Forest and Bird: Further Submission To: Proposed Plan Change 2 Regionally Significant Wetlands – Otago Regional Council 29 September 2011

Forest and Bird

Box 6230Dunedin 9010Ph 477 9677S.maturin@forestandbird.org.nzContact: Sue MaturinWe do wish to be heard and if others make a similar submission we will consider presenting a joint case.I represent a relevant aspect of the public interest.



Part 1 Regionally Significant Wetlands and Values

7.139 Policy 10.4.1.A Definition

Submitter Name	Sub Number	Support/Oppose	Part of Submitters Submission	Reasons
Solid Energy NZ	5	oppose	Remove 10.4.1A(c) and replace with: (c) A wetland higher than 800 metres above sea level which has been subjected to an evaluation confirming its ecological	Only 9.4% of NZ's wetlands remain and it is a national priority to protect remaining wetlands, and the draft NPS foreshadows the importance of protecting wetlands. Wetlands above 800m are particularly important in enhancing water quantity and deserve to be protected.
NZ Ski Limited	11	Oppose	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)	Ski field activities and developments can cause significant adverse effects to wetlands and should not be exempt from planning restrictions.

Submitter Name	Sub Number	Support/Oppose	Part of Submitters Submission	Reasons
Trust Power Limited	40	Oppose	Amend 10.4.1B: "Schedule 9 lists those Regionally Significant Wetlands that are mapped in Maps F1-F68 and contain one or more regionally significant wetland values <u>and their regionally significant wetland values</u> <u>as per Policy</u> 10.4.1	Values are more appropriate in a Inventory as any updates can be added without undergoing a plan change

159 Chapter 16

Submitter Name	Sub Number	Support/Oppose	Part of Submitters Submission	Reasons
Trust Power Limited	40	Oppose	Include in the Water Plan formal guidance on what an assessment of effects on a wetland above 800m should entail. Include the following information requirement: "Any activity managed by this Plan which has the potential to affect any wetland higher than 800 metres, must consider: 1. Whether the wetland is associated with one or more of the regionally significant values identified in Policy 10.4.1; and if so 2. The wetland is a Regionally Significant Wetland and the applicant must provide the following information: a. An assessment of the activity against the rules and standards pertaining to Regionally Significant Wetlands: b. An assessment of the effects of the activity on the wetland; and c. An assessment of the effects	Only 9.4% of NZ's wetlands remain and it is a national priority to protect remaining wetlands, and the draft NPS foreshadows the importance of protecting wetlands. Wetlands above 800m are particularly important in enhancing water quantity and deserve to be protected.

Regionally Significant Wetland Values

6.14 Policy 10.4.1 Definition of Regionally Significant Wetland Values

Submitter Name	Sub	Support/Oppose	Part of Submitters Submission	Reasons
	Number			
Otago Fish and Game Council	8	Support	Add criterion:	The ecological importance of networks of
Council			A10) Importance of this wetland within the wider	wetlands are recognised in the criterion
			network of wetlands within its catchment.	"Ecological Context" endorsed by the

		Environment Court as criteria for	
		identifying significant wetlands.	

Chapter 10 Wetlands 5 Objective 10.3.1 Maintain or enhance wetlands

Submitter Name	Sub Number	Support/Oppose	Part of Submitters Submission	Reasons
Trust Power Limited	40	Oppose	Amend: "Otago's <u>regionally significant</u> wetlands and their values and services will be maintained or enhanced for present and future generations.	The RMA requires robust mechanisms for all wetlands not just regionally significant wetlands.

9 Policy 10.4.2 Priority on avoiding adverse effects

Submitter Name	Sub Number	Support/Oppose	Part of Submitters Submission	Reasons
Merridian Energy Limited	32	Oppose	Delete policy 10.4.2 and replace with: "The adverse effects of activities on Regionally Significant Wetland shall be avoided where practicable and, otherwise, remedied or mitigated."	Wetlands are severely threatened ecosystems. Avoid preference is an important priority.

