

SUMMARY OF DECISIONS REQUESTED

**on
Proposed Plan Change 2
(Regionally Significant Wetlands)**

**to the
Regional Plan: Water for Otago**



10 September 2011

Preface

Proposed Plan Change 2 (Regionally Significant Wetlands) to the Regional Plan: Water for Otago was publicly notified on Saturday 2 July 2011 in accordance with Clause 5 of the First Schedule of the Resource Management Act 1991 (RMA).

The Otago Regional Council received a total of forty-nine submissions on the Proposed Plan Change from a range of groups, organisations and individuals. Forty-seven of these submissions were lodged within the statutory time frame specified, by 5pm on Friday 29 July 2011. Two submissions were received late and are marked accordingly.

In accordance with Clause 7 of the First Schedule of the RMA, this document presents the summary of decisions requested by persons making a submission.

It summarises all forty-nine submissions received in three ways:

- Grouped by Submitter (matters within the scope of the plan change) – page 1
- Grouped by Provision (matters within the scope of the plan change) – page 47
- Grouped by Submitter (matters beyond the scope of the plan change) – page 103

The full original submissions are available at Otago Regional Council offices and on www.orc.govt.nz

Under Clause 8, Schedule 1 of the RMA, certain persons may make a further submission, but only in support of, or opposition to, those original submissions received. That clause identifies the persons who may make a further submission as:

- (a) Any person representing a relevant aspect of the public interest; or
- (b) Any person that has an interest in the proposed plan change greater than the interest that the general public has.

Further submission forms are available:

- At Otago Regional Council offices at:
 - 70 Stafford Street, Dunedin
 - William Fraser Building, Dunorling Street, Alexandra
 - The Station, First Floor, Corner Shotover and Camp Streets, Queenstown
- At all public libraries and city and district council offices throughout the Otago Region
- At www.orc.govt.nz
- By phoning 0800 474 082; or
- By emailing policy@orc.govt.nz.

Further submissions must state whether you support or oppose an original submission, and whether or not you wish to be heard on your further submission. You must serve a copy of your further submission on the original submitter within five working days of making the further submission to Otago Regional Council.

Further submissions must be received at the Otago Regional Council by 5pm, Friday 23 September 2011.

Guide to Making a Further Submission

Important Information:

Under Clause 8, Schedule 1 of the Resource Management Act 1991, you may make a further submission if you are:

- (a) A person representing a relevant aspect of the public interest; or
- (b) A person that has an interest in the proposed plan change greater than the interest that the general public has.

A further submission may only be made in support of, or in opposition to an original submission. A further submission must state whether you support or oppose an original submission (or part thereof) and whether or not you wish to be heard on your further submission. You must serve a copy of your further submission on the original submitter within five working days of making the further submission to Otago Regional Council.

The Summary of Decisions Requested summarises the submissions received. If you intend to make a further submission, it is recommended that you read the full original submission, available at Otago Regional Council offices and on www.orc.govt.nz

When preparing your further submission, please use the **Submitter Number and Reference Number** to indicate what **submission point** you are referring to (e.g. submitter number / reference number).

This number is shown on the Summary of Decisions Requested by submitter (left) and by topic (right).

e.g. (5/145)

5

Issue	Ref
<i>(issue)</i>	145

145

Submitter Name	Sub Number
<i>(name)</i>	5

Clearly state which decision requested (using **Submitter Number** and **Reference Number**) on which you are making a further submission.

Clearly state whether you support or oppose the decision requested on which you are making a further submission.

Give the **reasons** for your support or opposition.

Use the **Further Submission Form** to help you set out your further submission.

It is in your best interests to make your further submission as clear as possible.

If you have any questions regarding how to prepare a further submission, please phone the Policy Team on (03) 474 0827 or 0800 474 082, or email policy@orc.govt.nz.

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Index to Submitters – By Number

Submitter Number	Surname, First Name <u>or</u> Organisation	Address for Service
1	Amende, Deanne and Steve	Taieri Ferry Road, RD1 Outram 9073
2	Treble Cone Investments Ltd.	C/- Richard Hanson - Darby Partners Ltd., PO Box 1164, Queenstown 9348
3	Wenita Forest Products Ltd.	C/- Paul George Greaves, PO Box 341, Mosgiel 9053
4	Palmer, Martin and Barbara	182 Moturata Road, Taieri Beach, RD 1 Brighton 9091
5	Solid Energy New Zealand Ltd	C/- Tim Lester, Private Bag 502, Huntly 3740
6	Thomson, Geoffrey	Mount Earnslaw Station, Glenorchy - Queenstown 9372
7	Andrews, John	Waipiata, RD3 Ranfurly 9397
8	Otago Fish & Game Council	C/- Peter Wilson, PO Box 76, Dunedin 9054
9	Hagan, Graeme John	Hawksbury Bush Road, RD 2 Waikouaiti 9472
10	Allan, Wayne and Hagan, Rochelle Anne	247 Quarry Road, RD 1 Waikouaiti 9471
11	NZSki Limited	C/- Jim Castiglione/Hetish Lochan – Lane Neave Lawyers, PO Box 701, Queenstown 9348
12	Jopp, David	Maritanga Station, RD3 Ranfurly 9397
13	River-Estuary Care: Waikouaiti-Karitane	C/- Patricia Vandenburg, 47 Coast Road, Karitane 9440
14	Waitaki District Council	C/- David Campbell, Private Bag 50058, Oamaru 9444
15	Cardrona Alpine Resort	C/- Duncan Veall, 18 Dunmore Street, Wanaka 9350
16	Te Ao Marama Inc.	C/- Michael Skerrit - Murihiku Marae, 408 Tramway Road, Invercargill.
17	Begg, William Thomas	22 Mount Wallace Road, RD2 Balclutha 9272
18	Nimmo, Trevor and Vivien	120 Kemp Road, Hillgrove - Palmerston 9482
19	Isbister, Ian and Judith	63 Ardgowan Road, 1DRD Oamaru 9492

20	Lake Waihola Waipori Wetlands Society Inc.	C/- Pauline Bacon, PO Box 15037, Waihola 9243
21	Save the Otago Peninsula Inc. Society	C/- Moira Jean Parker, PO Box 23, Portobello – Dunedin 9048
22	Herlihy, Gavan James	RD 4 Ranfurly 9398
23	Dowling, M V	RD 1 Ranfurly 9395
24	Lyders, D W	Berwick RD 1 Outram 9073
25	Holland, Michael and Christine	437 Waianakarua Road, 13 O RD, Oamaru 9495
26	The Yellow-eyed Penguin Trust	C/- Sue Murray, 3rd Floor - Queens Building, 109 Princes Street, PO Box 5409, Dunedin 9058
27	Otago Conservation Board	C/- Mark Clark, PO Box 5244, Dunedin 9058
28	Beattie, D V E and Burnett-Beattie, S G	3642 Owaka Valley Road, RD 1 Clinton 9583
29	Federated Farmers of New Zealand	C/- Kim Reilly, PO Box 5242, Dunedin
30	Contact Energy Ltd.	C/- Rosemary Dixon, Level 1 Harbour City Towers, 29 Brandon Street, PO Box 10742, Wellington 6143
31	Broekhuizen, Simon	207 Benhar Road, RD 2 Balclutha 9272
32	Meridian Energy Ltd.	C/- Andrew Feierabend, PO Box 2454, Christchurch 8140
33	Kerr, Vivienne	RD 1 Waikouaiti 9471
34	Clutha District Council	C/- Murray Brass, PO Box 25, Balclutha 9240
35	Kerr, Gregory	Apes Road, RD 1 Waikouaiti 9471
36	Fox, Herb	42C Quarantine Road, Nelson 7011
37	Transpower New Zealand Ltd.	C/- David le Marquand - Burton Planning Consultants Ltd, Level 1, 2-8 Northcroft Street, PO Box 33-817, Takapuna – Auckland 0740
38	Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou, and Hokonui Runanga	C/- Tim Vial – KTKO Ltd, PO Box 446, Dunedin 9054

39	Hawksbury Lagoon Inc.	C/- Shirley McKewen, 30 Thomas Street, Waikouaiti 9510
40	TrustPower Ltd.	C/- Laura Marra, Private Bag 12023, Tauranga 3143
41	Galloway Irrigation Society Inc.	C/- Mike Kelly, PO Box 322, Alexandra 9340
42	The Director General of Conservation	C/- Bruce Hill - Otago Conservancy Office, PO Box 5244, Moray Place, Dunedin 9058
43	OtagoNet Joint Venture	C/- Joanne Dowd - Mitchell Partnerships Limited, PO Box 489, Dunedin 9054
44	Ladies Mile Partnership	C/- Warwick Goldsmith/Tim Stevens - Anderson Lloyd Lawyers, PO Box 201, Queenstown 9348
45	Beaton, Mark	1388 Berwick Road, RD 1 Outram 9073
46	New Zealand Railways Corporation	C/- Pam Butler, Level 6, Wellington Railway Station, Bunny Street, PO Box 593, Wellington 6140
47	Royal Forest and Bird Protection Society of New Zealand Inc.	C/- Sue Maturin, PO Box 6230, Dunedin 9059
48	Judge, Bronwyn	PO Box 351, Oamaru 9444
49	Burgess, Karl Frank	87 Lakeside Road, 2RD Owaka, South Otago 9586

Grouped by Submitter
(Matters within the scope of the proposed plan change)

1 Deanne and Steve Amende

ISSUE	REF	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
General support and opposition	144	General opposition	Oppose	Oppose proposed plan change 2	<ul style="list-style-type: none"> •Policies are open to interpretation - regarding restrictions on our land use. •Plan is unreasonable and unworkable. •Financial cost.
Specific Schedule 9 wetlands	201	Schedule 9 - Akatore Creek Swamp (#1, Map F46)	Amend	Re-negotiate the boundaries of the Akatore Creek Swamp on our property.	<ul style="list-style-type: none"> •This is not a significant wetland. •There has not been enough thought put into the boundary.

2 Treble Cone Investments Limited

ISSUE	REF	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
What is a Regionally Significant Wetland	7.139	Policy 10.4.1A - Definition of a Regionally Significant Wetland	Amend	Delete 10.4.1A(c).	•Remove provisions that relate to wetlands higher than 800m.
What is a Regionally Significant Wetland	7.139	Policy 10.4.1A - Definition of a Regionally Significant Wetland	Amend	Provide for wetlands within Ski Area Sub Zones to be excluded from definition of Regionally Significant Wetlands in 10.4.1A.	No reason given.
Chapter 10 - Wetlands	153	Chapter 10 general	Amend	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.	No reason given.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	155	Chapter 13 general	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"> •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). 	No reason given.
Chapter 12 - Rules: Water Take, Use and Management	156	Chapter 12 general	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).	No reasons given.
Chapter 12 - Rules: Water Take, Use and Management	156	Chapter 12 general	Amend	Amend clauses within 12.2, 12.3, 12.9, and 12.11 to provide for: <ul style="list-style-type: none"> •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). 	No reasons given.
Chapter 12 - Rules: Water Take, Use and Management	156	Chapter 12 general	Amend	Clarify Discharge of Water provisions to confirm that any discharge of water associated with a snowmaking system is a permitted activity.	No reason given.
Protection general	161	Protection general	Amend	Specific note should be made in assessment criteria and background as to the substantial positive effects created by Snowmaking Systems and the water use associated with these systems.	No reason given.

3 Wenita Forest Products Limited

ISSUE	REF	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
General support and opposition	145	General support	Support	Support written content of the plan.	No reason given.
Specific Schedule 9 wetlands	201	Schedule 9 - Akatore Creek Swamp (#1, Map F46)	Amend	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".	<ul style="list-style-type: none"> •Map includes areas that are not swamp or estuary. •Map includes areas with established trees - inclusion will affect Wenita's operations.

4 Martin and Barbara Palmer

ISSUE	REF	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Specific Schedule 9 wetlands	287	Schedule 9 - Lower Coutts Gully Swamp (#87, Map F46)	Amend	Change name of the wetland from the "Lower Coutts Gully Swamp" to the "Coutts Gully Wetland".	•Suggested name is better known.
Specific Schedule 9 wetlands	287	Schedule 9 - Lower Coutts Gully Swamp (#87, Map F46)	Amend	Map F46 is reduced in extent within the Palmer property as shown on the annotated attached map.	<ul style="list-style-type: none"> •Mapped extent does not accurately reflect wetland area accurately. •Map includes areas of operational farm land, including stock gateway (in use for over 50 years) that is not damaging the wetland. •Difficult to determine the actual boundary from the map.

5 Solid Energy New Zealand Ltd

ISSUE	REF	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
What is a Regionally Significant Wetland	7.139	Policy 10.4.1A - Definition of a Regionally Significant Wetland	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>	<ul style="list-style-type: none"> •Definition of Regionally Significant Wetland is extremely broad given all 'wetlands' above a nominal 800m above sea level mark automatically trigger a regional significance status and subsequent protection. •A nominal altitude of 800m above sea level is not an effective gauge of ecological significance, which may be confirmed by survey or ground-truthing. •Submitter holds permit for exploration of a lignite deposit in Home Hills / Hawkdun area and future mining could take place above 800m above sea level. •Proposed definition of Regionally Significant Wetland would constrain future mining. Mining would require modification to existing landforms for access and extraction. If there is a wetland 800m above sea level within the resource envelope, this modification would have a non-complying activity status, regardless of the wetland's ecological significance. •This constraint is unsupported by ecological information, and would hinder access to a resource which is of value to Otago.
General support and opposition	145	General support	Support	Generally support direction of plan change.	•Will provide more definitive identification of significant wetlands.

6 Geoffrey Thomson

ISSUE	REF	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Specific Schedule 9 wetlands	235	Schedule 9 - Diamond Lake Wetland (#35, Map F3)	Amend	Amend the boundaries of wetland which is on parts of my farm property.	<ul style="list-style-type: none"> •Maps show areas that are not significant wetland, they need to be changed. •Wants a site visit to establish better boundaries.
Specific Schedule 9 wetlands	276	Schedule 9 - Lake Reid Wetland (#76, Map F3)	Amend	Amend the boundaries of wetland, which is on parts of my farm property.	<ul style="list-style-type: none"> •Maps show areas that are not significant wetland, they need to be changed. •Wants a site visit to establish better boundaries.

7 SH Andrews and Sons Ltd

ISSUE	REF	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Promotion, information and funding	148	Funding	Did not specify	Compensate for the confiscation of freehold property rights.	•Believe this is a confiscation of property rights.
Protection general	161	Protection general	Amend	Honour ORC staff assurances given at public meetings that existing farm practises continue within the new boundary.	•Would have accepted proposed changes when assured that current farming practices could continue. •Assurances incorrect with maintenance of drains and over sowing of clover seed now requiring consent.
Specific Schedule 9 wetlands	361	Schedule 9 - Upper Taieri Wetlands Complex (#161, Maps F22 to F28)	Amend	Redraw the map within our property to exclude additional areas that are not genuine wetlands.	•Much of the area is not a wetland, except during floods.

8 Otago Fish & Game Council

ISSUE	REF	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Regionally Significant Wetland values	6.14	Policy 10.4.1 - Definition of Regionally Significant Wetland values	Amend	Add criterion: <i>A10) Importance of this wetland within the wider network of wetlands within its catchment.</i>	•Proposed plan only considers wetlands in isolation and doesn't consider networks of wetlands as important (e.g. for river flow stability).
Chapter 10 - Wetlands	9	Policy 10.4.2 - Priority on avoiding adverse effects	Support	Support for the preference of an "avoid" test where possible.	•Gives a strong signal the Regionally Significant Wetlands should be left alone.
Protection general	10	Financial contributions policy (Policy 10.4.2A and Ch.17)	Support	Support for 10.4.2A	No reason given.
Chapter 12 - Rules: Water Take, Use and Management	22	Rule 12.1.1A.1 - Take and use of surface water from any Regionally Significant Wetland	Support	Support.	•Will help to protect wetlands into the future.
Chapter 12 - Rules: Water Take, Use and Management	26	Rule 12.1.2.4 - Take and use of surface water for no more than 3 days	Support	Support.	•Allows submitter to look at the effect of water takes on wetlands, and advise ORC accordingly.
Chapter 12 - Rules: Water Take, Use and Management	27	Rule 12.1.2.5 - Take and use of surface water general	Support	Support.	•Allows submitter to look at the effect of water takes on wetlands, and advise ORC accordingly.
Chapter 12 - Rules: Water Take, Use and Management	28	Rule 12.1.2.6 - Take and use of surface water for land drainage	Support	Support.	•Allows submitter to look at the effect of water takes on wetlands, and advise ORC accordingly.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	118	Rule 13.5.1.8 - Disturbance by livestock	Amend	Remove the word "conspicuous" 13.5.1.8(b) unless guidance can be given on what constitutes "conspicuous".	•All stock use of waterway or wetland margins will cause pugging and erosion and the proposed plan offers no guidance on this.
General support and opposition	145	General support	Support	Generally supports the proposed changes.	•Strengthens protection for regionally significant wetlands.
Promotion, information and funding	148	Funding	Amend	State as criterion that financial support, resource consent fee relief or in-kind payments may be provided to protect, create, or enhance wetlands. Expertise, fencing materials, rates relief, or plants are suggested as options.	•Resource consent fee relief is most workable and proactive. •Creation/enhancement of a wetland should not have the same consent fees as an activity that will damage a wetland. •Current consent fees encourage non-compliance and illegal activity and discourage creation or enhancement of wetlands. •Notes that plan provides little guidance on how wetland monitoring will be carried out.
Chapter 10 - Wetlands	153	Chapter 10 general	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>	•Proposed plan does not address issue of wetland transition and seasonal variability. •Suggested change enables assessment of effects of activities adjacent to wetland boundary.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	155	Chapter 13 general	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.	No reason given.

ISSUE	REF	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	155	Chapter 13 general	Amend	Would like the proposed plan to signal the following as criterion within the rules: Resource consent fee relief to protect, create, or enhance wetlands.	<ul style="list-style-type: none"> •Resource consent fee relief is workable and proactive. •Creation/enhancement of a wetland should not have the same consent fees as an activity that will damage a wetland. •Current consent fees encourage non-compliance and illegal activity and discourage creation or enhancement of wetlands. •Also wants clarification how internal compliance/enforcement practices will change.
Chapter 12 - Rules: Water Take, Use and Management	156	Chapter 12 general	Amend	Would like the proposed plan to signal the following as criterion within the rules: Resource consent fee relief to protect, create, or enhance wetlands.	<ul style="list-style-type: none"> •Resource consent fee relief is workable and proactive. •Creation/enhancement of a wetland should not have the same consent fees as an activity that will damage a wetland. •Current consent fees encourage non-compliance and illegal activity and discourage creation or enhancement of wetlands. •Also wants clarification how internal compliance/enforcement practices will change.
Chapter 12 - Rules: Water Take, Use and Management	156	Chapter 12 general	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.	No reason given.
Mapping of Schedule 9 wetlands - general	199	Mapping of Schedule 9 wetlands - general	Amend	Place detailed aerial photograph-based maps with cadastral boundaries of wetlands overlaid alongside the topographical maps within this plan.	<ul style="list-style-type: none"> •Maps do not show level of detail needed to assess effect of changes, or to give effect to the proposed plan. •Maps in the Wetland Inventory will not be sufficient as it doesn't have legal force.
Schedule 9 general	200	Schedule 9	Support	Welcomes the addition of many of the wetlands from the former Schedule 9 into Schedule 10.	<ul style="list-style-type: none"> •No reason given. •Notes that approx. 1/3 of the wetlands in Schedule 10 now receive no protection or identification under this plan.

9 Graeme John Hagan

ISSUE	REF	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Specific Schedule 9 wetlands	323	Schedule 9 - Pleasant River Estuary Wetland Complex (#123, Map F67)	Oppose	Oppose changes.	No reason given.

10 Wayne Allan and Rochelle Anne Hagan

ISSUE	REF	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Specific Schedule 9 wetlands	323	Schedule 9 - Pleasant River Estuary Wetland Complex (#123, Map F67)	Oppose	Oppose changes.	<ul style="list-style-type: none"> •Prepared for the ORC to use and monitor the land below the flood gates on our property as a wetland - but not above the flood gate. •Flood gate has been present for many years and that land is used/grazed as part of everyday farming operation. •Land within wetland boundary is used in farming operations, we should be able to keep using it the way we want. •Lack of consultation.

11 NZSki Limited

ISSUE	REF	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
What is a Regionally Significant Wetland	7.139	Policy 10.4.1A - Definition of a Regionally Significant Wetland	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.	<ul style="list-style-type: none"> •Definition of Regionally Significant Wetland is too broad as includes all wetlands (including shallow pools) above 800m. •Water levels at this height are dynamic and hard to monitor/assess. •Majority of NZSki's land is above 800m, they must operate at high altitude. •Proposed changes could restrict use, management, growth and development of NZSki's ski fields, or could impose costly financial contributions for unavoidable effects. •Current planning and consent regimes have been rigorous and all effects of the ski fields were assessed (including for wetlands).

ISSUE	REF	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Minor and other	143	Minor and consequential changes	Amend	Make any other amendments as may be necessary or expedient to give effect to the purpose and intent of the relief sought in the submission.	No reason given.

12 David Jopp

ISSUE	REF	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Specific Schedule 9 wetlands	356	Schedule 9 - Trig Q Ephemeral Pool (#156, Map F55)	Oppose	Not include Trig Q Ephemeral Pool.	•Is not a true ephemeral wet area and only ponds during high rainfall winters and when receiving run-off.

13 River-Estuary Care: Waikouaiti-Karitane

ISSUE	REF	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
RMA streamlining and simplifying	150	RMA streamlining and simplifying	Oppose	Certain sections of the Consultation Draft should be included in the final proposal, e.g. the Wetlands Introduction, the Issues section, and Section 10.5 Anticipated Environmental Results (especially the inclusion of the concept of "habitat and hydrological services").	•Introduction clearly sets out the context, explains the types and values of wetlands in Otago. •Issues give clear reasons for the need for certain wetlands to have special consideration.
Chapter 10 - Wetlands	153	Chapter 10 general	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.	No reason given.
Chapter 10 - Wetlands	153	Chapter 10 general	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.	No reason given.
Specific Schedule 9 wetlands	240	Schedule 9 - Ellison Saltmarsh (#40, Map F61)	Support	Inclusion of wetland commended.	•Areas are valuable in themselves and as areas with special biodiversity value.
Specific Schedule 9 wetlands	300	Schedule 9 - McGregor Swamp (#100, Map F61)	Support	Inclusion of wetland commended.	•Areas are valuable in themselves and as areas with special biodiversity value.
Specific Schedule 9 wetlands	302	Schedule 9 - McLachlan Road Marsh (#102, Map F61)	Support	Inclusion of wetland commended.	•Areas are valuable in themselves and as areas with special biodiversity value.
Specific Schedule 9 wetlands	365	Schedule 9 - Waikouaiti River Estuary Wetland Complex (#165, Map F61)	Support	Inclusion of wetland commended.	•Areas are valuable in themselves and as areas with special biodiversity value.
Wetland values information and Wetland Inventory	400	Schedule 9 - Wetlands values in Schedule 9	Oppose	Certain sections of the Consultation Draft should be included in the final proposal, e.g. listing of the specific nature and values in each of the designated wetlands.	No reason given.

14 Waitaki District Council

ISSUE	REF	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
General support and opposition	145	General support	Support	General support for plan change.	No reason given.
Wetland values information and Wetland Inventory	151	Wetland Inventory	Support	Supports providing information in a non-regulatory inventory of wetlands.	•Allows the inventory to be more extensive, regularly updated, and freely accessible to all. •Inventory information will be useful to the Waitaki DC's Ecological Study.
Mapping of Schedule 9 wetlands - general	199	Mapping of Schedule 9 wetlands - general	Support	Support the refined mapping for Schedule 9 wetlands.	•Will assist in determining compliance with Waitaki DC's Rural Zone Site Development Standard 4.4.7.

15 Cardrona Alpine Resort

ISSUE	REF	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
What is a Regionally Significant Wetland	7.139	Policy 10.4.1A - Definition of a Regionally Significant Wetland	Amend	Delete 10.4.1A(c).	•Remove provisions that relate to wetlands higher than 800m. •Skifield operations have not been considered in the proposal, and are a vital part of the economy.
What is a Regionally Significant Wetland	7.139	Policy 10.4.1A - Definition of a Regionally Significant Wetland	Amend	Provide for wetlands within Ski Area Sub Zones to be excluded from definition of Regionally Significant Wetlands in 10.4.1A.	•Skifield operations have not been considered in the proposal, and are a vital part of the economy.

ISSUE	REF	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Chapter 10 - Wetlands	153	Chapter 10 general	Amend	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.	•Skifield operations have not been considered in the proposal, and are a vital part of the economy.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	155	Chapter 13 general	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).	•Skifield operations have not been considered in the proposal, and are a vital part of the economy.
Chapter 12 - Rules: Water Take, Use and Management	156	Chapter 12 general	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).	•Skifield operations have not been considered in the proposal, and are a vital part of the economy.
Chapter 12 - Rules: Water Take, Use and Management	156	Chapter 12 general	Amend	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).	•Skifield operations have not been considered in the proposal, and are a vital part of the economy.
Chapter 12 - Rules: Water Take, Use and Management	156	Chapter 12 general	Amend	Clarify Discharge of Water provisions to confirm that any discharge of water associated with a snowmaking system is a permitted activity.	•Skifield operations have not been considered in the proposal, and are a vital part of the economy.
Protection general	161	Protection general	Amend	Specific note should be made in assessment criteria and background as to the substantial positive effects created by Snowmaking Systems and the water use associated with these systems.	•Skifield operations have not been considered in the proposal, and are a vital part of the economy.

16 Te Ao Marama Inc

ISSUE	REF	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Plan general	154	Plan general	Amend	Include preservation of wetland, lake and river margins in the proposed plan change.	•Proposed change does not address this (as required by s 6 RMA). •Would significantly strengthen the provisions proposed and help to achieve the purpose of RMA. •A lot of inappropriate use and development has been carried out in the margins, with significant effects on wetlands, lakes, rivers and the coast.

17 William Thomas Begg

ISSUE	REF	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	124	Rule 13.7.1.2 - Removal or clearance of exotic plant material	Amend	If Stirling Marsh Complex is retained as a Regionally Significant Wetland then provide for the harvesting of exotic species occurring in the wetland as a permitted activity.	•Part of the wetland area on my property is planted in poplar trees for timber. •Plan Change fails to provide for my economic wellbeing and that of the surrounding community (required by s 5 RMA).
Promotion, information and funding	148	Funding	Amend	If Stirling Marsh Complex is retained as a Regionally Significant Wetland then provide rates relief of up to 50% of total rates for the property to recognise the cost of protection and fencing.	•Plan Change fails to provide for my economic wellbeing and that of the surrounding community (required by s 5 RMA). •Measures are an infringement of my freehold property rights - compensation, fencing assistance or rate relief should be provided.

ISSUE	REF	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Promotion, information and funding	148	Funding	Amend	If Stirling Marsh Complex is retained as a Regionally Significant Wetland then provide a gorse and broom management/eradication plan for the wetland undertaken, implemented and funded by ORC.	<ul style="list-style-type: none"> The areas of this wetland on my property are used for intensive grazing, and one area has gorse and is fenced to keep cattle out.
Specific Schedule 9 wetlands	339	Schedule 9 - Stirling Marsh Complex (#139, Map F43)	Amend	Remove the areas identified as Stirling Marsh Complex that are on my property from proposed plan change 2.	<ul style="list-style-type: none"> Areas of this wetland on my property do not meet the criteria of regional significance. They are used for intensive grazing, growing poplar trees for timber, and one area has gorse and is fenced to keep cattle out. Insufficient consultation.

18 Trevor and Vivien Nimmo

ISSUE	REF	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Specific Schedule 9 wetlands	270	Schedule 9 - Kemp Road Lagoon (#70, Map F65)	Amend	Remove wetland from Schedule 9.	<ul style="list-style-type: none"> The lagoon is not regionally significant, it has none of the values listed in policy 10.4.1, and is not a freshwater lagoon. Inclusion in Schedule 9 would be a barrier to possible future development. Insufficient consultation.

19 Three Creeks Farm

ISSUE	REF	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Chapter 12 - Rules: Water Take, Use and Management	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	Amend	If Te Hua Taki Wetland (Map F66, #171) is retained as a regionally significant wetland then provide that there are no setbacks from the wetland for the application of Farm Dairy Effluent.	<ul style="list-style-type: none"> We have farmed alongside the wetland and in harmony with its values for a number of years, it is fenced and kept in its natural state. Our cowshed and milking platform are close to the wetland. Identifying the wetland as regionally significant may affect the integrity and functioning of our dairy farm effluent system.
Promotion, information and funding	148	Funding	Amend	If Te Hua Taki Wetland (Map F66, #171) is retained as a regionally significant wetland then provide rates relief of up to 50% of total rates for the property to recognise the cost of management.	<ul style="list-style-type: none"> Plan Change fails to provide for my economic wellbeing and that of the community around the affected area, as required by s 5 RMA. Identifying the wetland as regionally significant may affect the integrity and functioning of our dairy farm effluent system.
Promotion, information and funding	148	Funding	Amend	If Te Hua Taki Wetland (Map F66, #171) is retained as a regionally significant wetland and if consents are required for drain maintenance, provide that (a) there is no fee on the consent, (b) consents for drain maintenance are being processed as controlled activities, and (c) a non notification clause is included.	<ul style="list-style-type: none"> Plan Change fails to provide for my economic wellbeing and that of the community around the affected area, as required by s 5 RMA.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	155	Chapter 13 general	Amend	If Te Hua Taki Wetland (Map F66, #171) is retained as a regionally significant wetland then provide that there are no arbitrary setbacks on structures or buildings occurring on or near the wetland.	<ul style="list-style-type: none"> Plan Change fails to provide for my economic wellbeing and that of the community around the affected area, as required by s 5 RMA. We have farmed alongside the wetland and in harmony with its values for a number of years. Our cowshed and milking platform are close to the wetland.
Chapter 12 - Rules: Water Take, Use and Management	156	Chapter 12 general	Amend	If Te Hua Taki Wetland (Map F66, #171) is retained as a regionally significant wetland then provide that the taking of water from the wetland and taking of adjacent groundwater for stock, domestic and agricultural use is a permitted activity.	<ul style="list-style-type: none"> Plan Change fails to provide for my economic wellbeing and that of the community around the affected area, as required by s 5 RMA. We have farmed alongside the wetland and in harmony with its values for a number of years. Our current water take is adjacent to the wetland.
Protection general	157	Drain maintenance	Amend	If Te Hua Taki Wetland (Map F66, #171) is retained as a regionally significant wetland then: <ul style="list-style-type: none"> Provide for the maintenance of existing drains into and out of the wetland as a permitted activity. If consents are required include a non notification clause, include the consents as a controlled activity, that there is no fee on the consent. 	<ul style="list-style-type: none"> Drains in and out of the wetland need regular maintenance, which is an important part of how the wetland currently functions. Getting consent for drain maintenance will have a significant effect on my farming operation (cost and uncertainty). Plan Change fails to provide for my economic wellbeing and that of the community around the affected area, as required by s 5 RMA.

ISSUE	REF	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Specific Schedule 9 wetlands	371	Schedule 9 - Te Hua Taki Wetland (#171, Map F66)	Oppose	Remove wetland from the proposed schedule of regionally significant wetlands.	<ul style="list-style-type: none"> •Areas of this wetland on my property do not meet the criteria of regional significance in policy 10.4.1, and have not previously been identified as regionally significant. •Plan Change fails to provide for my economic wellbeing and that of the community around the affected area, as required by s 5 RMA. •Insufficient consultation.

20 Lake Waihola Waipori Wetlands Society Inc.

ISSUE	REF	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Promotion, information and funding	14	Policy 10.4.6 - Promotion of wetlands	Support	Supports concepts in 10.4.6.	<ul style="list-style-type: none"> •Notes lack of detail around how Council intend to educate, resource and fund the concepts in 10.4.6, and that there are no financial incentives for wetland restoration. •Notes lack of public presentation of wetland information.
Chapter 12 - Rules: Water Take, Use and Management	76	Rule 12.7.1.1 - Discharge of herbicide to water	Amend	Amend to provide for control of terrestrial weed species within wetlands.	<ul style="list-style-type: none"> •Rule only relates to the control of aquatic plants, not terrestrial plants. •Many weeds within wetlands are terrestrial species (e.g. willow, elder).
Chapter 12 - Rules: Water Take, Use and Management	77	Rule 12.7.1.2 - Discharge of pesticide, land-based discharge onto land	Amend	Wetland restorative works and weed control must be made simpler.	<ul style="list-style-type: none"> •Rule is confusing and makes wetland restorative efforts difficult to develop, plan and implement. •Weed control by herbicide application in wetlands is virtually impossible without short term effects on non-target species. •Weed control has positive effects on hydrology and sediment movement. Rule only looks at whether effects have occurred. People controlling weeds may be penalised for creating positive changes.
Chapter 12 - Rules: Water Take, Use and Management	78	Rule 12.7.1.3 - Discharge of herbicide to air or land	Amend	Wetland restorative works and weed control must be made simpler.	<ul style="list-style-type: none"> •Rule is confusing and makes wetland restorative efforts difficult to develop, plan and implement. •Weed control by herbicide application in wetlands is virtually impossible without short term effects on non-target species. •Weed control has positive effects on hydrology and sediment movement. Rule only looks at whether effects have occurred. People controlling weeds may be penalised for creating positive changes.
Chapter 12 - Rules: Water Take, Use and Management	79	Rule 12.7.1.4 - Discharge of pesticide, aerial discharge onto land	Amend	Wetland restorative works and weed control must be made simpler.	<ul style="list-style-type: none"> •Rule is confusing and makes wetland restorative efforts difficult to develop, plan and implement. •Weed control by herbicide application in wetlands is virtually impossible without short term effects on non-target species. •Weed control has positive effects on hydrology and sediment movement. Rule only looks at whether effects have occurred. People controlling weeds may be penalised for creating positive changes.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	118	Rule 13.5.1.8 - Disturbance by livestock	Amend	Amend to encourage farmers not to graze wetlands and to encourage options for protection.	<ul style="list-style-type: none"> •Stock in wetlands will damage native species - counter to goal of protecting wetland values. •Rule sets threshold only when grazing severely damages the wetland, and could result in debate over levels of damage.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	121	Rule 13.6.1.1 - Introduction of pest plants general	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.	<ul style="list-style-type: none"> •These species are invasive and have negative impacts on wetlands.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	122	Rule 13.6.2.0 - Introduction or planting of New Zealand native plant	Support	Supports rule in principle.	Allows for planting of native species in wetlands without resource consent being required
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	125	Rule 13.7.2.1 - Removal of pest plants - controlled activity	Amend	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> .	<ul style="list-style-type: none"> •Makes consent always be granted for the removal of these species.
General support and opposition	145	General support	Support	Supports increased focus on the protection, enhancement and restoration of wetlands.	No reason given.

