

Feedback on PORPS 2021		
Section/Chapter	Page	Comment
Part 2 Resource Management Overview	64-103	
Significant resource management issues for the region	64	LINZ is of the view that the economic and or recreation values etc derived from Otago's natural resources uphold the cultural or wellbeing values of Otago's community, and vice versa. Natural resources are made up of a set of interrelated values, including the natural system of biosphere elements, human and wildlife populations, the social system, the economic system, the political system, the cultural system etc. Recommendation: Better reflect the interrelation between all those values mentioned as they relate to natural resources (Figure 2 does a good job at this) but the commentary in the leading paragraphs separates them from one another.
	65	LINZ is of the view that one of the most significant issues impacting on the Otago region and all other regions within NZ are activities that affect and disturb the soil, which ultimately lead to its degradation. Inherently activities that degrade and affect soil result in greater natural hazards, contribute to climate change (soil exposure, land use cover and change influence soil pressure, moisture, and its ability to sequester carbon), affect water quality and quantity, as well as having significant correlation to losses in biodiversity. These may also have significant effects on other natural resource values such as economic and social values. Recommendation: Give greater weight to activities that affect and disturb soil as a resource management issue. For instance, agricultural practices leading to soil disturbance as well as various drainage techniques etc can change hydrologic conditions on the landscape, increase sediments and nutrients of run-off, and affect downstream water quality.
	65	LINZ agrees that the two "placed based issues" are regionally significant, but that an additional "High country" place-based issue should be assessed to acknowledge the significance of the inherent values in Otago's high country and that this land area has low resilience and is therefore at significant risk of economic and ecological failure in the face of climate change.
	65	Recommendation: Move the final paragraph of the introduction to the beginning. Making it clearer from the start that all the issues are interrelated.
Natural Hazards pose a risk to many Otago communities - social	66	LINZ's view is that the social impacts on people's wellbeing should take precedence over the other impacts noted. Recommendation: no longer refer to destruction of communities and the negative impacts on people as "secondary". Prioritise these ahead of other "social impacts" as this is the goal of mending any physical and infrastructure impacts.
Climate change is likely to impact our economy and environment	67	LINZ is of the view that the context and impact snapshot of this section should not only identify the impacts, but also the ways in which natural resource use and management in the Otago region is contributing to climate change. It will be difficult as a regulator to manage the impacts of climate change without identifying where and how the region is contributing and therefore where and how changes can occur. For example, this section mentions how climate change will impact the number of animals and types of crops grown in the region, yet it does not note how the types of crops and number of animals etc in the region have contributed to climate change up until this point. Recommendation: Amend the statement to focus more on the regional contributions to climate change and areas for change, not just the natural hazards that result from a changing climate. As with how the economic section speaks about impacts and opportunities, the context should cover the causal and coincidental factors.
Climate change is likely to impact our economy and environment - Regional industry	68	Greater significance should be given to the potential and increased reliance on irrigation that will result from climate change. This in hand with increasing levels of regulation on resource use will require ingenuity and a new approach to Agriculture. Recommendation: provide more context surrounding the need to future proof regional industries and that traditional and current practices are unlikely to hold up to climate change.
Climate change is likely to impact our economy and environment - Social	69	Recommendation: Comment on the potential of increased climate induced urban drift. As more marginal environments and sectors become more greatly affected by climate change Otago will begin seeing rural to urban migration. Essentially, not all communities will be affected equally, and it is those which rely on land-based industries that will be the most widely affected. Current research suggests that in middle- and higher-income countries (such as New Zealand), higher temperatures induce larger out-migration rates from rural areas.
Pest species pose an ongoing threat to indigenous biodiversity, economic activities, and landscapes.	70	As with the previous section on Climate change, this section would benefit from acknowledging how historically poor practice, and mistakes, has heightened the prevalence of pest species in the Otago region. Furthermore, LINZ recommends acknowledging how human-mediated land use change can drive pest plant trait variation and therefore their prevalence and perseverance in modified and natural environments. LINZ also recommends that this section notes that: land use change and agricultural intensification have contributed to the prevalence of invasive pest species across the region; land use change associated with urbanisation and agricultural practices is a leading cause of environmental degradation; and non-native invasive species can and have transformed ecosystems at the landscape level by altering disturbance regimes, nutrient cycling as well as above and below ground ecosystem properties.
	70	LINZ recommends that in some cases pest species can be native and that the economic and social values may also be adversely affected by undesirable native species such as <i>Coriaria arborea</i> or <i>Wiseana cervinata</i> . Furthermore, this section lacks commentary on how pest species may affect the abiotic environment (the non-living part of the ecosystem).
	71	In making decisions on its own land LINZ gives significant weight to the landscape values of an area. Similarly, it recommends that ORC give more weight to landscape values in relation to how pest species modify landscapes, subsequently impacting on those landscape's social and recreational value for all New Zealanders (e.g., a hill of wilding pines or a river of didymo may affect the community's wellbeing).