153 Chapter 10 General

Submitter Name	Sub Number	Support/Oppose	Part of Submitters Submission	Reasons
Otago Fish and Game Council	8	support	Amend the objectives and policies to reflect that wetland boundaries are often indistinct and changeable. Suggested wording of new policy: "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."	Promotion of sustainable management requires the maintenance of life supporting capacity of wetlands, and protection of regionally significant wetlands requires avoiding adverse impacts on wetland hydrology.
River-Estuary Care	13	Support	There should be specific mention of negative effects of	Tidal gates can have significant adverse

			tidal gates on coastal wetland habitats, blocking natural tidal flows to and from the wetland and the Sea.	effects on wetlands.
Cadrona Alpine Resort	15	Oppose	The locations identified as Ski Area Sub Zones in the Queenstown-Lakes District Plan should also be adopted as policy areas within the ORC Plan.	Wetlands within the Ski Areas Subzone are regionally significant and need to be recognised and managed within this framework.
Te Ao Marama Inc	16	Support	Include preservation of wetland, lake and river margins in the proposed plan change.	This is inline with S6(a) RMA.
Trustpower Limited	40	Oppose	Recognise and provide for the potential for alterations in the human use influences that affect certain wetlands.	Section 6(a) RMA requires preservation of the natural character of wetlands and their margins.

Chapter 12 rules: Water Take, Use and Management

22 Rule 12.1.1A1

Submitter Name	Sub Number	Support/Oppose	Part of Submitters Submission	Reasons
Federated Farmers of New Zealand	29	Oppose	Amend the activity status to a restricted discretionary activity.	Non complying is the most appropriate status.
Contact Energy	30	Oppose	That the non-complying activity status proposed for activities controlled by Chapter 12 be not approved and that such activities remain as discretionary activities.	Non Complying status is Consistent with Part 2 RMA and section 30.

28 Rule 12.1.2.6 Take and use of surface water for land drainage

Submitter Name	Sub	Support/Oppose	Part of Submitters Submission	Reasons
	Number			
Federated Farmers of	29	Oppose	Categorise the maintenance of an existing drain,	Clearing of drains can have adverse effects
New Zealand			including the clearing of any subsequent slumping, as a	and should require a consent. This is an
			permitted activity.	issue in the pollution of Waituna Lagoon in
				SOUTHLAND.

45 Rule 12.2.1A1

Submitter Name	Sub Number	Support/Oppose	Part of Submitters Submission	Reasons
Federated Farmers of New Zealand	29	Oppose	Amend the activity status to a restricted discretionary activity.	Full non- complying status is essential to provide robust protection of wetlands.
Contact Energy	30	Oppose	That the non-complying activity status proposed for activities controlled by Chapter 12 be not approved and that such activities remain as discretionary activities.	Full non- complying status is essential to provide robust protection of wetlands.

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53 Rule 12.2.3.4

Submitter Name	Sub Number	Support/Oppose	Part of Submitters Submission	Reasons
Federated Farmers of New Zealand	29		Amend: "Any adverse effect on any Regionally Significant Wetland or on any regionally significant wetland value"	Council needs to consider all effects on regionally significant wetlands

60 Rule 12.3.1A1

Submitter Name	Sub Number	Support/Oppose	Part of Submitters Submission	Reasons
Federated Farmers of New Zealand	29	Oppose	Amend the activity status to a restricted discretionary activity.	These activities have significant adverse effects on wetlands and it is appropriate they are non complying, to give certainty for the protection of wetlands.
Contact Energy	30	Oppose	That the non-complying activity status proposed for activities controlled by Chapter 12 be not approved and that such activities remain as discretionary activities.	These activities have significant adverse effects on wetlands and it is appropriate they are non complying, to

				give certainty for the protection of wetlands.
Trust Power Limited	40	Oppose	Amend Rule 12.3.1A.1: "Unless covered by Rules 12.3.1.1 to 12.3.1.4, and 12.3.3.1(i): (i) The direct damming or diversion of water from or within any Regionally Significant Wetland; or (ii) The damming or diversion of water that affects the water level of any Regionally Significant Wetland; is a non-complying activity."	These activities have significant adverse effects on wetlands and it is appropriate they are non complying, to give certainty for the protection of wetlands.

