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Form 6

Further submission in support of, or in opposition to, submission on publicly notified proposed policy statement or plan

108

*Clause 8 of First Schedule, Resource Management Act 1991*

**To:** **The Chief Executive**  
**Otago Regional Council**  
**Private Bag 1954**  
**DUNEDIN 9054**

**Name of person making further submission:** **The Director-General of Conservation**

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

Proposed Plan Change 2 (Regionally Significant Wetlands) to the Regional Plan: Water for Otago.

My comments on others submissions are set out in Attachment One.

The particular parts of the submissions I support or oppose are set out in Attachment One.

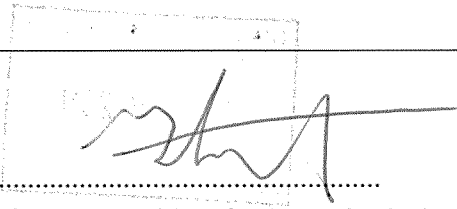
The reasons for my support or opposition are set out in Attachment One.

The decisions I seek are set out in Attachment One.

I wish (~~or do not wish~~) to be heard in support of my further submission.

\* If others make a similar submission, I will consider presenting a joint case with them at a hearing.

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Signature of person making further submission  
Kenneth Murray Stewart  
Community Relations Manager  
Otago Conservancy  
Department of Conservation  
Pursuant to a delegation from the Director-General of Conservation

Date 23<sup>rd</sup> September 2011

(A signature is not required if you make your submission by electronic means.)

Address for service of person making further submission: PO Box 5244  
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Contact person: [*name and designation, if applicable*] Bruce Hill  
Community Relations Officer  
Ph (03) 474 6959  
Email fbhill@doc.govt.nz

**Note to person making further submission**

A copy of your further submission must be served on the original submitter within 5 working days after making the further submission to the local authority.

**Council reference and provision: 7.139, Policy 10.4.1A- Definition of a Regionally Significant Wetland**

<b>Submitter's name</b>	<b>Submitter's number</b>	<b>Position</b>	<b>Decision requested</b>	<b>D-G's comments</b>
Solid Energy New Zealand Ltd	5	Amend	Remove 10.4.1A(c) and replace with:  <i>(c) A wetland higher than 800 metres above sea level which has been subjected to an evaluation confirming its ecological values against the ecological criteria detailed in Schedule 9.</i>	Requires an assessment of values in order to determine significance – reason why Schedule 10 didn't work. In addition all wetlands 800m and above are likely to meet other regionally significant criteria
NZSki Limited	11	Amend	That the definition of regionally significant wetlands exempts:  (a) wetlands in or around its operations not already identified in statutory or other legal instruments as significant from the definition of "wetlands" or description of "regionally significant wetlands" in Proposed Plan Change 2: and  (b) ski field operations (including existing use management and future development) from the restrictions otherwise proposed in Proposed Plan Change 2.	Oppose – as these activities will allow damage to occur to wetlands within Ski Areas = adverse effects
Cardrona Alpine Resort	15	Amend	Delete 10.4.1A(c).	Oppose – In addition all wetlands 800m and above are likely to meet other regionally significant criteria
Cardrona Alpine Resort	15	Amend	Provide for wetlands within Ski Area Sub Zones to be excluded from definition of Regionally Significant	Oppose as all of these activities

			Wetlands in 10.4.1A.	will allow damage to occur to wetlands within Ski Areas which may result in adverse effects
Contact Energy Limited	30	Oppose	That the definition of a Regionally Significant Wetland (which includes all wetlands over 800m above sea level) be not approved.	Oppose as all wetlands 800m and above are likely to meet other regionally significant criteria
Meridian Energy Limited	32	Amend	Amend: <i>"A Regionally Significant Wetland is: [...] (b) A wetland physically within a wetland management area listed in Schedule 9; or (c) A wetland higher than 800 metres above sea level."</i>	Oppose as all wetlands 800m and above are likely to meet other regionally significant criteria
TrustPower Limited	40	Amend	Amend: <i>". . . (c) A wetland higher than 800 metres above sea level with one or more regionally significant wetland values."</i>	Requires an assessment of values in order to determine significance – reason why Schedule 10 didn't work.  Oppose as all wetlands 800m and above are likely to meet other regionally significant criteria.
<b>Council reference and provision:8 Policy 10.4.1B - Schedule 9</b>				
<b>Submitter's name</b>	<b>Submitter's number</b>	<b>Position</b>	<b>Decision requested</b>	<b>D-G's comments</b>
TrustPower Limited	40	Amend	Amend 10.4.1B: <i>"Schedule 9 lists those Regionally Significant Wetlands that are mapped in Maps F1-F68 and contain one or more regionally significant wetland</i>	If put into Plan, any additions of or changes to values require Plan Changes – if in Inventory this



			<del>values and their regionally significant wetland values as per Policy 10.4.1.</del>	won't be necessary
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**Council reference and provision: 159 Chapter 16**

Submitter's name	Submitter's number	Position	Decision requested	D-G's comments
TrustPower Limited	40	Amend	<p>Include in the Water Plan formal guidance on what an assessment of effects on a wetland above 800m should entail.</p> <p>Include the following information requirement:</p> <p><i>"Any activity managed by this Plan which has the potential to affect any wetland higher than 800 metres, must consider:</i></p> <p><i>1. Whether the wetland is associated with one or more of the regionally significant values identified in Policy 10.4.1; and if so</i></p> <p><i>2. The wetland is a Regionally Significant Wetland and the applicant must provide the following information:</i></p> <p><i>a. An assessment of the activity against the rules and standards pertaining to Regionally Significant Wetlands;</i></p> <p><i>b. An assessment of the effects of the activity on the wetland; and</i></p> <p><i>c. An assessment of the effects of the activity on any regionally significant wetland value."</i></p>	<p>Requires an assessment of values in order to determine significance – reason why Schedule 10 didn't work.</p> <p>Oppose as all wetlands 800m and above are likely to meet other regionally significant criteria</p>

**Council reference and provision: 6.14 Policy 10.4.1 - Definition of Regionally Significant Wetland values**

Submitter's name	Submitter's number	Position	Decision requested	D-G's comments
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Otago Fish & Game Council	8	Amend	Add criterion: <i>A10) Importance of this wetland within the wider network of wetlands within its catchment.</i>	Support as often the sum of the parts is greater than the whole.
Meridian Energy Limited	32	Amend	Amend policy 10.4.1: <i>"A1 Habitat for regionally, nationally or internationally rare or threatened species or communities; ... <del>A7 High diversity of indigenous flora and fauna;</del> <del>A8 Regionally significant habitat for waterfowl;</del> and <del>A79 Significant hydrological values including maintaining water quality or low flows, or reducing flood flows."</del></i>	Oppose as criteria A1, A7, A8 and A7 as proposed identify significant features of wetlands.
Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou, and Hokonui Runanga	38	Amend	Add Kai Tahu cultural and spiritual beliefs, values and uses to policy 10.4.1 A6.	Support as these are another significant feature of wetlands.  Support as give effect to Treaty of Waitangi Principles
Hawksbury Lagoon Inc	39	Amend	In identifying significant wetlands, ensure adequate weight is given to the pattern of wetlands in maintaining corridors and feeding sites for waterfowl.	Support as often the sum of the parts is greater than the whole.
TrustPower Limited	40	Amend	Amend: <i>"The regionally significant wetland values of Otago's wetlands <del>are</del> include one or more of the following: . . ."</i>	Support as this amendment better identifies that 1 value may be the feature that gives a wetland its significance.
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Amend: <i>"The regionally significant wetland values of Otago's wetlands <u>that are identified in Schedule 9</u> are: ..."</i>	Support as Schedule 9 "is not exhaustive" and does not necessarily include all significant wetlands in Otago.

