

FURTHER SUBMISSION



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To: Otago Regional Council

From: Federated Farmers of New Zealand

On the: Proposed Plan Change 2 – Regionally Significant Wetlands

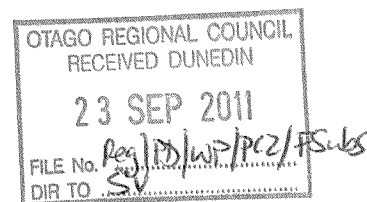
Date: 18 September 2011

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Where Federated Farmers submitted on the same variation point as any other submitter it stands by its original submission.

This Further Submission provides Federated Farmers views on points raised by other submitters.

1 st Name	Submitter Number	Section of Plan	Summary of relevant part of Submission	Support/ Oppose	Reason for submission
Solid Energy of New Zealand	5	10.4.1A (c)	Replace wording with: “(c) A wetland higher than 800m above sea level which has been subjected to an evaluation confirming its ecological values against the ecological criteria detailed in Schedule 9”	Support in part	Ensures wetlands protected hold values of ecological significance rather than the nominal '800m above sea level'
Contact Energy Limited	30	10.4.1A (c)	That the definition of a Regionally Significant Wetland (which includes all wetlands over 800m) be not approved	Support in part	Ensures only wetlands undergoing appropriate values assessments are included
Meridian Energy Limited	32	10.4.1A (c)	Request deletion of (c) regarding wetlands over 800m	Support in part	Wetlands above 800m still need to be included but should have a values assessment aspect.
TrustPower Limited	40	10.4.1A (c)	Only wetlands which have regionally significant values should be included – including those above 800m	Support in part	Federated Farmers supports wetlands undergoing consistent values assessments
NZ Railways Corporation	46	10.4.1A	Only those activities that impact on wetlands should be captured – activities occurring on 'dry' areas should be permitted	Support in part	Ensures activities not impacting on wetlands or occurring on wetland areas are permitted
Otago Fish & Game Council	8	10.4.1 Definition of Regionally Significant Wetland	Proposed plan needs to consider networks of wetlands as important rather than looking at wetlands in isolation	Oppose	Prefers provision as proposed
Te Runanaga o Moeraki, Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou and Hokonui Runanga	38	10.4.1 A6	Want to add 'Kai Tahu cultural and spiritual beliefs, values and uses to policy A6 to add recognition of role of nga Runanga as kaitiaki	Oppose	Prefer provision as proposed

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Meridian Energy Limited	32	10.4.2	10.4.2 is overly restrictive & fails to acknowledge that remediation or mitigation may be more appropriate. S5(2)(c) RMA is not a strict hierarchy	Support in part	Brings in a practicable element
Clutha District Council	34	10.4.2	Requirement to avoid adverse effects where possible is too strict and inflexible and is counter to regime in Part 5 RMA which treats 'avoid' 'remedy' and 'mitigate' equally	Support in part	Will ensure remediation and mitigation is given due weight
Trust Limited	40	10.4.2	Replace proposed policy with "adverse effects on RSW and their regionally significant values identified in Sch.9 should be avoided, remedied or mitigated"	Support in part	Ensures consistency with principles of RMA
OtagoNet Joint Venture	43	10.4.2	Primacy should not be given to avoiding adverse effects over remedying or mitigating adverse effects	Support in part	Ensures consistency with principles of sustainable management as defined in RMA
Otago Fish & Game Council	8	Chapter 10 generally	Wants amendment of the objectives and policies to reflect that wetland boundaries are often indistinct and changeable. Seeks a new policy: "Due to the seasonal variability of wetlands and their changeable boundaries, resource consent applications on or near defined RSW 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"	Oppose	Landowners need clarity around which parts of their land are subject to rules around regionally significant wetlands. Boundaries need to be clear and defined to ensure responsibilities are known and activities can be managed accordingly.
Te Ao Marama Inc	16	Chapter 10 in general	Want preservation of wetland, lake & river margins in the proposed plan change	Oppose	Landowners need clarity around which parts of their land are subject to rules around regionally significant wetlands. Boundaries need to be clear and defined to ensure responsibilities are known and activities can be managed accordingly.
Hawksbury Lagoon Inc	39	Chapter 10 in general	Wants default position on rules and policies to a conserved wetland rather than create permitted activities	Oppose	Inconsistent with Part 5 RMA
Royal Forest & Bird Protection Society of NZ	47	Chapter 10 in general	Wants a policy to recognise and provide for the protection of the values of unidentified wetlands	Oppose	Landowners need certainty as to responsibilities and extending protection to unidentified wetlands would create confusion