64 Rule 12.3.2.2

Submitter Name	Sub Number	Support/Oppose	Part of Submitters Submission	Reasons
Federated Farmers	29	Oppose	Categorise the maintenance of an existing drain, including the clearing of any subsequent slumping, as a permitted activity.	Clearing of drains can have adverse effects and should require a consent. This is an issue in the pollution of Waituna Lagoon in SOUTHLAND.

73 Rule 12.4.2.1

Submitter Name	Sub	Support/Oppose	Part of Submitters Submission	Reasons
	Number			

75 Rule 12.5.2.1

Submitter Name	Sub	Support/Oppose	Part of Submitters Submission	Reasons
	Number			
Federated Farmers of	29	Oppose	Amend: "Any adverse effect on any Regionally Significant	Council needs to consider all
New Zealand			Wetland or on any regionally significant wetland value"	effects on regionally
				significant wetlands

84 Rule 12.8.2.1

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Submitter Name	Sub	Support/Oppose Part of Submitters Submission	Reasons
	040	support, oppose i art of submitters submission	neusons

	Number			
Federated Farmers of	29	Oppose	Amend: "Any adverse effect on any Regionally Significant	Council needs to consider all
New Zealand			Wetland or on any regionally significant wetland value"	effects on regionally
				significant wetlands

87 Rule 12.9.2.1

Submitter Name	Sub	Support/Oppose	Part of Submitters Submission	Reasons
	Number			
Federated Farmers of	29	Oppose	Amend: "Any adverse effect on any Regionally Significant	Council needs to consider all
New Zealand			Wetland or on any regionally significant wetland value"	effects on regionally
				significant wetlands

Chapter 12 General

Submitter Name	Sub Number	Support/Oppose	Part of Submitters Submission	Reasons
Treble Cone Investments Limited	2	oppose	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).	Ski Areas include wetlands of regional significance and surface water takes can have adverse effects.
Treble Cone Investments Limited	2	oppose	Amend clauses within 12.2, 12.3, 12.9, and 12.11 to provide for: •taking of ground water, and •damming and diversion of water, and •discharges from drilling and bore testing, and •discharges of water or tracer dye 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).	Ski Areas include wetlands of regional significance and these activities can have adverse effects.
Otago Fish & Game Council	8	Support	Would like the proposed plan to signal the following as criterion within the rules: Resource consent fee relief to protect, create, or enhance wetlands.	Forest and Bird supports the encouragement of wetland creation and enhancement and this would be a small but significant means of doing that.
Federated Farmers of	29	Amend	Reinstate the word 'adverse' in these provisions:	Council needs to consider all

New Zealand			12.1.4.8, 12.2.3.4, 12.3.3.1, 12.4.2.1, 12.5.2.1, 12.8.2,	effects on regionally
			12.9.2.1.	significant wetlands.
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.	Neither offsetting or mitigation will result in the protection of regionally significant wetlands. Avoidance provides certainty and meets Part 2 and section 30 RMA requirements.
TrustPower Limited	40	Oppose	Remove rules (or standards in rules) that seek to achieve no net change of any particular value(s).	Avoidance provides certainty and meets Part 2 and section 30 RMA requirements for wetland protection
OtagoNet Joint Venture	43	Oppose	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.	Avoidance provides certainty and meets Part 2 and section 30 RMA requirements for wetland protection

Chapter 13 Rules: Land Use on Lake or River Beds and Regionally Significant Wetlands

103 Rule 13.2.2.1

Submitter Name	Sub	Support/Oppose	Part of Submitters Submission	Reasons
	Number			
Federated Farmers of	29	Support	Amend: "Any adverse effect on any Regionally Significant	Council needs to consider all
New Zealand			Wetland or on any regionally significant wetland value"	effects on regionally
				significant wetlands

