or amenity areas
- Nearby buildings and structures, including existing defences against water
- Existing infrastructure including roads

☐nature of terrain where the activity is to occur, including slope and direction of slope

☐A north symbol (orientated to the top of the page if possible) and scale bar

7. Nearby sensitive receptors

Any sensitive receptors (as per the table) should be identified on the map required under B.3. Please fill out the table below to clearly identify the separation distance from the earthworks area to these sensitive receptors, and any others not marked on the plan, use the table below.

Sensitive receptor	**Specific details about the sensitive receptor***	**Distance from defence against water**
River		
Stream		
Lake		
Drain		
Water race		
Pond		
Wetland		
Bores, soakholes or wells		
Buildings		
Structures, including existing defences against water		
Infrastructure		
Vegetation, including vegetation used for flood mitigation		
Fish habitat		
Bird habitat		
Bird nesting areas		
Department of Conservation reserves		
Public gathering areas		
Amenity areas		
other		

* Details might include address of dwellings, bore numbers, waterbody names, reserve names, types of habitat present

CONSTRUCTION DETAILS

8. Describe the proposed method of construction of the defence against water activity including (but not limited to):

- **a. The material to be used to erect, or place, or extend, or alter, or replace, or reconstruct the defence against water;**
- **b. The percentage change in size of any alterations or extensions to an existing defence against water;**
- **c. The equipment to be used; and**
- **d. The expected construction period**

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9. **Please attach technical drawings of the structure / proposed structures, along with details showing how the structure(s) will be secured in place. These drawings must show all of the following details (but not limited to):**

   - **The diameter, height and width of any alterations or extension to an existing defence against water or any new defence against water.**
   - **Flow path location and dimensions (where applicable).**

ASSESSMENT OF ENVIRONMENTAL EFFECTS

In assessing the potential effects of your defence against water activity, the key effects council staff will look at is the effectiveness of the proposed work, the need for the defence, any effect on existing defences against water and the effects of any associated diversion.

10. Waterbody Values

YES	NO	N/A	
☐	☐	☐	Amenity and natural character of any waterbody will not be significantly affected by the proposed works.
☐	☐	☐	Any waahi tapu, waahi taoka or other site of significance to Kai Tahu, including values in Schedule 1 will not be significantly affected by the proposed works
☐	☐	☐	Public access to any waterbody will not be impeded by the proposed works.

☐ ☐ If koiwi tangata (human skeletal remains), Maori artefact material, or archaeological material that predates 1900 is found, work will stop until an inspection by the appropriate authorities can be made.

☐ ☐ ☐ Effects on heritage values will be avoided.

If you have answered "NO" to any of the measures above, you MUST explain why:

11. Describe the likely effect of any flow or sediment process as a result of the defence against water activity

The construction, demolition or alteration of a defence against water has the potential to alter or divert floodwater flows and/or lead to sedimentation. In this section, describe the likely flow and sediment processes associated with the defence against water activity and measures to ensure adverse effects associated with this matter will be avoided or minimised.

12. **Describe the actual and potential effects of the defence against water activity on natural hazards, including flood carrying capacity.**
The alteration or construction of a defence against water has the potential to exacerbate natural hazards, including the flood carrying capacity of a river. In this section, describe how your defence against water activity will affect any natural hazards and measures to ensure the exacerbation of natural hazards will be avoided, mitigated or remedied.

13. **Describe the actual and potential effects the defence against water activity may have on existing defences**
The alteration or construction of a defence against water has the potential to affect existing defences against water by altering or diverting flows. In this section describe if your activity will be managed to ensure adverse effects on existing defences against water will be avoided or minimised as best as possible.

14. Please comment on the effectiveness of the proposed defence against water or alterations

15. In the case of demolition or removal of a defence against water, describe the methods to be used to remove the defence against water and any anticipated disturbance to the bed or margin of any water body resulting from that removal, and measures to be used to rectify the disturbance or rehabilitate the site.

16. Are there any alternative locations or methods for undertaking the proposed works? If yes, please describe and explain why you have chosen this location and method over others.

20. Describe how will the defence against water will be maintained?

17. Authorised Owner of the defence against water

YES NO N/A

☐ ☐ ☐ Are you the authorised owner of the defence against water this application applies to.