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Royal Forest & Bird Protection Society of NZ	47	Chapter 10 in general	Would like a new policy introduced with criteria to assess unidentified wetlands: 1. Ecological context 2. Representative wetlands 3. Rarity 4. Distinctiveness To ensure unidentified wetlands are recognised and protected	Oppose	The Proposed Plan Change already provides extensive wetland protection to wetlands with regionally significant values. To introduce new values and extend protection to unidentified wetlands would create uncertainty to Plan users.
Royal Forest & Bird Protection Society of NZ	47	Chapter 10 in general	Considers many wetlands are not scheduled and that all wetlands should be managed according to Part 2 RMA	Oppose	Unnecessary and beyond intent of proposed plan changes
Contact Energy Limited	30	Rule 12.1.1A.1	That non-complying status is too onerous, especially given concerns on artificial wetlands. That activities should remain as discretionary	Support in part	Objectives of the plan change can still be met by requiring landowner to apply for a discretionary activity. The taking and storing of water holds an important function in many areas and has potential to take pressure off other water resources
Trust Power Limited	40	Rule 12.1.1A.1	Want rule deleted as takes and uses that are not covered by other specified rules should have discretionary status.	Support in part	Non-complying status too onerous. There will be situations where minor takes and uses from RSWs may be required and these should not be considered non-complying. A balance needs to be achieved between enabling social and economic wellbeing and the protection of the environment.
Meridian Energy Limited	32	Rule 12.1.1A.1	Want rule amended to show explicitly that only water taken directly from the area identified as RSW should be non-complying.	Support in part	We consider a lesser standard than non-complying is appropriate but agree that rule should only affect 'direct' takes from identified and specific RSW areas.
Royal Forest and Bird Protection Society of NZ	47	Rules 12.1.2.4; 12.1.2.5; 12.1.2.6	Want rule to extend to non-assessed and non-scheduled wetlands	Oppose	Would bring a lack of certainty and clarity. Beyond scope of Plan Change.

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Royal Forest and Bird Protection Society of NZ	47	Rule 12.1.4.8	That Council needs to consider adverse effects on all wetlands and that not all significant wetlands have been captured in Schedule 9	Oppose	Proposed Plan Change applies rules to wetlands with certain regionally significant wetland values. To extend similar protection to all wetlands goes beyond scope of plan change.
Otago Conservation Board	27	12.2.1A.1	Consider it essential that all remaining wetlands receive highest level of protection and strongly support setting the default activity status as non-complying	Oppose in part	Non-complying status too onerous. A balance needs to be achieved between enabling social and economic wellbeing and the protection of the environment.
Contact Energy Limited	30	12.2.1A.1	That non-complying activity status proposed be not approved and that such activities remain as discretionary activities	Support in part	A robust examination can still occur and Council can still exercise discretion as to whether to accept or decline consent without need for a non-complying activity status. There will be instances, particularly given concerns on artificial wetlands, where activity with an adverse affect on a wetlands value may still be appropriate – particularly in the area of water take and storage.
Trust Power Limited	40	12.2.1A.1	Considers that takes and uses that are not covered by other specified rules should have discretionary status	Support in part	Non-complying status not necessary. Purpose can be achieved more efficiently with a restricted discretionary status.
Royal Forest and Bird Protection Society of NZ	47	12.2.2.5; 12.2.2.6	Want rule to extend to non-assessed and non-scheduled wetlands	Oppose	Would bring a lack of certainty and clarity. Beyond scope of Plan Change.
Royal Forest and Bird Protection Society of NZ	47	12.2.2A.1; 12.2.3.4	That Council needs to consider adverse effects on all wetlands and that not all significant wetlands have been captured in Schedule 9	Oppose	Proposed Plan Change applies rules to wetlands with certain regionally significant wetland values. To extend similar protection to all wetlands goes beyond scope of plan change.
Otago Conservation Board	27	12.3.1A.1	Consider it essential that all remaining wetlands receive highest level of protection and strongly support setting the default activity status as non-complying	Oppose in part	Non-complying status too onerous. A balance needs to be achieved between enabling social and economic wellbeing and the protection of the environment.