107 Rule 13.3.1.2

Submitter Name	Sub Number	Support/Oppose	Part of Submitters Submission	Reasons
OtagoNet Joint Venture	43	Oppose	Amend: "(a) In the case of a replacement or reconstruction, the structure is replaced or reconstructed in approximately the same location as the original structure; and"	The requested words create uncertainty.
Federated Farmers of	29	Support	Amend: "Any adverse effect on any Regionally Significant	Council needs to consider all

New Zealand	Wetland or on any regionally significant wetland value"	effects on regionally
		significant wetlands

111 Rule 13.4.2.1

Submitter Name	Sub	Support/Oppose	Part of Submitters Submission	Reasons
	Number			
Federated Farmers of New Zealand	29	Support	Amend: "Any adverse effect on any Regionally Significant Wetland or on any regionally significant wetland value"	Council needs to consider all effects on regionally
l				significant wetlands

118 Rule 13.5.1.8 – Disturbance by livestock

Submitter Name	Sub Number	Support/Oppose	Part of Submitters Submission	Reasons
Lake Waihola Waipori Wetlands Society Inc.	20	Support	Amend to encourage farmers not to graze wetlands and to encourage options for protection.	Grazing damages the life supporting capacity of wetlands.
Herbert Heritage Society	48	Support	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.	Grazing damages the life supporting capacity of wetlands.

119 Rule 13.5.2.1

Submitter Name	Sub	Support/Oppose	Part of Submitters Submission	Reasons
	Number			
Federated Farmers of New Zealand	29	Oppose	Amend: "Any adverse effect on any Regionally Significant Wetland or on any regionally significant wetland value"	Council needs to consider all effects on regionally
				significant wetlands

155 Chapter 13 General

Submitter Name	Sub	Support/Oppose	Part of Submitters Submission	Reasons
	Number			

Treble Cone Investments Limited	2	Oppose	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).	Ski field activities and developments can cause significant adverse effects to wetlands and these activities should not be exempt from planning restrictions.
Otago Fish & Game Council	8	Support	Would like the proposed plan to signal the following as criterion within the rules: Resource consent fee relief to protect, create, or enhance wetlands.	Forest and Bird supports the encouragement of wetland creation and enhancement and this would be a small but significant means of doing that.
Federated Farmers of New Zealand	29	Oppose	Reinstate the word 'adverse' in these provisions: 13.2.2.1, 13.3.2.1, 13.4.2.1, 13.5.2.1.	Council needs to consider all effects on regionally significant wetlands.
Contact Energy Limited	30	Oppose	The opportunity to mitigate or offset the effects of activities on Regionally Significant Wetlands be given recognition in the rules.	Neither offsetting or mitigation will result in the protection of regionally significant wetlands. Avoidance provides certainty and meets Part 2 and section 30 RMA requirements.
Contact Energy Limited	30	Oppose	That controls on the use of the beds of wetlands are not duplicated by the Regional and District Plans.	District and regional plans need to be consistent but can have regard to different matters.
Trust Power	40	Oppose	Remove rules (or standards in rules) that seek to achieve no net change of any particular value(s).	Wetland values should either be maintained or enhanced. No net change is uncertain and could provide for degradation or adverse effects on wetlands.
OtagoNet Joint Venture	43	Oppose	Rules (or standards in rules) that seek to achieve no net change of any particular value(s) should not be included in	Wetland values should either be maintained or enhanced.

the Water Plan.	No net change is uncertain
	and could provide for
	degradation or adverse
	effects on wetlands.

Protection General

157 Drain maintenance

Submitter Name	Sub Number	Support/Oppose	Part of Submitters Submission	Reasons
Gavan James Herlihy	22	Amend	Maintenance of existing drains to be a permitted activity.	Clearing of drains can have adverse effects and should require a consent. This is an issue in the pollution of Waituna Lagoon in SOUTHLAND.
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.	Clearing of drains can have adverse effects and should require a consent. This is an issue in the pollution of Waituna Lagoon in SOUTHLAND.