Poorly managed urban and residential growth affects productive land, treasured natural assets, infrastructure, and community well-being.	72	LINZ's view is that ORC should give greater context around urban and residential development specifically suburban sprawl of seasonal homes (baches) in amenity areas near mountains, lakes, and other recreation-oriented settings. It is important to give detail about why there is significant population growth expected in those areas, and whether that is permanent population growth or seasonal. It is important to identify what is driving urban and residential growth in high recreational value areas rather than major centres such as Dunedin. The context should also note that those high recreational value areas contain many of the region's most important natural resource values.
	73	Reverse sensitivity effects are not limited to pest control and further detail of other potential effects should be noted. For example, noise and smell from agricultural operations. Equally, as urban sprawl continues in high recreational value areas, which are valued for their idyllic and isolated location (have high landscape values) urban development will impact on those in terms of reducing the value of that landscape (noise and visually impaired by houses, vehicles etc).
Freshwater demand exceeds capacity in some places	74	LINZ's view is that ORC needs to give more context around the arid and semi-arid environments within Otago that have and are being modified because of water allocation. Further, in many situations economic and environmental value, as they relate to water and water allocation, are often conflicting.
	75	Environmental: Consideration should be given to how land use change is impacting the quality of the limited freshwater available in some areas e.g., nitrogen concentrations are above base levels due to fertiliser use and land use change.
Declining water quality has adverse effects on the environment, our communities, and the economy.	75-76	LINZ's view is that greater context should be given to the specific agricultural activities in Otago that are driving the degradation of water quality e.g., irrigation, unregulated fertiliser uses etc. "Agricultural intensification" generally is not sufficient rather a targeted understanding leads to more effective decisions and targeted actions to reverse historical water quality issues.
	77	Consideration should be given more broadly to the economic impacts of water pollution, or those activities mentioned above that lead to the pollution e.g., Fert NZ estimates a drop in gross output of \$19.8 Billion across the nation if N fret inputs were removed. Essentially consideration could be given to the value which water polluting activities contribute to the Otago economy. This will allow more balanced decision making that does not necessarily sacrifice economic for environmental outcomes.
Rich and varied biodiversity has been lost or degraded due to human activities and the presence of pests and predators.	78	As with the above comments LINZ recommends greater context surrounding the leading causes of biodiversity loss in the Otago region.
Policies IM-P1 (1)	96	What are the environmental constraints of the RPS? Does this not limit what action can be taken going forward e.g., new science reveals unforeseen environmental degradation outside of the constraints set by this RPS. LINZ recommends broadening this policy to enable flexibility going forward.
IM -P1 (2)	96	Amend to the following: all foreseeable provisions related to an issue or decision should be considered (it can sometimes be difficult for a planner to determine all that is applicable to an issue, the suggested wording allows for a little more leeway).
IM -P1	96	LINZ finds it surprising that there's a lack of policy which directly addresses the extent of land use change across the region and the impacts which that has on natural resource values. Specifically, priority should be given to limiting the extent of future land use change which would adversely impact inherent values of the land, specifically the soil.
IM -P2	97	LINZ recommends removing the use of firstly, secondly, and thirdly here as it creates a hierarchy which prioritises the natural environment over the health needs of people. There should be a balancing act here to ensure all the outcomes are equally given effect to in every decision.
IM -P12	98	LINZ disagrees that activities which create adverse effects that cannot be avoided, remedied, or mitigated should be consented if those effects are offset. ORC should remove IM -P12 (3) entirely for the following reasons 1. offsetting is inherently complex and hard to measure/do well so runs the risk of significant damage to inherent values and 2. the fragility and high values in the Otago region should not be traded off under offsetting.
IM-P13	98	Cumulative effects should be given equal weight to any actual or immediate effects of a proposed activity/decision. This would subsequently achieve IM-P13 more effectively.
Part 3 Domains and Topics		
Land and Fresh Water	121-142	
LF-WAI-P1	121	LINZ views that the priorities listed are all interrelated, and it would be impossible to change one without affecting (either positively or adversely) the others. Subsequently, LINZ recommends removing the prioritisation and changing the wording in such a way that emphasises the interconnectedness and relation between the three priorities. As above LINZ views the management of water as a balancing act between the 3 priorities. Recommend: Removing the wording first, second and third, and replace with wording that accentuates the balance e.g. In managing fresh water in the Otago region, seek to achieve the following....
LF-WAI-P3 (4)	122	The use of the term "development" seems to contradict policies as set out in Part 1. Development in most cases suggest the use of natural resources outside of its normal environmental capability. LINZ recommends removing the term development. Furthermore, this section gives specific consideration to the health and well-being of the water but not the land. LINZ's view is that these two things are inherently interconnected and should therefore be treated as such. Recommendation: give equal weighting to the health and wellbeing of the land, specifically the soil.
LF-WAI-P3 (7)	122	As above LINZ views cumulative effects as equal to all other effects. Recommendation: remove LF-WAI-P3 (7) and replace by adding cumulative effects to the definition of effects as it is used throughout this document.