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Contact Energy Limited	30	12.2.1A.1	That non-complying activity status proposed be not approved and that such activities remain as discretionary activities	Support in part	A robust examination can still occur and Council can still exercise discretion as to whether to accept or decline consent without need for a non-complying activity status.
Meridian Energy Limited	32	12.3.1A.1	Non-complying activity status is overly-restrictive. Diversion may improve water flow enabling the enhancement of wetland values. To decide 'affecting the water level of a RSW' is too subjective	Support in part	A lesser activity status can still achieve purpose of provision. An activity with an adverse effect on a wetland value may still be appropriate. In some areas, damming and storing water has the potential to take pressure off other water resources.
Royal Forest and Bird Protection Society of NZ	47	12.3.2.1; 12.3.2.2; 12.3.2.3; 12.4.1.1; 12.4.2.1; 12.5.1.1	Consider that Council needs to sustainably manage all wetlands not just those considered significant	Oppose	Proposed Plan Change applies rules to wetlands with certain regionally significant wetland values. To extend similar protection to all wetlands goes beyond scope of plan change.
Royal Forest and Bird Protection Society of NZ	47	12.3.3.1	Consider that matters of discretion don't address or protect non-scheduled wetlands and want to extend protection to other wetlands	Oppose	Proposed Plan Change applies rules to wetlands with certain regionally significant wetland values. To extend similar protection to all wetlands goes beyond scope of plan change.
Lake Waihola Waipori Wetlands Society	20	12.7.1.1; 12.7.1.2; 12.7.1.3; 12.7.1.4	Wetland restorative work and weed control must be made simpler	Support in part	Agree that weed control has positive effects on hydrology and sediment movement. As worded, rule looks at whether 'any' effects have occurred. People controlling weeds may be penalised for creating positive changes. Rule needs to look at 'adverse' effects not 'any' effects.
Three Creeks Farm	19	12.8.1.2	Have farmed alongside and in harmony with the wetland (Te Hua Taki Wetland F66 #171) for a number of years and have kept it fenced and in its natural state. If it is retained as a RSW, want to ensure there are no setbacks from the wetland for the application of dairy effluent	Support	Supports full consultation in ascertaining what is a RSW and supports any restrictions on activities being limited to within a RSW itself.

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Royal Forest and Bird Protection Society of NZ	47	12.8.1.1; 12.8.1.2 12.8.1.3; 12.8.1.5;	Consider that agricultural waste and fertiliser can be toxic to wetlands and rule should cover more than just scheduled wetlands	Oppose	Proposed Plan Change applies rules to wetlands with certain regionally significant wetland values. To extend similar protection to all wetlands goes beyond scope of plan change.
Royal Forest and Bird Protection Society of NZ	47	12.8.2.1; 12.9.1.1; 12.9.1.2; 12.9.2.1; 12.11.2.1; 12.11.2.2; 12.11.2.3	Consider that Council needs to sustainably manage all wetlands not just those considered significant	Oppose	Proposed Plan Change applies rules to wetlands with certain regionally significant wetland values. To extend similar protection to all wetlands goes beyond scope of plan change.
Royal Forest and Bird Protection Society of NZ	47	12.10.1.1; 12.10.2.1; 13.7.1.2	Current words do not provide Council with necessary control on potential adverse effects of contaminant discharge	Oppose	Do not agree with extending the proposed plan change's protection to unidentified and unassessed wetlands
Otago Fish & Game Council	8	Chapter 12 in general	Would like the proposed plan to signal that there will be resource consent fee relief where consent to protect, create or enhance wetlands	Support in part	Current consent fees discourage creation or enhancement of wetlands and that resource consent fee relief is workable and proactive
Three Creeks Farm	19	Chapter 12 in general	If Te Hua Taki Wetland Map F66 #171 is retained as a RSW want provision to provide for the taking of water from the wetland and taking of adjacent groundwater for stock, domestic and agricultural use as a permitted activity.	Support in part	There has been a lack of consultation throughout resulting in an inaccurate inclusion of the wetland. Current farming activities on both the wetland and adjacent land would be affected if the wetland continues to be inaccurately included.
Michael & Christine Holland	25	Chapter 12 in general	Support inclusion of wetland but want no changes to irrigation takes above the Waianakarua River Estuary Swamp (Map F65 #164) as don't want farming operation affected. Feel that wetland is already adequately protected by fencing	Support in part	Landowner accepts the wetland itself being included but wants to ensure adjacent activities are not affected.
Contact Energy Limited	30	Chapter 12 in general	Consider that the opportunity to mitigate or offset the effects of activities on RSW be given recognition in the rules	Support in part	Agree that hierarchy of avoid, followed by remedy or mitigate not endorsed in RMA
Hawksbury Lagoon Inc	39	Chapter 12 in general	That default position in rules should not be to create permitted activities but towards a conserved wetland	Oppose	Inconsistent with Part 5, RMA