Council reference and provision: 5 Objective 10.3.1 - Maintain or enhance wetlands				
Submitter's name	Submitter's number	Position	Decision requested	D-G's comments
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Delete Objective and replace with: <i>"To recognise and provide for the protection of the natural character, biodiversity and other values of wetlands in the regions."</i>	Better encapsulates Sec. 6(a) RMA requirements re: wetlands
Council reference and provision: 9 Policy 10.4.2 - Priority on avoiding adverse effects				
Submitter's name	Submitter's number	Position	Decision requested	D-G's comments
Meridian Energy Limited	32	Amend	Delete policy 10.4.2 and replace with: <i>"The adverse effects of activities on Regionally Significant Wetland shall be avoided where practicable and, otherwise, remedied or mitigated."</i>	Oppose, given that wetlands are recognised nationally as a severely threatened ecosystem type hence avoid must be a priority.
Clutha District Council	34	Amend	Delete: "Remedying or mitigating effects will be considered only where those effects cannot be avoided."	Support as avoidance should employed in the first instance given the scarcity of remaining wetlands both regionally and
TrustPower Limited	40	Amend	Replace proposed policy with: <i>"Adverse effects on Regionally Significant Wetlands and their regionally significant values identified in Schedule 9 should be avoided, remedied or mitigated."</i>	Oppose, given that wetlands are recognised nationally as a severely threatened ecosystem type hence avoid must be a priority.
OtagoNet Joint Venture	43	Amend	Amend: <i>"Priority will be given to the avoidance of adverse effects of activities on Regionally Significant Wetlands and values. Remedying or mitigating adverse effects will be considered only where those effects cannot be</i>	Oppose, given that wetlands are recognised nationally as a severely threatened ecosystem type hence avoid must be a priority.

			<i>avoided. Adverse effects on Regionally Significant Wetlands and their regionally significant values should be avoided, remedied or mitigated."</i>	
<b>Council reference and provision: 153 Chapter 10 general</b>				
<b>Submitter's name</b>	<b>Submitter's number</b>	<b>Position</b>	<b>Decision requested</b>	<b>D-G's comments</b>
Otago Fish & Game Council	8	Amend	Amend the objectives and policies to reflect that wetland boundaries are often indistinct and changeable.  Suggested wording of new policy: <i>"Due to the seasonal variability of wetlands and their changing boundaries, resource consent applications on or near defined regionally significant wetland boundaries with likely wetland characteristics will be assessed to ensure that they have no adverse effect on the functioning of the wetland as a whole."</i>	Support as natural boundaries of many wetland types are not fixed and so activities nearby can have an adverse effect.
River-Estuary Care: Waikouaiti-Karitane	13	Amend	Make emphasis on the interconnectedness of some wetlands (e.g. saltmarsh) with the marine environment and acknowledge the reliance of marine organisms and fish on various habitats for critical parts of their life cycles and food chains.	Support as many wetlands interconnections are a fundamental value.
River-Estuary Care: Waikouaiti-Karitane	13	Amend	There should be specific mention of negative effects of tidal gates on coastal wetland habitats, blocking natural tidal flows to and from the wetland and the sea.	Support as such structures, inappropriately installed and maintained can adversely effect such wetlands.
Te Ao Marama Inc	16	Amend	Include preservation of wetland, lake and river margins in the proposed plan change.	Support and note this amendment gives effect to sec 6(a) of the RMA.

Gregory Kerr	35	Amend	Include acknowledgement of 2-way relationship [between wetlands and sea] and the vital link it plays in the lifecycles of species.	Support as many wetlands interconnections are a fundamental value.
TrustPower Limited	40	Amend	Recognise and provide for the potential for alterations in the human use influences that affect certain wetlands.	Oppose as Sec 6(a) RMA requires preservation of natural character of wetlands.
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	<p>Insert new policy and explanation:</p> <p><u>"Policy x.x.x:</u>  <u>To recognise and protect wetlands that are shown to have significant values that are not identified on Schedule 9, and to protect those values by controlling activities in wetlands and their margins to ensure their ecosystem functioning, natural character and habitat values are sustained.</u></p> <p><u>Explanation:</u>  <u>It is stated in the introduction to Schedule 9 that Schedule 9 is not exhaustive, and therefore not all wetlands with significant values have been identified. This policy recognises and provides for the protection of the values of those unidentified wetlands."</u></p>	Support as not all potentially regionally significant wetlands have been scheduled. This amendment provides for the future recognition of such wetlands, some of which may up to now have gone un-noticed.
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	<p>Insert new policy and explanation:</p> <p><u>"Unidentified wetlands will be assessed using the following ecological criteria:</u>  <u>1. Ecological context</u>  <u>2. Representative wetlands</u>  <u>3. Rarity</u>  <u>4. Distinctiveness</u></p> <p><u>Explanation:</u>  <u>It is possible that not all wetlands with significant values have been identified on Schedule 9. This</u></p>	Support as not all potentially regionally significant wetlands have been scheduled. This amendment provides for the future evaluation of such wetlands, some of which may up to now have gone un-noticed.

			<i>policy recognises and provides for the protection of these wetlands. The policy also introduces an ecological criteria (Appendix XX) that will be used when assessing those wetlands. Where an assessment of any wetlands is required for resource consent purposes it shall be carried out in accordance with the ecological criteria set out in Appendix XX."</i>	
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	<p>Insert new policy and explanation:  <i>"Where an assessment has been undertaken on a wetland that is not identified on Schedule 9 and is shown to be significant these wetlands will be added to Schedule 9.</i></p> <p><u>Explanation:</u>  <i>It is possible through resource consent processes that significant wetlands not included on Schedule 9 will be identified. It is appropriate that these significant wetlands are added to Schedule 9. In doing so the wetlands on Schedule 9 will be derived from two different processes (Policy 10.4.1 and Policy x.x.x (see policy directly above)) and this is appropriate because the management of these significant wetlands will be consistent. Changes to Schedule 9 to include wetlands will be the subject of a plan change process."</i></p>	Support as not all potentially regionally significant wetlands have been scheduled. This amendment provides for the future recognition of such wetlands, some of which may up to now have gone un-noticed.
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	<p>Insert new policy and explanation:  <i>"Policy x.x.x  To recognise and provide for the protection of wetlands by managing adverse effects of activities on the values present, including natural character, ecosystem functioning, biodiversity, aesthetics or amenity values.</i></p> <p><u>Explanation:</u></p>	Support as encapsulates Sec. 6(a) RMA requirements re: wetlands.



			<i>All wetlands are required to be managed sustainably in accordance with RMA, not just those are determined as being significant. Within Part 2 of the RMA wetlands are to be managed to protect biodiversity, natural character and other values.</i>	
<b>Council reference and provision: 22      Rule 12.1.1A.1 - Take and use of surface water from any Regionally Significant Wetland</b>				
<b>Submitter's name</b>	<b>Submitter's number</b>	<b>Position</b>	<b>Decision requested</b>	<b>D-G's comments</b>
Federated Farmers of New Zealand	29	Amend	Amend the activity status to a restricted discretionary activity.	Oppose as the current class of activity accords wetlands greater legal protection
Contact Energy Limited	30	Amend	That the non-complying activity status proposed for activities controlled by Chapter 12 be not approved and that such activities remain as discretionary activities.	Oppose as the current class of activity accords wetlands greater legal protection
Meridian Energy Limited	32	Amend	Amend Rule 12.1.1A.1: <i>"Unless covered by Rules 12.1.1.1, 12.1.1.2, 12.1.2.1 and 12.1.2.3, the taking and use of surface water directly from any Regionally Significant Wetland is a non-complying activity."</i>	Oppose as the current class of activity accords wetlands greater legal protection
TrustPower Limited	40	Oppose	Delete rule. Takes and uses that are not covered by other specified rules should have discretionary status.	Oppose as the current class of activity accords wetlands greater legal protection
<b>Council reference and provision: 26      Rule 12.1.2.4 - Take and use of surface water for no more than 3 days</b>				
<b>Submitter's name</b>	<b>Submitter's number</b>	<b>Position</b>	<b>Decision requested</b>	<b>D-G's comments</b>

Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Amend 12.1.2.4(b): <i>"The water is not taken from and there is no change to the water level or hydrological function, or no damage to the indigenous flora, fauna or its habitat, in or on any Regionally Significant Wetland, or wetland that meets the significance criteria listed in Appendix XX Ecological Criteria."</i>  Add the following permitted rule conditions: <i>"(a) Effects on biological diversity and ecological values; and (b) Effects on the natural character of wetlands and their margins."</i>	Strengthens wetland protection requirements and follows on from support for Forest & Birds submission in 153 Chap.10 above
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Amend 12.1.2.5(a): <i>"The water is not taken from and there is no change to the water level or hydrological function, or no damage to the indigenous flora, fauna or its habitat, in or on any Regionally Significant Wetland, or wetland that meets the significance criteria listed in Appendix XX Ecological Criteria."</i>  Add the following permitted rule conditions: <i>"(a) Effects on biological diversity and ecological values; and (b) Effects on the natural character of wetlands and their margins."</i>	Strengthens wetland protection requirements and follows on from support for Forest & Birds submission in 153 Chap.10 above
<b>Council reference and provision: 28      Rule 12.1.2.6 - Take and use of surface water for land drainage</b>				
<b>Submitter's name</b>	<b>Submitter's number</b>	<b>Position</b>	<b>Decision requested</b>	<b>D-G's comments</b>
Otago Fish & Game Council	8	Support	Support	Support