LF-WAI-PR1	123	Use a land management example in the final paragraph. Current example (poor water quality effects other values) does not demonstrate how inland activities have an impact on coastal water quality. LINZ recommends for example unregulated or controlled erosion at the top of catchments has flow on effects downstream and into coastal waters e.g., sediment build up in fisheries (or something similar).
LF-VM-O2	124	LINZ is concerned that the ORC cannot fulfil the current commitments to provide Kāi Tahu access to all the mahika kai in this area. Recommendation: change the wording of (4) so that ORC will support Kāi Tahu whanui in accessing mahika kai. As it currently reads ORC commits to providing access, which they cannot reasonably achieve. Furthermore, consideration should be given by ORC to supporting Kāi Tahu in building relationships with private landowners whose properties contain significant sites.
LF-VM	124	The ORC should strive to support the enhancement of the relationship between Kāi Tahu and wāhi tūpuna. Kāi Tahu has historically been locked out large tracks of the Otago region and may not know of all the sites of significance in the region. Sustaining is not very aspirational; the ORC can at least support the enhancement. Recommendation change "the ongoing relationship of Kāi Tahu with wāhi tūpuna is sustained" to "the ongoing relationship of Kāi Tahu with wāhi tūpuna is sustained and finding new connections is supported".
PORPS - 7b	124	LINZ is concerned about the the ability to meet the expectations for Lake Dunstan, due to the challenges experienced in this area.
LF-VM-M3	128	LINZ recommends an additional method which requires the ORC to work with other Government organisation (like LINZ) to achieve the objectives and policies in this chapter. As an agency focussed on Land Information and Management, and as the holder of nearly 20% of the Region's land it is important that ORC work alongside LINZ to identify environmental outcomes and methods to achieve those outcomes. It would be contrary to the outcomes of both organisations not to align to achieve improved environmental outcomes for Otago's high country and freshwater ways.
LF-FW-09	129	LINZ's view is that the NPSFW was intended to improve New Zealand's overall quality of water, not to simply prevent a decrease in the quality. Similarly, LINZ's view is that "restoring" Otago's natural wetlands means more than preventing further degradation and this section should reflect that. LINZ recommends rewording (2) and (3) to remove the terms "no decrease" and "reduction" with "the range and diversity of indigenous ecosystem types and habitats in natural wetlands are enhanced " and "their ecosystem health, hydrological functioning, amenity values, extent or water quality are enhanced".
LF-FW-P7	129	Change "the health and well-being of water bodies is maintained or, if degraded, improved" to be more aspirational should strive of improve or enhance the health and wellbeing of all water bodies. Try "the health and well-being of water bodies is maintained or enhanced".
	129	We are unclear on the expectations around the 'freedom for fish passage'. Does this include the dams and how do ORC propose that this will be achieved?
LF-FW-P8	130	LINZ is of the view that any research or harvesting of sphagnum moss etc should not be exempt from causing loss in values. "Sustainable" would suggest that the impact is no more than minor, anyway.
LF-FW-P10	131	LINZ's view is that stock should be excluded in all circumstances (noting that stock is defined by the national stock exclusion regulations which do not include sheep), not simply where possible.
LF-FW-P13	131	"Functional need" is not considered to be a high enough standard to preserve the natural character of Otago's waterways. Functional need should not apply to individuals or commercial activities. Should only apply at a level of regional or national significance and importance.
LF-FW-M5 (5)	133	Replace significant and outstanding values with "all values".
LF-LS-O12	137	As above LINZ's view is that Land use in the ORC should strive to maintain and enhance soil quality across the region. Recommendation: Replace "maintains" with "maintains and enhances".
LF-LS-P17	137	Replace the soil characteristics or values listed with the national soil quality indicators + soil biology. The indicators are listed here: <a href="https://envirolink.govt.nz/assets/Envirolink/Land20and20soil20monitoring-A-guide-for-SoE20and20regional20council20reporting.PDF">https://envirolink.govt.nz/assets/Envirolink/Land20and20soil20monitoring-A-guide-for-SoE20and20regional20council20reporting.PDF</a>
LF-LS-P18	137	Soil erosion should be prevented in all cases. LINZ is however of the view that appropriate vegetation cover and activities that enhance soil retention should be promoted, not simply any activity that enhances soil retention and maintains vegetation cover. Avoid the use of invasive and exotic species in habitats such as the high country which have unique ecosystems. Essentially avoid the mistakes of the past such as wilding conifers. Recommendation: replace "effective" with "effective and appropriate" management practices
LF-LS-P19	137	As above, LINZ's view is that the classification of highly productive land should reflect a nationally recognised system, the Land Use Capacity, LUC classification system. This can be used alongside those other factors that make land highly productive (as listed) as well as access to transport routes, access to appropriate labour markets and the current or potential availability of water, to make a final determination.
EC - Ecosystems and Indigenous Biodiversity	142-150	LINZ notes that the in development National Policy Statement for Indigenous Biodiversity may impact how Significant Natural Areas are identified and how change to them is measured in future.
ECO M2 - Identification of SNAs	145	LINZ are interested in SNAs particularly on land that is managed by, or adjacent to land managed by LINZ as a means of prioritising our own works to protect these areas. Any means of sharing information (see p146) is encouraged
	146	While acknowledging that SNAs are a planning tool and should be included in Regional and District Plans, LINZ encourages the storage of this data in a digital format that can be shared with agencies for the above