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OtagoNet Joint Venture	43	Chapter 12 in general	Amend or delete rules (or standards within rules) associated with a high degree of subjectivity	Support in part	Landowners must have clarity and consistency as to the application of the rules
Royal Forest & Bird Protection Society of NZ	47	Rule 13.2.1.7; 13.2.2.1; 13.3.2.1; 13.4.1.1; 13.4.2.1; 13.5.1.1; 13.5.2.1; 13.6.3.1	Want reference to be to 'any wetland' and their margins rather than to in the regionally significant wetland	Oppose	Proposed Plan Change applies rules to wetlands with certain regionally significant wetland values. To extend similar protection to all wetlands goes beyond scope of plan change.
Beaton family of Berwick	45	Rule 13.5.1.5A	Consider that natural soil conditions of wetland may need to be reinstated before successful diverse vegetation can be reinstated. Want amendment to provide for some hump and hollow modification to allow some planting to take place out of water.	Support in part	Consider that before a wetland can be properly restored or enhanced, some activities may be necessary to prepare the area.
Lake Waihola Waipori Wetlands Society Inc.	20	13.5.1.8	Want amendment to encourage farmers not to graze wetlands as current rule sets threshold only when grazing severely damages the wetland and cause result in debate over levels of damage	Oppose in part	Light grazing of stock can have benefits to wetlands regeneration and is appropriately permitted where no obvious negative changes have resulted.
Gavan James Herlihy	22	13.5.1.8	Needs greater clarity as to what is 'conspicuous' damage and what threshold constitutes 'damage'	Support in part	Greater clarity would assist farmers as to what activities they can be permitted to carry out on the wetland.
Royal Forest and Bird Protection Society of NZ	47	13.5.1.8	Consider that grazing degrades wetlands and that all RSW should be fenced. Want extension of protection beyond RSW to unidentified wetlands	Oppose	Consider the permitted activity is appropriate. Do not agree with extending the proposed plan change's protection to unidentified and unassessed wetlands
Herbert Heritage Society	48	13.5.18	Consider that all wetlands, rivers & estuaries must be fenced off from livestock unless the grazing can be considered to be proven beneficial or fencing proven to be detrimental	Oppose in part	Considerable cost in fencing off all wetlands, rivers and estuaries. Scope of proposed plan is to Regionally Significant Wetlands not all wetlands.

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Royal Forest and Bird Protection Society of NZ	47	13.6.1.1	Want prohibited species list to be extended to four additional plants (Gray Willow, Crack Willow, Alder, Glyceria species) and want rule to apply to all wetlands.	Oppose in part	Proposed Plan Change applies rules to wetlands with certain regionally significant wetland values. To extend similar protection to all wetlands goes beyond scope of plan change.
Royal Forest and Bird Protection Society of NZ	47	13.6.2.0	Want to add the following permitted rule condition: "all plants and seeds are eco-sourced and appropriate for the specific wetland ecosystem"	Oppose in part	Difficulty and added expense in obtaining eco-sourced plants and seeds from local seed sources
William Thomas Begg	17	13.7.1.2	IF Stirling Marsh Complex is retained as a RSW then provide for the harvesting of exotic species occurring in the wetland as a permitted activity – re part of wetland planted in poplar trees for timber	Support	The exotic species already exist within the wetland now identified. It is consistent with the principles of the proposed plan to allow for their removal
Otago Fish & Game Council	8	Chapter 13 in general	Would like the proposed plan to signal that there will be resource consent fee relief where consent to protect, create or enhance wetlands	Support in part	Agree that current consent fees discourage creation or enhancement of wetlands and that resource consent fee relief is workable and proactive
Three Creeks Farm	19	Chapter 13 in general	If Te Hua Taki Wetland Map F66 #171 is retained as a RSW want provision to provide for the taking of water from the wetland and taking of adjacent groundwater for stock, domestic and agricultural use as a permitted activity.	Support in part	There has been a lack of consultation throughout resulting in an inaccurate inclusion of the wetland. Current farming activities on both the wetland and adjacent land would be affected if the wetland continues to be inaccurately included.
Department of Conservation	42	Chapter 13 in general	Want a new rule 13.7.2.1A in full added, and applying to areas of the Upper Taieri Wetland Complex, Ida Valley Kettle Holes that allows as a permitted activity the removal of vegetation by haying – both of these areas are not threatened by haying.	Support in part	IN the area identified, this activity is consistent with the proper enhancing and maintaining of the wetland values.
Royal Forest & Bird Protection Society of NZ Inc	47	Chapter 13 in general	Want a new non-complying rule added regarding the removal of indigenous vegetation and wants rule extended beyond those RSW already identified	Oppose in part	Do not agree with extending the proposed plan change's protection to unidentified and unassessed wetlands