Federated Farmers of New Zealand	29	Amend	Categorise the maintenance of an existing drain, including the clearing of any subsequent slumping, as a permitted activity.	Oppose – clearing of existing drains should require a resource consent with conditions to protect wetlands and their values, as damage similar to construction of new drains can be caused by this activity.
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Amend 12.1.2.6(a): <i>"The water is not taken from and there is no change to the water level or hydrological function, or no damage to the <u>indigenous</u> flora, fauna or its habitat, in or on any Regionally Significant Wetland, or wetland that meets the significance criteria listed in <u>Appendix XX Ecological Criteria</u>."</i>  Add the following permitted rule conditions: <i>"(a) <u>Effects on biological diversity and ecological values; and</u></i> <i>(b) <u>Effects on the natural character of wetlands and their margins</u>."</i>	Support – follows on from above
<b>Council reference and provision: 45      Rule 12.2.1A.1 - Take and use of groundwater from any Regionally Significant Wetland</b>				
<b>Submitter's name</b>	<b>Submitter's number</b>	<b>Position</b>	<b>Decision requested</b>	<b>D-G's comments</b>
Federated Farmers of New Zealand	29	Amend	Amend the activity status to a restricted discretionary activity.	Oppose as the current class of activity accords wetlands greater legal protection

Contact Energy Limited	30	Amend	That the non-complying activity status proposed for activities controlled by Chapter 12 be not approved and that such activities remain as discretionary activities.	Oppose as the current class of activity accords wetlands greater legal protection
TrustPower Limited	40	Oppose	Delete rule. Takes and uses that are not covered by other specified rules should have discretionary status.	Oppose – seeks to weaken standard of wetland protection
<b>Council reference and provision: 48      Rule 12.2.2.5 - Take and use of groundwater for no more than 3 days</b>				
Submitter's name	Submitter's number	Position	Decision requested	D-G's comments
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Amend 12.2.2.5(b): <i>"The water is not taken from and there is no change to the water level or hydrological function, or no damage to the <u>indigenous</u> flora, fauna or its habitat, in or on any Regionally Significant Wetland, or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria."</i>	Support – follows on from above
<b>Council reference and provision: 50      Rule 12.2.2A.1 - Take and use of groundwater for community water supply - controlled activity</b>				
Submitter's name	Submitter's number	Position	Decision requested	D-G's comments
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Amend 12.2.2A1(g): <i>"Any effect on and Regionally Significant Wetland or on any regionally significant wetland value or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria."</i>  Add new matters of control: <i>"(h) Effects on biological diversity and ecological values; and</i>	Support – follows on from above

			<i>(i) Effects on the natural character of wetlands and their margins."</i>	
<b>Council reference and provision: 53      Rule 12.2.3.4 - Take and use of groundwater - restricted discretionary activity</b>				
<b>Submitter's name</b>	<b>Submitter's number</b>	<b>Position</b>	<b>Decision requested</b>	<b>D-G's comments</b>
Federated Farmers of New Zealand	29	Amend	Amend: <i>"Any <u>adverse effect on any Regionally Significant Wetland or on any regionally significant wetland value</u>"</i>	Oppose – rule as written allows ORC to consider all effects on wetlands, not just adverse effects
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Amend (xiii): <i>"Any effect on and Regionally Significant Wetland or on any regionally significant wetland value <u>or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria.</u>"</i>  Add new matters of discretion: <i>"(a) <u>Effects on biological diversity and ecological values; and</u></i> <i><u>(b) Effects on the natural character of wetlands and their margins.</u>"</i>	Support – follows on from above
<b>Council reference and provision: 60      Rule 12.3.1A.1 - Damming or diversion of water: Regionally Significant Wetland</b>				
<b>Submitter's name</b>	<b>Submitter's number</b>	<b>Position</b>	<b>Decision requested</b>	<b>D-G's comments</b>
Otago Conservation Board	27	Support	Strongly support setting the default activity status of activities that affect wetlands as 'non-complying'.	Support
Federated Farmers of New Zealand	29	Amend	Amend the activity status to a restricted discretionary activity.	Oppose as non-complying allows

				for the ORC to assess an application against all the relevant plan provisions and also allows all environmental effects to be considered.
Contact Energy Limited	30	Amend	That the non-complying activity status proposed for activities controlled by Chapter 12 be not approved and that such activities remain as discretionary activities.	Oppose as non-complying allows for the ORC to assess an application against all the relevant plan provisions and also allows all environmental effects to be considered.
Meridian Energy Limited	32	Amend	Amend Rule 12.3.1A.1: <i>"Unless covered by Rules 12.3.1.1 to 12.3.1.4, and 12.3.3.1(i):  (ii) <del>The direct damming or diversion of water from or within any Regionally Significant Wetland; or</del>  (ii) <del>The damming or diversion of water that affects the water level of any Regionally Significant Wetland;</del>  is a <b>non-complying</b> activity."</i>	Oppose, water may be dammed by indirect means and still cause effects to wetlands.  Underlining is incorrect in ORC's summary
TrustPower Limited	40	Amend	Amend: <i>"Unless covered by Rules 12.3.1.1 to 12.3.1.4, <del>and</del> 12.3.3.1(i) <u>or</u> 12.3.2.0:  (i) <del>The diversion of water from or within any Regionally Significant Wetland; or</del>  (ii) <del>The damming or diversion of water that affects the water level of any Regionally Significant Wetland;</del>  is a <b>non-complying</b> activity."</i>  And a comprehensive assessment in terms of water allocation for a particular water body should be undertaken to determine whether the water level of	Oppose – as this approach is highly likely to cause adverse effects

			any Regionally Significant Wetland is adversely affected, rather than a blanket rule that provides for no effects on water level.	
<b>Council reference and provision: 64 Rule 12.3.2.2 - Damming or diversion of water for land drainage</b>				
<b>Submitter's name</b>	<b>Submitter's number</b>	<b>Position</b>	<b>Decision requested</b>	<b>D-G's comments</b>
Federated Farmers of New Zealand	29	Amend	Categorise the maintenance of an existing drain, including the clearing of any subsequent slumping, as a permitted activity.	Oppose – maintenance of existing drains should require a resource consent with conditions to protect wetlands and their values, as adverse effects similar to construction of new drains could be caused by this activity.
<b>Council reference and provision: 65 Rule 12.3.2.3 - Damming or diversion of water for erection, placement, repair or maintenance of structure</b>				
<b>Submitter's name</b>	<b>Submitter's number</b>	<b>Position</b>	<b>Decision requested</b>	<b>D-G's comments</b>
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Add new matters of discretion: <i>"(a) Effects on biological diversity and ecological values; and</i> <i>(b) Effects on the natural character of wetlands and their margins."</i>	Support – strengthens wetland protection provisions
<b>Council reference and provision: 66 Rule 12.3.3.1 - Damming or diversion of water - restricted discretionary activity</b>				
<b>Submitter's name</b>	<b>Submitter's number</b>	<b>Position</b>	<b>Decision requested</b>	<b>D-G's comments</b>



Federated Farmers of New Zealand	29	Amend	Amend: "Any <u>adverse effect on any Regionally Significant Wetland or on any regionally significant wetland value</u> "	Oppose – rule as written allows ORC to consider all effects on wetlands, not just adverse effects
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Amend 12.3.3.1(aa): "Any effect on and Regionally Significant Wetland or on any regionally significant wetland value <u>or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria.</u> "  Add new matters of discretion: " <u>(o) Effects on biological diversity and ecological values.</u> "	Support as strengthens wetland protection requirements and follows on from support for Forest & Birds submission in 153 Chap.10 above
<b>Council reference and provision: 72      Rule 12.4.1.1 - Discharge of stormwater general</b>				
Submitter's name	Submitter's number	Position	Decision requested	D-G's comments
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Amend (a)(i): "Any effect on and Regionally Significant Wetland or on any regionally significant wetland value <u>or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria.</u> "	Support as strengthens wetland protection requirements and follows on from support for Forest & Birds submission in 153 Chap.10 above
<b>Council reference and provision: 73      Rule 12.4.2.1 - Discharge of stormwater to water, or onto or into land where it may enter water</b>				
Submitter's name	Submitter's number	Position	Decision requested	D-G's comments
Federated Farmers of New Zealand	29	Amend	Amend: "Any <u>adverse effect on any Regionally Significant Wetland or on any regionally significant wetland value</u> "	Oppose – rule as written allows ORC to consider all effects on wetlands, not just adverse effects

Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Amend 12.4.2.1(c): <i>"Any effect on and Regionally Significant Wetland or on any regionally significant wetland value or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria."</i>  Add new matter of discretion: <i>"(o) Effects on biological diversity and ecological values."</i>	Support as strengthens wetland protection requirements and follows on from support for Forest & Birds submission in 153 Chap.10 above
<b>Council reference and provision: 75 Rule 12.5.2.1 - Discharge of drainage water - restricted discretionary activity</b>				
Submitter's name	Submitter's number	Position	Decision requested	D-G's comments
Federated Farmers of New Zealand	29	Amend	Amend: <i>"Any adverse effect on any Regionally Significant Wetland or on any regionally significant wetland value"</i>	Oppose – rule as written allows ORC to consider all effects on wetlands, not just adverse effects
<b>Council reference and provision: 81 Rule 12.8.1.2 - Discharge of contaminants collected in animal waste collection system in Zone A of Lower Waitaki Plains Groundwater Protection Zone</b>				
Submitter's name	Submitter's number	Position	Decision requested	D-G's comments
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Amend 12.8.1.2(l): <i>"There is no change to the water level or hydrological function, or no damage to the indigenous flora and fauna or its habitat, in or on any Regionally Significant Wetland, or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria."</i>	Support – similar to DOC submission

<b>Council reference and provision: 82 Rule 12.8.1.3 - Discharge of contaminants collected in animal waste collection system not in Zone A of a Groundwater Protection Zone</b>				
<b>Submitter's name</b>	<b>Submitter's number</b>	<b>Position</b>	<b>Decision requested</b>	<b>D-G's comments</b>
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Amend 12.8.1.3(l): <i>"There is no change to the water level or hydrological function, or no damage to the indigenous flora and fauna or its habitat, in or on any Regionally Significant Wetland, or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria."</i>	Support – similar to DOC submission
<b>Council reference and provision: 83 Rule 12.8.1.5 - Discharge of fertiliser onto production land where it may enter water</b>				
<b>Submitter's name</b>	<b>Submitter's number</b>	<b>Position</b>	<b>Decision requested</b>	<b>D-G's comments</b>
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Amend 12.8.1.5(c): <i>"There is no change to the water level or hydrological function, or no damage to the indigenous flora and fauna or its habitat, in or on any Regionally Significant Wetland, or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria."</i>	Support – similar to DOC submission
<b>Council reference and provision: 84 Rule 12.8.2.1 - Discharge of contaminants collected in animal waste collection system in Zone A Groundwater Protection Zones on Maps C10-C12 and C15</b>				
<b>Submitter's name</b>	<b>Submitter's number</b>	<b>Position</b>	<b>Decision requested</b>	<b>D-G's comments</b>



Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	<p>Amend (aa):  <i>"Any effect on and Regionally Significant Wetland or on any regionally significant wetland value or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria."</i></p> <p>Amend (a)(ii):  <i>"The natural character of any affected water body and their margins."</i></p> <p>Add new matter of discretion:  <i>"(o) Any effects on biological diversity and ecological values."</i></p>	Support as strengthens wetland protection requirements and follows on from support for Forest & Birds submission in 153 Chap.10 above
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**Council reference and provision: 85      Rule 12.9.1.1 - Discharge of water associated with down-hole pump testing**

<b>Submitter's name</b>	<b>Submitter's number</b>	<b>Position</b>	<b>Decision requested</b>	<b>D-G's comments</b>
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	<p>Amend 12.9.1.1(a):  <i>"There is no change to the water level or hydrological function, or no damage to the indigenous flora and fauna or its habitat, in or on any Regionally Significant Wetland, or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria."</i></p> <p>Add the following matters:  <i>"(a) Effects on biological diversity and ecological values; and  (b) There is no discharge to any surface water body including wetlands; and  (c) Effects on the natural character of wetlands and their margins."</i></p>	<p>Support as strengthens wetland protection requirements and follows on from support for Forest &amp; Birds submission in 153 Chap.10 above</p> <p>Also similar to DOC submission re: indigenous flora</p>

Council reference and provision: 86 Rule 12.9.1.2 - Discharge of contaminants associated with drilling				
Submitter's name	Submitter's number	Position	Decision requested	D-G's comments
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Amend 12.9.1.2(a): <i>"There is no change to the water level or hydrological function, or no damage to the indigenous flora and fauna or its habitat, in or on any Regionally Significant Wetland, or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria."</i>  Add the following matters: <i>"(a) Effects on biological diversity and ecological values; and            (b) There is no discharge to any surface water body including wetlands; and            (c) Effects on the natural character of wetlands and their margins."</i>	Support as strengthens wetland protection requirements and follows on from support for Forest & Birds submission in 153 Chap.10 above  Also similar to DOC submission re: indigenous flora
Council reference and provision: 87 Rule 12.9.2.1 - Discharge of water or contaminants associated with down-hole pump testing or drilling - restricted discretionary activity				
Submitter's name	Submitter's number	Position	Decision requested	D-G's comments
Federated Farmers of New Zealand	29	Amend	Amend: <i>"Any adverse effect on any Regionally Significant Wetland or on any regionally significant wetland value"</i>	Oppose – rule as written allows ORC to consider all effects on wetlands, not just adverse effects
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Amend (b): <i>"Any effect on and Regionally Significant Wetland or on any regionally significant wetland value or any wetland that meets the significance criteria listed in</i>	Support as strengthens wetland protection requirements and follows on from support for Forest

			<p><u>Appendix XX Ecological Criteria.</u>"</p> <p>Amend (a)(ii):  <i>"The natural character of any affected water body and their margins."</i></p> <p>Add new matter of discretion:  <i>"(o) Any effects on biological diversity and ecological values."</i></p>	& Birds submission in 153 Chap.10 above
<b>Council reference and provision: 88 Rule 12.10.1.1 - Discharge of any contaminant or water from a vessel</b>				
Submitter's name	Submitter's number	Position	Decision requested	D-G's comments
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	<p>Amend (a):  <i>"There is no discharge into or change the water level or hydrological function, or no damage to the indigenous flora and fauna or its habitat, in or on any Regionally Significant Wetland, or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria."</i></p>	Support as strengthens wetland protection requirements and follows on from support for Forest & Birds submission in 153 Chap.10 above
<b>Council reference and provision: 89 Rule 12.10.2.1 - Discharge of any contaminant or water from a vessel or from maintenance of vessel - restricted discretionary activity</b>				
Submitter's name	Submitter's number	Position	Decision requested	D-G's comments
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	<p>Amend (b):  <i>"Any effect on any Regionally Significant Wetland or on any regionally significant wetland value or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria."</i></p>	Support as strengthens wetland protection requirements and follows on from support for Forest & Birds submission in 153 Chap.10 above

			Amend (a)(ii): <i>"The natural character of any affected water body and their margins."</i>	
			Add new matter of discretion: <i>"(m) Any effects on biological diversity and ecological values."</i>	
<b>Council reference and provision: 90 Rule 12.11.2.1 - Discharge of sullage, cooling, drinking water supply reservoir, water supply pipeline or swimming pool water</b>				
Submitter's name	Submitter's number	Position	Decision requested	D-G's comments
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Amend 12.11.2.1(g): <i>"There is no discharge into or change to the water level or hydrological function, or no damage to the indigenous flora and fauna or its habitat, in or on any Regionally Significant Wetland, or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria."</i>	Support as strengthens wetland protection requirements and follows on from support for Forest & Birds submission in 153 Chap.10 above
<b>Council reference and provision: 91 Rule 12.11.2.2 - Discharge of water used for holding live organisms</b>				
Submitter's name	Submitter's number	Position	Decision requested	D-G's comments
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Amend 12.11.2.2(a): <i>"There is no discharge into or change to the water level or hydrological function, or no damage to the indigenous flora and fauna or its habitat, in or on any Regionally Significant Wetland, or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria."</i>	Support as strengthens wetland protection requirements and follows on from support for Forest & Birds submission in 153 Chap.10 above