161 Protection general

Submitter Name	Sub Number	Support/Oppose	Part of Submitters Submission	Reasons
Contact Energy Limited	30	Oppose	The opportunity to mitigate or offset the effects of activities on Regionally Significant Wetlands be given recognition in the objectives, policies, and rules.	Neither offsetting or mitigation will result in the protection of regionally significant wetlands. Avoidance provides certainty and meets Part 2 and section 30 RMA requirements.
Trust Power	40	Oppose	Establish Management Zone for the Waipori Hydro Scheme and the Loch Luella and Loch Loudon Fen Complexes which recognises and provides for the	Proposal does not meet RMA Part 2 and section 30 requirements. Non

longstanding human use influences on these wetlands 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].	complying is appropriate status for activities that are likely to have significant and large scale effects, e.g. the extension, replacement or reconstruction of structures. Any further proposed rules would require a plan change.
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162 Generic Permitted activity condition

Number		Part of Submitters Submission	Reasons
29	Oppose	Delete: "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." 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.	Changes to water levels, hydrologic function, damage to flora and fauna can degrade and destroy wetlands. Activities that result in such changes should not be permitted.
32	Oppose	Delete: "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 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	Changes to water levels, hydrologic function, damage to flora and fauna can degrade and destroy wetlands. Activities that result in such changes should not be permitted.
40	Oppose	Delete: "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" 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.	Changes to water levels, hydrologic function, damage to flora and fauna can degrade and destroy wetlands. Activities that result in such changes should not be permitted.
	32	32 Oppose	hydrological function, or no damage to the flora, fauna or its habitat, in or on any Regionally Significant Wetland." 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, 13.5.1.8.32OpposeDelete: "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 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 13.5.1.340OpposeDelete: "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 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 13.5.1.340OpposeDelete: "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 "In rules 12.1.2.4, 12.3.2.1, 12.3.2.3, 12.5.1.1 and 13.5.1.340OpposeDelete: "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" 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, 13.5.1.3.40OpposeDelete: "There is no change to the flora, fauna or its habitat, in or on any Regionally Significant Wetland" 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, 13.5.1.3.41Nules 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

			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.	
OtagoNet Joint Venture	43	Amend	Delete permitted activity standard in Rules 13.4.1.1, 13.5.1.1 and 13.5.1.3: "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."	Changes to water levels, hydrologic function, damage to flora and fauna can degrade and destroy wetlands. Activities that result in such changes should not be permitted.

Financial Contributions

Submitter Name	Sub Number	Support/Oppose	Part of Submitters Submission	Reasons
Meridian Energy Limited	32	Oppose	Amend the sixth paragraph of Section 17.1: "Works and services apply to remediation or mitigation activities, while financial contributions may apply to the offsetting of adverse effects that cannot be directly fully avoided, or completely remedied or, in the Council's opinion, adequately mitigated, perhaps due to the nature of activity that needs to occur within the vicinity of the Regionally Significant Wetland."	Forest and Bird opposed this policy. Proposed amendments create uncertainty and are contrary to RMA part 2 and section 30.

165 Financial contribution rules

Submitter Name	Sub Number	Support/Oppose	Part of Submitters Submission	Reasons
Meridian Energy Limited	32	Oppose	Delete clause regarding the consideration of the need for a financial contribution and replace with: "In circumstances where adverse effects on Regionally Significant Wetlands cannot be avoided, remedied or mitigated, whether a financial contribution is necessary and the appropriate value of any contribution."	Provision for financial contributions are inconsistent with Part 2 RMA and the NPS on Freshwater Objectives B1 and B2.
Trust Power Limited	40	Oppose	The proposed rules should guide financial contributions only where they are necessary, such as when adverse	Provision for financial contributions are inconsistent