Summary of Decisions Requested on Proposed Plan Change 2 (Regionally Significant Wetlands)
to the Regional Plan: Water for Otago 10 September 2011

ISSUE	REF	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Plan general	154	Plan general	Amend	Amend to more clearly delineate between what is defined as aquatic, wetlands, and land.	<ul style="list-style-type: none"> Lack of delineation between aquatic values and wetland values makes the proposal slightly confusing. Aquatic and wetland areas are distinct with quite different plant communities. This will make the rules work more clearly, and give greater guidance to people.
Promotion, information and funding	164	Chapter 15 - Methods other than Rules	Amend	Provide education, information, and leadership on the right kind of plant species for wetland planting in Otago. Recognise acceptance of risk by the Lake Waihola Waipori Wetlands Society in the planning and resource management process, in ensuring that projects in wetland restoration are to mean the outcomes of 10.4.6. Be proactive in drawing attention to the need to control Reed Sweetgrass in our region.	<ul style="list-style-type: none"> Choice of plants involves the selection of appropriate plant assemblages for differing wetlands throughout Otago. – Critical information if biodiversity and wetland functionality are to be retained and enhanced. Lake Waihola Waipori Wetlands Society has made a significant public commitment to the sustainable management of wetlands in its area. Will improve our waterways, wetlands and the region. Reed Sweetgrass is a significant threat to wetland and waterway health in the Waihola waipori Catchment.

21 Save the Otago Peninsula Inc Society

ISSUE	REF	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
RMA streamlining and simplifying	150	RMA streamlining and simplifying	Oppose	Opposes the deletion of 10.2.3	No reason given
Specific Schedule 9 wetlands	261	Schedule 9 - Hoopers Inlet Swamp (#61, Map F58)	Support	Support the new, more accurate boundaries of the wetland.	Important ecological values are recognised.
Specific Schedule 9 wetlands	320	Schedule 9 - Papanui Inlet Saltmarsh (#120, Map F59)	Support	Support the inclusion of wetland in the Water Plan.	No reason given.
Schedule 10 and Non-Regionally Significant Wetlands	600	Schedule 10 and Non-Regionally Significant Wetlands	Oppose	Oppose the deletion of Schedule 10.	<ul style="list-style-type: none"> Deletion of Schedule 10 would contribute to the loss and degradation of small wetlands. Some small wetlands on the Otago Peninsula are collectively very important as habitat for wading birds - they are gradually being drained and filled. Wetlands at the head of Papanui Inlet were once on the Wetland of Ecological and National Importance database, and are now almost non-existent.
Schedule 10 and Non-Regionally Significant Wetlands	600	Schedule 10 and Non-Regionally Significant Wetlands	Amend	Raupo swamp at Otakou provides example of a small wetland that should be considered for recognition in Schedule 10.	<ul style="list-style-type: none"> Has ecological value, and is significant locally, but maybe not regionally. Tomahawk Lagoon is the only other site for raupo on the Otago Peninsula.
Schedule 10 and Non-Regionally Significant Wetlands	600	Schedule 10 and Non-Regionally Significant Wetlands	Amend	Include schedule of locally important wetlands in the Water Plan.	No reasons given.

22 Gavan James Herlihy

ISSUE	REF	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Chapter 12 - Rules: Water Take, Use and Management	22	Rule 12.1.1A.1 - Take and use of surface water from any Regionally Significant Wetland	Support	New drains should require consent.	No reason given.
Chapter 12 - Rules: Water Take, Use and Management	45	Rule 12.2.1A.1 - Take and use of groundwater from any Regionally Significant Wetland	Support	New drains should require consent.	No reason given.
Chapter 12 - Rules: Water Take, Use and Management	60	Rule 12.3.1A.1 - Damming or diversion of water: Regionally Significant Wetland	Support	New drains should require consent.	No reason given.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	118	Rule 13.5.1.8 - Disturbance by livestock	Amend	Need greater clarity to what is "conspicuous" in 13.5.1.8(b)	Unclear as to whether stock will be able to still run on the Upper Taieri River Flats.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	118	Rule 13.5.1.8 - Disturbance by livestock	Amend	13.5.1.8(d) needs greater clarity or higher threshold as to what constitutes "damage".	Literal interpretation could exclude all stock any time, as any grazing will do some damage.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	120	Rule 13.5.3.2 - Alteration of Regionally Significant Wetland - discretionary activity	Support	New drains should require consent.	No reason given.

ISSUE	REF	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Protection general	157	Drain maintenance	Amend	Maintenance of existing drains to be a permitted activity.	No reason given.

23 Maniototo Homestead

ISSUE	REF	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
General support and opposition	144	General opposition	Oppose	Status quo. Strongly oppose the need for the proposed plan change.	•Could cause management issues.
Specific Schedule 9 wetlands	232	Schedule 9 - Cross Eden Creek Marsh Complex (#32, Map F16)	Oppose	Status quo.	•Could cause management issues. •The plants mentioned in the ecologist report on wetland values have long lived in harmony with farming practise.

24 D W Lyders

ISSUE	REF	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	155	Chapter 13 general	Did not specify	No decision requested.	•Concern that proposed rules will prevent or hamper the continuation of enhancement of Waipori/Waihola Wetland (by spraying willow, alders, gorse or by creation of ponds for wildlife) by requiring costly and time consuming consent.
Chapter 12 - Rules: Water Take, Use and Management	156	Chapter 12 general	Did not specify	No decision requested.	•Concern that proposed rules will prevent or hamper the continuation of enhancement of Waipori/Waihola Wetland (by spraying willow, alders, gorse or by creation of ponds for wildlife) by requiring costly and time consuming consent.

25 Michael and Christine Holland

ISSUE	REF	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	155	Chapter 13 general	Amend	Want no changes to land use adjacent to the Waianakarua River Estuary Swamp (Map F65, #164).	•Do not want farming operation affected, wetland is already adequately protected by fencing.
Chapter 12 - Rules: Water Take, Use and Management	156	Chapter 12 general	Amend	Want no changes to irrigation takes above the Waianakarua River Estuary Swamp (Map F65, #164).	•Do not want farming operation affected, wetland is already adequately protected by fencing.
Specific Schedule 9 wetlands	364	Schedule 9 - Waianakarua River Estuary Swamp (#164, Map F65)	Support	Support the identification of the wetland.	•Land is not farmed, and is fenced.

26 The Yellow-eyed Penguin Trust

ISSUE	REF	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Mapping of Schedule 9 wetlands - general	199	Mapping of Schedule 9 wetlands - general	Support	Commends more accurate definition of wetland areas.	No reason given.
Schedule 9 general	200	Schedule 9	Support	Commends the addition of 24 new wetlands.	No reason given.
Schedule 9 general	200	Schedule 9	Amend	Inclusion in Schedule 9 of Tavora Wetland at Bobbys Head.	•Wetland has been restored to improve wetland function. •Council has funded signs on wetland and vegetation - it gets lots of visitors, wetland is important for public education. •Notes the plan change offers little protection for "lesser" wetlands, which may be equally important in the wider scheme.
Specific Schedule 9 wetlands	315	Schedule 9 - Okia Flat Wetland Management Area (#115, Map F68)	Support	Approve of the wetland being a Wetland Management Area in Schedule 9.	No reason given.
Specific Schedule 9 wetlands	320	Schedule 9 - Papanui Inlet Saltmarsh (#120, Map F59)	Support	Approve of the wetland being in Schedule 9.	No reason given.
Specific Schedule 9 wetlands	349	Schedule 9 - Te Matai Marsh Complex (#149, Map F68)	Support	Approve of the wetland being in Schedule 9.	No reason given.

27 Otago Conservation Board

ISSUE	REF	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Chapter 10 - Wetlands	9	Policy 10.4.2 - Priority on avoiding adverse effects	Support	Strongly support the intention to avoid adverse effects on wetlands rather than to remedy or mitigate such effects.	•No longer acceptable to merely remedy or mitigate effects.
Chapter 12 - Rules: Water Take, Use and Management	22	Rule 12.1.1A.1 - Take and use of surface water from any Regionally Significant Wetland	Support	Strongly support setting the default activity status of activities that affect wetlands as 'non-complying'.	•Essential that all remaining wetlands receive highest level of protection.

ISSUE	REF	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Chapter 12 - Rules: Water Take, Use and Management	45	Rule 12.2.1A.1 - Take and use of groundwater from any Regionally Significant Wetland	Support	Strongly support setting the default activity status of activities that affect wetlands as 'non-complying'.	•Essential that all remaining wetlands receive highest level of protection.
Chapter 12 - Rules: Water Take, Use and Management	60	Rule 12.3.1A.1 - Damming or diversion of water: Regionally Significant Wetland	Support	Strongly support setting the default activity status of activities that affect wetlands as 'non-complying'.	•Essential that all remaining wetlands receive highest level of protection.
General support and opposition	145	General support	Support	Supports the proposed changes	•Will provide much needed protection for remaining wetlands.
Mapping of Schedule 9 wetlands - general	199	Mapping of Schedule 9 wetlands - general	Amend	Detailed maps and their base aerial photographs should be used in the new Schedule.	•Wetlands are often small areas with complicated boundaries •1:50,000 maps inadequate
Schedule 9 general	200	Schedule 9	Support	Strongly supports the addition of new wetlands to the list of protected wetlands.	No reason given.
Wetland values information and Wetland Inventory	400	Schedule 9 - Wetlands values in Schedule 9	Oppose	Information on wetland values should be retained and included in the new Schedule to be used for ongoing planning and protection.	•Planning decisions and protection improved by having ready access to values information.
Schedule 10 and Non-Regionally Significant Wetlands	600	Schedule 10 and Non-Regionally Significant Wetlands	Amend	Schedule 10 areas which are not going to be added into Schedule 9 should be re-evaluated and, where appropriate, given protection.	•Not including will mean fewer wetlands protected.

28 The Retreat Trust

ISSUE	REF	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Specific Schedule 9 wetlands	351	Schedule 9 - Three Stones Fen Complex (#151, Map F53)	Oppose	Oppose the proposed Plan Change. Take the tussock ground out of the fen system.	•It is insignificant and not a wetland area. •Has ditches throughout tussock, needs periodic cleaning to maintain drain and stock entrapment.

29 Federated Farmers of New Zealand

ISSUE	REF	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Regionally Significant Wetland values	6.14	Policy 10.4.1 - Definition of Regionally Significant Wetland values	Support	Adopt the provision as proposed.	•Supports the incorporation of wetland values within one provision, and the addition of "significant" to value A9.
Protection general	10	Financial contributions policy (Policy 10.4.2A and Ch.17)	Oppose	Opposes in part 10.4.2A and the Introduction to Chapter 17 in part.	No reason given.
Regionally Significant Wetland values	11	Policy 10.4.3 - Identification of Type B values	Support	Supports the incorporation of wetland values within one provision.	No reason given.
Chapter 12 - Rules: Water Take, Use and Management	22	Rule 12.1.1A.1 - Take and use of surface water from any Regionally Significant Wetland	Amend	Amend the activity status to a restricted discretionary activity.	•Unnecessary, and adds needless expense and time compared to restricted discretionary.
Chapter 12 - Rules: Water Take, Use and Management	28	Rule 12.1.2.6 - Take and use of surface water for land drainage	Amend	Categorise the maintenance of an existing drain, including the clearing of any subsequent slumping, as a permitted activity.	•Land drainage has positive benefits, both locally and wider. •Unmaintained drainage systems risk flooding, erosion and discharges. •Requiring consent may deter maintenance.
Chapter 12 - Rules: Water Take, Use and Management	45	Rule 12.2.1A.1 - Take and use of groundwater from any Regionally Significant Wetland	Amend	Amend the activity status to a restricted discretionary activity.	•Unnecessary, and adds needless expense and time compared to restricted discretionary.
Chapter 12 - Rules: Water Take, Use and Management	53	Rule 12.2.3.4 - Take and use of groundwater - restricted discretionary activity	Amend	Amend: "Any <i>adverse</i> effect on any Regionally Significant Wetland or on any regionally significant wetland value"	•Implementation uncertain; means standard farming practices may be captured.
Chapter 12 - Rules: Water Take, Use and Management	60	Rule 12.3.1A.1 - Damming or diversion of water: Regionally Significant Wetland	Amend	Amend the activity status to a restricted discretionary activity.	•Unnecessary, and adds needless expense and time compared to restricted discretionary.
Chapter 12 - Rules: Water Take, Use and Management	64	Rule 12.3.2.2 - Damming or diversion of water for land drainage	Amend	Categorise the maintenance of an existing drain, including the clearing of any subsequent slumping, as a permitted activity.	•Land drainage has positive benefits, both locally and wider. •Unmaintained drainage systems risk flooding, erosion and discharges. •Requiring consent may deter maintenance.
Chapter 12 - Rules: Water Take, Use and Management	66	Rule 12.3.3.1 - Damming or diversion of water - restricted discretionary activity	Amend	Amend: "Any <i>adverse</i> effect on any Regionally Significant Wetland or on any regionally significant wetland value"	•Implementation uncertain; means standard farming practices may be captured.

ISSUE	REF	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Chapter 12 - Rules: Water Take, Use and Management	73	Rule 12.4.2.1 - Discharge of stormwater to water, or onto or into land where it may enter water	Amend	Amend: "Any <u>adverse</u> effect on any Regionally Significant Wetland or on any regionally significant wetland value"	•Implementation uncertain; means standard farming practices may be captured.
Chapter 12 - Rules: Water Take, Use and Management	75	Rule 12.5.2.1 - Discharge of drainage water - restricted discretionary activity	Amend	Amend: "Any <u>adverse</u> effect on any Regionally Significant Wetland or on any regionally significant wetland value"	•Implementation uncertain; means standard farming practices may be captured.
Chapter 12 - Rules: Water Take, Use and Management	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	Amend	Amend: "Any <u>adverse</u> effect on any Regionally Significant Wetland or on any regionally significant wetland value"	•Implementation uncertain; means standard farming practices may be captured.
Chapter 12 - Rules: Water Take, Use and Management	87	Rule 12.9.2.1 - Discharge of water or contaminants associated with down-hole pump testing or drilling - restricted discretionary activity	Amend	Amend: "Any <u>adverse</u> effect on any Regionally Significant Wetland or on any regionally significant wetland value"	•Implementation uncertain; means standard farming practices may be captured.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	96	Rule 13.2.1.1 - Erection or placement of fence, pipe, line or cable over the bed	Support	Adopt 13.2.1.1 as proposed.	•Supports continuing as permitted activity the activities covered by the rule. •Supports no requirement to fence wetlands.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	97	Rule 13.2.1.2 - Erection or placement of pipe, line or cable on or under the bed	Support	Adopt 13.2.1.2 as proposed.	•Supports continuing as permitted activity the activities covered by the rule.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	99	Rule 13.2.1.5 - Erection or placement of maimai	Amend	Amend: "...Is a permitted activity, providing that for the bed of any lake, river or <u>Regionally Significant Wetland</u> ..."	•Supports Council permitting erection or placement of maimai, whitebait stand or eel trap in/on Regionally Significant Wetland. •As written, interpretation is uncertain.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	100	Rule 13.2.1.6 - Erection or placement of whitebait stand or eel trap	Amend	Amend: "...Is a permitted activity, providing that for the bed of any lake, river or <u>Regionally Significant Wetland</u> ..."	•Supports Council permitting erection or placement of maimai, whitebait stand or eel trap in/on Regionally Significant Wetland. •As written, interpretation is uncertain.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	103	Rule 13.2.2.1 - Erection or placement - restricted discretionary activity	Amend	Amend: "Any <u>adverse</u> effect on any Regionally Significant Wetland or on any regionally significant wetland value"	•Implementation uncertain; means standard farming practices may be captured.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	108	Rule 13.3.2.1 - Extension, alteration, replacement or reconstruction of structure - restricted discretionary activity	Amend	Amend: "Any <u>adverse</u> effect on any Regionally Significant Wetland or on any regionally significant wetland value"	•Implementation uncertain; means standard farming practices may be captured.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	111	Rule 13.4.2.1 - Demolition or removal of a structure - restricted discretionary activity	Amend	Amend: "Any <u>adverse</u> effect on any Regionally Significant Wetland or on any regionally significant wetland value"	•Implementation uncertain; means standard farming practices may be captured.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	119	Rule 13.5.2.1 - Extraction of alluvium - restricted discretionary activity	Amend	Amend: "Any <u>adverse</u> effect on any Regionally Significant Wetland or on any regionally significant wetland value"	•Implementation uncertain; means standard farming practices may be captured.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	120	Rule 13.5.3.2 - Alteration of Regionally Significant Wetland - discretionary activity	Support	Adopt 13.5.3.2 as proposed.	No reason given.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	122	Rule 13.6.2.0 - Introduction or planting of New Zealand native plant	Support	Adopt 13.6.2.0 as proposed.	No reason given.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	124	Rule 13.7.1.2 - Removal or clearance of exotic plant material	Support	Adopt 13.7.1.2 as proposed.	No reason given.
General support and opposition	145	General support	Support	Supports general approach to management of wetlands in the region so that it is acceptable in social and economic terms to the ratepayers of the region.	No reason given.
Promotion, information and funding	148	Funding	Amend	Introduce a non regulatory method that provides for Council to undertake, implement and fund weed management or eradication plans, where appropriate for regionally significant wetlands.	•Where wetlands primarily protected for the public interest Council should pay for weed management/eradication to prevent spread. •This will ensure wetland values are maintained and enhanced.
Promotion, information and funding	148	Funding	Amend	An acknowledgement from Council that financial contribution or rates relief will be required in certain circumstances and that this be introduced as a non-regulatory method in the proposed plan change.	•Wetlands primarily protected for the public interest so Council should pay, e.g., for fencing where it is necessary.

Summary of Decisions Requested on Proposed Plan Change 2 (Regionally Significant Wetlands)
to the Regional Plan: Water for Otago 10 September 2011

ISSUE	REF	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Promotion, information and funding	148	Funding	Amend	That Council be responsible for undertaking, implementing and funding the management and eradication of exotic plants where required to maintain or enhance wetland values.	•Where wetlands primarily protected for the public interest Council should pay for weed management/eradication to prevent spread.
Promotion, information and funding	148	Funding	Amend	Allow for a financial contribution or rates relief where a fence is considered necessary to protect wetland values by introducing appropriate non-regulatory methods.	•Fencing may be expensive or impractical, particularly for wetlands above 800m.
Wetland values information and Wetland Inventory	151	Wetland Inventory	Amend	Include only those values and wetlands already identified within the proposed plan to any non-regulatory inventory. Alternatively ensure that any changes or updating of any wetland inventory only occur in direct consultation with landowners concerned and that Council introduces a policy and method that provides for a process of consultation with the affected landowner(s).	•Values could be changed without plan change process and public consultation process. •Affected farmers should be able to submit on inventory contents, and appeal to Environment Court if necessary. •Concerned that inventory would be counterproductive to working positively unless landowners involved, and that ability to easily change inventory brings uncertainty to landowners.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	155	Chapter 13 general	Amend	Reinstate the word 'adverse' in these provisions: 13.2.2.1, 13.3.2.1, 13.4.2.1, 13.5.2.1.	•Implementation uncertain; means standard farming practices may be captured.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	155	Chapter 13 general	Support	Supports the restructuring of wetland rules to make them more concise, clear and consistent.	No reason given.
Chapter 12 - Rules: Water Take, Use and Management	156	Chapter 12 general	Support	Supports the restructuring of wetland rules to make them more concise, clear and consistent.	No reason given.
Chapter 12 - Rules: Water Take, Use and Management	156	Chapter 12 general	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.	•Implementation uncertain; means standard farming practices may be captured.
Protection general	162	Generic permitted activity condition for wetlands protection	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.	•Since other provisions control water in Regionally Significant Wetlands and wetlands are mapped, unsure of need for condition. •Concerned that implementation of rule is uncertain near mapped areas.
Schedule 9 general	200	Schedule 9	Amend	Remove any wetlands inaccurately identified as Regionally Significant Wetlands included within Schedule 9 maps as identified by individual submitters.	•Applying for consent for normal farming activities that have little/no effect on wetland values is unfair for landowners of inaccurately identified wetland areas. •Insufficient consultation

30 Contact Energy Limited

ISSUE	REF	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
What is a Regionally Significant Wetland	7.139	Policy 10.4.1A - Definition of a Regionally Significant Wetland	Oppose	That the definition of a Regionally Significant Wetland (which includes all wetlands over 800m above sea level) be not approved.	•Process classifying the wetlands as regionally significant was not robust. •Wetlands above 800m should not be automatically included if these are not accurately mapped/plotted and if no values assessment has been done on them.
Protection general	10	Financial contributions policy (Policy 10.4.2A and Ch.17)	Amend	That the new policy 10.4.2A on financial contributions be amended to clarify that not every effect not avoided, remedied or mitigated is required to be addressed by way of financial contribution for environmental compensation, but only those residual effects above a certain threshold - being more than minor effects. Appropriate clarification of the circumstances, purpose and method of determining the contribution amount should also be provided.	•Not every effect needs to be addressed. •The policy implies a "no net loss" approach, which is not taken in RMA.

ISSUE	REF	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Chapter 12 - Rules: Water Take, Use and Management	22	Rule 12.1.1A.1 - Take and use of surface water from any Regionally Significant Wetland	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.	<ul style="list-style-type: none"> •Non-complying status is too onerous, especially given concerns on artificial wetlands, and the lack of robustness in the process classifying the wetlands as regionally significant •Activity with an adverse effect on a wetland value may still be appropriate. •Discretionary status allows robust examination, and the possibility of declining activities.
Chapter 12 - Rules: Water Take, Use and Management	45	Rule 12.2.1A.1 - Take and use of groundwater from any Regionally Significant Wetland	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.	<ul style="list-style-type: none"> •Non-complying status is too onerous, especially given concerns on artificial wetlands, and the lack of robustness in the process classifying the wetlands as regionally significant. •Activity with an adverse effect on a wetland value may still be appropriate. •Discretionary status allows robust examination, and the possibility of declining activities.
Chapter 12 - Rules: Water Take, Use and Management	60	Rule 12.3.1A.1 - Damming or diversion of water: Regionally Significant Wetland	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.	<ul style="list-style-type: none"> •Non-complying status is too onerous, especially given concerns on artificial wetlands, and the lack of robustness in the process classifying the wetlands as regionally significant •Activity with an adverse effect on a wetland value may still be appropriate. •Discretionary status allows robust examination, and the possibility of declining activities.
Chapter 12 - Rules: Water Take, Use and Management	66	Rule 12.3.3.1 - Damming or diversion of water - restricted discretionary activity	Support	The restricted discretionary activity status for the damming of water that has previously been carried out remains a restricted discretionary activity (Rule 12.3.3.1(i)).	No reason given.
Minor and other	143	Minor and consequential changes	Amend	Give such other relief, including consequential relief, required to address the issues raised in this submission.	No reason given.
Plan general	154	Plan general	Amend	That recognition be given to the fact that Regionally Significant Wetlands can be an outcome of legitimate resource development such as hydro power generation.	<ul style="list-style-type: none"> •Concerned that wetland origin (natural or man made) has not been appropriately considered in classifying wetlands, and in writing provisions. •Plan change does not make allowance for the creation of new wetlands
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	155	Chapter 13 general	Amend	That controls on the use of the beds of wetlands are not duplicated by the Regional and District Plans.	<ul style="list-style-type: none"> •Queries Chapter 13 rules applying to wetlands. •Especially relevant to Central Otago District Plan.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	155	Chapter 13 general	Did not specify	The opportunity to mitigate or offset the effects of activities on Regionally Significant Wetlands be given recognition in the rules.	<ul style="list-style-type: none"> •Wetlands can be relocated and enhanced. •Concerned by hierarchy of avoid, followed by remedy or mitigate - not endorsed in RMA.
Chapter 12 - Rules: Water Take, Use and Management	156	Chapter 12 general	Did not specify	The opportunity to mitigate or offset the effects of activities on Regionally Significant Wetlands be given recognition in the rules.	<ul style="list-style-type: none"> •Wetlands can be relocated and enhanced. •Concerned by hierarchy of avoid, followed by remedy or mitigate - not endorsed in RMA.
Protection general	161	Protection general	Support	The opportunity to mitigate or offset the effects of activities on Regionally Significant Wetlands be given recognition in the objectives, policies, and rules.	<ul style="list-style-type: none"> •Wetlands can be relocated and enhanced. •Concerned by hierarchy of avoid, followed by remedy or mitigate - not endorsed in RMA.
Mapping of Schedule 9 wetlands - general	199	Mapping of Schedule 9 wetlands - general	Support	Supports all wetlands classified as Regionally Significant being accurately plotted/mapped before inclusion in the Regional Plan.	No reason given.
Schedule 9 general	200	Schedule 9	Oppose	That Schedule 9 be not approved.	<ul style="list-style-type: none"> •Process classifying the wetlands as regionally significant was not robust, had low level of investigation and assessment, which is not justified with the restrictive objectives and policies.
Schedule 9 general	200	Schedule 9	Amend	Clarify statement "Schedule 9 is not exhaustive" and make it explicit in order to provide certainty.	<ul style="list-style-type: none"> •Meaning of this is not clear. •Additional wetlands cannot be added to the Schedule without a formal plan change process.
Wetland values information and Wetland Inventory	400	Schedule 9 - Wetlands values in Schedule 9	Oppose	Opposes the removal of all descriptive information on each listed wetland, and the development of a separate non-regulatory inventory.	<ul style="list-style-type: none"> •Removing values is ultra vires - allows non-public, non-contestable process to assign values to a wetland, removes certainty for plan users, and is not just - especially as these values trigger non-complying category.

31 Brookhouse Farm Ltd

ISSUE	REF	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Specific Schedule 9 wetlands	277	Schedule 9 - Lake Tuakitoto Wetland (#77, Map F43)	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'.	<ul style="list-style-type: none"> •Minimum water levels will never result in area 'a' being used "for natural beauty or wetland". •Aerial photos show area 'a' is not the same vegetation. On ground, only sparse rushes and grass, because area 'a' higher than rest: waterlogged during wet periods and floods once or twice a year. •Have managed area 'a' as intensively as soil conditions allowed. •Rest of western boundary should stay undisturbed with no animal access.

32 Meridian Energy Limited

ISSUE	REF	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Chapter 10 - Wetlands	5	Objective 10.3.1 - Maintain or enhance wetlands	Support	Retain objective 10.3.1 as notified.	•Provides appropriate direction to resource users with respect to management expectations for wetland values.
Regionally Significant Wetland values	6.14	Policy 10.4.1 - Definition of Regionally Significant Wetland values	Amend	Amend policy 10.4.1: <i>"A1 Habitat for regionally, nationally or internationally rare or threatened species or communities; ... A7 - High diversity of indigenous flora and fauna; A8 - Regionally significant habitat for waterfowl; and A79 Significant hydrological values including maintaining water quality or low flows, or reducing flood flows."</i>	•The new characteristics/identification criteria listed in A7 to A8 is unnecessary.
What is a Regionally Significant Wetland	7.139	Policy 10.4.1A - Definition of a Regionally Significant Wetland	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>	<ul style="list-style-type: none"> •Arbitrary classification on elevation; many wetlands will not meet habitat, flora, fauna or cultural values. •More restrictive management is inappropriate given values not known.
Chapter 10 - Wetlands	9	Policy 10.4.2 - Priority on avoiding adverse effects	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>	<ul style="list-style-type: none"> •Overly restrictive; fails to acknowledge remediation/mitigation may be more appropriate. •Priority to avoid doesn't reflect intent of Objective 10.3.1; objective doesn't preclude remediation and mitigation. •S 5(2)(c) RMA not a strict hierarchy.
Protection general	10	Financial contributions policy (Policy 10.4.2A and Ch.17)	Amend	Amend the sixth paragraph of Section 17.1: <i>"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."</i>	<ul style="list-style-type: none"> •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.
Chapter 12 - Rules: Water Take, Use and Management	22	Rule 12.1.1A.1 - Take and use of surface water from any Regionally Significant Wetland	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>	•Many Regionally Significant Wetlands form part of rivers or lakes; the rule should be explicit that only water taken directly from the area identified as Regionally Significant Wetland is non-complying.

ISSUE	REF	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Chapter 12 - Rules: Water Take, Use and Management	60	Rule 12.3.1A.1 - Damming or diversion of water: Regionally Significant Wetland	Amend	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."	<ul style="list-style-type: none"> •Determination as to whether a diversion will 'affect' the water level requires subjective analysis and is not suitable for determining non-compliance. •Unclear why diversion is treated differently to (direct) take and use of surface water. Given many resource consents involve the take and diversion of water, inappropriate to treat differently. •Many Regionally Significant Wetlands form part of rivers or lakes; the rule should be explicit that only water diverted directly from/to the area identified as Regionally Significant Wetland is non-complying. •Non-complying activity overly restrictive: diversion may improve water flow enabling the enhancement of wetland values.
Minor and other	143	Minor and consequential changes	Amend	Make any similar or consequential amendments to Plan Change 2 that stem from the submissions and general relief sought.	No reason given.
Plan general	154	Plan general	Amend	Ensure there is an enabling policy framework for renewable energy production when planning documents are being prepared and determined.	<ul style="list-style-type: none"> •Electricity is vital to everyday life •Reliability of supply is critical to economic growth and social well-being.
Protection general	162	Generic permitted activity condition for wetlands protection	Amend	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	<ul style="list-style-type: none"> •Condition doesn't provide certainty to enable compliance to be objectively assessed (e.g., take of water affecting hydrological function or damaging habitat requires subjective analysis and not suitable as a permitted activity).
Protection general	165	Financial contributions rules	Amend	Delete clause regarding the consideration of the need for a financial contribution and replace with: <u>"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."</u>	<ul style="list-style-type: none"> •Should more accurately reflect Policy 10.4.2A. •Note: Relevant to Rules 12.1.4.8, 12.2.3.4, 12.3.3.1, 12.4.2.1, 12.5.2.1, 13.2.2.1, 13.3.2.1
Specific Schedule 9 wetlands	255	Schedule 9 - Great Moss Swamp (#55, Maps F29 & F30)	Support	Retain Maps F29 and F30 as notified.	<ul style="list-style-type: none"> •Boundaries now more accurately reflect existing human influences in the area, particularly roads.
Specific Schedule 9 wetlands	361	Schedule 9 - Upper Taieri Wetlands Complex (#161, Maps F22 to F28)	Amend	Amend boundary of Map F26 to reflect changes indicated in Annexure One to this submission (changes to boundary indicated in pink).	<ul style="list-style-type: none"> •South-eastern boundary defined in Map F26 not accurate: much area included is pasture and doesn't contain hydrological characteristics of a wetland or ecological or habitat values identified in Policy 10.4.1. •Amended area captures only areas with hydrological and ecological characteristics and aren't pasture.

33 Vivienne Kerr

ISSUE	REF	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
General support and opposition	145	General support	Support	Support of the proposed plan change.	No reason given.
RMA streamlining and simplifying	150	RMA streamlining and simplifying	Amend	Introduction, Issues and Anticipated Environmental Results, as they appear in the draft document of May 2010, be re-instated in the final plan.	This has the effect of downplaying the essential role wetlands play in the ecosystems of the Otago region in the plan document and in the public mind.

34 Clutha District Council

ISSUE	REF	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Chapter 10 - Wetlands	9	Policy 10.4.2 - Priority on avoiding adverse effects	Amend	Delete: "Remedying or mitigating effects will be considered only where those effects cannot be avoided."	<ul style="list-style-type: none"> •The requirement to avoid adverse effects where possible is too strict and inflexible. •It is counter to the regime set up in Part 5 RMA, which treats 'avoid', 'remedy' and 'mitigate' equally, and is also contrary to the established principle that the Act contemplates that activities can have adverse effects and still be acceptable. •If provision remains it is inevitable that proposals will be opposed on the basis that effects can always be avoided by not doing anything.
Protection general	10	Financial contributions policy (Policy 10.4.2A and Ch.17)	Support	Supports the use of financial contributions to offset adverse effects	•Can help ensure the best environmental outcome.
Promotion, information and funding	14	Policy 10.4.6 - Promotion of wetlands	Support	Supports monitoring and provision of information, and suggests that this could usefully be done in conjunction with Territorial Authorities and other agencies.	No reason given.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	122	Rule 13.6.2.0 - Introduction or planting of New Zealand native plant	Amend	Either: <ul style="list-style-type: none"> • Restrict native plants to wetland species which are native to the area; or • 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". 	•Rule allows planting of any native plant, and some native plants can be inappropriate in wetlands (e.g., non-wetland species which could be invasive or encourage succession away from wetland species, or non-local genetic stock).
General support and opposition	145	General support	Support	Overall, CDC supports the proposed plan change.	•Wetlands have significant biodiversity values, and fulfil vital roles in catchment functioning.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	155	Chapter 13 general	Support	Strongly support the addition of Regionally Significant Wetlands into existing rules controlling activities in lake and river beds.	•Addresses existing gap between Regional Council and Territorial Authority functions, which allowed significant impacts on wetlands from activities such as the erection of structures, disturbance, planting and vegetation removal.
Schedule 9 general	200	Schedule 9	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.	•No reason given.

35 Gregory Kerr

ISSUE	REF	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Chapter 10 - Wetlands	1	Introduction to Chapter 10	Amend	Include statement on the importance of wetlands.	•Can be linked or written into future consents
General support and opposition	145	General support	Support	Largely support the Proposal.	<ul style="list-style-type: none"> •Nationally 10% of wetlands remaining, with less than half protected. •Trustees of the Waikouaiti Maori Reserve were not informed of the proposed plan change.
RMA streamlining and simplifying	150	RMA streamlining and simplifying	Amend	Chapter 10's Introduction, Issues and Anticipated Environmental Results sections should be reinstated.	•Nationally 10% of wetlands remaining, with less than half protected.
Chapter 10 - Wetlands	153	Chapter 10 general	Amend	Include acknowledgement of 2-way relationship [between wetlands and sea] and the vital link it plays in the lifecycles of species.	•Wetlands are connected to each other and the sea.
Schedule 9 general	200	Schedule 9	Amend	Pleasing to see local wetlands included and expanded in Proposed Plan Change. May be better to regard them as one 'complex', interconnected to each other and to the sea - the salt marsh system of the Waikouaiti River Estuary / Hawksbury Lagoon.	•Vital link with lifecycles of species.