Council reference and provision: 92      Rule 12.11.2.3 - Discharge of any other water				
Submitter's name	Submitter's number	Position	Decision requested	D-G's comments
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Amend 12.11.2.3(h): <i>"There is no discharge into or change to the water level or hydrological function, or no damage to the indigenous flora and fauna or its habitat, in or on any Regionally Significant Wetland, or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria."</i>	Support as strengthens wetland protection requirements and follows on from support for Forest & Birds submission in 153 Chap.10 above
Council reference and provision: 156      Chapter 12 general				
Submitter's name	Submitter's number	Position	Decision requested	D-G's comments
Treble Cone Investments Limited	2	Amend	Amend clauses within 12.1 to provide for taking of surface water to be a permitted activity for wetlands within the Ski Area Sub Zones (areas currently designated as Ski Area Sub Zones in the Queenstown-Lakes District Plan).	Oppose as this approach is likely to cause adverse effects to wetlands
Treble Cone Investments Limited	2	Amend	Amend clauses within 12.2, 12.3, 12.9, and 12.11 to provide for: <ul style="list-style-type: none"> <li>•taking of ground water, and</li> <li>•damming and diversion of water, and</li> <li>•discharges from drilling and bore testing, and</li> <li>•discharges of water or tracer dye</li> </ul> to be a permitted activity within the Ski Area Sub Zones (areas currently designated as Ski Area Sub Zones in the Queenstown-Lakes District Plan).	Oppose as this approach is likely to cause adverse effects to wetlands
Otago Fish & Game Council	8	Amend	Would like the proposed plan to signal the following as criterion within the rules:	Support

			Resource consent fee relief to protect, create, or enhance wetlands.	
Otago Fish & Game Council	8	Support	Supports all rules within the proposed plan where the addition of the words "Regionally Significant Wetland" has been added to the previous rule which was related to lakes and rivers.	Support
Cardrona Alpine Resort	15	Amend	Amend clauses within 12.1 to provide for taking of surface water to be a permitted activity for wetlands within the Ski Area Sub Zones (areas currently designated as Ski Area Sub Zones in the Queenstown-Lakes District Plan).	Oppose as this approach is likely to cause adverse effects to wetlands
Cardrona Alpine Resort	15	Amend	Amend clauses within 12.2, 12.3, 12.9, and 12.11 to provide for: <ul style="list-style-type: none"> <li>•taking of ground water, and</li> <li>•damming and diversion of water, and</li> <li>•discharges from drilling and bore testing, and</li> <li>•discharges of water or tracer dye</li> </ul> to be a permitted activity within the Ski Area Sub Zones (areas currently designated as Ski Area Sub Zones in the Queenstown-Lakes District Plan).	Oppose as this approach is likely to cause adverse effects to wetlands
Federated Farmers of New Zealand	29	Amend	Reinstate the word 'adverse' in these provisions: 12.1.4.8, 12.2.3.4, 12.3.3.1, 12.4.2.1, 12.5.2.1, 12.8.2, 12.9.2.1.	Oppose – rule as written allows ORC to consider all effects on wetlands, not just adverse effects
Contact Energy Limited	30	Did not specify	The opportunity to mitigate or offset the effects of activities on Regionally Significant Wetlands be given recognition in the rules.	Oppose – avoidance as a first option is likely to give far more protection to wetlands than remedy or mitigate
TrustPower Limited	40	Amend	Remove rules (or standards in rules) that seek to achieve no net change of any particular value(s).	Oppose – as is likely to weaken wetland protection
OtagoNet Joint Venture	43	Amend	Rules (or standards in rules) that seek to achieve no net change of any particular value(s) should not be	Oppose – as is likely to weaken wetland protection

			included in the Water Plan.	
OtagoNet Joint Venture	43	Amend	Amend or delete rules (or standards in rules) associated with a high degree of subjectivity.	Oppose – as is likely to weaken wetland protection
<b>Council reference and provision: 96 Rule 13.2.1.1 - Erection or placement of fence, pipe, line or cable over the bed</b>				
<b>Submitter's name</b>	<b>Submitter's number</b>	<b>Position</b>	<b>Decision requested</b>	<b>D-G's comments</b>
Federated Farmers of New Zealand	29	Support	Adopt 13.2.1.1 as proposed.	Oppose – and the DOC submission requested amendment to this rule
<b>Council reference and provision: 97 Rule 13.2.1.2 - Erection or placement of pipe, line or cable on or under the bed</b>				
<b>Submitter's name</b>	<b>Submitter's number</b>	<b>Position</b>	<b>Decision requested</b>	<b>D-G's comments</b>
Federated Farmers of New Zealand	29	Support	Adopt 13.2.1.2 as proposed.	Oppose – and the DOC submission requested amendment
<b>Council reference and provision: 97 Rule 13.2.1.2 - Erection or placement of pipe, line or cable on or under the bed</b>				
<b>Submitter's name</b>	<b>Submitter's number</b>	<b>Position</b>	<b>Decision requested</b>	<b>D-G's comments</b>
Federated Farmers of New Zealand	29	Support	Adopt 13.2.1.2 as proposed.	Oppose. As proposed this provision would allow for tile drains (which could be used to drain a wetland) to be installed without adequate assessment into Regionally Significant wetlands.

<b>Council reference and provision: 99 Rule 13.2.1.5 - Erection or placement of maimai</b>				
<b>Submitter's name</b>	<b>Submitter's number</b>	<b>Position</b>	<b>Decision requested</b>	<b>D-G's comments</b>
Federated Farmers of New Zealand	29	Amend	Amend: "...Is a <i>permitted</i> activity, providing that for the bed of any lake, river or <u>Regionally Significant Wetland</u> ..."	Support as provides for limits to the extent of maimai construction, hence limits to effects on wetlands
<b>Council reference and provision: 100 Rule 13.2.1.6 - Erection or placement of whitebait stand or eel trap</b>				
<b>Submitter's name</b>	<b>Submitter's number</b>	<b>Position</b>	<b>Decision requested</b>	<b>D-G's comments</b>
Federated Farmers of New Zealand	29	Amend	Amend: "...Is a <i>permitted</i> activity, providing that for the bed of any lake, river or <u>Regionally Significant Wetland</u> ..."	Support as provides for limits to the extent of whitebait or eel stand construction, hence limits to adverse effects on wetlands
<b>Council reference and provision: 103 Rule 13.2.2.1 - Erection or placement - restricted discretionary activity</b>				
<b>Submitter's name</b>	<b>Submitter's number</b>	<b>Position</b>	<b>Decision requested</b>	<b>D-G's comments</b>
Federated Farmers of New Zealand	29	Amend	Amend: "Any <u>adverse</u> effect on any <u>Regionally Significant Wetland</u> or on any regionally significant wetland value"	Oppose – rule as written allows ORC to consider all effects on wetlands, not just adverse effects
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Delete " <del>or any Regional Significant</del> " from the introduction to the rule.  Amend (aa): "Any effect on any <u>Regionally Significant Wetland</u> or on any regionally significant wetland value <u>or any</u> "	Support as this better encapsulates Sec. 6(a) RMA requirements in respect to wetland protection.  Strengthens wetland protection



			<p><u>wetland that meets the significance criteria listed in Appendix XX Ecological Criteria.</u>"</p> <p>Amend (a)(ii):  <i>"The natural character of any affected water body and their margins"</i></p> <p>Add new matter of discretion:  <u>"(m) Any effects on biological diversity and ecological values."</u></p>	<p>requirements and follows on from support for Forest &amp; Birds sub. In 153 Chap.10 above</p>
<p><b>Council reference and provision: 111      Rule 13.4.2.1 - Demolition or removal of a structure - restricted discretionary activity</b></p>				
Submitter's name	Submitter's number	Position	Decision requested	D-G's comments
Federated Farmers of New Zealand	29	<u>Amend</u>	<p>Amend:  <i>"Any <u>adverse</u> effect on any Regionally Significant Wetland or on any regionally significant wetland value"</i></p>	<p>Oppose – rule as written allows ORC to consider all effects on wetlands, not just adverse effects</p>
Royal Forest and Bird Protection Society of New Zealand Inc	47	<u>Amend</u>	<p>Delete "<del>or any Regional Significant</del>" from the introduction to the rule.</p> <p>Amend (aa):  <i>"Any effect on any Regionally Significant Wetland or on any regionally significant wetland value <u>or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria.</u>"</i></p> <p>Amend (a)(ii):</p>	<p>Support as this better encapsulates Sec. 6(a) RMA requirements in respect to wetland protection.</p> <p>Strengthens wetland protection requirements and follows on from support for Forest &amp; Birds sub. In 153 Chap.10 above</p>