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Three Creeks Farm	19	157 Drain Maintenance	Drains in and out of the wetland need regular maintenance to ensure the wetland continues to function appropriately. Getting consent is costly and uncertain. Maintenance of existing drains should be a permitted activity; if consents are required, include a non-notification clause and ensure there is no fee on the consent	Support	Land drainage has positive effects beyond increasing the productivity of land and providing for better land management, including reducing the incidence of localised flooding. Where land drainage systems are already in place and are not properly maintained, there is further potential for flooding, erosion and discharge of sediment and other contaminants. Requiring consent may deter necessary maintenance.
Gavan James Herlihy	22	157 Drain Maintenance	Maintenance of existing drains should be a permitted activity	Support	Land drainage has positive effects beyond increasing the productivity of land and providing for better land management, including reducing the incidence of localised flooding. Where land drainage systems are already in place and are not properly maintained, there is further potential for flooding, erosion and discharge of sediment and other contaminants. Requiring consent may deter necessary maintenance.
Karl Frank Burgess	49	157 Drain Maintenance	Oppose having to get resource consent to clean existing ditches to keep them safe for stock. If consent is required, should be for substantial period (e.g. 35yrs)	Support	Land drainage has positive effects beyond increasing the productivity of land and providing for better land management, including reducing the incidence of localised flooding. Where land drainage systems are already in place and are not properly maintained, there is further potential for flooding, erosion and discharge of sediment and other contaminants. Requiring consent may deter necessary maintenance.

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SH Andrews and Sons Ltd	7	161 Protection General	Want ORC staff assurances given at public meetings to be honoured regarding existing farm practices being able to be permitted within the new boundaries. Under proposed plan, assurances have not been reflected given the requirement for consent for both maintenance of drains and oversowing of clover seed	Support	At public meetings throughout the region, ORC staff assured landowners that current farming practises could continue as currently, despite new boundaries and classifications for RSWs. These assurances gave farmers a false sense of security and may have resulted in lesser submissions against the plan. Federated Farmers considers it important for maintenance of drains to continue to be permitted activities.
Meridian Energy Limited	32	Generic Permitted Activity Condition for wetland protection	Wants deleted : "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 RSW" 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	Support	Agree that condition doesn't provide certainty to enable an objective achievement – analysis is subjective. Too uncertain in interpretation and application.
TrustPower Limited	40	Generic Permitted Activity Condition for wetland protection	Wants deleted : "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 RSW" 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	Support	Agree that condition doesn't provide certainty to enable an objective achievement – analysis is subjective. Too uncertain in interpretation and application.
OtagoNet Joint Venture	43	Generic Permitted Activity Condition for wetland protection	Wants deleted the following "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 RSW" in rules 13.4.1.1, 13.5.1.1 and 13.5.1.3	Support	Agree that compliance cannot be objectively assessed and provision is not consistent with s5(2) RMA
Contact Energy Limited	30	Financial Contributions Policy	That not every effect needs to be addressed (only those above a certain threshold – being more than minor effects). The policy takes a "no net loss" approach which is not taken in the RMA	Support in part	The financial contribution policy does need amendment to ensure it is consistent with RMA.

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Meridian Energy Limited	32	Financial Contributions Policy	The explanation suggests financial contributions will be used to address residual effects that cannot be avoided, remedied or mitigated; not consistent with Policy 10.4.2A. Given RMA is not a 'no effects' statute, 17.1 requires amendment to reflect direction provided in 10.4.2A	Support in part	The financial contribution policy does need amendment to ensure it is consistent with RMA.
Royal Forest & Bird Protection Society of NZ Inc.	47	Financial Contributions Policy	Want to delete policy 10.4.2A as feel financial contributions inappropriate given large-scale loss or modification of wetlands, and inconsistent with Part 2 RMA and NPS Freshwater	Oppose in part	Agree that policy 10.4.2A needs amendment but do not agree that financial contributions are always inappropriate.
Meridian Energy Limited	32	Financial contributions rules	Rules should ascertain whether a financial contribution is necessary and what the appropriate value of any contribution should be	Support in part	There will be circumstances where a financial contribution may not be necessary or of actual benefit and this should be appropriately reflected in the rules.
TrustPower Limited	40	Financial contributions rules	Proposed rules should only guide financial contributions where necessary and at scale required to ensure financial contribution is constructive.	Support in part	There will be circumstances where a financial contribution may not be necessary or of actual benefit and this should be appropriately reflected in the rules.
Contact Energy Limited	30	Schedule 9 in general	That Schedule 9 should not be approved. The process classifying the wetlands as regionally significant was not robust, had low levels of investigation and assessment which is not justified given the restrictive objectives and policies.	Support in part	There are wetlands that have not been accurately included in Schedule 9. There was inadequate consultation and on-site assessment before their inclusion and as a result landowners will be at a loss given the restrictive nature of the rules.
Contact Energy Limited	30	Schedule 9 in general	The statement 'Schedule 9 is not exhaustive' needs clarification.	Support	As written, the statement leaves substantial uncertainty to other landowners. Greater clarification is required.
Clutha District Council	34	Schedule 9 in general	Supports the inclusion of additional wetlands in the Clutha District BUT recognises that affected landowners need to be involved in finalising the details of the wetland boundaries	Support in part	Currently there has not been a consistent process of consultation with landowners. Landowners should be involved in finalising wetland boundaries.

