

Proposed Otago Regional Policy Statement 2021

Further Submissions

Information for Submitters

Further Submissions must be in the prescribed form (Form 6) specified by the Resource Management (Forms, Fees, and Procedure) Regulations 2003 and must be received by Otago Regional Council **by 5pm Friday 12 November 2021**

Privacy: Be aware that **all further submissions are considered public**, including your name and address which will be uploaded to ORC website as part of this process. The Council and further submitters will use your name and contact details for correspondence in relation to the making of the Regional Policy Statement.

LODGE A SUBMISSION MANUALLY (*USING FORM BELOW*)

A template complying with the requirements of Form 6 is provided below. Once completed, please provide to ORC **by 5pm Friday 12 November 2021** by one of the following:

Email: rps@orc.govt.nz Further Submissions in MS Word (eg docx) are preferred.

Post: Otago Regional Council, Private Bag 1954, Dunedin 9054. Att: Otago Regional Council Policy Team

Hand Delivery at

Dunedin: Otago Regional Council Office, Philip Laing House, Level 2, 144 Rattray Street, Dunedin 9016, Att: Otago Regional Council Policy Team

Queenstown: Terrace Junction, 1092 Frankton Road, Queenstown, Att: Otago Regional Council Policy Team

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

Submitter Address for Service details are provided in the Summary of Decisions Requested report.

INQUIRIES

Email: rps@orc.govt.nz

Phone: ORC Call Centre: 0800 474 082, Monday - Friday, 8am-5pm

Note to person making further submission

Please note that your further submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the further submission (or part of the submission):

- it is frivolous or vexatious:
- it discloses no reasonable or relevant case:
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
- it contains offensive language:
- it is supported only by material that purports to be independent expert evidence but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

These two pages are for information and are not part of the Form and can be deleted when submitting to ORC and Original Submitters.

Further Submission Form 6 commences on the next page.

Form 6

Further submission in support of, or in opposition to, submission on notified proposed Otago Regional Policy Statement 2021

(Submissions must be received by Otago Regional Council by 5pm on Friday 12 November 2021, and by original submitters within 5 working days of service on ORC)

To: Otago Regional Council

1. Name of person making further submission

Zella Downing

2. This is a further submission in support of (*or in opposition to*) a submission on the **Proposed Otago Regional Policy Statement 2021**.

3. I am (*tick whichever applies and add grounds if required*):

<input checked="" type="checkbox"/>	A person representing a relevant aspect of the public interest. In this case, also specify the grounds for saying that you come within this category; or
<input type="checkbox"/>	a person who has an interest in the proposal that is greater than the interest the general public has. In this case, also explain the grounds for saying that you come within this category; or
Grounds:	Stop Central Otago Airport (SCOA) is a group which has formed in opposition to the proposed jet airport at/near Tarras, Central Otago. We are a grassroots organisation with a current membership of 1,055 members, the vast majority of whom live in the ORC region. Members sign up via a world class electronic platform, and are required to give their details including email address, and confirm that they are opposed to the proposed airport. Members can unsubscribe from the list at any time, and as such, our numbers are “live” and real. Because each membership requires a distinct email address, members cannot have duplicate accounts.

In joining our group, our members have all confirmed that they are opposed to the development of a new airport at Tarras. We know that most of our members are deeply concerned about the impact such an airport would have on our environment - in both senses of the word - as in the ecological, environmental and climate change impacts as well as the many and direct impacts on the place we call home.

Our membership currently includes:

- **23 Members in Alexandra**
- **75 Members in Cromwell**
- **61 Members in and around Tarras**
- **452 Members in the Upper Clutha (Wanaka, Hawea, Cardrona, Queensbury, Luggate etc)**
- **50 members in Queenstown**
- **23 Members elsewhere in Central Otago**
- **66 Members in Dunedin**
- **13 Members elsewhere in Otago**

This means that we currently have 763 members who reside within the ORC territory, and approximately 400 others who live outside the territory but who have a strong interest in the region, and in some cases will own property or houses in the region, but have confirmed a location out of region as “where they live”. We do not

have data on how many of our members are ratepayers to ORC, but we could get this together if required in the future so support such submissions.

SCOA has read and understood the contents of the submission made by Sustainable Tarras, and we are totally in support of their submission.