If you have answered "NO", has the authorised owner given written approval to the application:

☐ Yes, Written approval of authorised owner attached

STATUTORY ASSESSMENT

The Resource Management Act requires this application to include an assessment of the proposed activity against the relevant statutory documents. In this case, the Regional Plan: Water and Iwi Management Plans are the most relevant documents. For larger applications, assessment against higher order documents may also be required.

If you are unable to answer the questions below, or you believe your proposal is inconsistent with the relevant policies and documents discussed, it is recommended you seek professional planning assistance to help you with your application.

21. Regional Plan: Water for Otago (RPW)

The following policies from the RPW may be relevant to your application:

- Undertake the works in a manner that avoids, in preference to remedying or mitigating, adverse effects on natural values and character, ecology and habitat, water supply values, historic places or archaeological sites, values of significance to Kai Tahu, amenity values, lawful water users and causing or exacerbate flooding, erosion, land instability, sedimentation or property damage (5.4.2).
- Avoid adverse effects on existing lawful uses and priorities (5.4.3).
- Recognise Kai Tahu's interests in Otago's lakes and rivers by promoting opportunities for their involvement in resource consent processing (5.4.4).
- Recognise the Water Conservation (Kawarau) Order 1997 by preserving, as far as possible, the waters set out in Schedule 1 of the Water Conservation Order in their natural state, protecting the outstanding characteristics of waters set out in Schedule 2 of the Water Conservation Order, and sustaining the outstanding amenity and intrinsic values set out in both Schedules of this order (5.4.5).
- Only restrict legal public access to and along the margins of lakes and rivers where necessary… to protect the health or safety of people and communities, to ensure a level of security consistent with the purposes of a resource consent, or in other exceptional circumstances… (5.4.6).
- Where existing public access to or along the margins of lakes or rivers is restricted, the provision or enhancement of alternative access may be required and will be promoted (5.4.7).
- Have regard to topography, natural flow characteristics or water levels, water colour and clarity, ecology, and the extent of use or development within the catchment when considering adverse effects on natural character of lakes, rivers and their margins (5.4.8).
- Have regard to aesthetic values and recreational opportunities provided by a lake or river or its margins when considering adverse effects on amenity values (5.4.9).
- Have regard to any heritage values of any site, building, place or area for any activity involving surface water or the bed or margin of any lake or river (5.4.10).
- Encourage and support community initiatives that assist in the achievement of the maintenance or enhancement of lakes and rivers and their margins (5.4.13).
- Manage water quality in rivers and wetlands by maintaining good water quality, enhancing water quality where it does not meet Schedule 15 limits (7.B.1).
- Avoid objectionable discharges of water or contaminants that degrade the natural and human use values of lakes, rivers and wetlands (7.B.2).
- Encourage adaptive management and innovation that reduces the level of contaminants in discharges (7.B.8).
- To maintain the integrity of existing defences against water (8.3.3)
- Give priority to avoiding changes in the nature of flow and sediment processes in water bodies, where those changes will cause adverse effects on the stability and function of existing

structures, associated erosion, sedimentation or land instability, or any reduction in the flood carrying capacity of any lake or river (8.4.1).

- In considering the construction, reconstruction or modification of defences against water, to have regard to the effectiveness of the proposed work; The need for the defence; and any effect on existing defences (8.5.5)
- To manage activities that have the potential to adversely affect existing defences against water (8.5.6).
- Avoid adverse effects on Regionally Significant Wetlands or regionally significant wetland values (10.4.2).

Discuss how your proposal meets the relevant policies above:

18. National Policy Statement for Freshwater Management 2020

The NPS-FM sets out a single objective, that natural and physical resources are managed in a way that prioritises:

a. first, the health and well-being of water bodies and freshwater ecosystems;
b. second, the health needs of people (such as drinking water); and
c. third, the ability of people and communities to provide for their social, economic, and cultural well-being, now and in the future.

The following policies are likely to be of relevance to this application:
Policy 6: There is no further loss of extent of natural inland wetlands, their values are protected, and their restoration is promoted.
Policy 8: The significant values of outstanding water bodies are protected.
Policy 15: Communities are enabled to provide for their social, economic, and cultural wellbeing in a way that is consistent with this National Policy Statement.