36 Herb Fox

ISSUE	REF	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Specific Schedule 9 wetlands	223	Schedule 9 - Chapman Road Inland Saline Wetland (#23, Map F18)	Amend	Map to accurately reflect the position of the "wetlands" of Dry Gully as the area is known.	•Mapped area covers driveway, and exceeds area that could be considered wetland when viewed on site.

37 Transpower New Zealand Limited

ISSUE	REF	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Minor and other	143	Minor and consequential changes	Amend	Amend the notification statement to reference the current notification sections of the RMA.	•Current sections referenced have been repealed. •Note: Relevant to Rules 12.1.3.1, 12.1.4.8, 12.2.2A.1, 12.2.3.4, 12.5.2.1, 12.8.2.1, 12.9.2.1, 12.10.2.1, 13.2.2.1, 13.3.2.1, 13.4.2.1, 13.5.2.1, 13.7.2.1.
Minor and other	143	Minor and consequential changes	Amend	Make any additions, deletions or consequential amendments necessary as a result of the matters raised in this submission. Adopt any other such relief as to give effect to this submission.	No reason given.
General support and opposition	145	General support	Support	Overall approach generally supported.	•Identification of wetlands will help in route evaluating for any new transmission lines.
Chapter 10 - Wetlands	153	Chapter 10 general	Support	Retain the objectives and policies as drafted without further modification.	No reasons given.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	155	Chapter 13 general	Amend	In relation to Rules 13.7.1.2, 13.7.2.1 and 13.7.3.1: Further consideration required in terms of adequate provision provided for vegetation removal around transmission lines.	•Vegetation trimming undertaken to protect lines, not included in "removal and clearance of vegetation". •Electricity (Hazards from Trees) Regulations 2003 and NES Electricity Transmission Activities 2009 are relevant to vegetation control. •Not immediate issue as wetlands generally have low growing plants.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	155	Chapter 13 general	Amend	Provide for the "use" of existing structures in Rule 13.1.1.1 by including after the words "any lake or river" the word "or any Regionally Significant Wetlands".	•It is important to clearly sanction the operation of existing lawfully established structures in or over wetlands. •Not including wetlands in this rule creates uncertainty (when they are included in other rules - e.g. 13.2, 13.3).
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	155	Chapter 13 general	Support	Retain rules 13.2 to 13.7 without further modification.	•Vegetation trimming undertaken to protect lines, not included in "removal and clearance of vegetation". •Electricity (Hazards from Trees) Regulations 2003 and NES Electricity Transmission Activities 2009 are relevant to vegetation control. •Not immediate issue as wetlands generally have low growing plants.
Chapter 12 - Rules: Water Take, Use and Management	156	Chapter 12 general	Support	Retain the amendments to the discharge rules without further modification.	•With no structures within wetlands, there should be no need for Transpower to make any discharges.
Specific Schedule 9 wetlands	367	Schedule 9 - Waipori/Waihola Wetland Complex (#167, Maps F48 & F49)	Did not specify	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 within the Waipori/Waihola Wetland Complex.	•From the maps looks like these are within the wetland boundary. •Don't want to get unnecessary consent to maintain/upgrade assets. Effects from such works cannot be avoided, and do not want financial contributions to be required. •Need to appropriately provide for the national grid, recognise its benefits and be in accordance with NPS Electricity Transmission.

38 Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou, and Hokonui Runanga

ISSUE	REF	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Chapter 10 - Wetlands	5	Objective 10.3.1 - Maintain or enhance wetlands	Oppose	Opposes removal of Kai Tahu cultural and spiritual beliefs, values and uses from objective 10.3.1.	•Provides insufficient recognition of the role of nga Runanga as kaitiaki. •All cultural and spiritual beliefs, values and uses associated with wetlands should be protected.
Regionally Significant Wetland values	6.14	Policy 10.4.1 - Definition of Regionally Significant Wetland values	Amend	Add Kai Tahu cultural and spiritual beliefs, values and uses to policy 10.4.1 A6.	•Provides insufficient recognition of the role of nga Runanga as kaitiaki. •All cultural and spiritual beliefs, values and uses associated with wetlands should be protected.

ISSUE	REF	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Protection general	10	Financial contributions policy (Policy 10.4.2A and Ch.17)	Amend	Amend policy 10.4.2A: "Where the avoidance, remedy or mitigation of adverse effects is not possible (agreed upon by stakeholders including nga Runanga), financial contribution may be required to: (a) Restore or rehabilitate regionally significant wetlands or regionally significant values where those have been degraded; and (b) Restore or rehabilitate regionally significant wetlands or regionally significant values where those have been lost."	<ul style="list-style-type: none"> •Want clarity on the process for triggering the mitigation listed in policy 10.4.2A. Nga Runanga as kaitiaki should be consulted before a decision is reached that mitigation of adverse effects is not possible. •Seeks to focus on improving wetlands rather than just restoring them to their past state. •Seeks to achieve the outcomes using all resources available to stakeholders.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	121	Rule 13.6.1.1 - Introduction of pest plants general	Support	Supports addition of regionally significant wetlands to this provision.	No reason given.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	122	Rule 13.6.2.0 - Introduction or planting of New Zealand native plant	Support	Supports addition: "The introduction or planting of any New Zealand native plant to any Regionally Significant Wetland, is a permitted activity providing: (a) . . ."	•May assist in the future restoration of wetlands.
General support and opposition	144	General opposition	Oppose	Oppose Plan Change, but support the intent of protecting more wetlands that are regionally significant, and strengthening protection for regionally significant wetlands.	<ul style="list-style-type: none"> •Does not adequately recognise and provide for the association of nga Runanga with their ancestral lands and waters. •Is in part contrary to Te Tiriti o Waitangi.
RMA streamlining and simplifying	150	RMA streamlining and simplifying	Support	Support the intent of "making provisions easier to read and understand", provided that important details are not lost through doing this.	No reason given.
Wetland values information and Wetland Inventory	151	Wetland Inventory	Support	Support the intent of the following changes to the plan change; "providing better wetland information".	<ul style="list-style-type: none"> •Recognise the need for flexibility. •Wish to be involved in process which helps inform the public about wetlands. •But consider that the information may not assist in the protection and enhancement of wetland values, and need to know this will occur.
Protection general	162	Generic permitted activity condition for wetlands protection	Support	Support the addition throughout the Plan of: "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."	<ul style="list-style-type: none"> •Note, want independent assessment to determine whether there are changes to regionally significant wetlands. •Want clarification on how an assessment would be done, who would do it, and whether the causes of these changes can be established. •Risk that cumulative effects are missed, and only marked changes are picked up.
Protection general	162	Generic permitted activity condition for wetlands protection	Oppose	Do not support the permissive nature of this change to the plan as in many places within the plan this provision: "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." has replaced the following provisions as a permitted activity: "The water is not taken from any wetlands identified in Schedule 9 or any wetland higher than 800 metres above sea level; and" or "The discharge is not to any wetland identified in Schedule 9"	•Proposed changes reduce the protection of regionally significant wetlands.
Protection general	162	Generic permitted activity condition for wetlands protection	Amend	Add provision to all permitted activities where it concerns permanent structures in or possible effects on regionally significant wetlands: "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."	•There are now activities permitted within Regionally Significant Wetlands that may have a permanent impact.
Schedule 9 general	200	Schedule 9	Amend	Nga Runanga need to know that the wetlands in Schedule 9 - regionally significant wetlands include all wetlands significant to them. If not there needs to be a process or a mechanism to achieve this.	•Added protection for wetlands is irrelevant if wetlands that are wahi taonga are not in Schedule 9.

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ISSUE	REF	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Regionally Significant Wetland values	6.14	Policy 10.4.1 - Definition of Regionally Significant Wetland values	Amend	In identifying significant wetlands, ensure adequate weight is given to the pattern of wetlands in maintaining corridors and feeding sites for waterfowl.	No reason given.
Promotion, information and funding	14	Policy 10.4.6 - Promotion of wetlands	Amend	In promoting rehabilitation, ensure adequate weight is given to the pattern of wetlands in maintaining corridors and feeding sites for waterfowl.	No reason given.
Promotion, information and funding	14	Policy 10.4.6 - Promotion of wetlands	Amend	Amend: (d) change 'and' for 'or'.	No reason given.
General support and opposition	145	General support	Support	Endorses ORC's commitment to ongoing protection and promotion of wetlands, and education of all public as to their value.	•Submitter has benefited greatly from such support already.
Promotion, information and funding	148	Funding	Amend	Providing financial assistance or rates incentives for landowners to fence off wetlands and fund revegetation would be of great value.	•Wetlands benefit everyone. •There are many small wetlands of great value that have not been identified as significant in this plan and which face an uncertain future. •Allows ORC to set timeframe for fencing off all significant wetlands in the knowledge it was not causing hardship for landowners.
Chapter 10 - Wetlands	153	Chapter 10 general	Amend	Default position on rules and policies should be a conserved wetland rather than create permitted activities (To keep faith with the objective to "avoid").	No reason given.
Plan general	154	Plan general	Amend	Would like to see as many as possible of the remaining wetlands, classified as significant or not, preserved.	•Wetlands play important role in sustaining diverse ecology, filtering water and providing interest to our landscapes. •The extent of loss makes all remaining wetlands significant.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	155	Chapter 13 general	Amend	Default position on rules and policies should be a conserved wetland rather than create permitted activities (To keep faith with the objective to "avoid").	No reason given.
Chapter 12 - Rules: Water Take, Use and Management	156	Chapter 12 general	Amend	Default position on rules and policies should be a conserved wetland rather than create permitted activities (To keep faith with the objective to "avoid").	No reason given.
Wetland values information and Wetland Inventory	400	Schedule 9 - Wetlands values in Schedule 9	Amend	Ensure there is an explicit requirement in the plan to keep wetland values up to date to use when considering applications for activities.	No reason given.
Schedule 10 and Non-Regionally Significant Wetlands	600	Schedule 10 and Non-Regionally Significant Wetlands	Amend	Would like to see as many as possible of the remaining wetlands, classified as significant or not, preserved.	•Wetlands play important role in sustaining diverse ecology, filtering water and providing interest to our landscapes. •The extent of loss makes all remaining wetlands significant.

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ISSUE	REF	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Chapter 10 - Wetlands	5	Objective 10.3.1 - Maintain or enhance wetlands	Amend	Amend: "Otago's <i>regionally significant</i> wetlands and their values and services will be maintained or enhanced for present and future generations."	•Provide better alignment with other provisions, and avoid confusion with broad definition of wetland in the Water Plan.
Regionally Significant Wetland values	6.14	Policy 10.4.1 - Definition of Regionally Significant Wetland values	Amend	Amend: "The regionally significant wetland values of Otago's wetlands are <i>include one or more of the following</i> : . . ."	•Clarifies that only one regionally significant value is needed for a wetland to be regionally significant.
Regionally Significant Wetland values	6.14	Policy 10.4.1 - Definition of Regionally Significant Wetland values	Amend	Amend: ". . . A8 Regionally significant habitat for <i>indigenous</i> waterfowl; and . . ."	•Better reflects s 6(c) RMA, and sets a practical threshold test.
What is a Regionally Significant Wetland	7.139	Policy 10.4.1A - Definition of a Regionally Significant Wetland	Amend	Amend: ". . . (c) A wetland higher than 800 metres above sea level with one or more regionally significant wetland values."	•Only wetlands which have regionally significant values should be regionally significant wetlands, doing otherwise is unjustified. •All wetlands above 800m will not necessarily have a regionally significant value, especially with the broad definition of wetland.

ISSUE	REF	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
What is a Regionally Significant Wetland	7.139	Policy 10.4.1A - Definition of a Regionally Significant Wetland	Amend	Resolution of confusion around the separation of wetlands identified in Schedule 9 that are not "wetland management areas" from those that are.	The reference to "wetland management area" in this Policy is confusing to land users as no definition of "wetland management area" is provided in Water Plan.
What is a Regionally Significant Wetland	8	Policy 10.4.1B - Schedule 9	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 values and their regionally significant wetland values as per Policy 10.4.1."</i>	<ul style="list-style-type: none"> As proposed the policy implies that values information will not be listed in the Plan. Values information established for each Significant Wetland should be listed in the Water Plan because this information needs to be assessed under proposed provisions.
Chapter 10 - Wetlands	9	Policy 10.4.2 - Priority on avoiding adverse effects	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>	<ul style="list-style-type: none"> Giving primacy to avoiding over remedying or mitigating is inconsistent with sustainable management as defined in the RMA and established case law. If this primacy is intended to give effect to the proposed NPS on Indigenous Biodiversity, should recognise that this is subject to change.
Protection general	10	Financial contributions policy (Policy 10.4.2A and Ch.17)	Amend	Include more specific guidelines as to how a financial contribution may be constructively applied.	<ul style="list-style-type: none"> Generally supports the intent of this policy in terms of offsetting adverse environmental effects. Would be helpful to plan users.
Promotion, information and funding	14	Policy 10.4.6 - Promotion of wetlands	Amend	Amend: <i>"To promote the maintenance and conservation, creation and reinstatement of wetland areas and enhancement of wetland values by: (a) Educating Otago's people and communities about land use activities that may result in the loss of wetlands and their values; (b) Initiating or supporting investigations and monitoring of wetlands and their values; (c) Supporting voluntary community and landholder programmes; or (d) Supporting the reinstatement of wetlands that have been drained or the creation of new wetlands where appropriate. (e) Initiating or undertaking works in consultation with local communities.; or (f) Providing general information on wetlands in a non-regulatory inventory and identifying Regionally Significant Wetland's values in Schedule 9 to the Water Plan. (g) Providing information about wetlands in Otago in general, including those that are not regarded as Regionally Significant Wetlands where such information exists."</i>	<ul style="list-style-type: none"> Creation of wetlands is of negligible ecological value. Regionally Significant Wetlands values information should be contained in the Water Plan. Providing information may lead to wetland maintenance and conservation.
Chapter 12 - Rules: Water Take, Use and Management	22	Rule 12.1.1A.1 - Take and use of surface water from any Regionally Significant Wetland	Oppose	Delete rule. Takes and uses that are not covered by other specified rules should have discretionary status.	Minor takes and uses from Regionally Significant Wetlands may be required and should not be non-complying.
Chapter 12 - Rules: Water Take, Use and Management	45	Rule 12.2.1A.1 - Take and use of groundwater from any Regionally Significant Wetland	Oppose	Delete rule. Takes and uses that are not covered by other specified rules should have discretionary status.	Minor takes and uses from Regionally Significant Wetlands may be required and should not be non-complying.

ISSUE	REF	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Chapter 12 - Rules: Water Take, Use and Management	60	Rule 12.3.1A.1 - Damming or diversion of water: Regionally Significant Wetland	Amend	Amend: "Unless covered by Rules 12.3.1.1 to 12.3.1.4, and 12.3.3.1(i) or 12.3.2.0: (i) The 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." And a comprehensive assessment in terms of water allocation for a particular water body should be undertaken to determine whether the water level of any Regionally Significant Wetland is adversely affected, rather than a blanket rule that provides for no effects on water level.	•Point (ii) is subjective and does not provide certainty to plan users.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	116	Rule 13.5.1.5A - Alteration of Regionally Significant Wetland associated with plant material	Support	Supports this rule.	No reason given.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	117	Rule 13.5.1.6 - Extraction of alluvium	Support	Supports this rule.	No reason given.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	120	Rule 13.5.3.2 - Alteration of Regionally Significant Wetland - discretionary activity	Support	Supports this rule.	No reason given.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	122	Rule 13.6.2.0 - Introduction or planting of New Zealand native plant	Support	Supports this rule.	No reason given.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	124	Rule 13.7.1.2 - Removal or clearance of exotic plant material	Support	Supports this rule.	No reason given.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	125	Rule 13.7.2.1 - Removal of pest plants - controlled activity	Support	Supports this rule.	No reason given.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	126	Rule 13.7.3.1 - Removal or clearance of plant material - discretionary activity	Support	Supports this rule.	No reason given.
Minor and other	143	Minor and consequential changes	Amend	Give such further or other relief as is appropriate or desirable in order to take account of the concerns expressed in this submission.	No reason given.
General support and opposition	144	General opposition	Oppose	Withdraw Plan Change in the event that the amendments set out in the submission are not implemented.	Generally opposes the Plan Change and has set out specific relief sought.
Wetland values information and Wetland Inventory	151	Wetland Inventory	Amend	Amend the inventory to reflect the following change to policy 10.4.1: " . . . A8 Regionally significant habitat for <i>indigenous waterfowl</i> ; and . . ."	•Better reflects s 6(c) RMA, and sets a practical threshold test.
Plan general	154	Plan general	Amend	Amend to give effect to the NPS Renewable Energy Generation.	No reason given.
Plan general	154	Plan general	Amend	Identify, record and provide for human use influences on Regionally Significant Wetlands where they occur.	•Human use influences can positively influence ecology and play a significant role in sustaining the life-supporting capacity of certain wetlands, contribute significantly to economy, and have positive social effects. •Can be provided for in the inventory, establishing boundaries and values of certain wetlands, Plan Change 2.
Plan general	154	Plan general	Amend	Recognise and provide for the potential for alterations in the human use influences that affect certain wetlands.	•A change in human use that affects a wetland may be sustainable (e.g. affecting hydrology, but not adversely affecting flora and fauna). •This is not provided for in Plan Change 2.
Plan general	154	Plan general	Amend	Provide for activities associated with the use and development of regionally significant infrastructure.	No reason given.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	155	Chapter 13 general	Amend	Remove rules (or standards in rules) that seek to achieve no net change of any particular value(s).	•They do not enable compliance to be objectively assessed, and result in uncertainty over their application.

ISSUE	REF	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Chapter 12 - Rules: Water Take, Use and Management	156	Chapter 12 general	Amend	Remove rules (or standards in rules) that seek to achieve no net change of any particular value(s).	•They do not enable compliance to be objectively assessed, and result in uncertainty over their application.
What is a Regionally Significant Wetland	159	Chapter 16	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>	•Guidance is important given that wetlands above 800m are not proposed to be listed in Water Plan.
Protection general	161	Protection general	Amend	<p>Establish Management Zone for the Waipori Hydro Scheme and the Loch Luella and Loch Loudon Fen Complexes which recognises and provides for the 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].</p>	<p>•Waipori Hydro Scheme is a key electricity generating asset for the region which warrants protection under policy B of NPS Renewable Energy Generation.</p> <p>•Plan Change 2 has the potential to unduly compromise its operating regime and future consenting requirements, which does not meet sustainable management.</p>
Protection general	162	Generic permitted activity condition for wetlands protection	Amend	<p>Delete:</p> <p><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.</p> <p>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.</p> <p>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.</p>	•Does not enable compliance to be objectively assessed, resulting in uncertainty in application of this standard.

ISSUE	REF	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Protection general	165	Financial contributions rules	Amend	<p>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.</p> <p>Amend: <i>"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"</i></p> <p>Amend 13.4.2.1(k) and 13.5.2.1(b): <i>"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."</i></p>	No reason given.
Protection general	165	Financial contributions rules	Amend	The proposed rules should guide financial contributions only where they are necessary, such as when adverse effects cannot be avoided, remedied or mitigated to ensure they have tangible benefits.	No reason given.
Specific Schedule 9 wetlands	284	Schedule 9 - Loch Loudon Fen Complex (#84, Map F50)	Amend	<p>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.</p> <p>[Submission includes a draft management zone, with objectives, policies and rules, to be conjointly developed by submitter and Council].</p>	<ul style="list-style-type: none"> •Waipori Hydro Scheme is a key electricity generating asset for the region which warrants protection under policy B of NPS Renewable Energy Generation. •Plan Change 2 has the potential to unduly compromise its operating regime and future consenting requirements, which does not meet sustainable management.
Specific Schedule 9 wetlands	285	Schedule 9 - Loch Luella Fen Complex (#85, Maps F50 & F51)	Amend	<p>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.</p> <p>[Submission includes a draft management zone, with objectives, policies and rules, to be conjointly developed by submitter and Council].</p>	<ul style="list-style-type: none"> •Waipori Hydro Scheme is a key electricity generating asset for the region which warrants protection under policy B of NPS Renewable Energy Generation. •Plan Change 2 has the potential to unduly compromise its operating regime and future consenting requirements, which does not meet sustainable management.
Wetland values information and Wetland Inventory	400	Schedule 9 - Wetlands values in Schedule 9	Oppose	Regionally significant values ascribed to each Regionally Significant Wetland should be included in Schedule 9 to the Water Plan.	<ul style="list-style-type: none"> •There are likely to be issues in applying proposed provisions if values information is not listed in Water Plan. •Any change to regionally significant wetland values identified for a Regionally Significant Wetland should require a formal plan change. •Values are not mutually exclusive, and wetlands have any one or more values. •General information can go in non-regulatory inventory.

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ISSUE	REF	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Specific Schedule 9 wetlands	288	Schedule 9 - Lower Manorburn Dam Margins (#88, Map F15)	Oppose	Wetland not to be classified as a Significant Wetland and not included in Schedule 9.	<ul style="list-style-type: none"> •Lower Manorburn Dam is artificial dam to supply irrigation water. May not be possible to maintain wetland values. •Plan change does not describe wetland values that have contributed to scheduling. •Use of dam lowers water level during the irrigation season. Therefore GIS cannot comply with the general regulation in Proposed Plan Change 2 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". •Problematic for other activities such as maintenance on dam wall, construction of structures (water level or flow measuring devices), discharge of the top race into dam for temporary storage, and maintaining an easement for a water race along north side of dam. •Lower Manorburn Dam is not excluded from Rule 12.1.1A.1 by Rule 12.1.2.3 because Rule 12.3.2.1 and the prior "General Authorisation" refer to small dams (i.e., less than 3m in height, less than 20,000 m3 and less than 50 ha upstream).

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ISSUE	REF	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Chapter 10 - Wetlands	5	Objective 10.3.1 - Maintain or enhance wetlands	Amend	Amend: <i>"Otago's wetlands and their values and <u>ecosystem</u> services will be maintained or enhanced for present and future generations."</i>	<ul style="list-style-type: none"> •Amend so that the services provided by wetlands are clarified. These services include providing base flows for streams, especially during critical low flow periods and removing silt and nutrients from any water entering the wetland and purifying it before discharge downstream. •Objective gives effect to section 30(1)(c)(iia) RMA. •Objective gives effect to the NPS Freshwater Management 2011.
Regionally Significant Wetland values	6.14	Policy 10.4.1 - Definition of Regionally Significant Wetland values	Support	Retain with no amendments.	<ul style="list-style-type: none"> •Consistent with Part 2 RMA. •Gives guidance when considering activities in wetlands. •Maintains flows in streams sourced from wetlands which protects habitat of indigenous threatened fish. •Gives effect to the NPS Freshwater Management.
What is a Regionally Significant Wetland	7.139	Policy 10.4.1A - Definition of a Regionally Significant Wetland	Support	Retain with no amendments.	<ul style="list-style-type: none"> •Consistent with Part 2 RMA. •Gives guidance when considering activities in wetlands. •Maintains flows in streams sourced from wetlands which protects habitat of indigenous threatened fish. •Gives effect to the NPS Freshwater Management.
What is a Regionally Significant Wetland	8	Policy 10.4.1B - Schedule 9	Support	Retain with no amendments.	<ul style="list-style-type: none"> •Consistent with Part 2 RMA. •Gives guidance when considering activities in wetlands. •Maintains flows in streams sourced from wetlands which protects habitat of indigenous threatened fish. •Gives effect to the NPS Freshwater Management.
Chapter 10 - Wetlands	9	Policy 10.4.2 - Priority on avoiding adverse effects	Support	Retain with no amendments.	<ul style="list-style-type: none"> •Consistent with Part 2 RMA. •Gives guidance when considering activities in wetlands. •Maintains flows in streams sourced from wetlands which protects habitat of indigenous threatened fish. •Gives effect to the NPS Freshwater Management.
Protection general	10	Financial contributions policy (Policy 10.4.2A and Ch.17)	Support	Retain policy 10.4.2A with no amendments.	<ul style="list-style-type: none"> •Consistent with Part 2 RMA. •Gives guidance when considering activities in wetlands. •Maintains flows in streams sourced from wetlands which protects habitat of indigenous threatened fish. •Gives effect to the NPS Freshwater Management.

ISSUE	REF	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Promotion, information and funding	14	Policy 10.4.6 - Promotion of wetlands	Support	Retain with no amendments, except amend "(e): <i>Providing information on wetlands and their values ecosystem services.</i> "	<ul style="list-style-type: none"> •Consistent with Part 2 RMA. •Gives guidance when considering activities in wetlands. •Maintains flows in streams sourced from wetlands which protects habitat of indigenous threatened fish. •Gives effect to the NPS Freshwater Management. •Monitoring of wetland condition is essential to ensure ORC is fulfilling its functions under section 30(1)(c)(iia) RMA. •Requests that the policy be amended to clarify the values of and services provided by wetlands.
Chapter 12 - Rules: Water Take, Use and Management	77	Rule 12.7.1.2 - Discharge of pesticide, land-based discharge onto land	Amend	Amend: <i>"(e) There is no change to the water level or hydrological function, or damage to the flora, indigenous fauna or its habitat, in or on any Regionally Significant Wetland."</i>	<ul style="list-style-type: none"> •The discharge of pesticide may damage selected indigenous fauna.
Chapter 12 - Rules: Water Take, Use and Management	78	Rule 12.7.1.3 - Discharge of herbicide to air or land	Amend	Amend: <i>"(e) There is no change to the water level or hydrological function, or damage to the flora, indigenous fauna or its habitat, in or on any Regionally Significant Wetland."</i>	<ul style="list-style-type: none"> •The discharge of herbicide may damage selected indigenous flora.
Chapter 12 - Rules: Water Take, Use and Management	79	Rule 12.7.1.4 - Discharge of pesticide, aerial discharge onto land	Amend	Amend: <i>"(e) There is no change to the water level or hydrological function, or damage to the flora, indigenous fauna or its habitat, in or on any Regionally Significant Wetland."</i>	<ul style="list-style-type: none"> •The discharge of pesticide may damage selected indigenous fauna.
Chapter 12 - Rules: Water Take, Use and Management	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	Amend	Amend: <i>"(c) The discharge occurs more than 50 metres from any surface water body, Regionally Significant Wetland, or mean high water springs:"</i>	<ul style="list-style-type: none"> •The addition of nutrients directly to Regionally Significant Wetlands should be restrained, as it is highly likely to cause adverse effects. •Gives effect to NPS Freshwater Management.
Chapter 12 - Rules: Water Take, Use and Management	82	Rule 12.8.1.3 - Discharge of contaminants collected in animal waste collection system not in Zone A of a Groundwater Protection Zone	Amend	Amend: <i>"(c) The discharge occurs more than 50 metres from any surface water body, Regionally Significant Wetland, or mean high water springs:"</i>	<ul style="list-style-type: none"> •The addition of nutrients directly to Regionally Significant Wetlands should be restrained, as it is highly likely to cause adverse effects. •Gives effect to NPS Freshwater Management.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	96	Rule 13.2.1.1 - Erection or placement of fence, pipe, line or cable over the bed	Amend	Amend: <i>"The erection or placement of any fence, pipe (used solely for the carrying of domestic and/or stock water), line or cable over the bed....."</i>	<ul style="list-style-type: none"> •Current non-definition of pipes would allow erection or placement of "pipes" such as tile drains which could be used to take water from a wetland. •Gives effect to Part 2 RMA. •Gives effect to NPS Freshwater Management.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	97	Rule 13.2.1.2 - Erection or placement of pipe, line or cable on or under the bed	Amend	Amend: <i>"The erection or placement of any fence, pipe (used solely for the carrying of domestic and/or stock water), line or cable over the bed....."</i>	<ul style="list-style-type: none"> •Current non-definition of pipes would allow erection or placement of "pipes" such as tile drains which could be used to take water from a wetland. •Gives effect to Part 2 RMA. •Gives effect to NPS Freshwater Management.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	121	Rule 13.6.1.1 - Introduction of pest plants general	Amend	Amend: <i>"The introduction of material of the following species: (i) Lagarosiphon (Lagarosiphon major); or (ii) Eel Grass (Vallisneria spiralis); or (xi) Glyceria species (xii) Alder (Alnus) species; (xiii) Crack willow; (xiv) Gray willow. To the bed of any Otago Lake...."</i>	<ul style="list-style-type: none"> •The 4 species proposed for inclusion have potential to adversely effect Regionally Significant Wetlands and Regionally Significant Wetland Values. •Amendment is consistent with Part 2 RMA. •Amendment gives effect to NPS Freshwater Management.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	124	Rule 13.7.1.2 - Removal or clearance of exotic plant material	Amend	Amend: <i>"(c) The wetland alteration is limited to that which is necessary, the use of best practice methods, for the removal or clearance of the plant material."</i>	<ul style="list-style-type: none"> •Amendment sought so that the removal or clearance of exotic plant material cannot be used as a pretext to damage Regionally Significant Wetlands or Regionally Significant Wetland Values.

ISSUE	REF	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	125	Rule 13.7.2.1 - Removal of pest plants - controlled activity	Amend	Amend: "Except as provided for by Rules 13.7.1.1..... (i) <i>Lagarosiphon</i> (<i>Lagarosiphon major</i>); or (ii) <i>Eel Grass</i> (<i>Vallisneria spiralis</i>); or (xv) <i>Glyceria species</i> (xvi) <i>Alder</i> (<i>Alnus</i>) <i>species</i> ; (xvii) <i>Crack willow</i> ; (xviii) <i>Gray willow</i> , from the bed of any lake or river, or from....."	<ul style="list-style-type: none"> The 4 species proposed for inclusion have potential to adversely effect Regionally Significant Wetlands and/or Regionally Significant Wetland Values. Amendment is consistent with Part 2 RMA. Amendment gives effect to NPS Freshwater Management.
Minor and other	143	Minor and consequential changes	Amend	Make any other consequential amendments to the Plan required to explain or give effects to these changes to be made.	No reason given.
Minor and other	143	Minor and consequential changes	Amend	Amend so that s 95 of the RMA is referred to.	<ul style="list-style-type: none"> Reference is made to repealed s 93 and s 94(1) RMA. Note: Relevant to Rules 12.1.3.1, 12.1.4.8, 12.2.2A.1, 12.2.3.4, 12.5.2.1, 12.8.2.1, 12.9.2.1, 12.10.2.1, 13.2.2.1, 13.3.2.1, 13.4.2.1, 13.5.2.1, 13.7.2.1.
Plan general	154	Plan general	Amend	That the Proposal be retained or amended as set out under the headings "Decision Sought" in Attachment One or to like effect	No reason given
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	155	Chapter 13 general	Support	For the following rules: 13.2.1.4 - 13.2.1.8; 13.2.2.1; 13.2.3.1; 13.3.1.1; 13.3.1.2; 13.3.2.1; 13.4.1.1; 13.4.2.1; 13.5.1.1; 13.5.1.3; 13.5.1.5A; 13.5.1.6; 13.5.1.8; 13.5.2.1; 13.5.3.2; 13.6.2.0; 13.6.3.1 and 13.7.3.1. Retain with no amendments.	<ul style="list-style-type: none"> Consistent with Part 2 RMA. Gives Regionally Significant Wetlands the same recognition as the region's rivers and lakes Protects wetland flora Enables the maintenance and restoration of regionally significant wetlands. Gives effect to NPS Freshwater Management.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	155	Chapter 13 general	Amend	Adopt new Rule 13.7.2.1A in full and apply only to the proposed extensions to: <ul style="list-style-type: none"> the Upper Taieri Wetlands Complex as contained and described (on maps 22-28) in Appendix 2 of this submission, and the map describing the extent of the Ida Valley Kettle Holes as contained and described in Appendix 3 of this submission. <p><u>"13.7.2.1A: Permitted activity: No resource consent required</u></p> <p><u>13.7.2.1A The removal of vegetation by haying from both the proposed extensions to the Upper Taieri Wetlands Complex (as contained in Appendix 2) and the Ida Valley Kettle Holes (as contained in Appendix 3) is a permitted activity providing:</u></p> <p>(a) <u>The wetland alteration is limited to that necessary for the removal of hay material;</u></p> <p>(b) <u>All reasonable steps are taken to minimise the release of sediment to the wetland during haying and there is no conspicuous change in colour or visual clarity of the water body."</u></p>	<ul style="list-style-type: none"> These areas of the Upper Taieri Wetland Complex act as buffer zones for the wetland. Ida Valley Kettle Holes are collectively significant. Regionally Significant Wetland Values of both these areas are not threatened by vegetation removal such as haying.
Chapter 12 - Rules: Water Take, Use and Management	156	Chapter 12 general	Support	For the following rules: 12.1.1A.1 - 12.1.1A.3; 12.1.2.4 - 12.1.2.6; 12.1.3.1; 12.2.1A.1; 12.2.1A.2, 12.2.2.5; 12.2.2.6; 12.2.2A.1; 12.2.3.1A; 12.2.3.2A; 12.2.3.4; 12.2.3.5; 12.2.4.1; 12.3.1A.1; 12.3.1A.2; 12.3.2.1 - 12.3.2.3; 12.3.3.1; 12.3.4.1; 12.4.1.1; 12.4.2.1; 12.5.1.1; 12.5.2.1; 12.7.1.1; 12.8.1.1; 12.8.1.5; 12.8.2.1; 12.9.1.1; 12.9.1.2; 12.10.1.1; 12.10.2.1; 12.11.2.1 - 12.11.2.3. Retain with no amendments.	<ul style="list-style-type: none"> Consistent with Part 2 RMA. Gives guidance when considering activities in wetlands. Manages discharges, the damming and diversion of water in a manner that protects the habitat of indigenous fish. Maintains groundwater and surface flows in a manner that protects the habitat of indigenous fish. Gives effect to the NPS Freshwater Management.