			<p><i>"The natural character of any affected water body and their margins"</i></p> <p>Add new matter of discretion:  <i>"(m) Any effects on biological diversity and ecological values."</i></p>	
<b>Council reference and provision: 114 Rule 13.5.1.1 - Disturbance of the bed general</b>				
<b>Submitter's name</b>	<b>Submitter's number</b>	<b>Position</b>	<b>Decision requested</b>	<b>D-G's comments</b>
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	<p>Amend (i):  <i>"Except for activities covered by Rules 13.2.1.5, 13.2.1.6, or 13.2.1.8, there is no change to the water level or hydrological function, or no damage to the indigenous flora, fauna or its habitat, in or on any Regional Significant Wetland, or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria"</i></p> <p>Amend 13.5.1.1(f) as follows:  <i>"...of sediment to the lake, river or wetland..."</i></p>	<p>Support as this better encapsulates Sec. 6(a) RMA requirements in respect to wetland protection..</p> <p>Strengthens wetland protection requirements and follows on from support for Forest &amp; Birds sub. In 153 Chap.10 above</p>
<b>Council reference and provision: 118 Rule 13.5.1.8 - Disturbance by livestock</b>				
<b>Submitter's name</b>	<b>Submitter's number</b>	<b>Position</b>	<b>Decision requested</b>	<b>D-G's comments</b>
Otago Fish & Game Council	8	Amend	Remove the word "conspicuous" 13.5.1.8(b) unless guidance can be given on what constitutes "conspicuous".	Support
Lake Waihola Waipori Wetlands Society Inc.	20	Amend	Amend to encourage farmers not to graze wetlands and to encourage options for protection.	Support – better protects wetland values – but note that short-

				duration grazing can be useful in wetland management
Gavan James Herlihy	22	Amend	Need greater clarity to what is "conspicuous" in 13.5.1.8(b)	
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Delete " <del>or any Regionally Significant</del> " from the introduction to the rule.  Delete permitted condition (d).  Amend (e): <i>"The activity does not <del>significantly disturb</del> adversely affect indigenous..."</i>  Add new condition: <i>"<u>The activity is not within any Regionally Significant Wetland identified in Schedule 9 or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria.</u>"</i>	Support as this better encapsulates Sec. 6(a) RMA requirements in respect to wetland protection..  Strengthens wetland protection requirements and follows on from support for Forest & Birds sub. In 153 Chap.10 above
Herbert Heritage Society	48	Amend	All wetlands/rivers/estuaries must be fenced off from livestock unless the grazing through the wetland can be considered to be proven beneficial to the wetland in question or that the procedure for fencing would be detrimental to the said wetland.	Support – better protects wetland values and provides for short-duration grazing where it would benefit wetlands.
<b>Council reference and provision: 121      Rule 13.6.1.1 - Introduction of pest plants general</b>				
<b>Submitter's name</b>	<b>Submitter's number</b>	<b>Position</b>	<b>Decision requested</b>	<b>D-G's comments</b>
Lake Waihola Waipori Wetlands Society Inc.	20	Amend	Include list of prohibited species in proposed rule 13.6.1. List should reflect that terrestrial species have a greater impact on the health of wetlands than the list of aquatic species in the proposed plan.	Support – similar to DOC submission
Royal Forest and Bird Protection	47	Amend	Amend: <i>"...to the bed or water of any Otago lakes, river or</i>	Support – better provides for the

Society of New Zealand Inc			<p><i>any Regionally Significant Wetland, is a prohibited activity for which no resource consent will be granted."</i></p> <p>Add the following species:  <u>Glyceria species</u>  <u>Alder (Alnus species)</u>  <u>Crack Willow</u>  <u>Gray Willow</u></p>	protection of the natural character of wetlands (Sec. 6(a))
<b>Council reference and provision: 122 Rule 13.6.2.0 - Introduction or planting of New Zealand native plant</b>				
Submitter's name	Submitter's number	Position	Decision requested	D-G's comments
Clutha District Council	34	Amend	<p>Either:</p> <ul style="list-style-type: none"> <li>• Restrict native plants to wetland species which are native to the area; or</li> <li>• Add new condition "(d) There is no change to the water level or hydrological function, or no damage to the flora, fauna and its habitat, in or on any Regionally Significant Wetland".</li> </ul>	Support – better protects wetlands and provides for local ecological values of same
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	<p>Add the following permitted rule condition:  <u>"All plants and seeds are eco-sourced and appropriate for the specific wetland ecosystem."</u></p>	Support – better protects wetlands and provides for local ecological values of same
<b>Council reference and provision: 125 Rule 13.7.2.1 - Removal of pest plants - controlled activity</b>				
Submitter's name	Submitter's number	Position	Decision requested	D-G's comments
Lake Waihola Waipori Wetlands Society Inc.	20	Amend	<p>Amend to include; Reed Sweetgrass <i>Glyceria maxima</i>, Crack Willow <i>Salix fragilis</i>, Grey Willow <i>Salix cinerea</i>, Black Alder <i>Alnus glutinosa</i>, Red Alder <i>Alnus rubra</i>, Pine <i>Pinus radiata</i>.</p>	Support – better protects wetlands and provides for local ecological values of same

Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Amend: <i>"...from the bed of any lake or river, or any <del>Regional Significant</del> wetland, is a ..."</i>  <u>Add the following species:</u> <u>"Glyceria species</u> <u>Alder (Alnus species)</u> <u>Crack Willow</u> <u>Gray Willow</u> <u>Alder (Alnus species)</u> <u>Crack Willow</u> <u>Gray Willow"</u>	Support – better provides for the protection of the natural character of wetlands (Sec. 6(a))
<b>Council reference and provision: 155 Chapter 13 general</b>				
<b>Submitter's name</b>	<b>Submitter's number</b>	<b>Position</b>	<b>Decision requested</b>	<b>D-G's comments</b>
Treble Cone Investments Limited	2	Amend	Amend clauses within 13.2, 13.3, 13.4, 13.5, 13.6 and 13.7 to provide for: <ul style="list-style-type: none"> <li>•erection, placement, extension, alteration, reconstruction, demolition or removal of structures and</li> <li>•alteration of a wetland and</li> <li>•introduction, planting or removal of vegetation to be a permitted activity for wetlands within the Ski Area Sub Zones (areas currently designated as Ski Area Sub Zones in the Queenstown-Lakes District Plan).</li> </ul>	Oppose – as these activities will allow damage to occur to wetlands within Ski Areas which may cause adverse effects
Otago Fish & Game Council	8	Support	Supports all rules within the proposed plan where the addition of the words "Regionally Significant Wetland" has been added to the previous rule which was related to lakes and rivers.	Support – aligns with DOC submission
Otago Fish & Game Council	8	Amend	Would like the proposed plan to signal the following as criterion within the rules:	Support will assist agencies and

			Resource consent fee relief to protect, create, or enhance wetlands.	individuals which/who wish to restore wetlands, by removing a potential barrier.
Cardrona Alpine Resort	15	Amend	Amend clauses within 13.2, 13.3, 13.4, 13.5, 13.6 and 13.7 to provide for: •erection, placement, extension, alteration, reconstruction, demolition or removal of structures and •alteration of a wetland and •introduction, planting or removal of vegetation to be a permitted activity for wetlands within the Ski Area Sub Zones (areas currently designated as Ski Area Sub Zones in the Queenstown-Lakes District Plan).	Oppose – as these activities will allow damage to occur to wetlands within Ski Areas which may cause adverse effects
Federated Farmers of New Zealand	29	Amend	Reinstate the word 'adverse' in these provisions: 13.2.2.1, 13.3.2.1, 13.4.2.1, 13.5.2.1.	Oppose - as rule as written allows ORC to consider all effects
Contact Energy Limited	30	Did not specify	The opportunity to mitigate or offset the effects of activities on Regionally Significant Wetlands be given recognition in the rules.	Oppose – as avoidance should be the primary consideration
Contact Energy Limited	30	Amend	That controls on the use of the beds of wetlands are not duplicated by the Regional and District Plans.	Oppose - essential that consistent controls are applied across all relevant planning instruments, in order to ensure protection of wetlands and their values.
OtagoNet Joint Venture	43	Amend	Rules (or standards in rules) that seek to achieve no net change of any particular value(s) should not be included in the Water Plan.	Oppose – wetlands are a threatened ecosystem type and further adverse effects on them should be avoided – Sec 6 (a)
OtagoNet Joint Venture	43	Amend	Amend or delete rules (or standards in rules) associated with a high degree of subjectivity.	Oppose – rules provide for protection of regionally significant wetlands and their values.



Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Amend Rules 13.2.1.1; 13.2.1.2; 13.2.1.4; 13.2.1.5; 13.2.1.6 and 13.2.1.8: <i>"The...bed of a lake or river, <del>or any Regionally Significant W</del> wetland is a permitted activity, providing:"</i>  Add the following permitted activity conditions: <i>"(a) <u>The structure is not in a Regionally Significant Wetland or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria.</u></i> <i>(b) <u>Effects on biological diversity and ecological values; and</u></i> <i>(c) <u>Effects on the natural character of wetlands and their margins.</u>"</i>	Support – better provides for the protection of the natural character of all wetlands (Sec. 6(a))
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Add new non-complying rule: <i>"<u>Removal or clearance of native plant material from any Regionally Significant Wetland, or any wetland that meets the significance criteria listed in Schedule #; and is a non-complying activity.</u>"</i>	Oppose – as there may be occasions during wetland restoration when some clearance of native vegetation would benefit overall restoration objectives – also, during willow (and other weed) spraying operations, some collateral damage will occur to native vegetation, but this is generally short-term, followed by recovery, and is more than balanced-out by the re-growth of native vegetation previously prevented by willow (and other weed) coverage.
<b>Council reference and provision: 157 Drain maintenance</b>				
<b>Submitter's</b>	<b>Submitter's</b>	<b>Position</b>	<b>Decision requested</b>	<b>D-G's comments</b>

name	number			
Three Creeks Farm	19	Amend	<p>If Te Hua Taki Wetland (Map F66, #171) is retained as a regionally significant wetland then:</p> <ul style="list-style-type: none"> <li>•Provide for the maintenance of existing drains into and out of the wetland as a permitted activity.</li> <li>•If consents are required include a non notification clause, include the consents as a controlled activity, that there is no fee on the consent.</li> </ul>	<p>Oppose both:</p> <p>1<sup>st</sup> bullet-point – as maintenance of existing drains can cause adverse effects of a similar scale to the construction of new drains within wetlands.</p> <p>2<sup>nd</sup> bullet-point – maintenance of existing drains should require a resource consent with conditions – the ability to refuse a consent needs to be available in order to deal with the worst cases of potential damage.</p>
Gavan James Herlihy	22	Amend	Maintenance of existing drains to be a permitted activity.	Oppose - as maintenance of existing drains can cause adverse effects of a similar scale to the construction of new drains within wetlands.
Karl Frank Burgess	49	Oppose	Oppose having to get resource consent to clean existing ditches to keep them safe for stock. If I have to get consent I do not want to get consent every year and consent should last for 35 years.	Oppose - as maintenance of existing drains can cause adverse effects of a similar scale to the construction of new drains within wetlands.



Council reference and provision: 161 Protection general				
Submitter's name	Submitter's number	Position	Decision requested	D-G's comments
Contact Energy Limited	30	Support	The opportunity to mitigate or offset the effects of activities on Regionally Significant Wetlands be given recognition in the objectives, policies, and rules.	Oppose – as avoidance should be the primary consideration
Council reference and provision: 162 Generic permitted activity condition for wetlands protection				
Submitter's name	Submitter's number	Position	Decision requested	D-G's comments
Federated Farmers of New Zealand	29	Amend	Delete: <i>"There is no change to the water level or hydrological function, or no damage to the flora, fauna or its habitat, in or on any Regionally Significant Wetland."</i> In rules 12.1.2.4, 12.1.2.5, 12.1.2.6, 12.2.2.5, 12.2.2.6, 12.3.2.1, 12.3.2.2, 12.3.2.3, 13.4.1.1, 13.5.1.1, 13.5.1.3, 13.5.1.8.	Oppose – rules provide for protection of regionally significant wetlands and their values.
Meridian Energy Limited	32	Amend	Delete: <i>"There is no change to the water level or hydrological function, or no damage to the flora, fauna or its habitats, in or on any Regionally Significant Wetland"</i> In rules 12.1.2.4, 12.1.2.5, 12.1.2.6, 12.2.2.5, 12.2.2.6, 12.3.2.1, 12.3.2.2, 12.3.2.3, 12.5.1.1 and 13.5.1.3	Oppose – rules provide for protection of regionally significant wetlands and their values.
Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, Te	38	Support	Support the addition throughout the Plan of: <i>"There is no change to the water level or hydrological function, or no damage to the flora, fauna or its habitat, in or on any Regionally</i>	Support – better provides for the protection of regionally significant wetlands

Runanga o Otakou, and Hokonui Runanga			<i>Significant Wetland.</i> "	
Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou, and Hokonui Runanga	38	Amend	Add provision to all permitted activities where it concerns permanent structures in or possible effects on regionally significant wetlands: <i>"That there is no change to the water level or hydrological function, or no damage to the flora, fauna or its habitat, in or on any Regionally Significant Wetland."</i>	Support – better provides for the protection of regionally significant wetlands
TrustPower Limited	40	Amend	Delete: <i>"There is no change to the water level or hydrological function, or no damage to the flora, fauna or its habitat, in or on any Regionally Significant Wetland"</i> in rules 12.1.2.4, 12.1.2.5, 12.1.2.6, 12.2.2.5, 12.2.2.6, 12.3.2.1, 12.3.2.2, 12.3.2.3, 13.4.1.1, 13.5.1.1, 13.5.1.3.  Rules 12.1.2.4, 12.1.2.5, 12.2.2.5, and 12.2.2.6 may include an alternative standard that provides that water is not taken from any Regionally Significant Wetland.  May be appropriate to include a maximum allocation value in rules 12.1.2.5 and 12.2.2.6 to control takes that may affect the water level of any particular Regionally Significant Wetland.	Oppose – rules provide for protection of regionally significant wetlands and their values.
OtagoNet Joint Venture	43	Amend	Delete permitted activity standard in Rules 13.4.1.1, 13.5.1.1 and 13.5.1.3: <i>"There is no change in water level or hydrological function, or no damage to the flora, fauna or its habitat, in or on any Regionally Significant Wetland."</i>	Oppose – rules provide for protection of regionally significant wetlands and their values.

<b>Council reference and provision: 200 Schedule 9</b>				
<b>Submitter's name</b>	<b>Submitter's number</b>	<b>Position</b>	<b>Decision requested</b>	<b>D-G's comments</b>
Federated Farmers of New Zealand	29	Amend	Remove any wetlands inaccurately identified as Regionally Significant Wetlands included within Schedule 9 maps as identified by individual submitters.	Oppose, unless independent advice from a component ecologist supports the views of such submitters.
Contact Energy Limited	30	Oppose	That Schedule 9 be not approved.	Oppose as Schedule 9 is fundamental for the provision of the sustainable management of the regions significant wetlands.
Clutha District Council	34	Support	Supports the inclusion of additional wetlands in the Clutha District, recognising that the affected landowners need to be involved in finalising the details of wetland boundaries.	Support the part re: inclusion of additional wetlands – but when landowners are involved in finalising wetland boundaries this inevitably results in losses of wetland margins.
<b>Council reference and provision: 232 Schedule 9 - Cross Eden Creek Marsh Complex (#32, Map F16)</b>				
<b>Submitter's name</b>	<b>Submitter's number</b>	<b>Position</b>	<b>Decision requested</b>	<b>D-G's comments</b>
Maniototo Homestead	23	Oppose	Status quo.	Oppose, unless independent advice from a component ecologist supports the views of the submitter.