Discuss how your proposal meets the relevant policies above:

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19. Partially Operative Regional Policy Statement and Proposed Regional Policy Statement

The following provisions apply to river and instream works:

PO-RPS

- 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 (1.1.1).
- 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 (1.1.2)
- Achieve integrated management of Otago's natural and physical resources (1.2.1).
- Recognising and protecting important sites and values of cultural significance to Kāi Tahu (2.2.2).
- Manage the beds of rivers, lakes, wetlands, their margins, and riparian vegetation to:
    - Safeguard the life supporting capacity of fresh water;
    - Maintain good quality water, or enhance it where it has been degraded;
    - Maintain or enhance bank stability;
    - Maintain or enhance ecosystem health and indigenous biological diversity;
    - Maintain or enhance, as far as practicable their natural functioning and character and amenity values;
    - Control the adverse effects of pest species, prevent their introduction and reduce their spread; and
    - Avoid, remedy or mitigate the adverse effects of natural hazards, including flooding and erosion (3.1.2).
- Protect and enhance areas of significant indigenous vegetation and significant habitats of indigenous fauna, by:

    - Maintaining those values which that contribute to the area or habitat being significant;
    - Avoiding significant adverse effects on other values of the area or habitat;
    - Remedying when other adverse effects cannot be avoided;
    - Mitigating when other adverse effects cannot be avoided or remedied;
    - Encouraging enhancement of those areas and values which that contribute to the area or habitat being significant;
    - Controlling the adverse effects of pest species, preventing their introduction and reducing their spread (3.2.2).
- Identify and protect outstanding freshwater bodies (3.2.13 & 3.2.16)
- Minimise natural hazard risk to people, communities, property and other aspects of the environment by:
    - Avoiding activities that result in significant risk from natural hazard;
    - Enabling activities that result in no or low residual risk from natural hazard;
    - Avoiding activities that increase risk in areas potentially affected by coastal hazards over at least the next 100 years;
    - Encouraging the location of infrastructure away from areas of hazard risk where practicable;
    - Minimising any other risk from natural hazard (4.1.6).
- Maintaining and enhancing public access (5.1.1)

Discuss how your proposal meets the relevant policies above:

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P-ORPS 2021

- ***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 (IM-P13).
- ***Freshwater*** In Otago's *water bodies* and their catchments:
    - the health of the wai supports the health of the people and thriving mahika kai,
    - *water* flow is continuous throughout the whole system,
    - the interconnection of *freshwater* (including *groundwater*) and *coastal waters* is recognised,
    - native fish can migrate easily and as naturally as possible and taoka species and their habitats are protected, and
    - the significant and outstanding values of Otago's *outstanding water bodies* are identified and protected (LF-FW-O8).

- **Natural character** The natural character of *wetlands, lakes* and *rivers* and their margins is preserved and protected from inappropriate subdivision, use and development (LF-FW-O10).
- ***Land* and soil** The life-supporting capacity of Otago's soil resources is safeguarded and the availability and productive capacity of highly productive land for *primary production* is maintained now and for future generations (LF-LS-O11).
- **Use of land** The use of *land* in Otago maintains soil quality and contributes to achieving *environmental outcomes* for *freshwater* (LF-LS-O12).
- **Provision of *infrastructure*** Effective, efficient and resilient *infrastructure* enables the people and communities of Otago to provide for their social and cultural well-being, their health and safety and supports sustainable economic development and growth within the region within environmental limits (EIT-INF-O4).
- **Locating and managing effects of *infrastructure*** When providing for new *infrastructure* outside the coastal environment:

  (1) avoid, as the first priority, locating *infrastructure* in all of the following:

  (a) *significant natural areas,*
  (b) outstanding natural features and landscapes,
  (c) *natural wetlands,*
  (d) *outstanding water bodies*,
  (e) areas of high or outstanding natural character,
  (f) areas or places of significant or outstanding *historic heritage*,
  (g wāhi tapu, wāhi taoka, and areas with protected customary rights, and
  (h) areas of high recreational and high amenity value, and

  (2) if it is not possible to avoid locating in the areas listed in (1) above because of the *functional* or *operational needs* of the *infrastructure* manage adverse effects as follows:

  (a) for *nationally* or *regionally significant infrastructure*:
  (i) in *significant natural areas,* in accordance with ECO–P4,
  (ii) in *natural wetlands,* in accordance with the relevant provisions in the NESF,
  (iii) in *outstanding water bodies,* in accordance with LF–P12,
  (iv) in other areas listed in EIT–INF–P13 (1) above, minimise the adverse *effects* of the *infrastructure* on the values that contribute to the area's importance, and

  (b) for all *infrastructure* that is not *nationally* or *regionally significant*, avoid adverse *effects* on the values that contribute to the area's outstanding nature or significance (EIT-INF-P13).