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Department of Conservation	42	Schedule 9 in general	Want inclusion of Ida Valley Kettle Holes, Silver Peak Swamp and Upper Waipahi River Swamp (previously all in Schedule 10 included in Schedule 9)	Oppose	It has been ascertained that these wetlands do not hold sufficient regionally significant wetlands values (10.4.1) to require the level of protection within the Plan Change. They have been appropriately excluded from Sch. 9.
Otago Conservation Board	27	Schedule 9 in general	Considers that wetlands are often small areas with complicated boundaries and that 1:50,000 maps are not adequate. Base aerial photographs should be used.	Support in part	There should be greater emphasis on ensuring ONLY wetlands with RSW values are included. Currently marginal land & dryland is included in mapped areas and aerial photographs will ensure greater accuracy in identifying and including only wetlands with RSW values.
OtagoNet Joint Venture	43	Schedule 10	Supports repeal of schedule 10	Support	Removal of schedule 10 streamlines wetland provisions and ensures only wetlands with RSW values are included within the rules.
Deanne and Steve Amende	1	201 – Sch 9 – Akatore Creek Swamp #1, Map F46	Want to renegotiate the boundaries of this swamp as do not consider there has been adequate consultation and do not feel the swamp has RSW values. Assurances previously provided have not been accurate.	Support	Federated Farmers do not feel these landowners have been adequately involved in the process of including their wetland within Schedule 9. There has been little input, consultation or on-site visits and a more adequate assessment of the wetland values should have taken place.
Herb Fox	36	223 – Sch 9 – Chapman Road Inland Saline Wetland #23, Map F18	Current mapped areas include areas of dryland, driveway and exceeds area that could be considered 'wetland' when viewed on site. Want map to accurately reflect the position of the actual 'wetlands' of Dry Gully (as the area is known)	Support	Mapped areas should accurately reflect wetlands with actual 10.4.1. RSW values. Inadequate consultation with landowners has resulted in inaccurate mapping and in incorrect inclusion within Schedule 9 and mapping.
Maniototo Homestead	23	232 – Sch 9 – Cross Eden Creek Marsh Complex # 32, Map f16	Consider that including this wetland area within Sch 9 could cause management issues. That the plants mentioned within the wetland values report have long lived in harmony with current farming practise.	Support	Mapped areas should accurately reflect wetlands with actual 10.4.1. RSW values. Inadequate consultation with landowners has resulted in inaccurate mapping and in incorrect inclusion within Schedule 9 and mapping.

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Geoffrey Thomson	6	235 – Sch 9 – Diamond Lake Wetland - #35, Map F3	Current mapping shows areas that are not significant wetland. Would like amending of the boundaries of wetland which is on his farm.	Support	Support the accurate and appropriate mapping and inclusion of wetlands within Sch.9. On-site consultation should be undertaken and assessment to ensure boundaries and inclusions are appropriate prior to adopting plan change.
Meridian Energy Limited	32	255 – Sch 9 – Great Moss Swamp #55, Maps F29&30	Consider that boundaries now more accurately reflect existing human influences in the area, particularly roads. Retain maps as notified	Support in part	Boundaries are better defined under current mapping and reflect certain dryland areas (roads) that are rightly excluded. However, there is concern as to the extent of the wetland included and as to whether an accurate assessment of values has occurred.
Department of Conservation	42	255 – Sch 9 – Great Moss Swamp #55, Maps F29&30	That the wetland is appropriately included within Sch.9 and the extent of the wetland be retained without amendment	Oppose in part	There is concern as to the extent of the wetland included and as to whether an accurate assessment of values has occurred.
Trevor and Vivien Nimmo	18	270 – Sch 9 – Kemp Road Lagoon #70 Map F65	Want the wetland removed from Sch 9. Feel that it is not regionally significant as it has none of the values listed in 10.4.1 and is not a freshwater lagoon. Its inclusion would be a barrier to possible future development. There has not been adequate consultation by ORC.	Support	Mapped areas should accurately reflect wetlands with actual 10.4.1. RSW values. Inadequate consultation with landowners has resulted in inaccurate mapping and in incorrect inclusion within Schedule 9 and mapping. Further conversation should occur with the landowner prior to adopting the plan change.
Geoffrey Thompson	6	276 – Sch 9 – Lake Reid Wetland #76 Map F3	Wants an on-site visit to establish better boundaries as current maps show areas that are not significant wetland.	Support	Mapped areas should accurately reflect wetlands with actual 10.4.1. RSW values. Inadequate consultation with landowners has resulted in inaccurate mapping and in incorrect inclusion within Schedule 9 and mapping. Further conversation should occur with the landowner prior to adopting the plan change