ISSUE	REF	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Minor and other	158	Glossary	Amend	Add: " <u>Ecosystem services: Are the benefits that people can obtain from ecosystems. These include provisioning, regulating, supporting and cultural services.</u> "	•As the term is not widely used, definition should be provided.
Schedule 9 general	200	Schedule 9	Amend	Include Ida Valley Kettle Holes in Schedule 9 and the F-Series Maps	•Wetland contains Regionally Significant Wetland Values •Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
Schedule 9 general	200	Schedule 9	Amend	Include current Schedule 10 wetland Silver Peak Swamp (Schedule 10, #80) in Schedule 9.	•Contains Regionally Significant Wetland Values •Consistent with Part 2 RMA, NPS Freshwater Management, and reflects ORC's functions under s 30 RMA.
Schedule 9 general	200	Schedule 9	Amend	Include current Schedule 10 wetland Upper Waipahi River Swamp (Schedule 10, #99) in Schedule 9.	•Contains Regionally Significant Wetland Values •Consistent with Part 2 RMA, NPS Freshwater Management, and reflects ORC's functions under s 30 RMA.
Specific Schedule 9 wetlands	201	Schedule 9 - Akatore Creek Swamp (#1, Map F46)	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
Specific Schedule 9 wetlands	208	Schedule 9 - Big Boggy Swamp (#8, Map F1)	Amend	Retain wetland and amend mapping to reflect that in Appendix 2.	•Additional area shown in Appendix 2 contains Regionally Significant Wetland Values. •Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
Specific Schedule 9 wetlands	223	Schedule 9 - Chapman Road Inland Saline Wetland (#23, Map F18)	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
Specific Schedule 9 wetlands	232	Schedule 9 - Cross Eden Creek Marsh Complex (#32, Map F16)	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
Specific Schedule 9 wetlands	235	Schedule 9 - Diamond Lake Wetland (#35, Map F3)	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
Specific Schedule 9 wetlands	236	Schedule 9 - Dingle Lagoon (#36, Map F1)	Amend	Retain wetland and amend mapping to reflect that in Appendix 2.	•Additional area shown in Appendix 2 contains Regionally Significant Wetland Values. •Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
Specific Schedule 9 wetlands	240	Schedule 9 - Ellison Saltmarsh (#40, Map F61)	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
Specific Schedule 9 wetlands	244	Schedule 9 - Flat Top Hill Ephemeral Wetlands (#44, Map F19)	Amend	Retain inclusion of Flat Top Hill Ephemeral Wetlands, and amend mapping of wetland.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
Specific Schedule 9 wetlands	252	Schedule 9 - Glenorchy Lagoon Wetland (#52, Map F9)	Amend	Retain wetland and amend mapping to reflect that in Appendix 2.	•Additional area shown in Appendix 2 contains Regionally Significant Wetland Values. •Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
Specific Schedule 9 wetlands	255	Schedule 9 - Great Moss Swamp (#55, Maps F29 & F30)	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
Specific Schedule 9 wetlands	261	Schedule 9 - Hoopers Inlet Swamp (#61, Map F58)	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
Specific Schedule 9 wetlands	270	Schedule 9 - Kemp Road Lagoon (#70, Map F65)	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
Specific Schedule 9 wetlands	276	Schedule 9 - Lake Reid Wetland (#76, Map F3)	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
Specific Schedule 9 wetlands	277	Schedule 9 - Lake Tuakitoto Wetland (#77, Map F43)	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
Specific Schedule 9 wetlands	284	Schedule 9 - Loch Loudon Fen Complex (#84, Map F50)	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
Specific Schedule 9 wetlands	285	Schedule 9 - Loch Luella Fen Complex (#85, Maps F50 & F51)	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
Specific Schedule 9 wetlands	287	Schedule 9 - Lower Couatts Gully Swamp (#87, Map F46)	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
Specific Schedule 9 wetlands	288	Schedule 9 - Lower Manorburn Dam Margins (#88, Map F15)	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.

ISSUE	REF	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Specific Schedule 9 wetlands	293	Schedule 9 - Makarora Flat Swamp Complex (#93, Map F1)	Amend	Retain wetland and amend mapping to reflect that in Appendix 2.	•Additional area shown in Appendix 2 contains Regionally Significant Wetland Values. •Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
Specific Schedule 9 wetlands	300	Schedule 9 - McGregor Swamp (#100, Map F61)	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
Specific Schedule 9 wetlands	302	Schedule 9 - McLachlan Road Marsh (#102, Map F61)	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
Specific Schedule 9 wetlands	315	Schedule 9 - Okia Flat Wetland Management Area (#115, Map F68)	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
Specific Schedule 9 wetlands	320	Schedule 9 - Papanui Inlet Saltmarsh (#120, Map F59)	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
Specific Schedule 9 wetlands	323	Schedule 9 - Pleasant River Estuary Wetland Complex (#123, Map F67)	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
Specific Schedule 9 wetlands	337	Schedule 9 - Shotover River Confluence Swamp (#137, Map F5)	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
Specific Schedule 9 wetlands	339	Schedule 9 - Stirling Marsh Complex (#139, Map F43)	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
Specific Schedule 9 wetlands	345	Schedule 9 - Tahakopa Marsh Complex (#145, Map F4)	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
Specific Schedule 9 wetlands	349	Schedule 9 - Te Matai Marsh Complex (#149, Map F68)	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
Specific Schedule 9 wetlands	351	Schedule 9 - Three Stones Fen Complex (#151, Map F53)	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
Specific Schedule 9 wetlands	356	Schedule 9 - Trig Q Ephemeral Pool (#156, Map F55)	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
Specific Schedule 9 wetlands	361	Schedule 9 - Upper Taieri Wetlands Complex (#161, Maps F22 to F28)	Amend	Retain wetland and amend mapping to reflect that in Appendix 2.	•Additional area shown in Appendix 2 contains Regionally Significant Wetland Values. •Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
Specific Schedule 9 wetlands	364	Schedule 9 - Waianakarua River Estuary Swamp (#164, Map F65)	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
Specific Schedule 9 wetlands	365	Schedule 9 - Waikouaiti River Estuary Wetland Complex (#165, Map F61)	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
Specific Schedule 9 wetlands	367	Schedule 9 - Waipori/Waiholo Wetland Complex (#167, Maps F48 & F49)	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
Specific Schedule 9 wetlands	371	Schedule 9 - Te Hua Taki Wetland (#171, Map F66)	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
Specific Schedule 9 wetlands	399	Schedule 9 - All other wetlands not otherwise listed	Support	For Schedule 9 wetlands #2 - 7; 9 - 22; 24 - 31; 33; 34; 37 - 39; 41 - 43; 45 - 51; 53; 54; 56 - 60; 62 - 69; 71 - 75; 78 - 83; 86; 89 - 92; 94 - 99; 101; 103 - 114; 116 - 119; 121; 122; 124 - 136; 138; 140 - 144; 146 - 148; 150; 152 - 155; 157 - 160; 162; 163; 166; 168 - 170; 172: That the inclusion in Schedule 9, and the extent of the wetlands be retained without amendment.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.

43 OtagoNet Joint Venture

ISSUE	REF	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Chapter 10 - Wetlands	9	Policy 10.4.2 - Priority on avoiding adverse effects	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 avoided. Adverse effects on Regionally Significant Wetlands and their regionally significant values should be avoided, remedied or mitigated."</i>	•Primacy should not be given to avoiding adverse effects, over remedying or mitigating adverse effects. •Giving primacy to avoidance is inconsistent with sustainable management as defined in RMA and established case law.

ISSUE	REF	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	96	Rule 13.2.1.1 - Erection or placement of fence, pipe, line or cable over the bed	Amend	Pipe, lines or cables should only be prevented from extending below the underside of a lawful structure if the lawful structure is within two metres of the 1 percent probability flood limit.	•Is uncertain of the purpose of 13.2.1.1(d).
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	96	Rule 13.2.1.1 - Erection or placement of fence, pipe, line or cable over the bed	Amend	Amend: "(f) <i>The fence, pipe, line or cable does not interfere with established navigation routes; and</i> "	•Subjective and difficult to decipher regarding effects on wetlands.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	96	Rule 13.2.1.1 - Erection or placement of fence, pipe, line or cable over the bed	Amend	Amend: "(h) <i>The fence, pipe, line or cable is maintained in good repair such that it does not present a hazard to persons or their property.</i> "	•High degree of subjectivity.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	97	Rule 13.2.1.2 - Erection or placement of pipe, line or cable on or under the bed	Amend	Amend: "(c) <i>The pipe, line or cable is maintained in good repair such that it does not present a hazard to persons or their property.</i> "	•High degree of subjectivity.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	106	Rule 13.3.1.1 - Repair or maintenance of structure	Support	Support.	•This should be permitted.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	107	Rule 13.3.1.2 - Extension, alteration, replacement or reconstruction of structure	Amend	Amend: "(a) <i>In the case of a replacement or reconstruction, the structure is replaced or reconstructed in approximately the same location as the original structure; and</i> "	•To avoid minor re-locations unnecessarily needing consent.
Minor and other	143	Minor and consequential changes	Amend	That the amendments and addendums outlined in sections 4 and 5 [of this submission] are accepted and any necessary consequential amendments to Plan Change 2 are made. Also give such further or other relief as is appropriate or desirable in order to take account of the concerns expressed in this submission.	No reasons given.
General support and opposition	144	General opposition	Oppose	Plan Change 2 be withdrawn if the amendments and addendums set out in the submission are not implemented.	•Would be effects on existing infrastructure if the changes requested are not made.
Wetland values information and Wetland Inventory	151	Wetland Inventory	Amend	Give due consideration to existing and consented activities and infrastructure and any associated human use in establishing the non-regulatory inventory for Regionally Significant Wetlands. This may involve identifying activities and human use values within or surrounding scheduled Regionally Significant Wetlands.	•Enables protection of physical resources in a way which enables people and communities to provide for their social, economic and cultural wellbeing and for their health and safety pursuant to s 5 RMA
Wetland values information and Wetland Inventory	151	Wetland Inventory	Support	Supports the periodic surveying of wetlands and the general information contained in the non-regulatory inventory being kept up to date.	•Aware that ecology is subject to change.
Plan general	154	Plan general	Amend	Activities and human use values should be provided for in Plan Change 2 such that they are not unduly compromised without recognition of their benefits.	•Relevant in establishing the boundaries and values ascribed to wetlands, and establishing the policy regime and the inventory. •ORC is required to protect regionally significant infrastructure. •Would meet s 5 RMA.
Plan general	154	Plan general	Did not specify	OtagoNet's existing lawfully established utility assets in and surrounding areas identified as Regionally Significant Wetlands, and the essential renewal of these assets should not be unduly compromised.	•ORC is required to protect regionally significant infrastructure under Part 2 RMA.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	155	Chapter 13 general	Oppose	Generally opposes proposed permitted activity rules.	•Superfluous resource consents are likely to be required under proposed provisions. Could impede OtagoNet's operations and risk the security of it's network.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	155	Chapter 13 general	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.	•Do not enable compliance to be objectively assessed. •Application is uncertain.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	155	Chapter 13 general	Amend	Amend or delete rules (or standards in rules) associated with a high degree of subjectivity.	No reasons given.
Chapter 12 - Rules: Water Take, Use and Management	156	Chapter 12 general	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.	•Do not enable compliance to be objectively assessed. •Application is uncertain.

ISSUE	REF	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Chapter 12 - Rules: Water Take, Use and Management	156	Chapter 12 general	Amend	Amend or delete rules (or standards in rules) associated with a high degree of subjectivity.	No reasons given.
Protection general	162	Generic permitted activity condition for wetlands protection	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."	<ul style="list-style-type: none"> Does not enable compliance to be objectively assessed. Precludes any development in a Regionally Significant Wetland without consent. Inconsistent with s 5(2) RMA. Extends protection for flora and fauna beyond s 6(c) RMA.
Wetland values information and Wetland Inventory	400	Schedule 9 - Wetlands values in Schedule 9	Amend	Include regionally significant wetland values ascribed to each Regionally Significant Wetland in Schedule 9.	<ul style="list-style-type: none"> There are likely to be issues in applying proposed provisions if values information is not listed in the Water Plan. Any change to the regionally significant wetland values identified for a Regionally Significant Wetland should require a formal plan change. General information can go in the non-regulatory inventory. The non-regulatory inventory which is to contain regionally significant wetland values for scheduled Regionally Significant Wetlands should have been available to stakeholders and the public at least at the time Plan Change 2 was publicly notified. For consideration in submission. Method of assessing and mapping individual wetlands also has not been made available. Lack of transparency is a significant shortcoming.
Schedule 10 and Non-Regionally Significant Wetlands	600	Schedule 10 and Non-Regionally Significant Wetlands	Support	Supports repeal of Schedule 10.	Streamlines wetland provisions, conducive to people using the Water Plan.

44 Ladies Mile Partnership

ISSUE	REF	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Minor and other	143	Minor and consequential changes	Amend	Give any other relief necessary to address the points raised in the submission	No reason given.
Specific Schedule 9 wetlands	337	Schedule 9 - Shotover River Confluence Swamp (#137, Map F5)	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.	<ul style="list-style-type: none"> Wetland does not have the values that would necessitate its status as regionally significant (specifically A1 and A3) Plan Change 41 (before Queenstown-Lakes District Council) already provides sufficient protection to the wetland. Categorising the wetland as regionally significant will not result in sustainable management under Part 2 RMA. If Plan Change 41 is confirmed by Queenstown-Lakes DC, submitter may develop part of wetland as ecological and/or recreation area and may discharge stormwater to it. Plan Change 2 makes resource consent for this harder to obtain, is unnecessary and will not result in efficient use of resources. Area mapped is inaccurate and exaggerated.

45 Beaton family of Berwick

ISSUE	REF	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Chapter 12 - Rules: Water Take, Use and Management	77	Rule 12.7.1.2 - Discharge of pesticide, land-based discharge onto land	Amend	Amend to include some control on spraying, and spray drift.	<ul style="list-style-type: none"> Have experienced people spraying planted trees (e.g., 25 years' old) along with willows. Experience does not support the view that natural vegetation will regenerate by doing nothing after spraying.
Chapter 12 - Rules: Water Take, Use and Management	78	Rule 12.7.1.3 - Discharge of herbicide to air or land	Amend	Amend to include some control on spraying, and spray drift.	<ul style="list-style-type: none"> Have experienced people spraying planted trees (e.g., 25 years' old) along with willows. Experience does not support the view that natural vegetation will regenerate by doing nothing after spraying.
Chapter 12 - Rules: Water Take, Use and Management	79	Rule 12.7.1.4 - Discharge of pesticide, aerial discharge onto land	Amend	Amend to include some control on spraying, and spray drift.	<ul style="list-style-type: none"> Have experienced people spraying planted trees (e.g., 25 years' old) along with willows. Experience does not support the view that natural vegetation will regenerate by doing nothing after spraying.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	99	Rule 13.2.1.5 - Erection or placement of maimai	Amend	Amend to reflect following position: "We think maimais should be temporary structures, particularly in some areas."	Shooters and whitebaiters shouldn't be allowed to squat in wetland area.

Summary of Decisions Requested on Proposed Plan Change 2 (Regionally Significant Wetlands)
to the Regional Plan: Water for Otago 10 September 2011

ISSUE	REF	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	116	Rule 13.5.1.5A - Alteration of Regionally Significant Wetland associated with plant material	Amend	Amend to provide for some hump and hollow modification to allow some planting to take place out of the water.	<ul style="list-style-type: none"> •Many of the plants put in to wet soil have died. •Natural wetland would have mix of firmer ground, mainly next to channels, with interfluvial swamps between. •E.g. Titiri wetland has been modified by farming and abandoned. Natural soil conditions may need to be reinstated before successful diverse vegetation may be reinstated.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	122	Rule 13.6.2.0 - Introduction or planting of New Zealand native plant	Amend	Amend to provide for some hump and hollow modification to allow some planting to take place out of the water.	<ul style="list-style-type: none"> •Many of the plants put in to wet soil have died. •Natural wetland would have mix of firmer ground, mainly next to channels, with interfluvial swamps between. •E.g. Titiri wetland has been modified by farming and abandoned. Natural soil conditions may need to be reinstated before successful diverse vegetation may be reinstated.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	122	Rule 13.6.2.0 - Introduction or planting of New Zealand native plant	Amend	A schedule of species suitable next to rivers might be appropriate.	•Planting next to a river would need to take into account requirements for flood river flow [13.6.2.0(b)], therefore permitted planting of any native wouldn't necessarily apply.
General support and opposition	145	General support	Support	Generally support the proposed document.	No reason given.
Specific Schedule 9 wetlands	367	Schedule 9 - Waipori/Waiholo Wetland Complex (#167, Maps F48 & F49)	Amend	ORC need to shift themselves to ground check the boundaries.	•Concerned that map does not clearly show whether one of our pumps and associated stop banks are included or excluded from the wetland area.

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ISSUE	REF	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
What is a Regionally Significant Wetland	7.139	Policy 10.4.1A - Definition of a Regionally Significant Wetland	Amend	Add definition to the glossary section of the Water Plan which specifically excludes permanently dry areas from regionally significant wetland areas.	<ul style="list-style-type: none"> •No definition of Regionally Significant Wetland in the Water Plan. •Where activities occur on 'dry' areas they should be permitted and the definition should clarify this.
What is a Regionally Significant Wetland	7.139	Policy 10.4.1A - Definition of a Regionally Significant Wetland	Amend	Add definition to the glossary section of the Water Plan which clarifies that those activities that occur on 'dry' land; such as land transport corridors located within the wider boundary area of the Regionally Significant Wetland shown in the revised Maps accompanying Plan Change 2 are not intended to be affected by the new controls.	Where activities occur on 'dry' areas they should be permitted and the definition should clarify this. Only those activities that impact on wetlands should be captured by the new controls.
General support and opposition	145	General support	Support	Plan Change 2 introduces a greater level of protection to the region's wetlands and this is generally supported.	No reason given
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	155	Chapter 13 general	Amend	Add to 13.2.2, 13.3.2, 13.4.2, and 13.5.2 a criterion which recognises the importance of existing land transport networks, such as rail where these are currently located within regionally significant wetlands such as: <i>"Any positive effect derived from the function of the structure and/or activity in this location" or similar.</i> <i>NB: Amending Schedule 1 as set out as requested would largely achieve the same relief.</i>	<ul style="list-style-type: none"> •Criteria do not take into account location and importance of regionally (and nationally) important land transport networks which are, in places, incorporated within the new Regional Significant Wetland boundaries. •No balancing criteria, other than those in Part 2 RMA, which allow for the fixed location of land-based transport networks to be considered when they require replacement, or alteration along their current alignments.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	155	Chapter 13 general	Amend	Add to 13.2.2, 13.3.2, 13.4.2, and 13.5.2 a criterion to recognise that transport infrastructure is particularly important for enabling people and communities to provide for their social, economic, and cultural wellbeing and for their health and safety.	<ul style="list-style-type: none"> •Criteria do not take into account location and importance of regionally (and nationally) important land transport networks which are, in places, incorporated within the new Regional Significant Wetland boundaries. •No balancing criteria, other than those in Part 2 RMA, which allow for the fixed location of land-based transport networks to be considered when they require replacement, or alteration along their current alignments.

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Chapter 12 - Rules: Water Take, Use and Management	156	Chapter 12 general	Amend	Add to 12.3.3, 12.4.2, 12.5.2, 12.9.2 a criterion which recognises the importance of existing land transport networks, such as rail where these are currently located within regionally significant wetlands such as: "Any positive effect derived from the function of the structure and/or activity in this location" or similar. <i>NB: Amending Schedule 1 as set out as requested would largely achieve the same relief.</i>	<ul style="list-style-type: none"> •Criteria do not take into account location and importance of regionally (and nationally) important land transport networks which are, in places, incorporated within the new Regional Significant Wetland boundaries. •No balancing criteria, other than those in Part 2 RMA, which allow for the fixed location of land-based transport networks to be considered when they require replacement, or alteration along their current alignments.
Chapter 12 - Rules: Water Take, Use and Management	156	Chapter 12 general	Amend	Add to 12.3.3, 12.4.2, 12.5.2, 12.9.2 a criterion to recognise that transport infrastructure is particularly important for enabling people and communities to provide for their social, economic, and cultural wellbeing and for their health and safety.	<ul style="list-style-type: none"> •Criteria do not take into account location and importance of regionally (and nationally) important land transport networks which are, in places, incorporated within the new Regional Significant Wetland boundaries. •No balancing criteria, other than those in Part 2 RMA, which allow for the fixed location of land-based transport networks to be considered when they require replacement, or alteration along their current alignments.
Mapping of Schedule 9 wetlands - general	199	Mapping of Schedule 9 wetlands - general	Amend	a.) All proposed maps to remove railways corridor(s) from regionally significant wetland areas; or b.) All proposed maps to ensure that rail formation 'above' the permanent regionally significant wetland areas are not subject to Plan Change 2	No reason given.

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ISSUE	REF	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Chapter 10 - Wetlands	5	Objective 10.3.1 - Maintain or enhance wetlands	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>	•Objective fails to form a framework to protect wetlands and their margins, and set out all that is required by Part 2 RMA.
Regionally Significant Wetland values	6.14	Policy 10.4.1 - Definition of Regionally Significant Wetland values	Amend	Amend: <i>"The regionally significant wetland values of Otago's wetlands that are identified in Schedule 9 are: ..."</i>	<ul style="list-style-type: none"> •Values inconsistent with case law, such as criterion for representativeness. •Significance criterion used to identify wetlands in Schedule 9 is incomplete and it's possible not all significant wetlands have been captured.
What is a Regionally Significant Wetland	7.139	Policy 10.4.1A - Definition of a Regionally Significant Wetland	Amend	Delete policy and insert in more appropriate place.	•Not a policy; should either be a footnote, explanatory note or added to glossary.
What is a Regionally Significant Wetland	8	Policy 10.4.1B - Schedule 9	Amend	Delete policy and insert in more appropriate place.	•Not a policy; should either be a footnote, explanatory note or added to glossary.
Chapter 10 - Wetlands	9	Policy 10.4.2 - Priority on avoiding adverse effects	Support	Support. No change.	•Appropriately recognises preferability of avoidance of adverse effects.
Protection general	10	Financial contributions policy (Policy 10.4.2A and Ch.17)	Amend	Delete policy 10.4.2A.	<ul style="list-style-type: none"> •Financial contributions inappropriate given large-scale loss or modification of wetlands, and inconsistent with Part 2 RMA and NPS Freshwater. •Assessment criteria inadequate to assess viability in any offsetting.
Promotion, information and funding	14	Policy 10.4.6 - Promotion of wetlands	Amend	Amend so that the 'or' is deleted from 10.4.6(d).	<ul style="list-style-type: none"> •As policy (e) works alongside (a) to (d), 'or' is inappropriate. •Notes deletion of 15.4.3 makes implementation of 10.4.6 unclear.
Chapter 12 - Rules: Water Take, Use and Management	22	Rule 12.1.1A.1 - Take and use of surface water from any Regionally Significant Wetland	Support	Retain rule as proposed.	•Consistent with Part 2 and s 30 RMA.

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Chapter 12 - Rules: Water Take, Use and Management	26	Rule 12.1.2.4 - Take and use of surface water for no more than 3 days	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>	<ul style="list-style-type: none"> •Deletion of 'water is not taken from' alters intent of rule. •Rule doesn't cover non-assessed and non-scheduled wetlands.
Chapter 12 - Rules: Water Take, Use and Management	27	Rule 12.1.2.5 - Take and use of surface water general	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>	<ul style="list-style-type: none"> •Deletion of 'water is not taken from' alters intent of rule. •Rule doesn't cover non-assessed and non-scheduled wetlands.
Chapter 12 - Rules: Water Take, Use and Management	28	Rule 12.1.2.6 - Take and use of surface water for land drainage	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 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>	<ul style="list-style-type: none"> •Deletion of 'water is not taken from' alters intent of rule. •Rule doesn't cover non-assessed and non-scheduled wetlands.
Chapter 12 - Rules: Water Take, Use and Management	29	Rule 12.1.3.1 - Take and use of surface water for community water supply - controlled activity	Amend	Retain (i) and add new (j) and (l): <i>"(j) Effects on biological diversity and ecological values; and (k) Effects on the natural character of wetlands and their margins."</i>	<ul style="list-style-type: none"> •To meet resource management duties, Council needs to control effects on any wetland that meets significance criteria.
Chapter 12 - Rules: Water Take, Use and Management	37	Rule 12.1.4.8 - Take and use of surface water - restricted discretionary activity	Amend	Add new discretionary matters: <i>"(a) Effects on biological diversity and ecological values; and (b) Effects on the natural character of wetlands and their margins."</i> Amend (xvii): <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>	<ul style="list-style-type: none"> •Council responsibilities are greater than the identification of significant wetlands; need to consider adverse effects on all wetlands. •Possible not all significant wetlands have been captured in Schedule 9. •Gives effect to Part 2 RMA.

ISSUE	REF	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Chapter 12 - Rules: Water Take, Use and Management	48	Rule 12.2.2.5 - Take and use of groundwater for no more than 3 days	Amend	Amend 12.2.2.5(b): " <u>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 any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria.</u> "	<ul style="list-style-type: none"> •Deletion of 'water is not taken from' alters intent of rule. •Rule doesn't cover non-assessed and non-scheduled wetlands.
Chapter 12 - Rules: Water Take, Use and Management	49	Rule 12.2.2.6 - Take and use of groundwater from Schedule 2C aquifer or within 100m of any wetland, lake or river	Amend	Amend 12.2.2.6(a): " <u>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 any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria.</u> "	<ul style="list-style-type: none"> •Deletion of 'water is not taken from' alters intent of rule. •Rule doesn't cover non-assessed and non-scheduled wetlands.
Chapter 12 - Rules: Water Take, Use and Management	50	Rule 12.2.2A.1 - Take and use of groundwater for community water supply - controlled activity	Amend	Amend 12.2.2A1(g): " <u>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.</u> " Add new matters of control: " <u>(h) Effects on biological diversity and ecological values; and</u> <u>(i) Effects on the natural character of wetlands and their margins.</u> "	<ul style="list-style-type: none"> •Council responsibilities are greater than the identification of significant wetlands; need to consider adverse effects on all wetlands. •Possible not all significant wetlands have been captured in Schedule 9. •Gives effect to Part 2 RMA.
Chapter 12 - Rules: Water Take, Use and Management	53	Rule 12.2.3.4 - Take and use of groundwater - restricted discretionary activity	Amend	Amend (xiii): " <u>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.</u> " Add new matters of discretion: " <u>(a) Effects on biological diversity and ecological values; and</u> <u>(b) Effects on the natural character of wetlands and their margins.</u> "	<ul style="list-style-type: none"> •Council responsibilities are greater than the identification of significant wetlands; need to consider adverse effects on all wetlands. •Possible not all significant wetlands have been captured in Schedule 9. •Gives effect to Part 2 RMA.
Chapter 12 - Rules: Water Take, Use and Management	60	Rule 12.3.1A.1 - Damming or diversion of water: Regionally Significant Wetland	Support	Retain wording as proposed.	No reason given
Chapter 12 - Rules: Water Take, Use and Management	63	Rule 12.3.2.1 - Damming or diversion of water general	Amend	Amend 12.3.2.1(e): " <u>It is not within and 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; and</u> "	<ul style="list-style-type: none"> •Should be explicit that damming or diversion within a Regionally Significant Wetland is not permitted.
Chapter 12 - Rules: Water Take, Use and Management	63	Rule 12.3.2.1 - Damming or diversion of water general	Amend	Add new matters of discretion: " <u>(a) Effects on biological diversity and ecological values; and</u> <u>(b) Effects on the natural character of wetlands and their margins.</u> "	<ul style="list-style-type: none"> •Need to sustainably manage all wetlands not just those considered significant.
Chapter 12 - Rules: Water Take, Use and Management	64	Rule 12.3.2.2 - Damming or diversion of water for land drainage	Amend	Add new matters of discretion: " <u>(a) Effects on biological diversity and ecological values; and</u> <u>(b) Effects on the natural character of wetlands and their margins.</u> "	<ul style="list-style-type: none"> •Need to sustainably manage all wetlands not just those considered significant.

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Chapter 12 - Rules: Water Take, Use and Management	64	Rule 12.3.2.2 - Damming or diversion of water for land drainage	Amend	Amend 12.3.2.2(a): " <u>The water is not diverted from and 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; and</u> "	•Should be explicit that damming or diversion within a Regionally Significant Wetland is not permitted.
Chapter 12 - Rules: Water Take, Use and Management	65	Rule 12.3.2.3 - Damming or diversion of water for erection, placement, repair or maintenance of structure	Amend	Add new matters of discretion: " <u>(a) Effects on biological diversity and ecological values; and</u> <u>(b) Effects on the natural character of wetlands and their margins.</u> "	•Need to sustainably manage all wetlands not just those considered significant.
Chapter 12 - Rules: Water Take, Use and Management	66	Rule 12.3.3.1 - Damming or diversion of water - restricted discretionary activity	Amend	Amend 12.3.3.1(aa): " <u>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.</u> " Add new matters of discretion: " <u>(o) Effects on biological diversity and ecological values.</u> "	•Matters of discretion don't address/protect non-scheduled wetlands.
Chapter 12 - Rules: Water Take, Use and Management	72	Rule 12.4.1.1 - Discharge of stormwater general	Amend	Amend (a)(i): " <u>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.</u> "	•Need to sustainably manage all wetlands not just those scheduled.
Chapter 12 - Rules: Water Take, Use and Management	73	Rule 12.4.2.1 - Discharge of stormwater to water, or onto or into land where it may enter water	Amend	Amend 12.4.2.1(c): " <u>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.</u> " Add new matter of discretion: " <u>(o) Effects on biological diversity and ecological values.</u> "	•Need to sustainably manage all wetlands not just those scheduled.
Chapter 12 - Rules: Water Take, Use and Management	74	Rule 12.5.1.1 - Discharge of drainage water from any drain	Amend	Amend 12.5.1.1(aa): " <u>Discharge is not to enter into and there is to be no change in the water level or hydrological function, or no damage to the indigenous flora, fauna or its habitat, in or on any regionally significant wetland value or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria.</u> "	•Need to sustainably manage all wetlands not just those scheduled.
Chapter 12 - Rules: Water Take, Use and Management	75	Rule 12.5.2.1 - Discharge of drainage water - restricted discretionary activity	Amend	Amend 12.5.2.1(b): " <u>Discharge is not to enter into and there is to be no change in the water level or hydrological function, or no damage to the indigenous flora, fauna or its habitat, in or on any regionally significant wetland value or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria.</u> " Add new matter of discretion: " <u>(n) Effects on biological diversity and ecological values.</u> "	•Need to sustainably manage all wetlands not just those scheduled.
Chapter 12 - Rules: Water Take, Use and Management	77	Rule 12.7.1.2 - Discharge of pesticide, land-based discharge onto land	Amend	Amend (e): " <u>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.</u> "	•Chemicals will be used to kill pest plants; under rule currently worded, a consent would be required.

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Chapter 12 - Rules: Water Take, Use and Management	80	Rule 12.8.1.1 - Discharge of animal dip material	Amend	Amend 12.8.1.1(k): "There is no change to the water level or hydrological function, or no damage to the <u>indigenous</u> flora <u>and</u> 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."	•Agricultural waste and fertiliser can be toxic to wetlands, and rule should cover more than just scheduled wetlands.
Chapter 12 - Rules: Water Take, Use and Management	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	Amend	Amend 12.8.1.2(l): "There is no change to the water level or hydrological function, or no damage to the <u>indigenous</u> flora <u>and</u> 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."	•Agricultural waste and fertiliser can be toxic to wetlands, and rule should cover more than just scheduled wetlands.
Chapter 12 - Rules: Water Take, Use and Management	82	Rule 12.8.1.3 - Discharge of contaminants collected in animal waste collection system not in Zone A of a Groundwater Protection Zone	Amend	Amend 12.8.1.3(l): "There is no change to the water level or hydrological function, or no damage to the <u>indigenous</u> flora <u>and</u> 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."	•Agricultural waste and fertiliser can be toxic to wetlands, and rule should cover more than just scheduled wetlands.
Chapter 12 - Rules: Water Take, Use and Management	83	Rule 12.8.1.5 - Discharge of fertiliser onto production land where it may enter water	Amend	Amend 12.8.1.5(c): "There is no change to the water level or hydrological function, or no damage to the <u>indigenous</u> flora <u>and</u> 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."	•Agricultural waste and fertiliser can be toxic to wetlands, and rule should cover more than just scheduled wetlands.
Chapter 12 - Rules: Water Take, Use and Management	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	Amend	Amend (aa): "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." Amend (a)(ii): "The natural character of any affected water body and their margins." Add new matter of discretion: "(o) Any effects on biological diversity and ecological values."	•Need to sustainably manage all wetlands not just those scheduled.
Chapter 12 - Rules: Water Take, Use and Management	85	Rule 12.9.1.1 - Discharge of water associated with down-hole pump testing	Amend	Amend 12.9.1.1(a): "There is no change to the water level or hydrological function, or no damage to the <u>indigenous</u> flora <u>and</u> 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." Add the following matters: "(a) Effects on biological diversity and ecological values; <u>and</u> (b) There is no discharge to any surface water body including wetlands; <u>and</u> (c) Effects on the natural character of wetlands and their margins."	•Need to sustainably manage all wetlands not just those scheduled.