- ***Natural hazards*** Levels of *risk* to people, communities and property from *natural hazards* within Otago do not exceed a tolerable level (HAZ-NH-O1).
- ***Adaption*** Otago's people, property and communities are prepared for and able to adapt to the *effects* of natural hazards, including *climate change (HAZ-NH-O2)*.
- **Mitigating *natural hazards*** Prioritise *risk* management approaches that reduce the need for *hard protection structures* or similar engineering interventions, and provide for *hard protection structures* only when:

  (1) *hard protection structures* are essential to manage *risk* to a level the community is able to tolerate,
  (2) there are no reasonable alternatives that result in reducing the *risk* exposure,
  (3) *hard protection structures* would not result in an increase in *risk* to people, communities and property, including displacement of *risk* off-site,

(4) the adverse *effects* of the *hard protection structures* can be adequately managed, and

(5) the mitigation is viable in the reasonably foreseeable long term or provides time for future adaptation methods to be implemented, or

(6) the *hard protection structure* protects a *lifeline utility*, or a facility for essential or emergency services (HAZ-NH-P7).

Discuss how your proposal meets the relevant policies above:

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Please read the proposed Regional Policy Statement and confirm what FMU the dishcarge is located in and confirm that the proposal supports the vision for this FMU - https://www.orc.govt.nz/plans-policies-reports/regional-plans-and-policies/otago-regional-policy-statements/proposed-otago-regional-policy-statement-2021

☐ LF-VM-O2 – Clutha Mata-au

- *water bodies* support thriving mahika kai and Kāi Tahu whānui have access to mahika kai;
- indigenous species migrate easily and as naturally as possible along and within the *river* system;
- In the Upper Lakes rohe, the high quality waters of the lakes and their tributaries are protected, recognising the significance of the purity of these waters to Kai Tahu and the wider community;
- In the Dunstan, Manuherekia and Roxburgh rohe, innovative and sustainable land and water management practices support food production in the area and reduce discharges of nutrients and other contaminants to water bodies so that they are safe for human contact.
- In the Lower Clutha rohe,
    - 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
    - land management practices reduce dischargese of nutrients and other contaminants to water bodies so that they are sage for human contact and there are no direct disharges of wastewater to waterbodies.

☐ LF-VM-O3 – North Otago

By 2050 in the North Otago FMU

- The ongoing relationship of Kāi Tahu with *wāhi tūpuna* is sustained and Kāi Tahu maintain their connection with and use of the *water bodies*;
- Healthy riparian margins, wetlands, estuaries and lagoons support thriving mahika kai, indigenous habitats and downstream coastal ecosystems;
- Indigenous species can migrate easily and as naturally as possible to and from the coastal environment;

- Land management pratices reduce dischages of nutrients and other contaminants to water bodies so that they are safe for human contact.

☐ LF-VM-O4 – Taieri

By 2050 in the Taieri FMU

- Healthy *wetlands* are restored in the upper and lower catchment *wetland* complexes, including the Waipori/Waihola wetlands, Tunaheketaka / Lake Taieri, scroll plain, and tussock areas;
- The gravel *bed* of the lower Taieri is restored and sedimentation of the Waipori/Waihola complex is reduced,
- *Water bodies* support healthy populations of *galaxiid* species
- There are no direct discharges of wastewater to waterbodies

☐ LF-VM-O5 – Dunedin & Coast FMU

- 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,
- 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
- Discharges of contaminants from urban environments are reduced so that water bodies are safe for human contact.

☐ LF-VM-O6 – Catlins

By 2030 in the Catlins

- Waterbodies support thriving mahika catchment and access to Kai Tahu whanui to mahika kai and access of Kai Tahu whanui to mahika kai;
- the high degree of naturalness and ecosystem connections between the forests, *freshwater* and coastal environment are preserved.
- Healthy, clear and clean water supports opportunities for recreation and sustainable food production for future generations.

Discuss how your proposal meets the relevant policies above:

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Please note if works are proposed within a wetland or could affect a wetland a separate policy assessment will be required.

22. Kai Tahu ki Otago Natural Resource Management Plan 2005 (NRMP).

The following requirements may apply to defence against water activities

- To require an assessment of instream values for all activities affecting water.