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Brookhouse Farm Ltd	31	277 – Sch 9 – Lake Tuakitoto Wetland #77 Map F43	Some of the land on the far Western boundary of the wetland should not be classified as RSW as minimum water levels will never result in that area being used for 'natural beauty or wetland'.	Support	Landowner supports the inclusion of the part of the wetland that meets 10.4.1 RSW values. There has been some land included however that does not have the necessary values and more appropriate mapping and assessment for that part of the wetland is necessary. Further conversation should occur with the landowner prior to adopting the plan change
Martin and Barbara Palmer	4	287 – Sch 9 – Lower Coutts Tully Swamp #87 Map F46	Want renaming of wetland to "Coutts Gully Wetland" and want Map F46 reduced as current mapping does not accurately reflect the wetland area. Map includes areas of operational farm land including stock gateway (in use for over 50yrs) that is not affecting the wetland. Mapping makes actual boundary difficult to establish.	Support	Mapped areas should accurately reflect wetlands with actual 10.4.1. RSW values. Inadequate consultation with landowners has resulted in inaccurate mapping and in incorrect inclusion within Schedule 9 and mapping. Further conversation should occur with the landowner prior to adopting the plan change
Galloway Irrigation Society Inc	41	288 – Sch 9 – Lower Manorburn Dam Margins #88, Map F15	Considers wetland should not be included as RSW and should not be included within Sch 9. It is an artificial dam to supply irrigation water. It may not be possible to retain wetland values. During the irrigation season, water levels are lowered and other general activities are outside scope of rules.	Support	Mapped areas should accurately reflect wetlands with actual 10.4.1. RSW values. The area in question is an artificial dam with the purpose of supplying irrigation water – there would be substantial difficulty in applying the Proposed Plan Change rules to this wetland.
Wayne Allan and Rochelle Anne Hagan	10	323 - Sch 9 – Pleasant Rivery Estuary Wetland Complex - #123, Map F67	There has been no consultation or on-site visits to correct establish RSW boundaries. Feel that land above floodgate is not accurately included as a RSW as land does not show RSW values & is currently used for grazing and in general as part of everyday farming activities.	Support	Mapped areas should accurately reflect wetlands with actual 10.4.1. RSW values. Inadequate consultation with the landowners has resulted in inaccurate mapping and in incorrect inclusion within Schedule 9 and mapping which will impact greatly on the landowner's everyday farming activities. Further conversation should occur with the landowner prior to adopting the plan change
Ladies Mile Partnership	44	337 – Sch 9 – Shotover River Confluence Swamp #137, Map F5	Wetland does not have values that would necessitate its status as a RSW. The mapped area is inaccurate and exaggerated. Would like either a removal of the wetland from Sch 9 or a reduction in the size of the area mapped in F5.	Support	Mapped areas should accurately reflect wetlands with actual 10.4.1. RSW values. Further conversation should occur with the landowner prior to adopting the plan change