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Chapter 12 - Rules: Water Take, Use and Management	86	Rule 12.9.1.2 - Discharge of contaminants associated with drilling	Amend	Amend 12.9.1.1(a): <i>"There is no change to the water level or hydrological function, or no damage to the <u>indigenous</u> flora <u>and</u> 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: <u>"(a) Effects on biological diversity and ecological values:</u> <u>and</u> <u>(b) There is no discharge to any surface water body including wetlands; and</u> <u>(c) Effects on the natural character of wetlands and their margins."</u>	•Need to sustainably manage all wetlands not just those scheduled.
Chapter 12 - Rules: Water Take, Use and Management	87	Rule 12.9.2.1 - Discharge of water or contaminants associated with down-hole pump testing or drilling - restricted discretionary activity	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 Appendix XX Ecological Criteria."</i> Amend (a)(ii): <i>"The natural character of any affected water body <u>and</u> their margins."</i> Add new matter of discretion: <u>"(o) Any effects on biological diversity and ecological values."</u>	•Need to sustainably manage all wetlands not just those scheduled.
Chapter 12 - Rules: Water Take, Use and Management	88	Rule 12.10.1.1 - Discharge of any contaminant or water from a vessel	Amend	Amend (a): <i>"There is no discharge into or change the water level or hydrological function, or no damage to the <u>indigenous</u> flora <u>and</u> 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>	•Current words do not provide Council with necessary control on potential adverse effects of contaminant discharge.
Chapter 12 - Rules: Water Take, Use and Management	89	Rule 12.10.2.1 - Discharge of any contaminant or water from a vessel or from maintenance of vessel - restricted discretionary activity	Amend	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> Amend (a)(ii): <i>"The natural character of any affected water body <u>and</u> their margins."</i> Add new matter of discretion: <u>"(m) Any effects on biological diversity and ecological values."</u>	•Current words do not provide Council with necessary control on potential adverse effects of contaminant discharge.
Chapter 12 - Rules: Water Take, Use and Management	90	Rule 12.11.2.1 - Discharge of sullage, cooling, drinking water supply reservoir, water supply pipeline or swimming pool water	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 <u>indigenous</u> flora <u>and</u> 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>	•Need to sustainably manage all wetlands not just those scheduled.

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Chapter 12 - Rules: Water Take, Use and Management	91	Rule 12.11.2.2 - Discharge of water used for holding live organisms	Amend	Amend 12.11.2.2(a): " <u>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.</u> "	•Need to sustainably manage all wetlands not just those scheduled.
Chapter 12 - Rules: Water Take, Use and Management	92	Rule 12.11.2.3 - Discharge of any other water	Amend	Amend 12.11.2.3(h): " <u>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.</u> "	•Need to sustainably manage all wetlands not just those scheduled.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	101	Rule 13.2.1.7 - Erection or placement of bridge, boardwalk or culvert	Amend	Amend 13.2.1.7: " <u>The erection or placement of any bridge, boardwalk or culvert in, on or over the bed of a lake or river, or any Regionally Significant wetland is a permitted activity, providing:</u> " Amend (b) to delete "boardwalk". Add the following permitted activity conditions: " <u>(a) The structure is not in a Regionally Significant Wetland or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria.</u> <u>(b) Effects on biological diversity and ecological values;</u> <u>and</u> <u>(c) Effects on the natural character of wetlands and their margins.</u> " Add a new rule: " <u>The erection or placement of any boardwalk in, on or over the bed of a lake or river, or any Regionally Significant Wetland, is a permitted activity, providing:</u> <u>(a) The boardwalk is for recreational or scientific purposes and its erection or placement, does not cause any flooding, nor cause any erosion of the bed or banks of a Regionally Significant Wetland, and</u> <u>(b) The site is left tidy following the erection or placement.</u> "	•Permitted activity inappropriate for bridge or culvert as Council cannot control adverse effects on other wetlands - should be discretionary.. •Support boardwalks being permitted (if for recreation or science) - need separate rule to culverts/bridges.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	103	Rule 13.2.2.1 - Erection or placement - restricted discretionary activity	Amend	Amend (aa): " <u>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.</u> " Amend (a)(ii): " <u>The natural character of any affected water body and their margins.</u> " Add new matter of discretion: " <u>(m) Any effects on biological diversity and ecological values.</u> "	•Current words do not provide Council with necessary control on potential adverse effects of contaminant discharge.

ISSUE	REF	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	108	Rule 13.3.2.1 - Extension, alteration, replacement or reconstruction of structure - restricted discretionary activity	Amend	<p>Delete "or any Regional Significant" from the introduction to the rule.</p> <p>Amend (aa): <i>"Any effect on any Regionally Significant Wetland or on any regionally significant wetland <u>that meets the significance criteria listed in Appendix XX Ecological Criteria</u>; and"</i></p> <p>Add new matter of discretion: <i>"(m) Any effects on biological diversity and ecological values."</i></p>	•Values for other wetlands should be assessed against best practice.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	110	Rule 13.4.1.1 - Demolition or removal of a structure	Amend	<p>Delete "or any Regional Significant" from the introduction to the rule.</p> <p>Amend (f): <i>"There is no change to the water level or hydrological function, or no and damage to the <u>indigenous</u> flora, fauna or its habitat, in or on any Regional Significant Wetland wetland is managed."</i></p>	•Current words do not provide Council with necessary control on potential adverse effects of contaminant discharge.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	111	Rule 13.4.2.1 - Demolition or removal of a structure - restricted discretionary activity	Amend	<p>Delete "or any Regional Significant" 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): <i>"The natural character of any affected water body <u>and their margins</u>"</i></p> <p>Add new matter of discretion: <i>"(m) Any effects on biological diversity and ecological values."</i></p>	•Current words do not provide Council with necessary control on potential adverse effects of contaminant discharge.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	114	Rule 13.5.1.1 - Disturbance of the bed general	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 <u>indigenous</u> flora, fauna or its habitat, in or on any Regional Significant Wetland, <u>or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria</u>"</i></p> <p>Amend 13.5.1.1(f) as follows: <i>"...of sediment to the lake, river or wetland..."</i></p>	•Current words do not provide Council with necessary control on potential adverse effects of contaminant discharge.

ISSUE	REF	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	118	Rule 13.5.1.8 - Disturbance by livestock	Amend	Delete " or any Regional Significant " from the introduction to the rule. Delete permitted condition (d). Amend (e): " <u>The activity does not significantly disturb adversely affect indigenous...</u> " Add new condition: " <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> "	•Grazing degrades wetlands, and is inconsistent with sustainable management and protection of wetlands; should not rely on permitted rule. •Regionally significant wetlands should be fenced.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	119	Rule 13.5.2.1 - Extraction of alluvium - restricted discretionary activity	Amend	Delete " or any Regional Significant " from the introduction to the rule Amend (aa): " <u>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.</u> " Amend (a)(ii): " <u>The natural character of any affected water body and their margins</u> " Add new matter of discretion: " <u>(m) Any effects on biological diversity and ecological values.</u> "	•Current words do not provide Council with necessary control on potential adverse effects of contaminant discharge.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	121	Rule 13.6.1.1 - Introduction of pest plants general	Amend	Amend: " <u>...to the bed or water of any Otago lakes, river or any Regionally Significant Wetland, is a prohibited activity for which no resource consent will be granted.</u> " Add the following species: <u>Glyceria species</u> <u>Alder (Alnus species)</u> <u>Crack Willow</u> <u>Gray Willow</u>	•Inappropriate to prohibit in Regionally Significant Wetlands only.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	122	Rule 13.6.2.0 - Introduction or planting of New Zealand native plant	Amend	Add the following permitted rule condition: " <u>All plants and seeds are eco-sourced and appropriate for the specific wetland ecosystem.</u> "	•Wetland restoration would be enhanced if permitted plants were eco-sourced (native plants from local seed sources) and appropriate for wetland ecosystem.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	123	Rule 13.6.3.1 - Introduction or planting of vegetation - discretionary activity	Amend	Amend: " <u>...or any Regional Significant Wetland or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria...</u> "	•Current words do not provide Council with necessary control on potential adverse effects of contaminant discharge.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	124	Rule 13.7.1.2 - Removal or clearance of exotic plant material	Amend	Amend: " <u>The removal or clearance...Regional Significant wetlands, is a permitted activity providing:</u> " Add the following condition: " <u>Damage to indigenous flora and habitats or indigenous fauna managed.</u> "	•Current words do not provide Council with necessary control on potential adverse effects of contaminant discharge.

ISSUE	REF	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	125	Rule 13.7.2.1 - Removal of pest plants - controlled activity	Amend	Amend: "...from the bed of any lake or river, or any <i>Regional Significant wetland</i> , is a ..." Add the following species: "Glyceria species Alder (<i>Alnus species</i>) Crack Willow Gray Willow Alder (<i>Alnus species</i>) Crack Willow Gray Willow"	•Support removal of all weeds from wetlands.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	126	Rule 13.7.3.1 - Removal or clearance of plant material - discretionary activity	Amend	Add the word exotic: " <u>Unless covered by Rules 13.7.1.1 to 13.7.2.1, removal or clearance of exotic plant material from any <i>Regionally Significant Wetland</i>, is a discretionary activity."</u>	•Agrees may be a need for discretionary consents for some removal of exotic species from significant wetlands, but removal of indigenous vegetation should be avoided and should be non-complying.
Minor and other	143	Minor and consequential changes	Amend	Amend wording and numbering of retained issues, explanations, principle reasons, anticipated results and cross references to account for changes and delete words no longer relevant as a result of the removal of Schedule 10 and the term type A and Type.	No reason given.
RMA streamlining and simplifying	150	RMA streamlining and simplifying	Oppose	Retain issues, Explanations, Principle Reasons, Anticipated Results, and cross references.	•Removal doesn't make Plan easier to understand. •These assist decision-makers individuals better understand the Plan, educates, and helps understand whether consents are required.
Wetland values information and Wetland Inventory	151	Wetland Inventory	Amend	It should be noted on the inventory of wetlands that Tahakopa Marsh Complex (Map F40, #145) is extremely threatened by an infestation of Alder which needs removal before it becomes an intractable weed in the wetlands and waterways. This should be noted on the inventory of wetlands.	No reason given.
Chapter 10 - Wetlands	153	Chapter 10 general	Amend	Insert new policy and explanation: " <u>Policy x.x.x</u> <u>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.</u> <u>Explanation:</u> <u>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.</u>	•Many wetlands not scheduled, and all wetlands should be managed according to Part 2 RMA.

ISSUE	REF	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Chapter 10 - Wetlands	153	Chapter 10 general	Amend	<p>Insert new policy and explanation: <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>	<ul style="list-style-type: none"> •Plan change doesn't allow for further significant wetlands to be identified. •Significance criterion used to identify wetlands in Schedule 9 is incomplete and it's possible not all significant wetlands have been captured.
Chapter 10 - Wetlands	153	Chapter 10 general	Amend	<p>Insert new policy and explanation: <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 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."</u></p>	<ul style="list-style-type: none"> •Values inconsistent with case law, such as criterion for representativeness. •Note: Appendix XX Ecological Criteria can be found in full in the original submission.
Chapter 10 - Wetlands	153	Chapter 10 general	Amend	<p>Insert new policy and explanation: <u>"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.</u></p> <p><u>Explanation:</u> <u>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."</u></p>	<ul style="list-style-type: none"> •Possible not all significant wetlands have been captured in Schedule 9.

ISSUE	REF	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	155	Chapter 13 general	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: "The...bed of a lake or river, or any Regional Significant Wetland is a permitted activity, providing:" Add the following permitted activity conditions: "(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> (b) <u>Effects on biological diversity and ecological values;</u> <u>and</u> (c) <u>Effects on the natural character of wetlands and their margins.</u> "	<ul style="list-style-type: none"> •Fences shouldn't be erected in wetlands as animals tend to congregate along them, and regionally significant wetlands shouldn't be grazed. •Digging of wetlands for pipe, line and cable placement can cause irreversible damage. •Erection of structures over wetlands can adversely affect them.
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	155	Chapter 13 general	Amend	Add new non-complying rule: " 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. "	<ul style="list-style-type: none"> •Removal of indigenous vegetation should be avoided and should be non-complying.
Protection general	165	Financial contributions rules	Amend	Delete all provisions for financial contributions for regionally significant wetlands and values in all rules.	<ul style="list-style-type: none"> •Financial contributions inappropriate given large-scale loss or modification of wetlands, and inconsistent with Part 2 RMA and NPS Freshwater Management. •Assessment criteria inadequate to assess viability in any offsetting.
Mapping of Schedule 9 wetlands - general	199	Mapping of Schedule 9 wetlands - general	Amend	All regionally significant wetlands, including those above 800m be mapped using detailed current aerial photographs and cadastral boundaries.	<ul style="list-style-type: none"> •Topographical maps inadequate to delineate wetlands and ensure adequate buffer margins. •Current aerial photographs important for rule understanding and enforcement.
Schedule 9 general	200	Schedule 9	Amend	Additional Wetland to be added to Schedule 9: Daphne Tarwood Peat Dome G46 325178	<ul style="list-style-type: none"> •Welcomes the plan change proposal to add many of the wetlands in Schedule 10, plus 24 newly identified wetlands to Schedule 9. •Wetland dominated by characteristic bog plants and contains threatened species Coprosma elatirioides. •See image in the original submission.
Specific Schedule 9 wetlands	345	Schedule 9 - Tahakopa Marsh Complex (#145, Map F4)	Amend	Entirety of this wetland and surrounding area shown as wetland on the topo map needs to be listed in schedule 9 as a regionally significant wetland.	<ul style="list-style-type: none"> •Boundaries on Map F40 only partially cover wetland complex. •See image in the original submission.

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ISSUE	REF	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Chapter 13 - Land Use (Beds and Regionally Significant Wetlands)	118	Rule 13.5.1.8 - Disturbance by livestock	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.	<ul style="list-style-type: none"> •Unreasonable for the public to be responsible for observing detrimental effects on the environment (neither time nor money), nor the DOC or ORC (neither manpower or budget). •Farmers can't be expected to self-police their activities when it results in financial benefits/costs. •Rule may be grumbled about but accepted, whereas community pressure for selfless/environmental actions from farmers only results in fracturing a community into conservationists and land developers.

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ISSUE	REF	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Protection general	157	Drain maintenance	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.	<ul style="list-style-type: none"> •Ditches need to be safe so the stock can graze grazeable land above the wetland.

Grouped by Provision
(Matters within the scope of the proposed plan change)

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Part 1: Regionally Significant Wetlands and values

What is a Regionally Significant Wetland

7.139 Policy 10.4.1A - Definition of a Regionally Significant Wetland

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Treble Cone Investments Limited	2	Amend	Delete 10.4.1A(c).	•Remove provisions that relate to wetlands higher than 800m.
Treble Cone Investments Limited	2	Amend	Provide for wetlands within Ski Area Sub Zones to be excluded from definition of Regionally Significant Wetlands in 10.4.1A.	No reason given.
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>	<ul style="list-style-type: none"> •Definition of Regionally Significant Wetland is extremely broad given all 'wetlands' above a nominal 800m above sea level mark automatically trigger a regional significance status and subsequent protection. •A nominal altitude of 800m above sea level is not an effective gauge of ecological significance, which may be confirmed by survey or ground-truthing. •Submitter holds permit for exploration of a lignite deposit in Home Hills / Hawkdun area and future mining could take place above 800m above sea level. •Proposed definition of Regionally Significant Wetland would constrain future mining. Mining would require modification to existing landforms for access and extraction. If there is a wetland 800m above sea level within the resource envelope, this modification would have a non-complying activity status, regardless of the wetland's ecological significance. •This constraint is unsupported by ecological information, and would hinder access to a resource which is of value to Otago.
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.	<ul style="list-style-type: none"> •Definition of Regionally Significant Wetland is too broad as includes all wetlands (including shallow pools) above 800m. •Water levels at this height are dynamic and hard to monitor/assess. •Majority of NZSki's land is above 800m, they must operate at high altitude. •Proposed changes could restrict use, management, growth and development of NZSki's ski fields, or could impose costly financial contributions for unavoidable effects. •Current planning and consent regimes have been rigorous and all effects of the ski fields were assessed (including for wetlands).
Cardrona Alpine Resort	15	Amend	Delete 10.4.1A(c).	<ul style="list-style-type: none"> •Remove provisions that relate to wetlands higher than 800m. •Skifield operations have not been considered in the proposal, and are a vital part of the economy.
Cardrona Alpine Resort	15	Amend	Provide for wetlands within Ski Area Sub Zones to be excluded from definition of Regionally Significant Wetlands in 10.4.1A.	•Skifield operations have not been considered in the proposal, and are a vital part of the economy.
Lake Waihola Waipori Wetlands Society Inc.	20	Amend	Amend to more clearly delineate between what is defined as aquatic, wetlands, and land.	<ul style="list-style-type: none"> •Lack of delineation between aquatic values and wetland values makes the proposal slightly confusing. •Aquatic and wetland areas are distinct with quite different plant communities. •This will make the rules work more clearly, and give greater guidance to people.
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.	<ul style="list-style-type: none"> •Process classifying the wetlands as regionally significant was not robust. •Wetlands above 800m should not be automatically included if these are not accurately mapped/plotted and if no values assessment has been done on them.

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Meridian Energy Limited	32	Amend	Amend: "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."	<ul style="list-style-type: none"> •Arbitrary classification on elevation; many wetlands will not meet habitat, flora, fauna or cultural values. •More restrictive management is inappropriate given values not known.
TrustPower Limited	40	Amend	Amend: ". . . (c) A wetland higher than 800 metres above sea level <u>with one or more regionally significant wetland values.</u> "	<ul style="list-style-type: none"> •Only wetlands which have regionally significant values should be regionally significant wetlands, doing otherwise is unjustified. •All wetlands above 800m will not necessarily have a regionally significant value, especially with the broad definition of wetland.
TrustPower Limited	40	Amend	Resolution of confusion around the separation of wetlands identified in Schedule 9 that are not "wetland management areas" from those that are.	The reference to "wetland management area" in this Policy is confusing to land users as no definition of "wetland management area" is provided in Water Plan.
Department of Conservation	42	Support	Retain with no amendments.	<ul style="list-style-type: none"> •Consistent with Part 2 RMA. •Gives guidance when considering activities in wetlands. •Maintains flows in streams sourced from wetlands which protects habitat of indigenous threatened fish. •Gives effect to the NPS Freshwater Management.
New Zealand Railways Corporation	46	Amend	Add definition to the glossary section of the Water Plan which specifically excludes permanently dry areas from regionally significant wetland areas.	<ul style="list-style-type: none"> •No definition of Regionally Significant Wetland in the Water Plan. •Where activities occur on 'dry' areas they should be permitted and the definition should clarify this.
New Zealand Railways Corporation	46	Amend	Add definition to the glossary section of the Water Plan which clarifies that those activities that occur on 'dry' land; such as land transport corridors located within the wider boundary area of the Regionally Significant Wetland shown in the revised Maps accompanying Plan Change 2 are not intended to be affected by the new controls.	Where activities occur on 'dry' areas they should be permitted and the definition should clarify this. Only those activities that impact on wetlands should be captured by the new controls.
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Delete policy and insert in more appropriate place.	•Not a policy; should either be a footnote, explanatory note or added to glossary.

8 Policy 10.4.1B - Schedule 9

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
TrustPower Limited	40	Amend	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 and their regionally significant wetland values as per Policy 10.4.1."	<ul style="list-style-type: none"> •As proposed the policy implies that values information will not be listed in the Plan. •Values information established for each Significant Wetland should be listed in the Water Plan because this information needs to be assessed under proposed provisions.
Department of Conservation	42	Support	Retain with no amendments.	<ul style="list-style-type: none"> •Consistent with Part 2 RMA. •Gives guidance when considering activities in wetlands. •Maintains flows in streams sourced from wetlands which protects habitat of indigenous threatened fish. •Gives effect to the NPS Freshwater Management.
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Delete policy and insert in more appropriate place.	•Not a policy; should either be a footnote, explanatory note or added to glossary.

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SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
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>	<ul style="list-style-type: none"> •Guidance is important given that wetlands above 800m are not proposed to be listed in Water Plan.

Regionally Significant Wetland values

6.14 Policy 10.4.1 - Definition of Regionally Significant Wetland values

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Otago Fish & Game Council	8	Amend	Add criterion: <i>A10) Importance of this wetland within the wider network of wetlands within its catchment.</i>	<ul style="list-style-type: none"> •Proposed plan only considers wetlands in isolation and doesn't consider networks of wetlands as important (e.g. for river flow stability).
Federated Farmers of New Zealand	29	Support	Adopt the provision as proposed.	<ul style="list-style-type: none"> •Supports the incorporation of wetland values within one provision, and the addition of "significant" to value A9.
Meridian Energy Limited	32	Amend	Amend policy 10.4.1: <i>"A1 Habitat for regionally, nationally or internationally rare or threatened species or communities; ...</i> <i>A7 High diversity of indigenous flora and fauna;</i> <i>A8 Regionally significant habitat for waterfowl; and</i> <i>A79 Significant hydrological values including maintaining water quality or low flows, or reducing flood flows."</i>	<ul style="list-style-type: none"> •The new characteristics/identification criteria listed in A7 to A8 is unnecessary.
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.	<ul style="list-style-type: none"> •Provides insufficient recognition of the role of nga Runanga as kaitiaki. •All cultural and spiritual beliefs, values and uses associated with wetlands should be protected.
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.	No reason given.
TrustPower Limited	40	Amend	Amend: <i>"The regionally significant wetland values of Otago's wetlands are include one or more of the following: . . ."</i>	<ul style="list-style-type: none"> •Clarifies that only one regionally significant value is needed for a wetland to be regionally significant.
TrustPower Limited	40	Amend	Amend: <i>" . . . A8 Regionally significant habitat for indigenous waterfowl; and . . ."</i>	<ul style="list-style-type: none"> •Better reflects s 6(c) RMA, and sets a practical threshold test.
Department of Conservation	42	Support	Retain with no amendments.	<ul style="list-style-type: none"> •Consistent with Part 2 RMA. •Gives guidance when considering activities in wetlands. •Maintains flows in streams sourced from wetlands which protects habitat of indigenous threatened fish. •Gives effect to the NPS Freshwater Management.

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Amend: "The regionally significant wetland values of Otago's wetlands <u>that are identified in Schedule 9</u> are: ..."	<ul style="list-style-type: none"> •Values inconsistent with case law, such as criterion for representativeness. •Significance criterion used to identify wetlands in Schedule 9 is incomplete and it's possible not all significant wetlands have been captured.

11 Policy 10.4.3 - Identification of Type B values

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Federated Farmers of New Zealand	29	Support	Supports the incorporation of wetland values within one provision.	No reason given.

Part 2: Protection of wetlands

Chapter 10 - Wetlands

1 Introduction to Chapter 10

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Gregory Kerr	35	Amend	Include statement on the importance of wetlands.	•Can be linked or written into future consents

5 Objective 10.3.1 - Maintain or enhance wetlands

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Meridian Energy Limited	32	Support	Retain objective 10.3.1 as notified.	•Provides appropriate direction to resource users with respect to management expectations for wetland values.
Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou, and Hokonui Runanga	38	Oppose	Opposes removal of Kai Tahu cultural and spiritual beliefs, values and uses from objective 10.3.1.	•Provides insufficient recognition of the role of nga Runanga as kaitiaki. •All cultural and spiritual beliefs, values and uses associated with wetlands should be protected.
TrustPower Limited	40	Amend	Amend: "Otago's <u>regionally significant</u> wetlands and their values and services will be maintained or enhanced for present and future generations."	•Provide better alignment with other provisions, and avoid confusion with broad definition of wetland in the Water Plan.
Department of Conservation	42	Amend	Amend: "Otago's wetlands and their values and <u>ecosystem</u> services will be maintained or <u>and</u> enhanced for present and future generations."	•Amend so that the services provided by wetlands are clarified. These services include providing base flows for streams, especially during critical low flow periods and removing silt and nutrients from any water entering the wetland and purifying it before discharge downstream. •Objective gives effect to section 30(1)(c)(iii) RMA. •Objective gives effect to the NPS Freshwater Management 2011.
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Delete Objective and replace with: " <u>To recognise and provide for the protection of the natural character, biodiversity and other values of wetlands in the regions.</u> "	•Objective fails to form a framework to protect wetlands and their margins, and set out all that is required by Part 2 RMA.

9 Policy 10.4.2 - Priority on avoiding adverse effects

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Otago Fish & Game Council	8	Support	Support for the preference of an "avoid" test where possible.	•Gives a strong signal the Regionally Significant Wetlands should be left alone.
Otago Conservation Board	27	Support	Strongly support the intention to avoid adverse effects on wetlands rather than to remedy or mitigate such effects.	•No longer acceptable to merely remedy or mitigate effects.
Meridian Energy Limited	32	Amend	Delete policy 10.4.2 and replace with: " <u>The adverse effects of activities on Regionally Significant Wetland shall be avoided where practicable and, otherwise, remedied or mitigated.</u> "	•Overly restrictive; fails to acknowledge remediation/mitigation may be more appropriate. •Priority to avoid doesn't reflect intent of Objective 10.3.1; objective doesn't preclude remediation and mitigation. •S 5(2)(c) RMA not a strict hierarchy.
Clutha District Council	34	Amend	Delete: "Remedying or mitigating effects will be considered only where those effects cannot be avoided."	•The requirement to avoid adverse effects where possible is too strict and inflexible. •It is counter to the regime set up in Part 5 RMA, which treats 'avoid', 'remedy' and 'mitigate' equally, and is also contrary to the established principle that the Act contemplates that activities can have adverse effects and still be acceptable. •If provision remains it is inevitable that proposals will be opposed on the basis that effects can always be avoided by not doing anything.

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
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>	<ul style="list-style-type: none"> •Giving primacy to avoiding over remedying or mitigating is inconsistent with sustainable management as defined in the RMA and established case law. •If this primacy is intended to give effect to the proposed NPS on Indigenous Biodiversity, should recognise that this is subject to change.
Department of Conservation	42	Support	Retain with no amendments.	<ul style="list-style-type: none"> •Consistent with Part 2 RMA. •Gives guidance when considering activities in wetlands. •Maintains flows in streams sourced from wetlands which protects habitat of indigenous threatened fish. •Gives effect to the NPS Freshwater Management.
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 avoided. Adverse effects on Regionally Significant Wetlands and their regionally significant values should be avoided, remedied or mitigated."</i>	<ul style="list-style-type: none"> •Primacy should not be given to avoiding adverse effects, over remedying or mitigating adverse effects. •Giving primacy to avoidance is inconsistent with sustainable management as defined in RMA and established case law.
Royal Forest and Bird Protection Society of New Zealand Inc	47	Support	Support. No change.	<ul style="list-style-type: none"> •Appropriately recognises preferability of avoidance of adverse effects.

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SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Treble Cone Investments Limited	2	Amend	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.	No reason given.
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>	<ul style="list-style-type: none"> •Proposed plan does not address issue of wetland transition and seasonal variability. •Suggested change enables assessment of effects of activities adjacent to wetland boundary.
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.	No reason given.
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.	No reason given.
Cardrona Alpine Resort	15	Amend	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.	<ul style="list-style-type: none"> •Skifield operations have not been considered in the proposal, and are a vital part of the economy.
Te Ao Marama Inc	16	Amend	Include preservation of wetland, lake and river margins in the proposed plan change.	<ul style="list-style-type: none"> •Proposed change does not address this (as required by s 6 RMA). •Would significantly strengthen the provisions proposed and help to achieve the purpose of RMA. •A lot of inappropriate use and development has been carried out in the margins, with significant effects on wetlands, lakes, rivers and the coast.
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.	<ul style="list-style-type: none"> •Wetlands are connected to each other and the sea.
Transpower New Zealand Limited	37	Support	Retain the objectives and policies as drafted without further modification.	No reason given.
Hawksbury Lagoon Inc	39	Amend	Default position on rules and policies should be a conserved wetland rather than create permitted activities (To keep faith with the objective to "avoid").	No reason given.

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
TrustPower Limited	40	Amend	Recognise and provide for the potential for alterations in the human use influences that affect certain wetlands.	<ul style="list-style-type: none"> •A change in human use that affects a wetland may be sustainable (e.g. affecting hydrology, but not adversely affecting flora and fauna). •This is not provided for in Plan Change 2.
OtagoNet Joint Venture	43	Amend	Activities and human use values should be provided for in Plan Change 2 such that they are not unduly compromised without recognition of their benefits.	<ul style="list-style-type: none"> •Relevant in establishing the boundaries and values ascribed to wetlands, and establishing the policy regime and the inventory. •ORC is required to protect regionally significant infrastructure. •Would meet s 5 RMA.
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>	<ul style="list-style-type: none"> •Plan change doesn't allow for further significant wetlands to be identified. •Significance criterion used to identify wetlands in Schedule 9 is incomplete and it's possible not all significant wetlands have been captured.
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 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."</u></p>	<ul style="list-style-type: none"> •Values inconsistent with case law, such as criterion for representativeness. •Note: Appendix XX Ecological Criteria can be found in full in the original submission.
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	<p>Insert new policy and explanation:</p> <p><u>"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.</u></p> <p><u>Explanation:</u> <u>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."</u></p>	<ul style="list-style-type: none"> •Possible not all significant wetlands have been captured in Schedule 9.

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
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 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.</u></p> <p><u>Explanation:</u> <u>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.</u></p>	<ul style="list-style-type: none"> •Many wetlands not scheduled, and all wetlands should be managed according to Part 2 RMA.

Chapter 12 - Rules: Water Take, Use and Management

22 Rule 12.1.1A.1 - Take and use of surface water from any Regionally Significant Wetland

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Otago Fish & Game Council	8	Support	Support.	<ul style="list-style-type: none"> •Will help to protect wetlands into the future.
Gavan James Herlihy	22	Support	New drains should require consent.	No reason given.
Otago Conservation Board	27	Support	Strongly support setting the default activity status of activities that affect wetlands as 'non-complying'.	<ul style="list-style-type: none"> •Essential that all remaining wetlands receive highest level of protection.
Federated Farmers of New Zealand	29	Amend	Amend the activity status to a restricted discretionary activity.	<ul style="list-style-type: none"> •Unnecessary, and adds needless expense and time compared to restricted discretionary.
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.	<ul style="list-style-type: none"> •Non-complying status is too onerous, especially given concerns on artificial wetlands, and the lack of robustness in the process classifying the wetlands as regionally significant •Activity with an adverse effect on a wetland value may still be appropriate. •Discretionary status allows robust examination, and the possibility of declining activities.
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>	<ul style="list-style-type: none"> •Many Regionally Significant Wetlands form part of rivers or lakes; the rule should be explicit that only water taken directly from the area identified as Regionally Significant Wetland is non-complying.
TrustPower Limited	40	Oppose	Delete rule. Takes and uses that are not covered by other specified rules should have discretionary status.	<ul style="list-style-type: none"> •Minor takes and uses from Regionally Significant Wetlands may be required and should not be non-complying.
Royal Forest and Bird Protection Society of New Zealand Inc	47	Support	Retain rule as proposed.	<ul style="list-style-type: none"> •Consistent with Part 2 and s 30 RMA.

26 Rule 12.1.2.4 - Take and use of surface water for no more than 3 days

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Otago Fish & Game Council	8	Support	Support.	<ul style="list-style-type: none"> •Allows submitter to look at the effect of water takes on wetlands, and advise ORC accordingly.
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	<p>Amend 12.1.2.4(b):</p> <p><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></p> <p>Add the following permitted rule conditions: <i>"(a) Effects on biological diversity and ecological values; and</i> <i>(b) Effects on the natural character of wetlands and their margins."</i></p>	<ul style="list-style-type: none"> •Deletion of 'water is not taken from' alters intent of rule. •Rule doesn't cover non-assessed and non-scheduled wetlands.

27 Rule 12.1.2.5 - Take and use of surface water general

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Otago Fish & Game Council	8	Support	Support.	•Allows submitter to look at the effect of water takes on wetlands, and advise ORC accordingly.
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>	•Deletion of 'water is not taken from' alters intent of rule. •Rule doesn't cover non-assessed and non-scheduled wetlands.

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

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Otago Fish & Game Council	8	Support	Support.	•Allows submitter to look at the effect of water takes on wetlands, and advise ORC accordingly.
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.	•Land drainage has positive benefits, both locally and wider. •Unmaintained drainage systems risk flooding, erosion and discharges. •Requiring consent may deter maintenance.
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 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>	•Deletion of 'water is not taken from' alters intent of rule. •Rule doesn't cover non-assessed and non-scheduled wetlands.

29 Rule 12.1.3.1 - Take and use of surface water for community water supply - controlled activity

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Retain (i) and add new (j) and (l): <i>"(j) Effects on biological diversity and ecological values; and (k) Effects on the natural character of wetlands and their margins."</i>	•To meet resource management duties, Council needs to control effects on any wetland that meets significance criteria.

37 Rule 12.1.4.8 - Take and use of surface water - restricted discretionary activity

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Add new discretionary matters: <i>"(a) Effects on biological diversity and ecological values; and (b) Effects on the natural character of wetlands and their margins."</i> Amend (xvii): <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>	•Council responsibilities are greater than the identification of significant wetlands; need to consider adverse effects on all wetlands. •Possible not all significant wetlands have been captured in Schedule 9. •Gives effect to Part 2 RMA.

45 Rule 12.2.1A.1 - Take and use of groundwater from any Regionally Significant Wetland

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Gavan James Herlihy	22	Support	New drains should require consent.	No reason given.
Otago Conservation Board	27	Support	Strongly support setting the default activity status of activities that affect wetlands as 'non-complying'.	•Essential that all remaining wetlands receive highest level of protection.
Federated Farmers of New Zealand	29	Amend	Amend the activity status to a restricted discretionary activity.	•Unnecessary, and adds needless expense and time compared to restricted discretionary.
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.	•Non-complying status is too onerous, especially given concerns on artificial wetlands, and the lack of robustness in the process classifying the wetlands as regionally significant. •Activity with an adverse effect on a wetland value may still be appropriate. •Discretionary status allows robust examination, and the possibility of declining activities.
TrustPower Limited	40	Oppose	Delete rule. Takes and uses that are not covered by other specified rules should have discretionary status.	•Minor takes and uses from Regionally Significant Wetlands may be required and should not be non-complying.

48 Rule 12.2.2.5 - Take and use of groundwater for no more than 3 days

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
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 indigenous 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> "	•Deletion of 'water is not taken from' alters intent of rule. •Rule doesn't cover non-assessed and non-scheduled wetlands.

49 Rule 12.2.2.6 - Take and use of groundwater from Schedule 2C aquifer or within 100m of any wetland, lake or river

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Amend 12.2.2.6(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 indigenous 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> "	•Deletion of 'water is not taken from' alters intent of rule. •Rule doesn't cover non-assessed and non-scheduled wetlands.

50 Rule 12.2.2A.1 - Take and use of groundwater for community water supply - controlled activity

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
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> <i>(i) Effects on the natural character of wetlands and their margins.</i> "	•Council responsibilities are greater than the identification of significant wetlands; need to consider adverse effects on all wetlands. •Possible not all significant wetlands have been captured in Schedule 9. •Gives effect to Part 2 RMA.

53 Rule 12.2.3.4 - Take and use of groundwater - restricted discretionary activity

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
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> "	•Implementation uncertain; means standard farming practices may be captured.