- To promote the cultural importance of water to Käi Tahu ki Otago in all water management within the Otago Region and Lower Waitaki Catchment.
- To protect and restore the mauri of all water.
- To promote land use that suits the type of land and climatic conditions.
- To require consultation with Käi Tahu ki Otago for activities that have the potential to affect wähi tapu.
- To require that a Käi Tahu ki Otago mandated archaeologist survey an area before any earth disturbance work commences.
- To promote the use of Accidental Discovery Protocols for any earth disturbance work.

Discuss how your proposal meets the relevant policies above:

For activities south of the Clutha River/ Mata- Au the Ngāi Tahu ki Murihiku Natural Resource and Environmental Iwi Management Plan 2008 contains requirements that must be considered.

- Require that placement of culverts and other flood works activities in the beds or margins of waterways is such that the passage of native fish and other stream life is not impeded.
- Recommend that culvert pipes are buried in the streambed, so that gravel can lie in the bottom third of the pipe, thus providing natural habitat in the culvert so that fish can migrate through them.
- Require that the placement of culverts and other flood works activities in the beds or margins of waterways occurs in a manner that minimises disturbance to the streambed.
- Recommend that tracks leading to culverts are designed (e.g. contoured) so that stormwater run-off and any effluent on the track is directed away from the stream. Such discharges should be to land and not directly to water.
- Require that that placement of culverts and other flood works activities in the beds or margins of waterways occur at times of low or no flow.
- Require that short term effects on water quality and appearance are mitigated during culvert or flood works construction, and for a settling period following. For example, straw bales may be used to minimise turbidity, and contain discolouration and sedimentation.
- Avoid the direct or indirect modification of any existing wetland area.
- Ensure that all native fish species have uninhibited passage from the river to the sea at all times, through ensuring continuity of flow.

Discuss how your proposal meets the relevant policies above:

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Please note if the works are located in the Waitaki catchment as shown by Map 1 of the plan *https://aukaha.co.nz/wp-content/uploads/2019/12/Waitaki-Iwi-Management-Plan-2019.pdf*

An assessment on the Waitaki Iwi Management Plan is required.

23. **Further Assessment of Environmental Effects (AEE)**

Depending on the scale of the proposed activity, a separate Assessment of Environmental Effects (AEE) may be required as outlined in the Fourth Schedule of the Resource Management Act 1991**. <u>If you are unsure whether a separate AEE is required, please contact the Consents Team prior to lodging your application</u>.** The extent of detail required should be relative to the scale and significance of the potential adverse effects that the activity may have on the receiving environment. The AEE must contain, but is not limited to:

- if it is likely that the activity will result in any significant adverse effect on the environment, a description of any possible alternative locations or methods for undertaking the activity;
- an assessment of the actual or potential effect on the environment of the activity;
- if the activity includes the use of hazardous installations, an assessment of any risks to the environment that are likely to arise from such use;
- if the activity includes the discharge of any contaminant, a description of -
  - (i) the nature of the discharge and the sensitivity of the receiving environment to adverse effects; and
  - (ii) any possible alternative methods of discharge, including discharge into any other receiving environment;
- a description of the mitigation measures (including safeguards and contingency plans where relevant) to be undertaken to help prevent or reduce the actual or potential effect;
- identification of the persons affected by the activity, any consultation undertaken, and any response to the views of any person consulted;
- if the scale and significance of the activity's effects are such that monitoring is required, a description of how and by whom the effects will be monitored if the activity is approved;
- if the activity will, or is likely to, have adverse effects that are more than minor on the exercise of a protected customary right, a description of possible alternative locations or methods for the exercise of the activity (unless written approval for the activity is given by the protected customary rights group).

24. Policy Assessment

For larger applications, you may also need to provide a policy assessment which includes an assessment of the proposed activity against:

- the matters set out in Part 2 of the Resource Management Act 1991; and
- any relevant objectives, policies, rules or other provisions of:
  - the National Policy Statement for Freshwater Management 2020 (and any subsequent versions);
  - the Otago Regional Policy Statement or proposed Regional Policy Statement;
  - any other relevant national environmental standards or national policy statements.

CHECKLIST

In order to submit a complete application, have you remembered to?

- ☐ Fully completed this application form and Form 1?
- ☐ Attached an Assessment of Environmental Effects? (if required)
- ☐ Attached maps, technical drawings and photographs as appropriate?
- ☐ Attached any written approvals?
- ☐ Paid your deposit?

To keep consent processing costs to a minimum it is strongly recommended that the checklist is complete, and all items required are attached **before** you lodge your application to the Otago Regional Council.