SCOA wholeheartedly rejects the CIAL statements in Appendix A stating that the provision of domestic and international connectivity is a driver of social and economic prosperity cannot be maximised for the region due to capacity constraints at Queenstown within the next 10 years.

- **The inference that Tarras is a low-density population area and therefore optimal for another internationally capable jet airport is offensive and environmentally destructive.**
- **The assertion that a Tarras airport will support future low emission aviation requirements (and the inference that Queenstown airport won't and may need to be relocated or substituted) conveniently ignores the minimal impact of these new technologies, but more importantly the major increase in absolute emissions from both a new airport build as well as a large increase in flight demand and resultant emissions that a new airport will create. This problem (more carbon emissions despite modest improvements in jet technology) has been well documented in both NZ and international scientific journals, and we are happy to provide examples of these if ORC is not already in receipt of these.**
- **A large increase in flight numbers runs totally opposed to**
 - **the Commissioner of the Environment's recent reports calling on a review of tourism numbers and their negative impacts on the environment; AND**

- **the commitments made by ORC as a signatory of the Local Government Leaders Climate Change Declaration, which highlights an urgent need for responsive leadership and a holistic approach to climate change.**
- **the declarations of Climate Emergency made by CODC in September 2019; AND**
- **the declaration of Climate Emergency made by the NZ Government on behalf of all New Zealanders in December 2020, and also the many and various statements by the NZ Government that Climate Change and Carbon Emissions are significant concerns and will be a focus, and that New Zealand is committed to reducing its carbon emissions.**

As a group, we are deeply concerned that CIAL's submission to the RPS aims to have the effect of watering down environmental protections, allows for biodiversity loss and more easily facilitates a major industrial development in a sensitive area. We are vehemently opposed to this move by CIAL.

Without better environmental protections we will be vulnerable to inappropriate developments and in the long term have less significant natural environment left in Central Otago. If CIAL's submitted changes are accepted into the RPS they will create more favourable conditions for a future development application permanently harming the natural environment which are members are overwhelmingly against.

We are also concerned that on the one hand, CIAL is stating in its communications that it is a) talking with and consulting with affected communities and b) continuing with investigations to see whether the airport is viable before taking further steps, yet at the same time is making an application such as the one to which we are

	objecting which clearly would lower the barriers to CIAL being able to take steps which would undoubtedly cause detriment to our environment and our community, and reduce our ability to advocate for the community and the outstanding environment within which we live.
	the local authority for the relevant area: CODC

4. I ~~wish/do not wish~~ *(Select one)* to be heard in support of my further submission. **Please note that it may be me in person, or any other member(s) of the committee of SCOA speaking to this submission in my place.**
5. If others make a similar submission, I ~~will/will not~~ *(Select one)* consider presenting a joint case with them at a hearing.

6. Further Submitter Details

a. Signature of person making further submission

(or person authorised to sign on behalf of submitter. A signature is NOT required if you make your submission by electronic means).

Not required

b. Signatory name, position, and organisation *(if signatory is acting on behalf of a submitter organisation or group referred to at Point 1 above)*

Name Zella Downing

Position Spokesperson

Organisation Stop Central Otago Airport

c. Date

12 November 2021

Address for service of person making further submission *(This is where all correspondence will be directed)*

d. **Contact person** (name and designation, if applicable)

Zella Downing, Spokesperson, Stop Central Otago Airport

e. **Email:** (this is our preferred means of contact)

stopcentralotagoairport@gmail.com

f. **Telephone:**

+64 274 329 551

g. **Postal address** (or alternative method of service under [section 352](#) of the Act):

50 Loach Road, Hawea Flat, RD2, Wānaka, Otago 9382

7. My further submission is:

I ~~support~~/oppose the submission of:

**Christchurch International Airport Limited c/- Amy Hill
Chapman Tripp
Level 5, PwC Centre
60 Cashel Street
PO Box 2510
Christchurch 8140**

Submission ID 307

NOTE: Please use a new further submission form for each different original submission you support/oppose

The particular parts of the submission I support (or oppose) are:

Original submission point number	Support OR Oppose	The reasons for my support/opposition are:	I seek that the whole (or part [describe part]) of the submission be allowed (or disallowed): [Please state].
<p>14 ECO-P6 – Maintaining indigenous biodiversity</p>	<p>Oppose</p>	<p>Removes or substantively reduces protection for Bendigo Wetlands and Mata-Au/Clutha River. The Bendigo wetlands are located approximately 6-10km from the proposed airport and well within the Civil Airport Authority recommended a 13km bird strike management zone.</p> <p>Airport safety standards require reductions and/or removal of native bird life via various techniques including culling, removal of food sources including native plant life, restrictions on farming, water ponding and grass seed choices.</p> <p>These actions will permanently change the local area, impact bird, insect and plant life indigenous only to Central Otago.</p> <p>A reasonable person would say these impacts are not less than minor or de minimis.</p> <p>In addition, CIAL’s request reflects an organisation with little understanding of and respect for the perilous nature of New Zealand’s indigenous biodiversity</p>	<p>Disallow in part – deletion of section 5(b)</p>

		<p>and the urgent need with which the effects management hierarchy needs to be strengthened. The ORC has appropriately adopted the hierarchy as is expressed by Te Mana o te Wai in the National Policy Statement for Freshwater Management (2020), and which is being considered as part of the Natural and Built Environments Bill.</p>	
<p>20</p> <p>EIT-INF-P13 – Locating and managing effects of infrastructure</p>	<p>Oppose</p>	<p>Removes or substantively reduces protection currently available to the Tarras community and surrounding environment. The broader Tarras environment is one of outstanding natural beauty and includes significant natural areas, outstanding natural features and landscapes, natural wetlands, etc. Again, CIAL has demonstrated their lack of understanding of the need to avoid further degradation of New Zealand’s natural environment and the degree of step change needed in order to do so. We support ORC’s consistent application of ‘avoid’ as the first priority.</p> <p>Locating infrastructure such as an international airport on a 750 ha campus in Tarras does not serve the Tarras community or surrounding Central Otago district. Questions from the community on any direct or indirect benefits to Tarras and surrounding</p>	<p>Disallow whole</p>

		<p>district remain unanswered over a 15-month period, as to questions about potential environmental impacts and how they would be mitigated, if at all.</p> <p>The lower South Island would have ~7% of the population but 50% of the international capable airports, with significant spare capacity well into the future in the existing 4 available airports (Queenstown, Dunedin, Invercargill, Christchurch).</p> <p>Further, there is no “evidence” that passenger numbers will “bounce back” beyond pre-covid levels, and there is also huge uncertainty as to how international movement into New Zealand will be allowed.</p> <p>A reasonable person would say the sense of urgency and need to reduce protections to the environment is unwarranted and unjustified. We strongly oppose this.</p>	
<p>12</p> <p>IM-P14 – Human impact</p>	<p>Oppose</p>	<p>With less than 13% of the local Tarras community supporting the Christchurch airport proposal, and obvious levels of concern running through the wider community, asking to set aside the community’s view (or indeed the wider view of other affected communities with the ORC district) and</p>	<p>Disallow in part – addition of item 3</p>

		<p>trading this off against unknown tangible or intangible important public benefits is unconscionable.</p> <p>Selectively trading off human impacts from functional or operational needs (from building and operating an international airport) against the environment creates a risk and unnecessary discussion of where the boundaries are or should be drawn.</p> <p>Imposing functional or operational restrictions (which to date are unknown) on a local community for public benefit can ultimately be used to remove or minimise compensation to these communities for these restrictions.</p>	
<p>6</p> <p>IM-P2-Decision priorities</p>	<p>Oppose</p>	<p>Our membership clearly values its natural environment over and above currently proposed (and unquantified) economic benefits provided by an international airport in the community.</p> <p>Our members value preserving the natural environment over and above the benefits proposed with the Tarras international airport.</p> <p>Proposing that economic benefits have equal priority to securing long term life-supporting capacity and mauri of</p>	<p>Disallow in part – the deletion of the words “firstly”, ‘secondly”, “thirdly”.</p>

		<p>the natural environment may create unnecessary conflicts between communities who do not evenly share or gain any of the benefits or may have much of the negative impact.</p> <p>It also silences the voices of future generations by trading off present day economic gain for the long-term sustainability of the environment.</p> <p>CIAL’s referencing to ‘balance these goals’ perpetuates the ill-informed approach to our management of the natural environment which has delivered the climate crisis and biodiversity crisis we are currently experiencing.</p>	
<p>Note: Additional rows for each separate further submission point should be added as required.</p>			