ECO M3 - Identification of Taoka	146	It is not clear whether taoka, when mapped, would be shared publicly and whether Mana Whenua will have any influence in this. Mana whenua would be more likely to share this information if it was likely to be used in a way to protect areas of taoka, while not making the public aware of them which could identify them as targets of damage or vandalism
ECO M7 - Monitoring	148	LINZ are also interested in the outcomes of biodiversity monitoring as a tool to measure the outcomes of weed control and restoration works we undertake. It maybe useful to collaborate or share with other Landholding agencies that are interested.
HCV - Historical and cultural values		
HCV-WT_P2	175	Broadly speaking cultural values associated with wāhi tūpuna may be much greater than, and capture many more things than, have been anticipated by the ORC. In some cases, the ORC may therefore be unable to achieve all these protections particularly the avoiding of significant adverse effects. Recommendation: reword (1) to not overcommit, e.g., striving to avoid instead of avoiding.
HCV-WT-M1	175	Local authorities must not only work together to ensure the identification process but must also work with private landowners to ensure the identification of those sites and prevent the destruction or degradation of those sites.
HCV-WT-PR1	177	The ORPS provides for the principles under Te Tiriti o Waitangi allowing Kāi Tahu to take an active role in the RMA process. As such it should be mentioned here as one of the principal reasons for recognising and providing for wāhi tūpuna.
HCV-WT_AER1	177	LINZ understands that in many cases Kāi Tahu and local hapu do not want information on cultural values to be published publicly, such as in regional and district plans. This is due to previous occurrences of destruction and vandalism of those sites and values. Subsequently, a more subtle approach may be required where information on those sites and values known are not made public.
HCV-HH-P3	178	Greater clarity should be given to ensure such things as farming practices or pastoral activities are excluded from the list of historical values (e.g., the fact that there has been farming on the land historically should not be a value itself). However, a historic wool shed might have a value associated with heritage, but also with a farming activity. Recommendation: redraft the definition to better reflect cultural and heritage values that may be associated with farming activities, but not the farming activity itself.
HCV-HH-P5	178	As above replace "avoiding" with "striving to avoid", to set a more realistic benchmark and acknowledge that it is not possible to avoid adverse effects in all situations.
HCV-HH-M4 (2)	179	Include any other soil disturbance.
HCV-HH-M5(2)	180	As above include any other soil disturbance.
HCV-HH-M6	180	As mentioned, regarding wāhi tūpuna the ORC must think carefully about releasing information publicly regarding the location and type of historical and cultural sites and values in the region. This may result in perverse outcomes such as the destruction or vandalism of those sites.
NFL -Natural features and landscapes		As above replace "avoiding" with "striving to avoid".
NFL-P5	182	LINZ is of the view that afforestation and planting of invasive species and plantation forest species, not just wilding conifers, should be prevented from entering the highly valued features and landscapes in the Otago region. For example, the use of lupins should be prevented in high country landscapes.
NFL -M1	183	As above identification of valuable areas in a public forum may result in perverse outcomes. Also, jurisdictional boundary relationships should be extended beyond other regional and district authorities to central government agencies such as LINZ.
Freshwater	186-197	The freshwater section does not seem to address the following points in any detail, which we believe should be addressed: leeway for herbicide usage to treat aquatic pests (eg lagarosiphon) - the definition of 'pollutant/waste' is unclear in relation to herbicide, and whether this would counteract our ability to target aquatic pests with herbicide, which is critical in Otago. Hessian is another control method used for aquatic weeds, which is layed down on the lakebed to smother aquatic pests - this is also not mentioned anywhere and we need to ensure that it's use is not prohibited in any way.
		The freshwater section also does not talk much about prevention of new species getting into our waterways. The introduction/spread of pest species is a serious concern to Otago waterways. Invasive aquatic pests may impact native biodiversity, oxygen content in the water, and heavy metals, and should be considered as a water quality factor.
Part 4 - Evaluation and Monitoring	198-199	
	198	As on pg 148, the collection and sharing of data, including data and information that the regional council collects that may be of benefit to territorial authorities could also potentially be useful to land managing public agencies such as LINZ and DOC
	198	LINZ will also be working to link outcomes of our biosecurity control works in our key systems (such as Wanaka and Wakatipu) to how they contribute to the wellbeing of our people in order to help us best prioritise our investment into biosecurity