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Amend (xiii): "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: "(a) Effects on biological diversity and ecological values; and (b) Effects on the natural character of wetlands and their margins."	<ul style="list-style-type: none"> •Council responsibilities are greater than the identification of significant wetlands; need to consider adverse effects on all wetlands. •Possible not all significant wetlands have been captured in Schedule 9. •Gives effect to Part 2 RMA.

60 Rule 12.3.1A.1 - Damming or diversion of water: Regionally Significant Wetland

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Gavan James Herlihy	22	Support	New drains should require consent.	No reason given.
Otago Conservation Board	27	Support	Strongly support setting the default activity status of activities that affect wetlands as 'non-complying'.	•Essential that all remaining wetlands receive highest level of protection.
Federated Farmers of New Zealand	29	Amend	Amend the activity status to a restricted discretionary activity.	•Unnecessary, and adds needless expense and time compared to restricted discretionary.
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.	<ul style="list-style-type: none"> •Non-complying status is too onerous, especially given concerns on artificial wetlands, and the lack of robustness in the process classifying the wetlands as regionally significant •Activity with an adverse effect on a wetland value may still be appropriate. •Discretionary status allows robust examination, and the possibility of declining activities.
Meridian Energy Limited	32	Amend	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."	<ul style="list-style-type: none"> •Determination as to whether a diversion will 'affect' the water level requires subjective analysis and is not suitable for determining non-compliance. •Unclear why diversion is treated differently to (direct) take and use of surface water. Given many resource consents involve the take and diversion of water, inappropriate to treat differently. •Many Regionally Significant Wetlands form part of rivers or lakes; the rule should be explicit that only water diverted directly from/to the area identified as Regionally Significant Wetland is non-complying. •Non-complying activity overly restrictive: diversion may improve water flow enabling the enhancement of wetland values.
TrustPower Limited	40	Amend	Amend: "Unless covered by Rules 12.3.1.1 to 12.3.1.4, and 12.3.3.1(i) or 12.3.2.0: (i) The 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." And a comprehensive assessment in terms of water allocation for a particular water body should be undertaken to determine whether the water level of any Regionally Significant Wetland is adversely affected, rather than a blanket rule that provides for no effects on water level.	•Point (ii) is subjective and does not provide certainty to plan users.
Royal Forest and Bird Protection Society of New Zealand Inc	47	Support	Retain wording as proposed.	No reason given

63 Rule 12.3.2.1 - Damming or diversion of water general

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Amend 12.3.2.1(e): <i>"It is not within and 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; and"</i>	•Should be explicit that damming or diversion within a Regionally Significant Wetland is not permitted.
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 (b) Effects on the natural character of wetlands and their margins."</i>	•Need to sustainably manage all wetlands not just those considered significant.

64 Rule 12.3.2.2 - Damming or diversion of water for land drainage

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
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.	•Land drainage has positive benefits, both locally and wider. •Unmaintained drainage systems risk flooding, erosion and discharges. •Requiring consent may deter maintenance.
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Amend 12.3.2.2(a): <i>"The water is not diverted from and 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; and"</i>	•Should be explicit that damming or diversion within a Regionally Significant Wetland is not permitted.
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 (b) Effects on the natural character of wetlands and their margins."</i>	•Need to sustainably manage all wetlands not just those considered significant.

65 Rule 12.3.2.3 - Damming or diversion of water for erection, placement, repair or maintenance of structure

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
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 (b) Effects on the natural character of wetlands and their margins."</i>	•Need to sustainably manage all wetlands not just those considered significant.

66 Rule 12.3.3.1 - Damming or diversion of water - restricted discretionary activity

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
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>	•Implementation uncertain; means standard farming practices may be captured.
Contact Energy Limited	30	Support	The restricted discretionary activity status for the damming of water that has previously been carried out remains a restricted discretionary activity (Rule 12.3.3.1(i)).	No reason given.
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Amend 12.3.3.1(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> Add new matters of discretion: <i>"(o) Effects on biological diversity and ecological values."</i>	•Matters of discretion don't address/protect non-scheduled wetlands.

72 Rule 12.4.1.1 - Discharge of stormwater general

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Amend (a)(i): <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>	•Need to sustainably manage all wetlands not just those scheduled.

73 Rule 12.4.2.1 - Discharge of stormwater to water, or onto or into land where it may enter water

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Federated Farmers of New Zealand	29	Amend	Amend: "Any <u>adverse</u> effect on any Regionally Significant Wetland or on any regionally significant wetland value"	•Implementation uncertain; means standard farming practices may be captured.
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Amend 12.4.2.1(c): "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 matter of discretion: "(o) <u>Effects on biological diversity and ecological values.</u> "	•Need to sustainably manage all wetlands not just those scheduled.

74 Rule 12.5.1.1 - Discharge of drainage water from any drain

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Amend 12.5.1.1(aa): " <u>Discharge is not to enter into and there is to be no change in the water level or hydrological function, or no damage to the indigenous flora, fauna or its habitat, in or on any regionally significant wetland value or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria.</u> "	•Need to sustainably manage all wetlands not just those scheduled.

75 Rule 12.5.2.1 - Discharge of drainage water - restricted discretionary activity

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Federated Farmers of New Zealand	29	Amend	Amend: "Any <u>adverse</u> effect on any Regionally Significant Wetland or on any regionally significant wetland value"	•Implementation uncertain; means standard farming practices may be captured.
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Amend 12.5.2.1(b): " <u>Discharge is not to enter into and there is to be no change in the water level or hydrological function, or no damage to the indigenous flora, fauna or its habitat, in or on any regionally significant wetland value or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria.</u> " Add new matter of discretion: "(n) <u>Effects on biological diversity and ecological values.</u> "	•Need to sustainably manage all wetlands not just those scheduled.

76 Rule 12.7.1.1 - Discharge of herbicide to water

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Lake Waiholo Waipori Wetlands Society Inc.	20	Amend	Amend to provide for control of terrestrial weed species within wetlands.	•Rule only relates to the control of aquatic plants, not terrestrial plants. •Many weeds within wetlands are terrestrial species (e.g. willow, elder).

77 Rule 12.7.1.2 - Discharge of pesticide, land-based discharge onto land

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Lake Waihola Waipori Wetlands Society Inc.	20	Amend	Wetland restorative works and weed control must be made simpler.	<ul style="list-style-type: none"> •Rule is confusing and makes wetland restorative efforts difficult to develop, plan and implement. •Weed control by herbicide application in wetlands is virtually impossible without short term effects on non-target species. •Weed control has positive effects on hydrology and sediment movement. Rule only looks at whether effects have occurred. People controlling weeds may be penalised for creating positive changes.
Department of Conservation	42	Amend	Amend: "(e) There is no change to the water level or hydrological function, or damage to the flora, <u>indigenous fauna</u> or its habitat, in or on any Regionally Significant Wetland."	<ul style="list-style-type: none"> •The discharge of pesticide may damage selected indigenous fauna.
Beaton family of Berwick	45	Amend	Amend to include some control on spraying, and spray drift.	<ul style="list-style-type: none"> •Have experienced people spraying planted trees (e.g., 25 years' old) along with willows. •Experience does not support the view that natural vegetation will regenerate by doing nothing after spraying.
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Amend: "(e) There is no change to the water level or hydrological function, or damage to the indigenous flora, fauna or its habitat, in or on any Regionally Significant Wetland."	<ul style="list-style-type: none"> •Chemicals will be used to kill pest plants; under rule currently worded, a consent would be required.

78 Rule 12.7.1.3 - Discharge of herbicide to air or land

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Lake Waihola Waipori Wetlands Society Inc.	20	Amend	Wetland restorative works and weed control must be made simpler.	<ul style="list-style-type: none"> •Rule is confusing and makes wetland restorative efforts difficult to develop, plan and implement. •Weed control by herbicide application in wetlands is virtually impossible without short term effects on non-target species. •Weed control has positive effects on hydrology and sediment movement. Rule only looks at whether effects have occurred. People controlling weeds may be penalised for creating positive changes.
Department of Conservation	42	Amend	Amend: "(e) There is no change to the water level or hydrological function, or damage to the flora, <u>indigenous fauna</u> or its habitat, in or on any Regionally Significant Wetland."	<ul style="list-style-type: none"> •The discharge of herbicide may damage selected indigenous flora.
Beaton family of Berwick	45	Amend	Amend to include some control on spraying, and spray drift.	<ul style="list-style-type: none"> •Have experienced people spraying planted trees (e.g., 25 years' old) along with willows. •Experience does not support the view that natural vegetation will regenerate by doing nothing after spraying.

79 Rule 12.7.1.4 - Discharge of pesticide, aerial discharge onto land

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Lake Waihola Waipori Wetlands Society Inc.	20	Amend	Wetland restorative works and weed control must be made simpler.	<ul style="list-style-type: none"> •Rule is confusing and makes wetland restorative efforts difficult to develop, plan and implement. •Weed control by herbicide application in wetlands is virtually impossible without short term effects on non-target species. •Weed control has positive effects on hydrology and sediment movement. Rule only looks at whether effects have occurred. People controlling weeds may be penalised for creating positive changes.
Department of Conservation	42	Amend	Amend: "(e) There is no change to the water level or hydrological function, or damage to the flora, <u>indigenous fauna</u> or its habitat, in or on any Regionally Significant Wetland."	<ul style="list-style-type: none"> •The discharge of pesticide may damage selected indigenous fauna.

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Beaton family of Berwick	45	Amend	Amend to include some control on spraying, and spray drift.	<ul style="list-style-type: none"> •Have experienced people spraying planted trees (e.g., 25 years' old) along with willows. •Experience does not support the view that natural vegetation will regenerate by doing nothing after spraying.

80 Rule 12.8.1.1 - Discharge of animal dip material

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Amend 12.8.1.1(k): "There is no change to the water level or hydrological function, or no damage to the <u>indigenous</u> flora <u>and</u> 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."	<ul style="list-style-type: none"> •Agricultural waste and fertiliser can be toxic to wetlands, and rule should cover more than just scheduled wetlands.

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

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Three Creeks Farm	19	Amend	If Te Hua Taki Wetland (Map F66, #171) is retained as a regionally significant wetland then provide that there are no setbacks from the wetland for the application of Farm Dairy Effluent.	<ul style="list-style-type: none"> •We have farmed alongside the wetland and in harmony with its values for a number of years, it is fenced and kept in its natural state. •Our cowshed and milking platform are close to the wetland. •Identifying the wetland as regionally significant may affect the integrity and functioning of our dairy farm effluent system.
Department of Conservation	42	Amend	Amend: "(c) The discharge occurs more than 50 metres from any surface water body, Regionally Significant Wetland, or mean high water springs:"	<ul style="list-style-type: none"> •The addition of nutrients directly to Regionally Significant Wetlands should be restrained, as it is highly likely to cause adverse effects. •Gives effect to NPS Freshwater Management.
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Amend 12.8.1.2(l): "There is no change to the water level or hydrological function, or no damage to the <u>indigenous</u> flora <u>and</u> 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."	<ul style="list-style-type: none"> •Agricultural waste and fertiliser can be toxic to wetlands, and rule should cover more than just scheduled wetlands.

82 Rule 12.8.1.3 - Discharge of contaminants collected in animal waste collection system not in Zone A of a Groundwater Protection Zone

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Department of Conservation	42	Amend	Amend: "(c) The discharge occurs more than 50 metres from any surface water body, Regionally Significant Wetland, or mean high water springs:"	<ul style="list-style-type: none"> •The addition of nutrients directly to Regionally Significant Wetlands should be restrained, as it is highly likely to cause adverse effects. •Gives effect to NPS Freshwater Management.
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Amend 12.8.1.3(l): "There is no change to the water level or hydrological function, or no damage to the <u>indigenous</u> flora <u>and</u> 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."	<ul style="list-style-type: none"> •Agricultural waste and fertiliser can be toxic to wetlands, and rule should cover more than just scheduled wetlands.

83 Rule 12.8.1.5 - Discharge of fertiliser onto production land where it may enter water

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Amend 12.8.1.5(c): "There is no change to the water level or hydrological function, or no damage to the <u>indigenous</u> flora <u>and</u> 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."	<ul style="list-style-type: none"> •Agricultural waste and fertiliser can be toxic to wetlands, and rule should cover more than just scheduled wetlands.

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

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Federated Farmers of New Zealand	29	Amend	Amend: "Any <u>adverse</u> effect on any Regionally Significant Wetland or on any regionally significant wetland value"	•Implementation uncertain; means standard farming practices may be captured.
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Amend (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> " Amend (a)(ii): "The natural character of any affected water body <u>and their margins.</u> " Add new matter of discretion: "(o) Any effects on biological diversity and ecological values."	•Need to sustainably manage all wetlands not just those scheduled.

85 Rule 12.9.1.1 - Discharge of water associated with down-hole pump testing

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Amend 12.9.1.1(a): "There is no change to the water level or hydrological function, or no damage to the <u>indigenous</u> flora <u>and</u> fauna or its habitat, in or on any Regionally Significant Wetland, <u>or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria.</u> " Add the following matters: " <u>(a) Effects on biological diversity and ecological values; and</u> <u>(b) There is no discharge to any surface water body including wetlands;</u> <u>and</u> <u>(c) Effects on the natural character of wetlands and their margins.</u> "	•Need to sustainably manage all wetlands not just those scheduled.

86 Rule 12.9.1.2 - Discharge of contaminants associated with drilling

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Amend 12.9.1.2(a): "There is no change to the water level or hydrological function, or no damage to the <u>indigenous</u> flora <u>and</u> fauna or its habitat, in or on any Regionally Significant Wetland, <u>or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria.</u> " Add the following matters: " <u>(a) Effects on biological diversity and ecological values; and</u> <u>(b) There is no discharge to any surface water body including wetlands;</u> <u>and</u> <u>(c) Effects on the natural character of wetlands and their margins.</u> "	•Need to sustainably manage all wetlands not just those scheduled.

87 Rule 12.9.2.1 - Discharge of water or contaminants associated with down-hole pump testing or drilling - restricted discretionary activity

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Federated Farmers of New Zealand	29	Amend	Amend: "Any <u>adverse</u> effect on any Regionally Significant Wetland or on any regionally significant wetland value"	•Implementation uncertain; means standard farming practices may be captured.

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Amend (b): "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> " Amend (a)(ii): "The natural character of any affected water body <u>and their margins.</u> " Add new matter of discretion: "(o) Any effects on biological diversity and ecological values."	•Need to sustainably manage all wetlands not just those scheduled.

88 Rule 12.10.1.1 - Discharge of any contaminant or water from a vessel

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Amend (a): "There is no discharge into or change the water level or hydrological function, or no damage to the <u>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.</u> "	•Current words do not provide Council with necessary control on potential adverse effects of contaminant discharge.

89 Rule 12.10.2.1 - Discharge of any contaminant or water from a vessel or from maintenance of vessel - restricted discretionary activity

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Amend (b): "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> " Amend (a)(ii): "The natural character of any affected water body <u>and their margins.</u> " Add new matter of discretion: "(m) Any effects on biological diversity and ecological values."	•Current words do not provide Council with necessary control on potential adverse effects of contaminant discharge.

90 Rule 12.11.2.1 - Discharge of sullage, cooling, drinking water supply reservoir, water supply pipeline or swimming pool water

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Amend 12.11.2.1(g): "There is no discharge into or change to the water level or hydrological function, or no damage to the <u>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.</u> "	•Need to sustainably manage all wetlands not just those scheduled.

91 Rule 12.11.2.2 - Discharge of water used for holding live organisms

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Amend 12.11.2.2(a): "There is no discharge into or change to the water level or hydrological function, or no damage to the <u>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.</u> "	•Need to sustainably manage all wetlands not just those scheduled.

92 Rule 12.11.2.3 - Discharge of any other water

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Amend 12.11.2.3(h): "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."	•Need to sustainably manage all wetlands not just those scheduled.

156 Chapter 12 general

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
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).	No reason given.
Treble Cone Investments Limited	2	Amend	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).	No reason given.
Treble Cone Investments Limited	2	Amend	Clarify Discharge of Water provisions to confirm that any discharge of water associated with a snowmaking system is a permitted activity.	No reason given.
Otago Fish & Game Council	8	Amend	Would like the proposed plan to signal the following as criterion within the rules: Resource consent fee relief to protect, create, or enhance wetlands.	•Resource consent fee relief is workable and proactive. •Creation/enhancement of a wetland should not have the same consent fees as an activity that will damage a wetland. •Current consent fees encourage non-compliance and illegal activity and discourage creation or enhancement of wetlands. •Also wants clarification how internal compliance/enforcement practices will change.
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.	No reason given.
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).	•Skifield operations have not been considered in the proposal, and are a vital part of the economy.
Cardrona Alpine Resort	15	Amend	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).	•Skifield operations have not been considered in the proposal, and are a vital part of the economy.
Cardrona Alpine Resort	15	Amend	Clarify Discharge of Water provisions to confirm that any discharge of water associated with a snowmaking system is a permitted activity.	•Skifield operations have not been considered in the proposal, and are a vital part of the economy.
Three Creeks Farm	19	Amend	If Te Hua Taki Wetland (Map F66, #171) is retained as a regionally significant wetland then provide that the taking of water from the wetland and taking of adjacent groundwater for stock, domestic and agricultural use is a permitted activity.	•Plan Change fails to provide for my economic wellbeing and that of the community around the affected area, as required by s 5 RMA. •We have farmed alongside the wetland and in harmony with its values for a number of years. •Our current water take is adjacent to the wetland.

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
D W Lyders	24	Did not specify	No decision requested.	•Concern that proposed rules will prevent or hamper the continuation of enhancement of Waipori/Waihola Wetland (by spraying willow, alders, gorse or by creation of ponds for wildlife) by requiring costly and time consuming consent.
Michael and Christine Holland	25	Amend	Want no changes to irrigation takes above the Waianakarua River Estuary Swamp (Map F65, #164).	•Do not want farming operation affected, wetland is already adequately protected by fencing.
Federated Farmers of New Zealand	29	Support	Supports the restructuring of wetland rules to make them more concise, clear and consistent.	No reason given.
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.	•Implementation uncertain; means standard farming practices may be captured.
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.	•Wetlands can be relocated and enhanced. •Concerned by hierarchy of avoid, followed by remedy or mitigate - not endorsed in RMA.
Transpower New Zealand Limited	37	Support	Retain the amendments to the discharge rules without further modification.	•With no structures within wetlands, there should be no need for Transpower to make any discharges.
Hawksbury Lagoon Inc	39	Amend	Default position on rules and policies should be a conserved wetland rather than create permitted activities (To keep faith with the objective to "avoid").	No reason given.
TrustPower Limited	40	Amend	Remove rules (or standards in rules) that seek to achieve no net change of any particular value(s).	•They do not enable compliance to be objectively assessed, and result in uncertainty over their application.
Department of Conservation	42	Support	For the following rules: 12.1.1A.1 - 12.1.1A.3; 12.1.2.4 - 12.1.2.6; 12.1.3.1; 12.2.1A.1; 12.2.1A.2, 12.2.2.5; 12.2.2.6; 12.2.2A.1; 12.2.3.1A; 12.2.3.2A; 12.2.3.4; 12.2.3.5; 12.2.4.1; 12.3.1A.1; 12.3.1A.2; 12.3.2.1 - 12.3.2.3; 12.3.3.1; 12.3.4.1; 12.4.1.1; 12.4.2.1; 12.5.1.1; 12.5.2.1; 12.7.1.1; 12.8.1.1; 12.8.1.5; 12.8.2.1; 12.9.1.1; 12.9.1.2; 12.10.1.1; 12.10.2.1; 12.11.2.1 - 12.11.2.3. Retain with no amendments.	•Consistent with Part 2 RMA. •Gives guidance when considering activities in wetlands. •Manages discharges, the damming and diversion of water in a manner that protects the habitat of indigenous fish. •Maintains groundwater and surface flows in a manner that protects the habitat of indigenous fish. •Gives effect to the NPS Freshwater Management.
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.	•Do not enable compliance to be objectively assessed. •Application is uncertain.
OtagoNet Joint Venture	43	Amend	Amend or delete rules (or standards in rules) associated with a high degree of subjectivity.	No reason given.
New Zealand Railways Corporation	46	Amend	Add to 12.3.3, 12.4.2, 12.5.2, 12.9.2 a criterion which recognises the importance of existing land transport networks, such as rail where these are currently located within regionally significant wetlands such as: "Any positive effect derived from the function of the structure and/or activity in this location" or similar. <i>NB: Amending Schedule 1 as set out as requested would largely achieve the same relief.</i>	•Criteria do not take into account location and importance of regionally (and nationally) important land transport networks which are, in places, incorporated within the new Regional Significant Wetland boundaries. •No balancing criteria, other than those in Part 2 RMA, which allow for the fixed location of land-based transport networks to be considered when they require replacement, or alteration along their current alignments.
New Zealand Railways Corporation	46	Amend	Add to 12.3.3, 12.4.2, 12.5.2, 12.9.2 a criterion to recognise that transport infrastructure is particularly important for enabling people and communities to provide for their social, economic, and cultural wellbeing and for their health and safety.	•Criteria do not take into account location and importance of regionally (and nationally) important land transport networks which are, in places, incorporated within the new Regional Significant Wetland boundaries. •No balancing criteria, other than those in Part 2 RMA, which allow for the fixed location of land-based transport networks to be considered when they require replacement, or alteration along their current alignments.

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

96 Rule 13.2.1.1 - Erection or placement of fence, pipe, line or cable over the bed

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Federated Farmers of New Zealand	29	Support	Adopt 13.2.1.1 as proposed.	<ul style="list-style-type: none"> •Supports continuing as permitted activity the activities covered by the rule. •Supports no requirement to fence wetlands.
Department of Conservation	42	Amend	Amend: "The erection or placement of any fence, pipe (<u>used solely for the carrying of domestic and/or stock water</u>), line or cable over the bed....."	<ul style="list-style-type: none"> •Current non-definition of pipes would allow erection or placement of "pipes" such as tile drains which could be used to take water from a wetland. •Gives effect to Part 2 RMA. •Gives effect to NPS Freshwater Management.
OtagoNet Joint Venture	43	Amend	Amend: "(h) The fence, pipe, line or cable is maintained in good repair <u>such that it does not present a hazard to persons or their property.</u> "	<ul style="list-style-type: none"> •High degree of subjectivity.
OtagoNet Joint Venture	43	Amend	Pipe, lines or cables should only be prevented from extending below the underside of a lawful structure if the lawful structure is within two metres of the 1 percent probability flood limit.	<ul style="list-style-type: none"> •Is uncertain of the purpose of 13.2.1.1(d).
OtagoNet Joint Venture	43	Amend	Amend: "(f) The fence, pipe, line or cable does not interfere with <u>established navigation routes; and</u> "	<ul style="list-style-type: none"> •Subjective and difficult to decipher regarding effects on wetlands.

97 Rule 13.2.1.2 - Erection or placement of pipe, line or cable on or under the bed

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Federated Farmers of New Zealand	29	Support	Adopt 13.2.1.2 as proposed.	<ul style="list-style-type: none"> •Supports continuing as permitted activity the activities covered by the rule.
Department of Conservation	42	Amend	Amend: "The erection or placement of any fence, pipe (<u>used solely for the carrying of domestic and/or stock water</u>), line or cable over the bed....."	<ul style="list-style-type: none"> •Current non-definition of pipes would allow erection or placement of "pipes" such as tile drains which could be used to take water from a wetland. •Gives effect to Part 2 RMA. •Gives effect to NPS Freshwater Management.
OtagoNet Joint Venture	43	Amend	Amend: "(c) The pipe, line or cable is maintained in good repair <u>such that it does not present a hazard to persons or their property.</u> "	<ul style="list-style-type: none"> •High degree of subjectivity.

99 Rule 13.2.1.5 - Erection or placement of maimai

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Federated Farmers of New Zealand	29	Amend	Amend: "...Is a permitted activity, providing that for the bed of any lake, river or <u>Regionally Significant Wetland</u> ..."	<ul style="list-style-type: none"> •Supports Council permitting erection or placement of maimai, whitebait stand or eel trap in/on Regionally Significant Wetland. •As written, interpretation is uncertain.
Beaton family of Berwick	45	Amend	Amend to reflect following position: "We think maimais should be temporary structures, particularly in some areas."	<ul style="list-style-type: none"> •Shooters and whitebaiters shouldn't be allowed to squat in wetland area.

100 Rule 13.2.1.6 - Erection or placement of whitebait stand or eel trap

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Federated Farmers of New Zealand	29	Amend	Amend: "...Is a permitted activity, providing that for the bed of any lake, river or <u>Regionally Significant Wetland</u> ..."	<ul style="list-style-type: none"> •Supports Council permitting erection or placement of maimai, whitebait stand or eel trap in/on Regionally Significant Wetland. •As written, interpretation is uncertain.

101 Rule 13.2.1.7 - Erection or placement of bridge, boardwalk or culvert

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	<p>Amend 13.2.1.7: <i>"The erection or placement of any bridge, boardwalk or culvert in, on or over the bed of a lake or river, or any Regionally Significant wetland is a permitted activity, providing:"</i></p> <p>Amend (b) to delete "boardwalk".</p> <p>Add the following permitted activity conditions: <i>"(a) The structure is not in a Regionally Significant Wetland or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria. (b) Effects on biological diversity and ecological values; and (c) Effects on the natural character of wetlands and their margins."</i></p> <p>Add a new rule: <i>"The erection or placement of any boardwalk in, on or over the bed of a lake or river, or any Regionally Significant Wetland, is a permitted activity, providing: (a) The boardwalk is for recreational or scientific purposes and its erection or placement, does not cause any flooding, nor cause any erosion of the bed or banks of a Regionally Significant Wetland, and (b) The site is left tidy following the erection or placement."</i></p>	<ul style="list-style-type: none"> •Permitted activity inappropriate for bridge or culvert as Council cannot control adverse effects on other wetlands - should be discretionary.. •Support boardwalks being permitted (if for recreation or science) - need separate rule to culverts/bridges.

103 Rule 13.2.2.1 - Erection or placement - restricted discretionary activity

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Federated Farmers of New Zealand	29	Amend	<p>Amend: <i>"Any <u>adverse effect</u> on any Regionally Significant Wetland or on any regionally significant wetland value"</i></p>	<ul style="list-style-type: none"> •Implementation uncertain; means standard farming practices may be captured.
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	<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): <i>"The natural character of any affected water body <u>and their margins.</u>"</i></p> <p>Add new matter of discretion: <i>"(m) Any effects on biological diversity and ecological values."</i></p>	<ul style="list-style-type: none"> •Current words do not provide Council with necessary control on potential adverse effects of contaminant discharge.

106 Rule 13.3.1.1 - Repair or maintenance of structure

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
OtagoNet Joint Venture	43	Support	Support.	•This should be permitted.

107 Rule 13.3.1.2 - Extension, alteration, replacement or reconstruction of structure

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
OtagoNet Joint Venture	43	Amend	<p>Amend: <i>"(a) In the case of a replacement or reconstruction, the structure is replaced or reconstructed in <u>approximately</u> the same location as the original structure; and"</i></p>	<ul style="list-style-type: none"> •To avoid minor re-locations unnecessarily needing consent.

108 Rule 13.3.2.1 - Extension, alteration, replacement or reconstruction of structure - restricted discretionary activity

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Federated Farmers of New Zealand	29	Amend	Amend: "Any <u>adverse</u> effect on any Regionally Significant Wetland or on any regionally significant wetland value"	•Implementation uncertain; means standard farming practices may be captured.
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Delete " or any Regional Significant " from the introduction to the rule. Amend (aa): "Any effect on any Regionally Significant Wetland or on any regionally significant wetland <u>that meets the significance criteria listed in Appendix XX Ecological Criteria; and</u> " Add new matter of discretion: "(m) Any effects on biological diversity and ecological values."	•Values for other wetlands should be assessed against best practice.

110 Rule 13.4.1.1 - Demolition or removal of a structure

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Delete " or any Regional Significant " from the introduction to the rule. Amend (f): "There is no change to the water level or hydrological function, or no and damage to the <u>indigenous</u> flora, fauna or its habitat, in or on any <u>Regional Significant Wetland</u> wetland is managed."	•Current words do not provide Council with necessary control on potential adverse effects of contaminant discharge.

111 Rule 13.4.2.1 - Demolition or removal of a structure - restricted discretionary activity

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Federated Farmers of New Zealand	29	Amend	Amend: "Any <u>adverse</u> effect on any Regionally Significant Wetland or on any regionally significant wetland value"	•Implementation uncertain; means standard farming practices may be captured.
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Delete " or any Regional Significant " from the introduction to the rule. Amend (aa): "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> " Amend (a)(ii): "The natural character of any affected water body <u>and their margins</u> " Add new matter of discretion: "(m) Any effects on biological diversity and ecological values."	•Current words do not provide Council with necessary control on potential adverse effects of contaminant discharge.

114 Rule 13.5.1.1 - Disturbance of the bed general

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Amend (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 <u>indigenous</u> flora, fauna or its habitat, in or on any <u>Regional Significant Wetland, or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria</u> " Amend 13.5.1.1(f) as follows: "...of sediment to the lake, river or wetland..."	•Current words do not provide Council with necessary control on potential adverse effects of contaminant discharge.

116 Rule 13.5.1.5A - Alteration of Regionally Significant Wetland associated with plant material

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
TrustPower Limited	40	Support	Supports this rule.	No reason given.
Beaton family of Berwick	45	Amend	Amend to provide for some hump and hollow modification to allow some planting to take place out of the water.	<ul style="list-style-type: none"> •Many of the plants put in to wet soil have died. •Natural wetland would have mix of firmer ground, mainly next to channels, with interfluvial swamps between. •E.g. Titiri wetland has been modified by farming and abandoned. Natural soil conditions may need to be reinstated before successful diverse vegetation may be reinstated.

117 Rule 13.5.1.6 - Extraction of alluvium

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
TrustPower Limited	40	Support	Supports this rule.	No reason given.

118 Rule 13.5.1.8 - Disturbance by livestock

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Otago Fish & Game Council	8	Amend	Remove the word "conspicuous" 13.5.1.8(b) unless guidance can be given on what constitutes "conspicuous".	<ul style="list-style-type: none"> •All stock use of waterway or wetland margins will cause pugging and erosion and the proposed plan offers no guidance on this.
Lake Waihola Waipori Wetlands Society Inc.	20	Amend	Amend to encourage farmers not to graze wetlands and to encourage options for protection.	<ul style="list-style-type: none"> •Stock in wetlands will damage native species - counter to goal of protecting wetland values. •Rule sets threshold only when grazing severely damages the wetland, and could result in debate over levels of damage.
Gavan James Herlihy	22	Amend	Need greater clarity to what is "conspicuous" in 13.5.1.8(b)	<ul style="list-style-type: none"> •Unclear as to whether stock will be able to still run on the Upper Taieri River Flats.
Gavan James Herlihy	22	Amend	13.5.1.8(d) needs greater clarity or higher threshold as to what constitutes "damage".	<ul style="list-style-type: none"> •Literal interpretation could exclude all stock any time, as any grazing will do some damage.
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	<p>Delete "or any Regionally Significant" from the introduction to the rule.</p> <p>Delete permitted condition (d).</p> <p>Amend (e): <i>"The activity does not significantly disturb adversely affect indigenous..."</i></p> <p>Add new condition: <i>"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."</i></p>	<ul style="list-style-type: none"> •Grazing degrades wetlands, and is inconsistent with sustainable management and protection of wetlands; should not rely on permitted rule. •Regionally significant wetlands should be fenced.
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.	<ul style="list-style-type: none"> •Unreasonable for the public to be responsible for observing detrimental effects on the environment (neither time nor money), nor the DOC or ORC (neither manpower or budget). •Farmers can't be expected to self-police their activities when it results in financial benefits/costs. •Rule may be grumbled about but accepted, whereas community pressure for selfless/environmental actions from farmers only results in fracturing a community into conservationists and land developers.

119 Rule 13.5.2.1 - Extraction of alluvium - restricted discretionary activity

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Federated Farmers of New Zealand	29	Amend	<p>Amend:</p> <p><i>"Any adverse effect on any Regionally Significant Wetland or on any regionally significant wetland value"</i></p>	<ul style="list-style-type: none"> •Implementation uncertain; means standard farming practices may be captured.

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Delete " <i>or any Regionally Significant</i> " from the introduction to the rule 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> Amend (a)(ii): <i>"The natural character of any affected water body <u>and their margins</u>"</i> Add new matter of discretion: <i>"(m) Any effects on biological diversity and ecological values."</i>	•Current words do not provide Council with necessary control on potential adverse effects of contaminant discharge.

120 Rule 13.5.3.2 - Alteration of Regionally Significant Wetland - discretionary activity

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Gavan James Herlihy	22	Support	New drains should require consent.	No reason given.
Federated Farmers of New Zealand	29	Support	Adopt 13.5.3.2 as proposed.	No reason given.
TrustPower Limited	40	Support	Supports this rule.	No reason given.

121 Rule 13.6.1.1 - Introduction of pest plants general

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
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.	•These species are invasive and have negative impacts on wetlands.
Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou, and Hokonui Runanga	38	Support	Supports addition of regionally significant wetlands to this provision.	No reason given.
Department of Conservation	42	Amend	Amend: <i>"The introduction of material of the following species: (i) Lagarosiphon (Lagarosiphon major); or (ii) Eel Grass (Vallisneria spiralis); or (xi) Glyceria species (xii) Alder (Alnus) species: (xiii) Crack willow; (xiv) Gray willow. To the bed of any Otago Lake...."</i>	•The 4 species proposed for inclusion have potential to adversely effect Regionally Significant Wetlands and/or Regionally Significant Wetland Values. •Amendment is consistent with Part 2 RMA. •Amendment gives effect to NPS Freshwater Management.
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Amend: <i>"...to the bed or water of any Otago lakes, river or any Regionally Significant Wetland, is a prohibited activity for which no resource consent will be granted."</i> Add the following species: <i>Glyceria species Alder (Alnus species) Crack Willow Gray Willow</i>	•Inappropriate to prohibit in Regionally Significant Wetlands only.

122 Rule 13.6.2.0 - Introduction or planting of New Zealand native plant

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Lake Waihola Waipori Wetlands Society Inc.	20	Support	Supports rule in principle.	Allows for planting of native species in wetlands without resource consent being required
Federated Farmers of New Zealand	29	Support	Adopt 13.6.2.0 as proposed.	No reason given.

