

From: John Binney <johnbinney@iinet.net.au>
Sent: Wednesday, 1 September 2021 12:15 p.m.
To: RPS
Subject: Proposed RPS - Submission
Attachments: ORC00001.pdf; ORCSP20210829.docx

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Submission - Sector stakeholder

Hi,

Attached are

- Completed scan of Form 5
- Letter with detailed comments.

Regards

John Binney

President

Upper Clutha Angling Club

Address for service of submitter (This is where all correspondence will be directed)

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

JOHN BINNEY

e. Email:

johnbinney@iinet.net.au

f. Telephone:

020 41134402

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

721 MT BARKER RD WANAKA 9382

8. My submission is: REFER ATTACHED

Column 1	Column 2	Column 3	Column 4
The specific provisions of the proposal that my submission relates to are: (Please enter the relevant objective, policy, method, or 'other' provision reference where possible. For example, 'AIR-01'.)	I support or oppose the specific provisions or wish to have them amended . (Please indicate "support" or "oppose" or "amend")	The reasons for my views are:	I seek the following decision from the local authority: (Please be as clear as possible – for example, include any alternative wording for specific provision amendments.)
Note: Additional rows for each separate provision or submission point should be added as required.			

Written Submission on Proposed Otago Regional Policy Statement 2021

(Submissions must be received by Otago Regional Council by 3 pm Friday 3 September 2021)

To: Otago Regional Council

1. **Name of submitter** (full name of person/persons or organisation making the submission. Note: The submissions will be referred to by the name of the submitter)

UPPER CLUTHA ANGLING CLUB

2. This is a submission on the **Proposed Otago Regional Policy Statement 2021**.

3. I ~~could~~/could not (Select one) gain an advantage in trade competition through this submission. (See notes to person making submission)

4. I am/~~am not~~ (Select one) directly affected by an effect of the subject matter of the submission that

a. adversely affects the environment; and

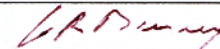
b. does not relate to trade competition or the effects of trade competition (See notes to person making submission)

5. I wish/~~do not wish~~ (Select one) to be heard in support of my submission

6. If others make a similar submission, I **will**/~~will not~~ (Select one) consider presenting a joint case with them at a hearing

7. **Submitter Details**

a. **Signature of submitter** (or person authorised to sign on behalf of submitter)



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 JOHN BINNEY

Position PRESIDENT

Organisation UPPER CLUTHA ANGLING CLUB

c. **Date**

1 SEPTEMBER 2021



for the aspiring angler

Otago Regional Council
70 Stafford St
Dunedin
Attn ORC Policy Team

1 September 2021

PROPOSED OTAGO REGIONAL POLICY STATEMENT

The Submitter

This submission is made on behalf of the Upper Clutha Angling Club.

The club has more than 100 members and is based in Wanaka. The primary objective of the club is to encourage the pursuit of fishing as an active pastime for community members of all age groups. Club members primarily fish the lakes and rivers of Central Otago but also regularly fish inland waters in other regions as well as fish along both the east and west coast of the South Island.

Establishing a Valued Aquatic Environment

The purpose of the ORPS is defined on page 5 of the document. In summary, the ORPS is intended to set out objectives, policies and methods to resolve identified environmental issues.

Unfortunately, the document is silent on how a balance is to be struck between the ORPS goal of protecting indigenous fish and the presence of Salmonids in almost all our regional lakes and rivers.

It must be recognised that Salmonids deserve their future place as an important part of the Otago aquatic environment. Firstly, they contribute to the balanced lifestyle and well-being of Otago residents. There is a large and active fishing community in Otago with about 18,000 fishing licence holders. Secondly, they are a significant contributor to the regional economy. One study has suggested a regional contribution of between \$88 and \$130million pa ⁽¹⁾. Thirdly, Otago is recognised internationally for the quality of its' trout fishery adding yet another reason for tourists to visit and help sustain the regional tourist industry.

The need to protect indigenous fish is understood and supported by our members but we would contend that this goal requires a well-researched investigation to understand the interaction of aquatic species in our lakes and rivers. Our observations of the current status of indigenous fish suggests their protection does not require exclusion of Salmonids from our rivers and lakes. In fact

the biggest threat to indigenous fish is loss of habitat (eg wetland loss) and loss of connectivity (eg dams, diversions and dry streams and rivers) not the presence of salmonids.

This ORPS must confirm the need for a balanced population of indigenous fish and salmonids in our rivers and lakes with a scientifically based management plan to ensure healthy populations of all aquatic species living in high quality water with sufficient year-round water flows.

There can be a balance – it is not an all or nothing situation.

Specific Comments on Proposed Policy Statement

It is recognised the ORPS is a high-level document that often relies on subservient documents for specific criteria. However, there are some concepts that are broad reaching and would benefit from definition or wording modification in the ORPS

- Pages 75 and 76 the term 'Healthy State' is used. This is a very important benchmark and as such needs a properly quantified and measurable definition.
- Page 96 there is a requirement that 'all provisions relevant to an issue or decision must be considered'. This statement is so broad as to be meaningless.
- Page 129 section LF-FW-P7 (1) has the term 'if degraded, improved'. This is so loose it is meaningless.
- Page 132 section LFF-FW-P15 2(a) and 2(b) use the term 'where one is available'. We believe all urban areas should have, within a realistic timeframe, properly engineered and monitored stormwater and sewage reticulation systems with discharge points to the environment appropriately monitored. The present wording is not compatible with responsible management of the environment.
- Page 133 section LFF-FW-P15 2(f). The term 'wherever practicable' should be deleted. Recognised engineering measures are available to mitigate these problems and as is regularly observed in the Wanaka area, developers take advantage of this type of wording to instal low cost (ie profit maximising) solutions for run-off management to the detriment of our rivers and lakes.

We trust this feedback is of use and would be happy to discuss our comments further should that be of assistance.

Yours faithfully,

John Binney

President UCAC

⁽¹⁾ 2014 Masters Thesis by Liang Jiang