## RPS

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**From:** Ini-Isabee Gunn <IGunn@linz.govt.nz>  
**Sent:** Friday, 3 September 2021 10:22 a.m.  
**To:** RPS  
**Cc:** Rachel Currie  
**Subject:** Feedback on PORPS 2021 & Evaluation Report from Toitū Te Whenua LINZ  
**Attachments:** 2021 Otago Regional Policy Statement PORPS 2021 & Section 32 Evaluation Report - LINZ Feedback.xlsx

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Kia ora koutou,

Thank you very much for giving us the opportunity to provide input into your proposed Otago Regional Policy Statement 2021 and its Evaluation Report. We've had a number of team members provide some detailed feedback on the two documents provided, which we summarized in the attached Excel sheet in two separate tabs. These are very comprehensive documents with a very aspirational direction – well done to the team that pulled this all together. As you will see, there are several comments and suggestions, as well as some concerns, risks and gaps that we would like to highlight. If you would like to discuss any of our comments with us, please don't hesitate to contact me.

Toitū Te Whenua LINZ supports the intent of the ORPS and is looking forward to working with ORC and the District Councils in the Otago Region to deliver the outcomes set by the strategy.

Ngā mihi,

Ini

### Dr. Ini-Isabée Gunn

**Principal Advisor Ecology – Biosecurity & Biodiversity**

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