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Clutha District Council	34	Amend	Either: • Restrict native plants to wetland species which are native to the area; or • 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".	•Rule allows planting of any native plant, and some native plants can be inappropriate in wetlands (e.g., non-wetland species which could be invasive or encourage succession away from wetland species, or non-local genetic stock).
Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou, and Hokonui Runanga	38	Support	Supports addition: "The introduction or planting of any New Zealand native plant to any Regionally Significant Wetland, is a permitted activity providing: (a) . . ."	•May assist in the future restoration of wetlands.
TrustPower Limited	40	Support	Supports this rule.	No reason given.
Beaton family of Berwick	45	Amend	Amend to provide for some hump and hollow modification to allow some planting to take place out of the water.	•Many of the plants put in to wet soil have died. •Natural wetland would have mix of firmer ground, mainly next to channels, with interfluvial swamps between. •E.g. Titiri wetland has been modified by farming and abandoned. Natural soil conditions may need to be reinstated before successful diverse vegetation may be reinstated.
Beaton family of Berwick	45	Amend	A schedule of species suitable next to rivers might be appropriate.	•Planting next to a river would need to take into account requirements for flood river flow [13.6.2.0(b)], therefore permitted planting of any native wouldn't necessarily apply.
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Add the following permitted rule condition: "All plants and seeds are eco-sourced and appropriate for the specific wetland ecosystem."	•Wetland restoration would be enhanced if permitted plants were eco-sourced (native plants from local seed sources) and appropriate for wetland ecosystem.

123 Rule 13.6.3.1 - Introduction or planting of vegetation - discretionary activity

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Amend: "...or any Regional Significant Wetland or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria..."	•Current words do not provide Council with necessary control on potential adverse effects of contaminant discharge.

124 Rule 13.7.1.2 - Removal or clearance of exotic plant material

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
William Thomas Begg	17	Amend	If Stirling Marsh Complex is retained as a Regionally Significant Wetland then provide for the harvesting of exotic species occurring in the wetland as a permitted activity.	•Part of the wetland area on my property is planted in poplar trees for timber. •Plan Change fails to provide for my economic wellbeing and that of the surrounding community (required by s 5 RMA).
Federated Farmers of New Zealand	29	Support	Adopt 13.7.1.2 as proposed.	No reason given.
TrustPower Limited	40	Support	Supports this rule.	No reason given.
Department of Conservation	42	Amend	Amend: "(c) The wetland alteration is limited to that which is necessary, <u>the use of best practice methods</u> , for the removal or clearance of the plant material."	•Amendment sought so that the removal or clearance of exotic plant material cannot be used as a pretext to damage Regionally Significant Wetlands or Regionally Significant Wetland Values.
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Amend: "The removal or clearance...Regional-Significant <u>wetlands</u> , is a permitted activity providing:" Add the following condition: "Damage to indigenous flora and habitats or indigenous fauna managed."	•Current words do not provide Council with necessary control on potential adverse effects of contaminant discharge.

125 Rule 13.7.2.1 - Removal of pest plants - controlled activity

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Lake Waihola Waipori Wetlands Society Inc.	20	Amend	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> .	•Makes consent always be granted for the removal of these species.
TrustPower Limited	40	Support	Supports this rule.	No reason given.
Department of Conservation	42	Amend	Amend: <i>"Except as provided for by Rules 13.7.1.1..... (i) Lagarosiphon (Lagarosiphon major); or (ii) Eel Grass (Vallisneria spiralis); or (xv) Glyceria species (xvi) Alder (Alnus) species; (xvii) Crack willow; (xviii) Gray willow, from the bed of any lake or river, or from....."</i>	•The 4 species proposed for inclusion have potential to adversely effect Regionally Significant Wetlands and/or Regionally Significant Wetland Values. •Amendment is consistent with Part 2 RMA. •Amendment gives effect to NPS Freshwater Management.
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Amend: <i>"...from the bed of any lake or river, or any Regional Significant wetland, is a ..."</i> <i>Add the following species: "Glyceria species Alder (Alnus species) Crack Willow Gray Willow Alder (Alnus species) Crack Willow Gray Willow"</i>	•Support removal of all weeds from wetlands.

126 Rule 13.7.3.1 - Removal or clearance of plant material - discretionary activity

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
TrustPower Limited	40	Support	Supports this rule.	No reason given.
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Add the word exotic: <i>"Unless covered by Rules 13.7.1.1 to 13.7.2.1, removal or clearance of exotic plant material from any Regionally Significant Wetland, is a discretionary activity."</i>	•Agrees may be a need for discretionary consents for some removal of exotic species from significant wetlands, but removal of indigenous vegetation should be avoided and should be non-complying.

155 Chapter 13 general

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
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: •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).	No reason given.
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.	No reason given.

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Otago Fish & Game Council	8	Amend	Would like the proposed plan to signal the following as criterion within the rules: Resource consent fee relief to protect, create, or enhance wetlands.	<ul style="list-style-type: none"> •Resource consent fee relief is workable and proactive. •Creation/enhancement of a wetland should not have the same consent fees as an activity that will damage a wetland. •Current consent fees encourage non-compliance and illegal activity and discourage creation or enhancement of wetlands. •Also wants clarification how internal compliance/enforcement practices will change.
Cardrona Alpine Resort	15	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"> •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).	<ul style="list-style-type: none"> •Skifield operations have not been considered in the proposal, and are a vital part of the economy.
Three Creeks Farm	19	Amend	If Te Hua Taki Wetland (Map F66, #171) is retained as a regionally significant wetland then provide that there are no arbitrary setbacks on structures or buildings occurring on or near the wetland.	<ul style="list-style-type: none"> •Plan Change fails to provide for my economic wellbeing and that of the community around the affected area, as required by s 5 RMA. •We have farmed alongside the wetland and in harmony with its values for a SUB NUMBER of years. •Our cowshed and milking platform are close to the wetland.
D W Lyders	24	Did not specify	No decision requested.	<ul style="list-style-type: none"> •Concern that proposed rules will prevent or hamper the continuation of enhancement of Waipori/Waiholo Wetland (by spraying willow, alders, gorse or by creation of ponds for wildlife) by requiring costly and time consuming consent.
Michael and Christine Holland	25	Amend	Want no changes to land use adjacent to the Waianakarua River Estuary Swamp (Map F65, #164).	<ul style="list-style-type: none"> •Do not want farming operation affected, wetland is already adequately protected by fencing.
Federated Farmers of New Zealand	29	Support	Supports the restructuring of wetland rules to make them more concise, clear and consistent.	No reason given.
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.	<ul style="list-style-type: none"> •Implementation uncertain; means standard farming practices may be captured.
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.	<ul style="list-style-type: none"> •Wetlands can be relocated and enhanced. •Concerned by hierarchy of avoid, followed by remedy or mitigate - not endorsed in RMA.
Contact Energy Limited	30	Amend	That controls on the use of the beds of wetlands are not duplicated by the Regional and District Plans.	<ul style="list-style-type: none"> •Queries Chapter 13 rules applying to wetlands. •Especially relevant to Central Otago District Plan.
Clutha District Council	34	Support	Strongly support the addition of Regionally Significant Wetlands into existing rules controlling activities in lake and river beds.	<ul style="list-style-type: none"> •Addresses existing gap between Regional Council and Territorial Authority functions, which allowed significant impacts on wetlands from activities such as the erection of structures, disturbance, planting and vegetation removal.
Transpower New Zealand Limited	37	Amend	Provide for the "use" of existing structures in Rule 13.1.1.1 by including after the words "any lake or river" the word "or any Regionally Significant Wetlands".	<ul style="list-style-type: none"> •It is important to clearly sanction the operation of existing lawfully established structures in or over wetlands. •Not including wetlands in this rule creates uncertainty (when they are included in other rules - e.g. 13.2, 13.3).
Transpower New Zealand Limited	37	Support	Retain rules 13.2 to 13.7 without further modification.	<ul style="list-style-type: none"> •Vegetation trimming undertaken to protect lines, not included in "removal and clearance of vegetation". •Electricity (Hazards from Trees) Regulations 2003 and NES Electricity Transmission Activities 2009 are relevant to vegetation control. •Not immediate issue as wetlands generally have low growing plants.
Transpower New Zealand Limited	37	Amend	In relation to Rules 13.7.1.2, 13.7.2.1 and 13.7.3.1: Further consideration required in terms of adequate provision provided for vegetation removal around transmission lines.	<ul style="list-style-type: none"> •Vegetation trimming undertaken to protect lines, not included in "removal and clearance of vegetation". •Electricity (Hazards from Trees) Regulations 2003 and NES Electricity Transmission Activities 2009 are relevant to vegetation control. •Not immediate issue as wetlands generally have low growing plants.
Hawksbury Lagoon Inc	39	Amend	Default position on rules and policies should be a conserved wetland rather than create permitted activities (To keep faith with the objective to "avoid").	No reason given.

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
TrustPower Limited	40	Amend	Remove rules (or standards in rules) that seek to achieve no net change of any particular value(s).	•They do not enable compliance to be objectively assessed, and result in uncertainty over their application.
Department of Conservation	42	Amend	<p>Adopt new Rule 13.7.2.1A in full and apply only to the proposed extensions to:</p> <ul style="list-style-type: none"> • the Upper Taieri Wetlands Complex as contained and described (on maps 22-28) in Appendix 2 of this submission, and • the map describing the extent of the Ida Valley Kettle Holes as contained and described in Appendix 3 of this submission. <p><u>"13.7.2.1A: Permitted activity: No resource consent required</u></p> <p><u>13.7.2.1A The removal of vegetation by haying from both the proposed extensions to the Upper Taieri Wetlands Complex (as contained in Appendix 2) and the Ida Valley Kettle Holes (as contained in Appendix 3) is a permitted activity providing:</u></p> <p><u>(a) The wetland alteration is limited to that necessary for the removal of hay material.</u></p> <p><u>(b) All reasonable steps are taken to minimise the release of sediment to the wetland during haying and there is no conspicuous change in colour or visual clarity of the water body."</u></p>	<ul style="list-style-type: none"> •These areas of the Upper Taieri Wetland Complex act as buffer zones for the wetland. •Ida Valley Kettle Holes are collectively significant. •Regionally Significant Wetland Values of both these areas are not threatened by vegetation removal such as haying.
Department of Conservation	42	Support	<p>For the following rules: 13.2.1.4 - 13.2.1.8; 13.2.2.1; 13.2.3.1; 13.3.1.1; 13.3.1.2; 13.3.2.1; 13.4.1.1; 13.4.2.1; 13.5.1.1; 13.5.1.3; 13.5.1.5A; 13.5.1.6; 13.5.1.8; 13.5.2.1; 13.5.3.2; 13.6.2.0; 13.6.3.1 and 13.7.3.1.</p> <p>Retain with no amendments.</p>	<ul style="list-style-type: none"> •Consistent with Part 2 RMA. •Gives Regionally Significant Wetlands the same recognition as the region's rivers and lakes •Protects wetland flora •Enables the maintenance and restoration of regionally significant wetlands. •Gives effect to NPS Freshwater Management.
OtagoNet Joint Venture	43	Oppose	Generally opposes proposed permitted activity rules.	•Superfluous resource consents are likely to be required under proposed provisions. Could impede OtagoNet's operations and risk the security of it's network.
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.	<ul style="list-style-type: none"> •Do not enable compliance to be objectively assessed. •Application is uncertain.
OtagoNet Joint Venture	43	Amend	Amend or delete rules (or standards in rules) associated with a high degree of subjectivity.	No reasons given.
New Zealand Railways Corporation	46	Amend	<p>Add to 13.2.2, 13.3.2, 13.4.2, and 13.5.2 a criterion which recognises the importance of existing land transport networks, such as rail where these are currently located within regionally significant wetlands such as:</p> <p><i>"Any positive effect derived from the function of the structure and/or activity in this location" or similar.</i></p> <p><i>NB: Amending Schedule 1 as set out as requested would largely achieve the same relief.</i></p>	<ul style="list-style-type: none"> •Criteria do not take into account location and importance of regionally (and nationally) important land transport networks which are, in places, incorporated within the new Regional Significant Wetland boundaries. •No balancing criteria, other than those in Part 2 RMA, which allow for the fixed location of land-based transport networks to be considered when they require replacement, or alteration along their current alignments.
New Zealand Railways Corporation	46	Amend	Add to 13.2.2, 13.3.2, 13.4.2, and 13.5.2 a criterion to recognise that transport infrastructure is particularly important for enabling people and communities to provide for their social, economic, and cultural wellbeing and for their health and safety.	<ul style="list-style-type: none"> •Criteria do not take into account location and importance of regionally (and nationally) important land transport networks which are, in places, incorporated within the new Regional Significant Wetland boundaries. •No balancing criteria, other than those in Part 2 RMA, which allow for the fixed location of land-based transport networks to be considered when they require replacement, or alteration along their current alignments.

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
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, or any Regionally Significant Wetland is a permitted activity, providing:"</i> Add the following permitted activity conditions: <i>"(a) The structure is not in a Regionally Significant Wetland or any wetland that meets the significance criteria listed in Appendix XX Ecological Criteria.</i> <i>(b) Effects on biological diversity and ecological values; and</i> <i>(c) Effects on the natural character of wetlands and their margins."</i>	<ul style="list-style-type: none"> Fences shouldn't be erected in wetlands as animals tend to congregate along them, and regionally significant wetlands shouldn't be grazed. Digging of wetlands for pipe, line and cable placement can cause irreversible damage. Erection of structures over wetlands can adversely affect them.
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Add new non-complying rule: <i>"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."</i>	<ul style="list-style-type: none"> Removal of indigenous vegetation should be avoided and should be non-complying.

Protection general

157 Drain maintenance

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Three Creeks Farm	19	Amend	If Te Hua Taki Wetland (Map F66, #171) is retained as a regionally significant wetland then: <ul style="list-style-type: none"> Provide for the maintenance of existing drains into and out of the wetland as a permitted activity. If consents are required include a non notification clause, include the consents as a controlled activity, that there is no fee on the consent. 	<ul style="list-style-type: none"> Drains in and out of the wetland need regular maintenance, which is an important part of how the wetland currently functions. Getting consent for drain maintenance will have a significant effect on my farming operation (cost and uncertainty). Plan Change fails to provide for my economic wellbeing and that of the community around the affected area, as required by s 5 RMA.
Gavan James Herlihy	22	Amend	Maintenance of existing drains to be a permitted activity.	No reason given.
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.	<ul style="list-style-type: none"> Ditches need to be safe so the stock can graze grazeable land above the wetland.

161 Protection general

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Treble Cone Investments Limited	2	Amend	Specific note should be made in assessment criteria and background as to the substantial positive effects created by Snowmaking Systems and the water use associated with these systems.	No reason given.
SH Andrews and Sons Ltd	7	Amend	Honour ORC staff assurances given at public meetings that existing farm practises continue within the new boundary.	<ul style="list-style-type: none"> Would have accepted proposed changes when assured that current farming practices could continue. Assurances incorrect with maintenance of drains and oversowing of clover seed now requiring consent.
Cardrona Alpine Resort	15	Amend	Specific note should be made in assessment criteria and background as to the substantial positive effects created by Snowmaking Systems and the water use associated with these systems.	<ul style="list-style-type: none"> Skifield operations have not been considered in the proposal, and are a vital part of the economy.
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.	<ul style="list-style-type: none"> Wetlands can be relocated and enhanced. Concerned by hierarchy of avoid, followed by remedy or mitigate - not endorsed in RMA.
TrustPower Limited	40	Amend	Establish Management Zone for the Waipori Hydro Scheme and the Loch Luella and Loch Loudon Fen Complexes which recognises and provides for the 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 jointly developed by submitter and Council].	<ul style="list-style-type: none"> Waipori Hydro Scheme is a key electricity generating asset for the region which warrants protection under policy B of NPS Renewable Energy Generation. Plan Change 2 has the potential to unduly compromise its operating regime and future consenting requirements, which does not meet sustainable management.

162 Generic permitted activity condition for wetlands protection

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Federated Farmers of New Zealand	29	Amend	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.	<ul style="list-style-type: none"> •Since other provisions control water in Regionally Significant Wetlands and wetlands are mapped, unsure of need for condition. •Concerned that implementation of rule is uncertain near mapped areas.
Meridian Energy Limited	32	Amend	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	<ul style="list-style-type: none"> •Condition doesn't provide certainty to enable compliance to be objectively assessed (e.g., take of water affecting hydrological function or damaging habitat requires subjective analysis and not suitable as a permitted activity).
Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou, and Hokonui Runanga	38	Support	Support the addition throughout the Plan of: "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."	<ul style="list-style-type: none"> •Note, want independent assessment to determine whether there are changes to regionally significant wetlands. •Want clarification on how an assessment would be done, who would do it, and whether the causes of these changes can be established. •Risk that cumulative effects are missed, and only marked changes are picked up.
Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou, and Hokonui Runanga	38	Oppose	Do not support the permissive nature of this change to the plan as in many places within the plan this provision: "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." has replaced the following provisions as a permitted activity: "The water is not taken from any wetlands identified in Schedule 9 or any wetland higher than 800 metres above sea level; and" or "The discharge is not to any wetland identified in Schedule 9"	<ul style="list-style-type: none"> •Proposed changes reduce the protection of regionally significant wetlands.
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: "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."	<ul style="list-style-type: none"> •There are now activities permitted within Regionally Significant Wetlands that may have a permanent impact.
TrustPower Limited	40	Amend	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. 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.	<ul style="list-style-type: none"> •Does not enable compliance to be objectively assessed, resulting in uncertainty in application of this standard.
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."	<ul style="list-style-type: none"> •Does not enable compliance to be objectively assessed. •Precludes any development in a Regionally Significant Wetland without consent. •Inconsistent with s 5(2) RMA. •Extends protection for flora and fauna beyond s 6(c) RMA.

Financial contributions

10 Financial contributions policy (Policy 10.4.2A and Ch.17)

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Otago Fish & Game Council	8	Support	Support for 10.4.2A	No reason given.
Federated Farmers of New Zealand	29	Oppose	Opposes in part 10.4.2A and the Introduction to Chapter 17 in part.	No reason given.
Contact Energy Limited	30	Amend	That the new policy 10.4.2A on financial contributions be amended to clarify that not every effect not avoided, remedied or mitigated is required to be addressed by way of financial contribution for environmental compensation, but only those residual effects above a certain threshold - being more than minor effects. Appropriate clarification of the circumstances, purpose and method of determining the contribution amount should also be provided.	<ul style="list-style-type: none"> •Not every effect needs to be addressed. •The policy implies a "no net loss" approach, which is not taken in RMA.
Meridian Energy Limited	32	Amend	Amend the sixth paragraph of Section 17.1: <i>"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."</i>	<ul style="list-style-type: none"> •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.
Clutha District Council	34	Support	Supports the use of financial contributions to offset adverse effects	•Can help ensure the best environmental outcome.
Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou, and Hokonui Runanga	38	Amend	Amend policy 10.4.2A: <i>"Where the avoidance, remedy or mitigation of adverse effects is not possible (agreed upon by stakeholders including nga Runanga), financial contribution may be required to: (a) Restore or rehabilitate regionally significant wetlands or regionally significant values where those have been degraded; and (b) Restore or rehabilitate regionally significant wetlands or regionally significant values where those have been lost."</i>	<ul style="list-style-type: none"> •Want clarity on the process for triggering the mitigation listed in policy 10.4.2A. Nga Runanga as kaitiaki should be consulted before a decision is reached that mitigation of adverse effects is not possible. •Seeks to focus on improving wetlands rather than just restoring them to their past state. •Seeks to achieve the outcomes using all resources available to stakeholders.
TrustPower Limited	40	Amend	Include more specific guidelines as to how a financial contribution may be constructively applied.	<ul style="list-style-type: none"> •Generally supports the intent of this policy in terms of offsetting adverse environmental effects. •Would be helpful to plan users.
Department of Conservation	42	Support	Retain policy 10.4.2A with no amendments.	<ul style="list-style-type: none"> •Consistent with Part 2 RMA. •Gives guidance when considering activities in wetlands. •Maintains flows in streams sourced from wetlands which protects habitat of indigenous threatened fish. •Gives effect to the NPS Freshwater Management.
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Delete policy 10.4.2A.	<ul style="list-style-type: none"> •Financial contributions inappropriate given large-scale loss or modification of wetlands, and inconsistent with Part 2 RMA and NPS Freshwater. •Assessment criteria inadequate to assess viability in any offsetting.

165 Financial contributions rules

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Meridian Energy Limited	32	Amend	Delete clause regarding the consideration of the need for a financial contribution and replace with: <i>"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."</i>	<ul style="list-style-type: none"> •Should more accurately reflect Policy 10.4.2A. •Note: Relevant to Rules 12.1.4.8, 12.2.3.4, 12.3.3.1, 12.4.2.1, 12.5.2.1, 13.2.2.1, 13.3.2.1
TrustPower Limited	40	Amend	The proposed rules should guide financial contributions only where they are necessary, such as when adverse effects cannot be avoided, remedied or mitigated to ensure they have tangible benefits.	No reason given.

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
TrustPower Limited	40	Amend	<p>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.</p> <p>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"</p> <p>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."</p>	No reason given.
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Delete all provisions for financial contributions for regionally significant wetlands and values in all rules.	<ul style="list-style-type: none"> •Financial contributions inappropriate given large-scale loss or modification of wetlands, and inconsistent with Part 2 RMA and NPS Freshwater Management. •Assessment criteria inadequate to assess viability in any offsetting.

Part 3: Schedules and maps

Schedule 9 general

200 Schedule 9

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Otago Fish & Game Council	8	Support	Welcomes the addition of many of the wetlands from the former Schedule 9 into Schedule 10.	<ul style="list-style-type: none"> •No reason given. •Notes that approx. 1/3 of the wetlands in Schedule 10 now receive no protection or identification under this plan.
The Yellow-eyed Penguin Trust	26	Support	Commends the addition of 24 new wetlands.	No reason given.
The Yellow-eyed Penguin Trust	26	Amend	Inclusion in Schedule 9 of Tavora Wetland at Bobbys Head.	<ul style="list-style-type: none"> •Wetland has been restored to improve wetland function. •Council has funded signs on wetland and vegetation - it gets lots of visitors, wetland is important for public education. •Notes the plan change offers little protection for "lesser" wetlands, which may be equally important in the wider scheme.
Otago Conservation Board	27	Support	Strongly supports the addition of new wetlands to the list of protected wetlands.	No reason given.
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.	<ul style="list-style-type: none"> •Applying for consent for normal farming activities that have little/no effect on wetland values is unfair for landowners of inaccurately identified wetland areas. •Insufficient consultation
Contact Energy Limited	30	Oppose	That Schedule 9 be not approved.	<ul style="list-style-type: none"> •Process classifying the wetlands as regionally significant was not robust, had low level of investigation and assessment, which is not justified with the restrictive objectives and policies.
Contact Energy Limited	30	Amend	Clarify statement "Schedule 9 is not exhaustive" and make it explicit in order to provide certainty.	<ul style="list-style-type: none"> •Meaning of this is not clear. •Additional wetlands cannot be added to the Schedule without a formal plan change process.
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.	<ul style="list-style-type: none"> •No reason given.
Gregory Kerr	35	Amend	Pleasing to see local wetlands included and expanded in Proposed Plan Change. May be better to regard them as one 'complex', interconnected to each other and to the sea - the salt marsh system of the Waikouaiti River Estuary / Hawksbury Lagoon.	<ul style="list-style-type: none"> •Vital link with lifecycles of species.
Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou, and Hokonui Runanga	38	Amend	Nga Runanga need to know that the wetlands in Schedule 9 - regionally significant wetlands include all wetlands significant to them. If not there needs to be a process or a mechanism to achieve this.	<ul style="list-style-type: none"> •Added protection for wetlands is irrelevant if wetlands that are wahi taonga are not in Schedule 9.
Department of Conservation	42	Amend	Include Ida Valley Kettle Holes in Schedule 9 and the F-Series Maps	<ul style="list-style-type: none"> •Wetland contains Regionally Significant Wetland Values •Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
Department of Conservation	42	Amend	Include current Schedule 10 wetland Silver Peak Swamp (Schedule 10, #80) in Schedule 9.	<ul style="list-style-type: none"> •Contains Regionally Significant Wetland Values •Consistent with Part 2 RMA, NPS Freshwater Management, and reflects ORC's functions under s 30 RMA.
Department of Conservation	42	Amend	Include current Schedule 10 wetland Upper Waipahi River Swamp (Schedule 10, #99) in Schedule 9.	<ul style="list-style-type: none"> •Contains Regionally Significant Wetland Values •Consistent with Part 2 RMA, NPS Freshwater Management, and reflects ORC's functions under s 30 RMA.
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Additional Wetland to be added to Schedule 9: Daphne Tarwood Peat Dome G46 325178	<ul style="list-style-type: none"> •Welcomes the plan change proposal to add many of the wetlands in Schedule 10, plus 24 newly identified wetlands to Schedule 9. •Wetland dominated by characteristic bog plants and contains threatened species Coprosma elatirioides. •See image in the original submission.

Mapping of Schedule 9 wetlands general

199 Mapping of Schedule 9 wetlands general

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Otago Fish & Game Council	8	Amend	Place detailed aerial photograph-based maps with cadastral boundaries of wetlands overlaid alongside the topographical maps within this plan.	<ul style="list-style-type: none"> •Maps do not show level of detail needed to assess effect of changes, or to give effect to the proposed plan. •Maps in the Wetland Inventory will not be sufficient as it doesn't have legal force.
Waitaki District Council	14	Support	Support the refined mapping for Schedule 9 wetlands.	<ul style="list-style-type: none"> •Will assist in determining compliance with Waitaki DC's Rural Zone Site Development Standard 4.4.7.
The Yellow-eyed Penguin Trust	26	Support	Commends more accurate definition of wetland areas.	No reason given.
Otago Conservation Board	27	Amend	Detailed maps and their base aerial photographs should be used in the new Schedule.	<ul style="list-style-type: none"> •Wetlands are often small areas with complicated boundaries •1:50,000 maps inadequate
Contact Energy Limited	30	Support	Supports all wetlands classified as Regionally Significant being accurately plotted/mapped before inclusion in the Regional Plan.	No reason given.
New Zealand Railways Corporation	46	Amend	a.) All proposed maps to remove railways corridor(s) from regionally significant wetland areas; or b.) All proposed maps to ensure that rail formation 'above' the permanent regionally significant wetland areas are not subject to Plan Change 2	No reason given.
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	All regionally significant wetlands, including those above 800m be mapped using detailed current aerial photographs and cadastral boundaries.	<ul style="list-style-type: none"> •Topographical maps inadequate to delineate wetlands and ensure adequate buffer margins. •Current aerial photographs important for rule understanding and enforcement.

Schedule 10 and non-Regionally Significant Wetlands

600 Schedule 10 and non-Regionally Significant Wetlands

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Save the Otago Peninsula Inc Society	21	Oppose	Oppose the deletion of Schedule 10.	<ul style="list-style-type: none"> •Deletion of Schedule 10 would contribute to the loss and degradation of small wetlands. •Some small wetlands on the Otago Peninsula are collectively very important as habitat for wading birds - they are gradually being drained and filled. •Wetlands at the head of Papanui Inlet were once on the Wetland of Ecological and National Importance database, and are now almost non-existent.
Save the Otago Peninsula Inc Society	21	Amend	Raupo swamp at Otakou provides example of a small wetland that should be considered for recognition in Schedule 10.	<ul style="list-style-type: none"> •Has ecological value, and is significant locally, but maybe not regionally. •Tomahawk Lagoon is the only other site for raupo on the Otago Peninsula.
Save the Otago Peninsula Inc Society	21	Amend	Include schedule of locally important wetlands in the Water Plan.	No reasons given.
Otago Conservation Board	27	Amend	Schedule 10 areas which are not going to be added into Schedule 9 should be re-evaluated and, where appropriate, given protection.	<ul style="list-style-type: none"> •Not including will mean fewer wetlands protected.
Hawksbury Lagoon Inc	39	Amend	Would like to see as many as possible of the remaining wetlands, classified as significant or not, preserved.	<ul style="list-style-type: none"> •Wetlands play important role in sustaining diverse ecology, filtering water and providing interest to our landscapes. •The extent of loss makes all remaining wetlands significant.
OtagoNet Joint Venture	43	Support	Supports repeal of Schedule 10.	<ul style="list-style-type: none"> •Streamlines wetland provisions, conducive to people using the Water Plan.

Specific Schedule 9 wetlands

201 Schedule 9 - Akatore Creek Swamp (#1, Map F46)

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Deanne and Steve Amende	1	Amend	Re-negotiate the boundaries of the Akatore Creek Swamp on our property.	<ul style="list-style-type: none"> •This is not a significant wetland. •There has not been enough thought put into the boundary.
Wenita Forest Products Limited	3	Amend	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".	<ul style="list-style-type: none"> •Map includes areas that are not swamp or estuary. •Map includes areas with established trees - inclusion will affect Wenita's operations.
Department of Conservation	42	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.

208 Schedule 9 - Big Boggy Swamp (#8, Map F1)

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Department of Conservation	42	Amend	Retain wetland and amend mapping to reflect that in Appendix 2.	<ul style="list-style-type: none"> •Additional area shown in Appendix 2 contains Regionally Significant Wetland Values. •Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.

223 Schedule 9 - Chapman Road Inland Saline Wetland (#23, Map F18)

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Herb Fox	36	Amend	Map to accurately reflect the position of the "wetlands" of Dry Gully as the area is known.	<ul style="list-style-type: none"> •Mapped area covers driveway, and exceeds area that could be considered wetland when viewed on site.
Department of Conservation	42	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.

232 Schedule 9 - Cross Eden Creek Marsh Complex (#32, Map F16)

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Maniototo Homestead	23	Oppose	Status quo.	<ul style="list-style-type: none"> •Could cause management issues. •The plants mentioned in the ecologist report on wetland values have long lived in harmony with farming practise.
Department of Conservation	42	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.

235 Schedule 9 - Diamond Lake Wetland (#35, Map F3)

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Geoffrey Thomson	6	Amend	Amend the boundaries of wetland which is on parts of my farm property.	<ul style="list-style-type: none"> •Maps show areas that are not significant wetland, they need to be changed. •Wants a site visit to establish better boundaries.
Department of Conservation	42	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.

236 Schedule 9 - Dingle Lagoon (#36, Map F1)

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Department of Conservation	42	Amend	Retain wetland and amend mapping to reflect that in Appendix 2.	<ul style="list-style-type: none"> •Additional area shown in Appendix 2 contains Regionally Significant Wetland Values. •Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.

240 Schedule 9 - Ellison Saltmarsh (#40, Map F61)

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
River-Estuary Care: Waikouaiti-Karitane	13	Support	Inclusion of wetland commended.	•Areas are valuable in themselves and as areas with special biodiversity value.
Department of Conservation	42	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.

244 Schedule 9 - Flat Top Hill Ephemeral Wetlands (#44, Map F19)

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Department of Conservation	42	Amend	Retain inclusion of Flat Top Hill Ephemeral Wetlands, and amend mapping of wetland.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.

252 Schedule 9 - Glenorchy Lagoon Wetland (#52, Map F9)

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Department of Conservation	42	Amend	Retain wetland and amend mapping to reflect that in Appendix 2.	•Additional area shown in Appendix 2 contains Regionally Significant Wetland Values. •Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.

255 Schedule 9 - Great Moss Swamp (#55, Maps F29 & F30)

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Meridian Energy Limited	32	Support	Retain Maps F29 and F30 as notified.	•Boundaries now more accurately reflect existing human influences in the area, particularly roads.
Department of Conservation	42	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.

261 Schedule 9 - Hoopers Inlet Swamp (#61, Map F58)

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Save the Otago Peninsula Inc Society	21	Support	Support the new, more accurate boundaries of the wetland.	•Important ecological values are recognised.
Department of Conservation	42	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.

270 Schedule 9 - Kemp Road Lagoon (#70, Map F65)

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Trevor and Vivien Nimmo	18	Amend	Remove wetland from Schedule 9.	•The lagoon is not regionally significant, it has none of the values listed in policy 10.4.1, and is not a freshwater lagoon. •Inclusion in Schedule 9 would be a barrier to possible future development. •Insufficient consultation.
Department of Conservation	42	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.

276 Schedule 9 - Lake Reid Wetland (#76, Map F3)

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Geoffrey Thomson	6	Amend	Amend the boundaries of wetland, which is on parts of my farm property.	•Maps show areas that are not significant wetland, they need to be changed. •Wants a site visit to establish better boundaries.

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Department of Conservation	42	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.

277 Schedule 9 - Lake Tuakitoto Wetland (#77, Map F43)

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
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'.	<ul style="list-style-type: none"> •Minimum water levels will never result in area 'a' being used "for natural beauty or wetland". •Aerial photos show area 'a' is not the same vegetation. On ground, only sparse rushes and grass, because area 'a' higher than rest: waterlogged during wet periods and floods once or twice a year. •Have managed area 'a' as intensively as soil conditions allowed. •Rest of western boundary should stay undisturbed with no animal access.
Department of Conservation	42	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.

284 Schedule 9 - Loch Loudon Fen Complex (#84, Map F50)

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
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 jointly developed by submitter and Council].	<ul style="list-style-type: none"> •Waipori Hydro Scheme is a key electricity generating asset for the region which warrants protection under policy B of NPS Renewable Energy Generation. •Plan Change 2 has the potential to unduly compromise its operating regime and future consenting requirements, which does not meet sustainable management.
Department of Conservation	42	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.

285 Schedule 9 - Loch Luella Fen Complex (#85, Maps F50 & F51)

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
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 jointly developed by submitter and Council].	<ul style="list-style-type: none"> •Waipori Hydro Scheme is a key electricity generating asset for the region which warrants protection under policy B of NPS Renewable Energy Generation. •Plan Change 2 has the potential to unduly compromise its operating regime and future consenting requirements, which does not meet sustainable management.
Department of Conservation	42	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.

287 Schedule 9 - Lower Coutts Gully Swamp (#87, Map F46)

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Martin and Barbara Palmer	4	Amend	Change name of the wetland from the "Lower Coutts Gully Swamp" to the "Coutts Gully Wetland".	•Suggested SUBMITTER NAME is better known.
Martin and Barbara Palmer	4	Amend	Map F46 is reduced in extent within the Palmer property as shown on the annotated attached map.	<ul style="list-style-type: none"> •Mapped extent does not accurately reflect wetland area accurately. •Map includes areas of operational farm land, including stock gateway (in use for over 50 years) that is not damaging the wetland. •Difficult to determine the actual boundary from the map.
Department of Conservation	42	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.