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William Thomas Begg	17	339 – Sch 9 – Stirling Marsh Complex #139, Map F43	The area of the wetland on his property does not meet the criteria of regional significance. It is used for intensive grazing; growing poplar trees and one area has gorse and is fenced to keep cattle out. There has been insufficient consultation and landowner wants wetland removed from Sch.9	Support	Mapped areas should accurately reflect wetlands with actual 10.4.1. RSW values. Inadequate consultation with landowners has resulted in inaccurate mapping and in incorrect inclusion within Schedule 9 and mapping. Further conversation should occur with the landowner prior to adopting the plan change
David Jopp	12	351 – Sch 9 – Trig Q Ephemeral pool #156 Map F53	That area is not a true ephemeral wet area and only ponds during high rainfall winters and when receiving run-off and as a result, it should not be included with Sch.9. Previously ORC visited and advised the area was NOT a regionally significant wetland.	Support	Only wetlands reflecting actual 10.4.1 RSW values should be included with Sch 9 and mapping. The on-site visit resulted in advice that the wetland did not hold RSW values. Further conversation should occur with the landowner prior to adopting the plan change
SH Andrews & Sons Ltd	7	361 – Sch 9 – Upper Taieri Wetlands Complex #161 Maps F22-F28	Much of the area shown is not a wetland except during floods. The mapped boundaries should be redrawn within their property to exclude additional areas that are not genuine wetlands. ORC provided assurances that current farming practices within RSW areas could continue and this is not reflected with the Plan Change.	Support	Only wetlands reflecting actual 10.4.1 RSW values should be included with Sch 9 and mapping. At public meetings, ORC provided inaccurate advice to landowners as to the continuation of their current farming practices on their wetland areas. Further conversation should occur with the landowner prior to adopting the plan change
Meridian Energy Limited	32	361 – Sch 9 – Upper Taieri Wetlands Complex #161 Maps F22-F28	The south-eastern boundary in F26 is inaccurate. Much of the area included is pasture and doesn't contain hydrological characteristics of a wetland or ecological or habitat values identified in 10.4.1.	Support	Only wetlands reflecting actual 10.4.1 RSW values should be included with Sch 9 and mapping.
Transpower NZ Ltd	37	367 Sch 9 – Waipori/Waiho la Wetland Complex	From the look of the maps, appears transmission lines are included. Don't want to get unnecessary consent to maintain or upgrade these assets. Effects from such works can not be avoided and don't want financial contributions to be required. Prefer accurate mapping.	Support	It is important for maps to be accurate and for all areas identified as RSW to hold RSW 10.4.1 values.

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Beaton family of Berwick	45	367 Sch 9 – Waipori/Waiho la Wetland Complex	Wants ORC to ground-check the boundaries of the mapped area. Can't tell whether maps show one of their pumps and associated stop banks as included or excluded from wetland area.	Support	Mapped areas should accurately reflect wetlands with actual 10.4.1. RSW values. Inadequate consultation with landowners has resulted in inaccurate mapping and in incorrect inclusion within Schedule 9 and mapping. This has resulted in uncertainty as to boundaries and permitted activities. Further conversation should occur with the landowner prior to adopting the plan change
Three Creeks Farm	19	371 – Sch 9 – Te Hua Taki Wetland	Want the wetland removed from the schedule of RSWs. The areas of this wetland within the property do not meet the criteria of significance within 10.4.1 and have not previously been identified as significant.	Support	Mapped areas should accurately reflect wetlands with actual 10.4.1. RSW values. Inadequate consultation with landowners has resulted in inaccurate mapping and in incorrect inclusion within Schedule 9 and mapping. This has resulted in uncertainty as to boundaries and permitted activities. Further conversation should occur with the landowner prior to adopting the plan change
Otago Fish & Game Council	8	148 Funding	Resource consent fee relief is most workable and proactive and would like as a criterion that financial support, resource fee consent fee relief or in-kind payments may be provided to protect, create or enhance wetlands. Expertise, fencing materials, rates relief or provision of plants is suggested as options.	Support in part	To ensure wetland values are maintained and enhanced, Council should provide a method for allowing for rates relief, resource consent relief or provision of materials/plants.
William Thomas Begg	17	148 Funding	Would like rates relief of up to 50% of total rates for the property to allow for cost of wetland protection and fencing. Would like a gorse and broom management/eradication plan undertaken, implemented and funded by ORC.	Support	To ensure wetland values are maintained and enhanced, Council should provide a method for allowing for rates relief, resource consent relief or provision of materials/plants.
Three Creeks Farm	19	148 Funding	Would like rates relief of up to 50% of total rates to recognise the cost of management of the wetland. IF consents are required for drain maintenance that there be no fees on the consent and that there be a non-notification clause on consent.	Support	To ensure wetland values are maintained and enhanced, Council should provide a method for allowing for rates relief, resource consent relief or provision of materials/plants.

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Hawksbury Lagoon Inc	39	148 Funding	Wetlands benefit everyone and there should be a provision for financial assistance or rates incentives for landowners to fence off wetlands and fun revegetation.	Support	To ensure wetland values are maintained and enhanced, Council should provide a method for allowing for rates relief, resource consent relief or provision of materials/plants.
OtagoNet Joint Venture	43	Wetland Values in Sch9	Include RSW values ascribed to each RSW in Sch 9. Any change to the RSW values identified for a RSW should require a formal plan change. General information can go in a non-regulatory inventory and this should have been available to stakeholders and the public at the time the plan was publicly notified. Lack of transparency.	Support in part	There has been a lack of consultation in identifying many RSWs within Sch 9 and mapped areas. The concern is that this lack of consultation will continue in the management of the non-regulatory inventory - impacting on landowners and creating uncertainty in the management of the wetland.

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