<b>Council reference and provision: 235 Schedule 9 - Diamond Lake Wetland (#35, Map F3)</b>				
<b>Submitter's name</b>	<b>Submitter's number</b>	<b>Position</b>	<b>Decision requested</b>	<b>D-G's comments</b>
Geoffrey Thomson	6	Amend	Amend the boundaries of wetland which is on parts of my farm property.	Oppose, unless independent advice from a component ecologist supports the views of the submitter.
<b>Council reference and provision: 270 Schedule 9 - Kemp Road Lagoon (#70, Map F65)</b>				
<b>Submitter's name</b>	<b>Submitter's number</b>	<b>Position</b>	<b>Decision requested</b>	<b>D-G's comments</b>
Trevor and Vivien Nimmo	18	Amend	Remove wetland from Schedule 9.	Oppose, unless independent advice from a component ecologist supports the views of the submitter.
<b>Council reference and provision: 276 Schedule 9 - Lake Reid Wetland (#76, Map F3)</b>				
<b>Submitter's name</b>	<b>Submitter's number</b>	<b>Position</b>	<b>Decision requested</b>	<b>D-G's comments</b>
Geoffrey Thomson	6	Amend	Amend the boundaries of wetland, which is on parts of my farm property.	Oppose, unless independent advice from a component ecologist supports the views of the submitter.
<b>Council reference and provision: 277 Schedule 9 - Lake Tuakitoto Wetland (#77, Map F43)</b>				
<b>Submitter's</b>	<b>Submitter's</b>	<b>Position</b>	<b>Decision requested</b>	<b>D-G's comments</b>

<b>name</b>	<b>number</b>			
Brookhouse Farm Ltd	31	Amend	Some of the land on the far Western boundary of the wetland should not be classified as regionally significant wetland. Proposed an alternative boundary on an attached copy of Map F43 and the area of concern is marked 'a'.	Oppose, unless independent advice from a component ecologist supports the views of the submitter.
<b>Council reference and provision: 284 Schedule 9 - Loch Loudon Fen Complex (#84, Map F50)</b>				
<b>Submitter's name</b>	<b>Submitter's number</b>	<b>Position</b>	<b>Decision requested</b>	<b>D-G's comments</b>
TrustPower Limited	40	Amend	Establish a Management Zone for the Waipori Hydro Scheme and Loch Loudon Fen Complex which recognises and provides for the longstanding human use influences on this wetland and the potential for such influences to change. [Submission includes a draft management zone, with objectives, policies and rules, to be conjointly developed by submitter and Council].	Oppose, unless independent advice from a component ecologist supports the views of the submitter.
<b>Council reference and provision: 285 Schedule 9 - Loch Luella Fen Complex (#85, Maps F50 &amp; F51)</b>				
<b>Submitter's name</b>	<b>Submitter's number</b>	<b>Position</b>	<b>Decision requested</b>	<b>D-G's comments</b>
TrustPower Limited	40	Amend	Establish Management Zone for the Waipori Hydro Scheme and Loch Luella Fen Complex which recognises and provides for the longstanding human use influences on this wetland and the potential for such influences to change. [Submission includes a draft management zone, with objectives, policies and rules, to be conjointly developed by submitter and Council].	Oppose, unless independent advice from a component ecologist supports the views of the submitter.



**Council reference and provision: 287 Schedule 9 - Lower Coutts Gully Swamp (#87, Map F46)**

<b>Submitter's name</b>	<b>Submitter's number</b>	<b>Position</b>	<b>Decision requested</b>	<b>D-G's comments</b>
Martin and Barbara Palmer	4	Amend	Map F46 is reduced in extent within the Palmer property as shown on the annotated attached map.	Oppose, unless independent advice from a component ecologist supports the views of the submitter.

**Council reference and provision: 288 Schedule 9 - Lower Manorburn Dam Margins (#88, Map F15)**

<b>Submitter's name</b>	<b>Submitter's number</b>	<b>Position</b>	<b>Decision requested</b>	<b>D-G's comments</b>
Galloway Irrigation Society Incorporated	41	Oppose	Wetland not to be classified as a Significant Wetland and not included in Schedule 9.	Oppose, unless independent advice from a component ecologist supports the views of the submitter.

**Council reference and provision: 323 Schedule 9 - Pleasant River Estuary Wetland Complex (#123, Map F67)**

<b>Submitter's name</b>	<b>Submitter's number</b>	<b>Position</b>	<b>Decision requested</b>	<b>D-G's comments</b>
Graeme John Hagan	9	Oppose	Oppose changes.	Oppose, unless independent advice from a component ecologist supports the views of the submitter.
Wayne Allan and Rochelle Anne Hagan	10	Oppose	Oppose changes.	Oppose, unless independent advice from a component ecologist supports the views of the

				submitter.
<b>Council reference and provision: 337 Schedule 9 - Shotover River Confluence Swamp (#137, Map F5)</b>				
Submitter's name	Submitter's number	Position	Decision requested	D-G's comments
Ladies Mile Partnership	44	Oppose	a.) Removal of wetland's categorisation as a regionally significant wetland; or b.) Reduction in the size of the area mapped in Map F5.	Oppose, unless independent advice from a component ecologist supports the views of the submitter.
<b>Council reference and provision: 339 Schedule 9 - Stirling Marsh Complex (#139, Map F43)</b>				
Submitter's name	Submitter's number	Position	Decision requested	D-G's comments
William Thomas Begg	17	Amend	Remove the areas identified as Stirling Marsh Complex that are on my property from proposed plan change 2.	Oppose, unless independent advice from a component ecologist supports the views of the submitter.
<b>Council reference and provision: 351 Schedule 9 - Three Stones Fen Complex (#151, Map F53)</b>				
Submitter's name	Submitter's number	Position	Decision requested	D-G's comments
The Retreat Trust	28	Oppose	Oppose the proposed Plan Change. Take the tussock ground out of the fen system.	Oppose, unless independent advice from a component ecologist supports the views of the submitter.



**Council reference and provision: 356 Schedule 9 - Trig Q Ephemeral Pool (#156, Map F55)**

<b>Submitter's name</b>	<b>Submitter's number</b>	<b>Position</b>	<b>Decision requested</b>	<b>D-G's comments</b>
David Jopp	12	Oppose	Not include Trig Q Ephemeral Pool.	Oppose, unless independent advice from a component ecologist supports the views of the submitter.

**Council reference and provision: 361 Schedule 9 - Upper Taiari Wetlands Complex (#161, Maps F22 to F28)**

<b>Submitter's name</b>	<b>Submitter's number</b>	<b>Position</b>	<b>Decision requested</b>	<b>D-G's comments</b>
SH Andrews and Sons Ltd	7	Amend	Redraw the map within our property to exclude additional areas that are not genuine wetlands.	Oppose, unless independent advice from a component ecologist supports the views of the submitter.
Meridian Energy Limited	32	Amend	Amend boundary of Map F26 to reflect changes indicated in Annexure One to this submission (changes to boundary indicated in pink).	Oppose, unless independent advice from a component ecologist supports the views of the submitter.

**Council reference and provision: 371 Schedule 9 - Te Hua Taki Wetland (#171, Map F66)**

<b>Submitter's name</b>	<b>Submitter's number</b>	<b>Position</b>	<b>Decision requested</b>	<b>D-G's comments</b>
Three Creeks Farm	19	Oppose	Remove wetland from the proposed schedule of regionally significant wetlands.	Oppose, unless independent advice from a component ecologist supports the views of the

				submitter.
<b>Council reference and provision: 144 General opposition</b>				
<b>Submitter's name</b>	<b>Submitter's number</b>	<b>Position</b>	<b>Decision requested</b>	<b>D-G's comments</b>
Deanne and Steve Amende	1	Oppose	Oppose proposed plan change 2	Oppose as Proposed Plan Change 2 provides for the sustainable management of the regions significant wetlands.
Maniototo Homestead	23	Oppose	Status quo. Strongly oppose the need for the proposed plan change.	Oppose as Proposed Plan Change 2 provides for the sustainable management of the regions significant wetlands.
TrustPower Limited	40	Oppose	Withdraw Plan Change in the event that the amendments set out in the submission are not implemented.	Oppose as Proposed Plan Change 2, exclusive of the submitters proposed amendments, provides for the sustainable management of the regions significant wetlands.
OtagoNet Joint Venture	43	Oppose	Plan Change 2 be withdrawn if the amendments and addendums set out in the submission are not implemented.	Oppose as Proposed Plan Change 2, exclusive of the submitters proposed amendments, provides for the sustainable management of the regions significant wetlands.