288 Schedule 9 - Lower Manorburn Dam Margins (#88, Map F15)

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Galloway Irrigation Society Incorporated	41	Oppose	Wetland not to be classified as a Significant Wetland and not included in Schedule 9.	<ul style="list-style-type: none"> •Lower Manorburn Dam is artificial dam to supply irrigation water. May not be possible to maintain wetland values. •Plan change does not describe wetland values that have contributed to scheduling. •Use of dam lowers water level during the irrigation season. Therefore GIS cannot comply with the general regulation in Proposed Plan Change 2 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". •Problematic for other activities such as maintenance on dam wall, construction of structures (water level or flow measuring devices), discharge of the top race into dam for temporary storage, and maintaining an easement for a water race along north side of dam. •Lower Manorburn Dam is not excluded from Rule 12.1.1A.1 by Rule 12.1.2.3 because Rule 12.3.2.1 and the prior "General Authorisation" refer to small dams (i.e., less than 3m in height, less than 20,000 m3 and less than 50 ha upstream).
Department of Conservation	42	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.

293 Schedule 9 - Makarora Flat Swamp Complex (#93, Map F1)

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Department of Conservation	42	Amend	Retain wetland and amend mapping to reflect that in Appendix 2.	<ul style="list-style-type: none"> •Additional area shown in Appendix 2 contains Regionally Significant Wetland Values. •Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.

300 Schedule 9 - McGregor Swamp (#100, Map F61)

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
River-Estuary Care: Waikouaiti-Karitane	13	Support	Inclusion of wetland commended.	•Areas are valuable in themselves and as areas with special biodiversity value.
Department of Conservation	42	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.

302 Schedule 9 - McLachlan Road Marsh (#102, Map F61)

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
River-Estuary Care: Waikouaiti-Karitane	13	Support	Inclusion of wetland commended.	•Areas are valuable in themselves and as areas with special biodiversity value.
Department of Conservation	42	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.

315 Schedule 9 - Okia Flat Wetland Management Area (#115, Map F68)

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
The Yellow-eyed Penguin Trust	26	Support	Approve of the wetland being a Wetland Management Area in Schedule 9.	No reason given.
Department of Conservation	42	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.

320 Schedule 9 - Papanui Inlet Saltmarsh (#120, Map F59)

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Save the Otago Peninsula Inc Society	21	Support	Support the inclusion of wetland in the Water Plan.	No reason given.
The Yellow-eyed Penguin Trust	26	Support	Approve of the wetland being in Schedule 9.	No reason given.
Department of Conservation	42	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.

323 Schedule 9 - Pleasant River Estuary Wetland Complex (#123, Map F67)

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Graeme John Hagan	9	Oppose	Oppose changes.	No reason given.
Wayne Allan and Rochelle Anne Hagan	10	Oppose	Oppose changes.	<ul style="list-style-type: none"> •Prepared for the ORC to use and monitor the land below the flood gates on our property as a wetland - but not above the flood gate. •Flood gate has been present for many years and that land is used/grazed as part of everyday farming operation. •Land within wetland boundary is used in farming operations, we should be able to keep using it the way we want. •Lack of consultation.
Department of Conservation	42	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.

337 Schedule 9 - Shotover River Confluence Swamp (#137, Map F5)

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Department of Conservation	42	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
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.	<ul style="list-style-type: none"> •Wetland does not have the values that would necessitate its status as regionally significant (specifically A1 and A3) •Plan Change 41 (before Queenstown-Lakes District Council) already provides sufficient protection to the wetland. •Categorising the wetland as regionally significant will not result in sustainable management under Part 2 RMA. •If Plan Change 41 is confirmed by Queenstown-Lakes DC, submitter may develop part of wetland as ecological and/or recreation area and may discharge stormwater to it. Plan Change 2 makes resource consent for this harder to obtain, is unnecessary and will not result in efficient use of resources. •Area mapped is inaccurate and exaggerated.

339 Schedule 9 - Stirling Marsh Complex (#139, Map F43)

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
William Thomas Begg	17	Amend	Remove the areas identified as Stirling Marsh Complex that are on my property from proposed plan change 2.	<ul style="list-style-type: none"> •Areas of this wetland on my property do not meet the criteria of regional significance. They are used for intensive grazing, growing poplar trees for timber, and one area has gorse and is fenced to keep cattle out. •Insufficient consultation.
Department of Conservation	42	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.

345 Schedule 9 - Tahakopa Marsh Complex (#145, Map F4)

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Department of Conservation	42	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Entirety of this wetland and surrounding area shown as wetland on the topo map needs to be listed in schedule 9 as a regionally significant wetland.	<ul style="list-style-type: none"> •Boundaries on Map F40 only partially cover wetland complex. •See image in the original submission.

349 Schedule 9 - Te Matai Marsh Complex (#149, Map F68)

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
The Yellow-eyed Penguin Trust	26	Support	Approve of the wetland being in Schedule 9.	No reason given.
Department of Conservation	42	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.

351 Schedule 9 - Three Stones Fen Complex (#151, Map F53)

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
The Retreat Trust	28	Oppose	Oppose the proposed Plan Change. Take the tussock ground out of the fen system.	<ul style="list-style-type: none"> •It is insignificant and not a wetland area. •Has ditches throughout tussock, needs periodic cleaning to maintain drain and stock entrapment.
Department of Conservation	42	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.

356 Schedule 9 - Trig Q Ephemeral Pool (#156, Map F55)

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	Reason for DECISION REQUESTED
David Jopp	12	Oppose	Not include Trig Q Ephemeral Pool.	<ul style="list-style-type: none"> •Is not a true ephemeral wet area and only ponds during high rainfall winters and when receiving run-off.
Department of Conservation	42	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.

361 Schedule 9 - Upper Taieri Wetlands Complex (#161, Maps F22 to F28)

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
SH Andrews and Sons Ltd	7	Amend	Redraw the map within our property to exclude additional areas that are not genuine wetlands.	<ul style="list-style-type: none"> •Much of the area is not a wetland, except during floods.
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).	<ul style="list-style-type: none"> •South-eastern boundary defined in Map F26 not accurate: much area included is pasture and doesn't contain hydrological characteristics of a wetland or ecological or habitat values identified in Policy 10.4.1. •Amended area captures only areas with hydrological and ecological characteristics and aren't pasture.
Department of Conservation	42	Amend	Retain wetland and amend mapping to reflect that in Appendix 2.	<ul style="list-style-type: none"> •Additional area shown in Appendix 2 contains Regionally Significant Wetland Values. •Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.

364 Schedule 9 - Waianakarua River Estuary Swamp (#164, Map F65)

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	Reason for DECISION REQUESTED
Michael and Christine Holland	25	Support	Support the identification of the wetland.	<ul style="list-style-type: none"> •Land is not farmed, and is fenced.
Department of Conservation	42	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.

365 Schedule 9 - Waikouaiti River Estuary Wetland Complex (#165, Map F61)

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
River-Estuary Care: Waikouaiti-Karitane	13	Support	Inclusion of wetland commended.	<ul style="list-style-type: none"> •Areas are valuable in themselves and as areas with special biodiversity value.

Summary of Decisions Requested on Proposed Plan Change 2 (Regionally Significant Wetlands)
to the Regional Plan: Water for Otago 10 September 2011

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Department of Conservation	42	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.

367 Schedule 9 - Waipori/Waihola Wetland Complex (#167, Maps F48 & F49)

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Transpower New Zealand Limited	37	Did not specify	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 within the Waipori/Waihola Wetland Complex.	<ul style="list-style-type: none"> •From the maps looks like these are within the wetland boundary. •Don't want to get unnecessary consent to maintain/upgrade assets. Effects from such works cannot be avoided, and do not want financial contributions to be required. •Need to appropriately provide for the national grid, recognise its benefits and be in accordance with NPS Electricity Transmission.
Department of Conservation	42	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.
Beaton family of Berwick	45	Amend	ORC need to shift themselves to ground check the boundaries.	•Concerned that map does not clearly show whether one of our pumps and associated stop banks are included or excluded from the wetland area.

371 Schedule 9 - Te Hua Taki Wetland (#171, Map F66)

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Three Creeks Farm	19	Oppose	Remove wetland from the proposed schedule of regionally significant wetlands.	<ul style="list-style-type: none"> •Areas of this wetland on my property do not meet the criteria of regional significance in policy 10.4.1, and have not previously been identified as regionally significant. •Plan Change fails to provide for my economic wellbeing and that of the community around the affected area, as required by s 5 RMA. •Insufficient consultation.
Department of Conservation	42	Support	That the inclusion in Schedule 9, and the extent of the wetland be retained without amendment.	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.

399 Schedule 9 - All other wetlands not otherwise listed

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Department of Conservation	42	Support	<p>For Schedule 9 wetlands #2 - 7; 9 - 22; 24 - 31; 33; 34; 37 - 39; 41 - 43; 45 - 51; 53; 54; 56 - 60; 62 - 69; 71 - 75; 78 - 83; 86; 89 - 92; 94 - 99; 101; 103 - 114; 116 - 119; 121; 122; 124 - 136; 138; 140 - 144; 146 - 148; 150; 152 - 155; 157 - 160; 162; 163; 166; 168 - 170; 172:</p> <p>That the inclusion in Schedule 9, and the extent of the wetlands be retained without amendment.</p>	Consistent with Part 2 RMA, and reflects ORC's functions under s 30 RMA.

Part 4: Methods other than Rules

Promotion, information and funding

14 Policy 10.4.6 - Promotion of wetlands

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Lake Waihola Waipori Wetlands Society Inc.	20	Support	Supports concepts in 10.4.6.	<ul style="list-style-type: none"> •Notes lack of detail around how Council intend to educate, resource and fund the concepts in 10.4.6, and that there are no financial incentives for wetland restoration. •Notes lack of public presentation of wetland information.
Clutha District Council	34	Support	Supports monitoring and provision of information, and suggests that this could usefully be done in conjunction with Territorial Authorities and other agencies.	No reason given.
Hawksbury Lagoon Inc	39	Amend	In promoting rehabilitation, ensure adequate weight is given to the pattern of wetlands in maintaining corridors and feeding sites for waterfowl.	No reason given.
Hawksbury Lagoon Inc	39	Amend	Amend: (d) change 'and' for 'or'.	No reason given.
TrustPower Limited	40	Amend	Amend: "To promote the <u>maintenance and conservation, creation and reinstatement of wetland areas and enhancement of wetland values by:</u> <u>(a) Educating Otago's people and communities about land use activities that may result in the loss of wetlands and their values;</u> <u>(b) Initiating or supporting investigations and monitoring of wetlands and their values;</u> <u>(c) Supporting voluntary community and landholder programmes; or</u> <u>(d) Supporting the reinstatement of wetlands that have been drained or the creation of new wetlands where appropriate.</u> (e) <u>(e) Initiating or undertaking works in consultation with local communities.; or</u> (f) <u>(f) Providing general information on wetlands in a non-regulatory inventory and identifying Regionally Significant Wetland's their values in Schedule 9 to the Water Plan.</u> <u>(g) Providing information about wetlands in Otago in general, including those that are not regarded as Regionally Significant Wetlands where such information exists."</u>	<ul style="list-style-type: none"> •Creation of wetlands is of negligible ecological value. •Regionally Significant Wetlands values information should be contained in the Water Plan. •Providing information may lead to wetland maintenance and conservation.
Department of Conservation	42	Support	Retain with no amendments, except amend "(e): <u>Providing information on wetlands and their values ecosystem services.</u> "	<ul style="list-style-type: none"> •Consistent with Part 2 RMA. •Gives guidance when considering activities in wetlands. •Maintains flows in streams sourced from wetlands which protects habitat of indigenous threatened fish. •Gives effect to the NPS Freshwater Management. •Monitoring of wetland condition is essential to ensure ORC is fulfilling its functions under section 30(1)(c)(iii) RMA. •Requests that the policy be amended to clarify the values of and services provided by wetlands.
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Amend so that the 'or' is deleted from 10.4.6(d).	<ul style="list-style-type: none"> •As policy (e) works alongside (a) to (d), 'or' is inappropriate. •Notes deletion of 15.4.3 makes implementation of 10.4.6 unclear.

148 Funding

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
SH Andrews and Sons Ltd	7	Did not specify	Compensate for the confiscation of freehold property rights.	•Believe this is a confiscation of property rights.
Otago Fish & Game Council	8	Amend	State as criterion that financial support, resource consent fee relief or in-kind payments may be provided to protect, create, or enhance wetlands. Expertise, fencing materials, rates relief, or plants are suggested as options.	•Resource consent fee relief is most workable and proactive. •Creation/enhancement of a wetland should not have the same consent fees as an activity that will damage a wetland. •Current consent fees encourage non-compliance and illegal activity and discourage creation or enhancement of wetlands. •Notes that plan provides little guidance on how wetland monitoring will be carried out.
William Thomas Begg	17	Amend	If Stirling Marsh Complex is retained as a Regionally Significant Wetland then provide rates relief of up to 50% of total rates for the property to recognise the cost of protection and fencing.	•Plan Change fails to provide for my economic wellbeing and that of the surrounding community (required by s 5 RMA). •Measures are an infringement of my freehold property rights - compensation, fencing assistance or rate relief should be provided.
William Thomas Begg	17	Amend	If Stirling Marsh Complex is retained as a Regionally Significant Wetland then provide a gorse and broom management/eradication plan for the wetland undertaken, implemented and funded by ORC.	•The areas of this wetland on my property are used for intensive grazing, and one area has gorse and is fenced to keep cattle out.
Three Creeks Farm	19	Amend	If Te Hua Taki Wetland (Map F66, #171) is retained as a regionally significant wetland then provide rates relief of up to 50% of total rates for the property to recognise the cost of management.	•Plan Change fails to provide for my economic wellbeing and that of the community around the affected area, as required by s 5 RMA. •Identifying the wetland as regionally significant may affect the integrity and functioning of our dairy farm effluent system.
Three Creeks Farm	19	Amend	If Te Hua Taki Wetland (Map F66, #171) is retained as a regionally significant wetland and if consents are required for drain maintenance, provide that (a) there is no fee on the consent, (b) consents for drain maintenance are being processed as controlled activities, and (c) a non notification clause is included.	•Plan Change fails to provide for my economic wellbeing and that of the community around the affected area, as required by s 5 RMA.
Federated Farmers of New Zealand	29	Amend	An acknowledgement from Council that financial contribution or rates relief will be required in certain circumstances and that this be introduced as a non-regulatory method in the proposed plan change.	•Wetlands primarily protected for the public interest so Council should pay, e.g., for fencing where it is necessary.
Federated Farmers of New Zealand	29	Amend	That Council be responsible for undertaking, implementing and funding the management and eradication of exotic plants where required to maintain or enhance wetland values.	•Where wetlands primarily protected for the public interest Council should pay for weed management/eradication to prevent spread.
Federated Farmers of New Zealand	29	Amend	Allow for a financial contribution or rates relief where a fence is considered necessary to protect wetland values by introducing appropriate non-regulatory methods.	•Fencing may be expensive or impractical, particularly for wetlands above 800m.
Federated Farmers of New Zealand	29	Amend	Introduce a non regulatory method that provides for Council to undertake, implement and fund weed management or eradication plans, where appropriate for regionally significant wetlands.	•Where wetlands primarily protected for the public interest Council should pay for weed management/eradication to prevent spread. •This will ensure wetland values are maintained and enhanced.
Hawksbury Lagoon Inc	39	Amend	Providing financial assistance or rates incentives for landowners to fence off wetlands and fund revegetation would be of great value.	•Wetlands benefit everyone. •There are many small wetlands of great value that have not been identified as significant in this plan and which face an uncertain future. •Allows ORC to set timeframe for fencing off all significant wetlands in the knowledge it was not causing hardship for landowners.

164 Chapter 15 - Methods other than Rules

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Lake Waihola Waipori Wetlands Society Inc.	20	Amend	Provide education, information, and leadership on the right kind of plant species for wetland planting in Otago. Recognise acceptance of risk by the Lake Waihola Waipori Wetlands Society in the planning and resource management process, in ensuring that projects in wetland restoration are to mean the outcomes of 10.4.6. Be proactive in drawing attention to the need to control Reed Sweetgrass in our region.	•Choice of plants involves the selection of appropriate plant assemblages for differing wetlands throughout Otago. – •Critical information if biodiversity and wetland functionality are to be retained and enhanced. •Lake Waihola Waipori Wetlands Society has made a significant public commitment to the sustainable management of wetlands in its area. •Will improve our waterways, wetlands and the region. •Reed Sweetgrass is a significant threat to wetland and waterway health in the Waihola waipori Catchment.

Wetland values information and Wetland Inventory

151 Wetland Inventory

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Waitaki District Council	14	Support	Supports providing information in a non-regulatory inventory of wetlands.	<ul style="list-style-type: none"> •Allows the inventory to be more extensive, regularly updated, and freely accessible to all. •Inventory information will be useful to the Waitaki DC's Ecological Study.
Federated Farmers of New Zealand	29	Amend	Include only those values and wetlands already identified within the proposed plan to any non-regulatory inventory. Alternatively ensure that any changes or updating of any wetland inventory only occur in direct consultation with landowners concerned and that Council introduces a policy and method that provides for a process of consultation with the affected landowner(s).	<ul style="list-style-type: none"> •Values could be changed without plan change process and public consultation process. •Affected farmers should be able to submit on inventory contents, and appeal to Environment Court if necessary. •Concerned that inventory would be counterproductive to working positively unless landowners involved, and that ability to easily change inventory brings uncertainty to landowners.
Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou, and Hokonui Runanga	38	Support	Support the intent of the following changes to the plan change; " <i>providing better wetland information</i> ".	<ul style="list-style-type: none"> •Recognise the need for flexibility. •Wish to be involved in process which helps inform the public about wetlands. •But consider that the information may not assist in the protection and enhancement of wetland values, and need to know this will occur.
TrustPower Limited	40	Amend	Amend the inventory to reflect the following change to policy 10.4.1: ". . . A8 Regionally significant habitat for <i>indigenous</i> waterfowl; and . . ."	<ul style="list-style-type: none"> •Better reflects s 6(c) RMA, and sets a practical threshold test.
TrustPower Limited	40	Amend	Identify, record and provide for human use influences on Regionally Significant Wetlands where they occur.	<ul style="list-style-type: none"> •Human use influences can positively influence ecology and play a significant role in sustaining the life-supporting capacity of certain wetlands, contribute significantly to economy, and have positive social effects. •Can be provided for in the inventory, establishing boundaries and values of certain wetlands, Plan Change 2.
OtagoNet Joint Venture	43	Amend	Give due consideration to existing and consented activities and infrastructure and any associated human use in establishing the non-regulatory inventory for Regionally Significant Wetlands. This may involve identifying activities and human use values within or surrounding scheduled Regionally Significant Wetlands.	<ul style="list-style-type: none"> •Enables protection of physical resources in a way which enables people and communities to provide for their social, economic and cultural wellbeing and for their health and safety pursuant to s 5 RMA
OtagoNet Joint Venture	43	Support	Supports the periodic surveying of wetlands and the general information contained in the non-regulatory inventory being kept up to date.	<ul style="list-style-type: none"> •Aware that ecology is subject to change.
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	It should be noted on the inventory of wetlands that Tahakopa Marsh Complex (Map F40, #145) is extremely threatened by an infestation of Alder which needs removal before it becomes an intractable weed in the wetlands and waterways. This should be noted on the inventory of wetlands.	No reason given.

400 Schedule 9 - Wetlands values in Schedule 9

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
River-Estuary Care: Waikouaiti-Karitane	13	Oppose	Certain sections of the Consultation Draft should be included in the final proposal, e.g. listing of the specific nature and values in each of the designated wetlands.	No reason given.
Otago Conservation Board	27	Oppose	Information on wetland values should be retained and included in the new Schedule to be used for ongoing planning and protection.	<ul style="list-style-type: none"> •Planning decisions and protection improved by having ready access to values information.
Contact Energy Limited	30	Oppose	Opposes the removal of all descriptive information on each listed wetland, and the development of a separate non-regulatory inventory.	<ul style="list-style-type: none"> •Removing values is ultra vires - allows non-public, non-contestable process to assign values to a wetland, removes certainty for plan users, and is not just - especially as these values trigger non-complying category.
Hawksbury Lagoon Inc	39	Amend	Ensure there is an explicit requirement in the plan to keep wetland values up to date to use when considering applications for activities.	No reason given.

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
TrustPower Limited	40	Oppose	Regionally significant values ascribed to each Regionally Significant Wetland should be included in Schedule 9 to the Water Plan.	<ul style="list-style-type: none"> •There are likely to be issues in applying proposed provisions if values information is not listed in Water Plan. •Any change to regionally significant wetland values identified for a Regionally Significant Wetland should require a formal plan change. •Values are not mutually exclusive, and wetlands have any one or more values. •General information can go in non-regulatory inventory.
OtagoNet Joint Venture	43	Amend	Include regionally significant wetland values ascribed to each Regionally Significant Wetland in Schedule 9.	<ul style="list-style-type: none"> •There are likely to be issues in applying proposed provisions if values information is not listed in the Water Plan. •Any change to the regionally significant wetland values identified for a Regionally Significant Wetland should require a formal plan change. •General information can go in the non-regulatory inventory. •The non-regulatory inventory which is to contain regionally significant wetland values for scheduled Regionally Significant Wetlands should have been available to stakeholders and the public at least at the time Plan Change 2 was publicly notified. •For consideration in submission. •Method of assessing and mapping individual wetlands also has not been made available. •Lack of transparency is a significant shortcoming.

Part 5: General

Miscellaneous

150 RMA streamlining and simplifying

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
River-Estuary Care: Waikouaiti-Karitane	13	Oppose	Certain sections of the Consultation Draft should be included in the final proposal, e.g. the Wetlands Introduction, the Issues section, and Section 10.5 Anticipated Environmental Results (especially the inclusion of the concept of "habitat and hydrological services").	<ul style="list-style-type: none"> •Introduction clearly sets out the context, explains the types and values of wetlands in Otago. •Issues give clear reasons for the need for certain wetlands to have special consideration.
Save the Otago Peninsula Inc Society	21	Oppose	Opposes the deletion of 10.2.3	No reason given
Vivienne Kerr	33	Amend	Introduction, Issues and Anticipated Environmental Results, as they appear in the draft document of May 2010, be re-instated in the final plan.	This has the effect of downplaying the essential role wetlands play in the ecosystems of the Otago region in the plan document and in the public mind.
Gregory Kerr	35	Amend	Chapter 10's Introduction, Issues and Anticipated Environmental Results sections should be reinstated.	•Nationally 10% of wetlands remaining, with less than half protected.
Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou, and Hokonui Runanga	38	Support	Support the intent of " <i>making provisions easier to read and understand</i> ", provided that important details are not lost through doing this.	No reason given.
Royal Forest and Bird Protection Society of New Zealand Inc	47	Oppose	Retain issues, Explanations, Principle Reasons, Anticipated Results, and cross references.	<ul style="list-style-type: none"> •Removal doesn't make Plan easier to understand. •These assist decision-makers individuals better understand the Plan, educates, and helps understand whether consents are required.

143 Minor and consequential changes

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
NZSki Limited	11	Amend	Make any other amendments as may be necessary or expedient to give effect to the purpose and intent of the relief sought in the submission.	No reason given.
Contact Energy Limited	30	Amend	Give such other relief, including consequential relief, required to address the issues raised in this submission.	No reason given.
Meridian Energy Limited	32	Amend	Make any similar or consequential amendments to Plan Change 2 that stem from the submissions and general relief sought.	No reason given.
Transpower New Zealand Limited	37	Amend	Amend the notification statement to reference the current notification sections of the RMA.	<ul style="list-style-type: none"> •Current sections referenced have been repealed. •Note: Relevant to Rules 12.1.3.1, 12.1.4.8, 12.2.2A.1, 12.2.3.4, 12.5.2.1, 12.8.2.1, 12.9.2.1, 12.10.2.1, 13.2.2.1, 13.3.2.1, 13.4.2.1, 13.5.2.1, 13.7.2.1.
Transpower New Zealand Limited	37	Amend	Make any additions, deletions or consequential amendments necessary as a result of the matters raised in this submission. Adopt any other such relief as to give effect to this submission.	No reason given.
TrustPower Limited	40	Amend	Give such further or other relief as is appropriate or desirable in order to take account of the concerns expressed in this submission.	No reason given.
Department of Conservation	42	Amend	Make any other consequential amendments to the Plan required to explain or give effects to these changes to be made.	No reason given.
Department of Conservation	42	Amend	Amend so that s 95 of the RMA is referred to.	<ul style="list-style-type: none"> •Reference is made to repealed s 93 and s 94(1) RMA. •Note: Relevant to Rules 12.1.3.1, 12.1.4.8, 12.2.2A.1, 12.2.3.4, 12.5.2.1, 12.8.2.1, 12.9.2.1, 12.10.2.1, 13.2.2.1, 13.3.2.1, 13.4.2.1, 13.5.2.1, 13.7.2.1.
OtagoNet Joint Venture	43	Amend	That the amendments and addendums outlined in sections 4 and 5 [of this submission] are accepted and any necessary consequential amendments to Plan Change 2 are made. Also give such further or other relief as is appropriate or desirable in order to take account of the concerns expressed in this submission.	No reasons given.

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Ladies Mile Partnership	44	Amend	Give any other relief necessary to address the points raised in the submission	No reason given.
Royal Forest and Bird Protection Society of New Zealand Inc	47	Amend	Amend wording and SUB NUMBERING of retained issues, explanations, principle reasons, anticipated results and cross references to account for changes and delete words no longer relevant as a result of the removal of Schedule 10 and the term type A and Type.	No reason given.

158 Glossary

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	Reason for DECISION REQUESTED
Department of Conservation	42	Amend	Add: "Ecosystem services: Are the benefits that people can obtain from ecosystems. These include provisioning, regulating, supporting and cultural services."	•As the term is not widely used, definition should be provided.

154 Plan general

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Contact Energy Limited	30	Amend	That recognition be given to the fact that Regionally Significant Wetlands can be an outcome of legitimate resource development such as hydro power generation.	•Concerned that wetland origin (natural or man made) has not been appropriately considered in classifying wetlands, and in writing provisions. •Plan change does not make allowance for the creation of new wetlands
Meridian Energy Limited	32	Amend	Ensure there is an enabling policy framework for renewable energy production when planning documents are being prepared and determined.	•Electricity is vital to everyday life •Reliability of supply is critical to economic growth and social well-being.
TrustPower Limited	40	Amend	Amend to give effect to the NPS Renewable Energy Generation.	No reason given.
TrustPower Limited	40	Amend	Provide for activities associated with the use and development of regionally significant infrastructure.	No reason given.
OtagoNet Joint Venture	43	Did not specify	OtagoNet's existing lawfully established utility assets in and surrounding areas identified as Regionally Significant Wetlands, and the essential renewal of these assets should not be unduly compromised.	•ORC is required to protect regionally significant infrastructure under Part 2 RMA.

General support and opposition

144 General opposition

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Deanne and Steve Amende	1	Oppose	Oppose proposed plan change 2	•Policies are open to interpretation - regarding restrictions on our land use. •Plan is unreasonable and unworkable. •Financial cost.
Maniototo Homestead	23	Oppose	Status quo. Strongly oppose the need for the proposed plan change.	•Could cause management issues.
Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou, and Hokonui Runanga	38	Oppose	Oppose Plan Change, but support the intent of protecting more wetlands that are regionally significant, and strengthening protection for regionally significant wetlands.	•Does not adequately recognise and provide for the association of nga Runanga with their ancestral lands and waters. •Is in part contrary to Te Tiriti o Waitangi.
TrustPower Limited	40	Oppose	Withdraw Plan Change in the event that the amendments set out in the submission are not implemented.	Generally opposes the Plan Change and has set out specific relief sought.
Department of Conservation	42	Amend	That the Proposal be retained or amended as set out under the headings "Decision Sought" in Attachment One or to like effect	No reason given
OtagoNet Joint Venture	43	Oppose	Plan Change 2 be withdrawn if the amendments and addendums set out in the submission are not implemented.	•Would be effects on existing infrastructure if the changes requested are not made.

145 General support

SUBMITTER NAME	SUB NUMBER	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Wenita Forest Products Limited	3	Support	Support written content of the plan.	No reason given.
Solid Energy New Zealand Ltd	5	Support	Generally support direction of plan change.	•Will provide more definitive identification of significant wetlands.
Otago Fish & Game Council	8	Support	Generally supports the proposed changes.	•Strengthens protection for regionally significant wetlands.
Waitaki District Council	14	Support	General support for plan change.	No reason given.
Lake Waihola Waipori Wetlands Society Inc.	20	Support	Supports increased focus on the protection, enhancement and restoration of wetlands.	No reason given.
Otago Conservation Board	27	Support	Supports the proposed changes	•Will provide much needed protection for remaining wetlands.
Federated Farmers of New Zealand	29	Support	Supports general approach to management of wetlands in the region so that it is acceptable in social and economic terms to the ratepayers of the region.	No reason given.
Vivienne Kerr	33	Support	Support of the proposed plan change.	No reason given.
Clutha District Council	34	Support	Overall, CDC supports the proposed plan change.	•Wetlands have significant biodiversity values, and fulfil vital roles in catchment functioning.
Gregory Kerr	35	Support	Largely support the Proposal.	•Nationally 10% of wetlands remaining, with less than half protected. •Trustees of the Waikouaiti Maori Reserve were not informed of the proposed plan change.
Transpower New Zealand Limited	37	Support	Overall approach generally supported.	•Identification of wetlands will help in route evaluating for any new transmission lines.
Hawksbury Lagoon Inc	39	Support	Endorses ORC's commitment to ongoing protection and promotion of wetlands, and education of all public as to their value.	•Submitter has benefited greatly from such support already.
Beaton family of Berwick	45	Support	Generally support the proposed document.	No reason given.
New Zealand Railways Corporation	46	Support	Plan Change 2 introduces a greater level of protection to the region's wetlands and this is generally supported.	No reason given

Grouped by Submitter
(Decision requested beyond the scope of the proposed plan change)

Decisions requested beyond the scope of the proposed plan change

17 William Thomas Begg

ISSUE	REF	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Matters beyond the scope of the plan change	152	Matters beyond the scope of the plan change	Not Applicable	If Stirling Marsh Complex is retained as a Regionally Significant Wetland then provide the following: <ul style="list-style-type: none"> •Retention of grazing on ORC lease land. •The maintenance of existing ORC drains out of the wetland. 	<ul style="list-style-type: none"> •The areas of this wetland on my property are used for intensive grazing, and one area has gorse and is fenced to keep cattle out. •Two areas of the wetland on my property contain scheduled ORC drains. Concerned that they may not be maintained to same level as previous. ORC should maintain drains where multiple properties are impacted. •There are other drains in the area, if a consent is needed to maintain these, the owners may not maintain them.

20 Lake Waiholo Waipori Wetlands Society Inc.

ISSUE	REF	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Matters beyond the scope of the plan change	152	Matters beyond the scope of the plan change	Not Applicable	Add <i>Glyceria maxima</i> [Reed Sweetgrass] to the ORC Pest Plant Strategy.	•Is a matter of extreme importance for waterway and wetland biodiversity.
Matters beyond the scope of the plan change	152	Matters beyond the scope of the plan change	Not Applicable	Seek progressive control of Reed Sweetgrass over a 5-7 year period of time within the Taieri Plains area and its associated tributaries and catchments.	<ul style="list-style-type: none"> •Weed is a significant threat to wetland and waterway health in the Waiholo Waipori Catchment. •Grows aggressively around waterways and nutrient rich wetlands, and disperses by water. •Catchment based approach to species control will benefit the region's waterways and wetland habitats.

33 Vivienne Kerr

ISSUE	REF	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Matters beyond the scope of the plan change	152	Matters beyond the scope of the plan change	Not Applicable	A statement on the importance of wetlands be included in each and every consent	To ensure that the public are reminded of the essential part wetlands play in the ecology of the Otago region.
Matters beyond the scope of the plan change	152	Matters beyond the scope of the plan change	Not Applicable	A "register of interest", or similar, be established by which those with an interest in the ecological health (including, but not limited to owners and/or lessees of Regionally Significant Wetlands) be notified of all consent applications (new & renewed) in the (geographical) catchments of those wetlands that may impact on those wetlands.	No reason given.

35 Gregory Kerr

ISSUE	REF	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Matters beyond the scope of the plan change	152	Matters beyond the scope of the plan change	Not Applicable	The possibility of a notification process that would inform interested parties with regard to any new activity neighbouring or within the catchment of a Regionally Significant Wetland whether a Resource Consent is needed or not.	•Would give a 'heads up' on any possible impacts.

38 Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou, and Hokonui Runanga

ISSUE	REF	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Matters beyond the scope of the plan change	152	Matters beyond the scope of the plan change	Not Applicable	Commitment from ORC for addressing cumulative effects in the future.	•Addressing cumulative effects at an early stage is more cost-effective than allowing cumulative degradation of wetlands to occur.

45 Beaton family of Berwick

ISSUE	REF	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Matters beyond the scope of the plan change	152	Matters beyond the scope of the plan change	Not Applicable	Level of Lake Mahinerangi should be on web-site along with other hydrological information available from the ORC.	No reason given.

46 New Zealand Railways Corporation

ISSUE	REF	PROVISION	POSITION	DECISION REQUESTED	REASON FOR DECISION REQUESTED
Matters beyond the scope of the plan change	152	Matters beyond the scope of the plan change	Amend	Add criteria to Schedule 1 which would apply to all wetland areas and state (or similar): The regional value of existing land transport networks, including rail, and their function.	<ul style="list-style-type: none"> •Schedule does not contain any criteria which recognise location and importance of regionally (and nationally) important land transport networks which are, in places, incorporated within the new Regional Significant Wetland boundaries. •Reconciliation of competing objectives must be considered via Part 2 RMA. Water Plan does not provide a policy framework that allows full consideration of ways to address these competing outcomes. •Plan change does not allow for the fixed location of land-based transport networks to be weighed when they require replacement, or alteration within their alignments. Amending Schedule 1 will achieve the relief sought, which is to provide a balancing policy within which the retention and maintenance of existing infrastructure can be adequately considered in consent applications.