			effects cannot be avoided, remedied or mitigated to ensure they have tangible benefits.	with Part 2 RMA and the NPS on Freshwater Objectives B1 and B2
Trust Power Limited	40	Oppose	Consideration should be given to whether a financial contribution is necessary, and at what scale it would be required to ensure any financial contribution is constructive. Amend: "13.3.2.1(k) A financial contribution if the structure is a dam, or for regionally significant wetland values or Regionally Significant Wetlands that are adversely affected Whether and at what scale a financial contribution is necessary, such as when adverse effects on regionally significant wetlands cannot be avoided, remedied or mitigated; and" Amend 13.4.2.1(k) and 13.5.2.1(b): "Any financial contribution for regionally significant wetland values or Regionally Significant Wetlands that are adversely affected. Whether and at what scale a financial contribution is necessary, such as when adverse effects on regionally significant wetlands cannot be avoided, remedied or mitigated; and" Amend 13.4.2.1(k) and 13.5.2.1(b): "Any financial contribution for regionally significant wetland values or Regionally Significant Wetlands that are adversely affected. Whether and at what scale a financial contribution is necessary, such as when adverse effects on regionally significant wetlands cannot be avoided, remedied or mitigated."	Provision for financial contributions are inconsistent with Part 2 RMA and the NPS on Freshwater Objectives B1 and B2

Schedule 9 general

200 Schedule 9

Submitter Name	Sub Number	Support/Oppose	Part of Submitters Submission	Reasons
The Yellow-eyed Penguin Trust	26	Support	Inclusion in Schedule 9 of Tavora Wetland at Bobbys Head.	Wetland would meet Plans and Environment Court endorsed criteria for wetland of significance.
Federated Farmers	29	Oppose	Remove any wetlands inaccurately identified as Regionally Significant Wetlands included within Schedule 9 maps as identified by individual submitters.	Any alterations to wetland boundaries must involve independent advice from an ecologist, preferably a freshwater ecologist.
Contact Energy	30	Oppose	That Schedule 9 be not approved.	Schedule 9 is required for Council to meet its RMA part 2 and section 30

				responsibilities.
Clutha District Council	34	Oppose in part	Supports the inclusion of additional wetlands in the Clutha	Alteration of boundaries must
			District, recognising that the affected landowners need to	involve independent advice
			be involved in finalising the details of wetland boundaries.	from an ecologist, preferably
				a freshwater ecologist.

Schedule 10

600 Schedule 10

Submitter Name	Sub	Support/Oppose	Part of Submitters Submission	Reasons
	Number			
Otago Conservation Board	27	Support	Schedule 10 areas which are not going to be added into Schedule 9 should be re-evaluated and, where appropriate, given protection.	Deletion of schedule 10 would remove protection for wetlands and this is contrary to part 2 and section 30 RMA.

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Submitter Name	Sub Number	Support/Oppose	Part of Submitters Submission	Reasons
Deanne and Steve Amende	1	Oppose	Re-negotiate the boundaries of the Akatore Creek Swamp on our property.	Alteration of boundaries must involve independent advice from an ecologist, preferably a freshwater ecologist.
Wenita Forest Products Limited	3	Oppose	Review mapping and redefine the actual ground areas affected by the Akatore Creek Swamp to show those areas. "Do not include areas already established in trees by Wenita".	Alteration of boundaries must involve independent advice from an ecologist, preferably a freshwater ecologist.

Submitter Name	Sub	Support/Oppose	Part of Submitters Submission	Reasons
	Number			
Maniototo	23	Oppose	Status quo	Alteration of boundaries must
Homestead				involve independent advice

		from an ecologist, preferably
		a freshwater ecologist.

Submitter Name	Sub Number	Support/Oppose	Part of Submitters Submission	Reasons
Geoffrey Thomson	6	Oppose	Amend the boundaries of wetland which is on parts of my farm property.	Alteration of boundaries must involve independent advice from an ecologist, preferably a freshwater ecologist.

Submitter Name	Sub	Support/Oppose	Part of Submitters	Reasons
	Number		Submission	
Trevor and Vivien Nimmo	18	Oppose	Remove wetland from Schedule 9.	Should not be removed unless upon independent advice from an ecologist, preferably a freshwater ecologist.

Submitter Name	Sub Number	Support/Oppose	Part of Submitters Submission	Reasons
Geoffrey Thomson	6	Oppose	Amend the boundaries of wetland, which is on parts of my farm property.	Alteration of boundaries must involve independent advice from an ecologist, preferably a freshwater ecologist.

Submitter Name	Sub	Support/Oppose	Part of Submitters Submission	Reasons
	Number			
Brookhouse Farm Ltd	31	Amend	Some of the land on the far	Alteration of boundaries must
			Western boundary of the	involve independent advice

	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'.	from an ecologist, preferably a freshwater ecologist.
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Submitter Name	Sub Number	Support/Oppose	Part of Submitters Submission	Reasons
Trust Power	40	Oppose	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].	Proposal does not meet RMA Part 2 and section 30 requirements. Non complying is appropriate status for activities that are likely to have significant and large scale effects, e.g. the extension, replacement or reconstruction of structures. Any further proposed rules would require a plan change.

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Submitter Name	Sub	Support/Oppose	Part of Submitters Submission	Reasons
	Number			
Martin and Barbara Palmer	4	oppose	Map F46 is reduced in extent within the Palmer property as	Alteration of boundaries must involve independent advice
			shown on the annotated	from an ecologist, preferably
L			attached map.	a freshwater ecologist.

Submitter Name	Sub Number	Support/Oppose	Part of Submitters Submission	Reasons
Galloway Irrigation Society Incorporated	41	Oppose	Wetland not to be classified as a Significant Wetland and not included in Schedule 9.	Alteration of boundaries must involve independent advice from an ecologist, preferably a freshwater ecologist.

Submitter Name	Sub Number	Support/Oppose	Part of Submitters Submission	Reasons
Graeme John Hagan	9	Oppose	Oppose changes.	Alteration of boundaries must involve independent advice from an ecologist, preferably a freshwater ecologist.
Wayne Allan and Rochelle Anne Hagan	10	Oppose	Oppose changes.	Alteration of boundaries must involve independent advice from an ecologist, preferably a freshwater ecologist.

Submitter Name	Sub Number	Support/Oppose	Part of Submitters Submission	Reasons
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.	Alteration of boundaries must involve independent advice from an ecologist, preferably a freshwater ecologist.

Submitter Name	Sub Number	Support/Oppose	Part of Submitters Submission	Reasons
William Thomas Begg	17	Oppose	Remove the areas identified as Stirling Marsh Complex that are on my property from proposed plan change 2.	Alteration of boundaries must involve independent advice from an ecologist, preferably a freshwater ecologist.

Submitter Name	Sub	Support/Oppose	Part of Submitters Submission	Reasons
	Number			
The Retreat Trust	28	Oppose	Oppose the proposed Plan Change. Take the tussock ground out of the fen system.	Alteration of boundaries must involve independent advice from an ecologist, preferably a freshwater ecologist.

Submitter Name	Sub Number	Support/Oppose	Part of Submitters Submission	Reasons
David Jopp	12	Oppose	Not include Trig Q Ephemeral Pool.	Alteration of boundaries must involve independent advice from an ecologist, preferably a freshwater ecologist.

Submitter Name	Sub Number	Support/Oppose	Part of Submitters Submission	Reasons
SH Andrews and Sons Ltd	7	Amend	Redraw the map within our property to exclude additional areas that are not genuine wetlands.	Alteration of boundaries must involve independent advice from an ecologist, preferably a freshwater ecologist.
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).	Alteration of boundaries must involve independent advice from an ecologist, preferably a freshwater ecologist.

Submitter Name	Sub Number	Support/Oppose	Part of Submitters Submission	Reasons
Transpower	37	Oppose	Review the extent of the wetland complex at the location of transmission support structures for the GOR-HWB 110kV and NMA- TMH 220kV lines, and confirm that these structures are not contained	Alteration of boundaries must involve independent advice from an ecologist, preferably a freshwater ecologist.
Beaton Family	45	Oppose	ORC need to shift themselves to ground check the boundaries.	Alteration of boundaries must involve independent advice from an ecologist, preferably a freshwater ecologist.

Submitter Name	Sub Number	Support/Oppose	Part of Submitters Submission	Reasons
Three Creeks Farm	19	Oppose	Remove wetland from the proposed schedule of regionally significant wetlands.	Alteration of boundaries must involve independent advice from an ecologist, preferably a freshwater ecologist.

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