

From: [Ben Farrell](#)
To: [RPS](#)
Cc: ["Fiona Black"](#)
Subject: Wayfare Submission on pRPS
Date: Friday, 3 September 2021 2:24:36 p.m.
Attachments: [image001.png](#)
[Proposed Otago RPS - WAYFARE Submission 3 Sept 2021.pdf](#)

Good afternoon, please find attached a submission on the pRPS by Wayfare Group.

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Written Submission on Proposed Otago Regional Policy Statement 2021

To: Otago Regional Council (rps@orc.govt.nz)

1. This is a submission by **Wayfare Group Limited (Wayfare)** on the Proposed Otago Regional Policy Statement 2021.
2. Wayfare:
 - a. Could not gain an advantage in trade competition through this submission.
 - b. Is directly affected by an effect of the subject matter of the submission that adversely affects the environment; and does not relate to trade competition or the effects of trade competition
 - c. Does wish to be heard in support of my submission
 - d. Will consider presenting a joint case with them at a hearing if others make a similar submission
3. Wayfare seek:
 - a. Amendments to all the provisions of the RPS in accordance with and in no way limited to the changes set out on the following pages;
 - b. Or alternatively other amendments, including any such combination of provisions as may be appropriate, to address the matters raised in this submission, and to achieve the intent of this submission.
 - c. Any similar, alternative, consequential and/or other relief as necessary to address the issues raised in this submission.
4. Reasons for this submission are provided throughout this document.
5. Fiona Black, Concessions & Consents Manager at Real Journeys Limited on this day 3 September 2021

Address for service

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WAYFARE

1. Wayfare Group is the parent company of *Real Journeys*, *Cardrona Alpine Resort*, *Go Orange*, and the *International Antarctic Centre*. Wayfare owns or as interests in businesses and properties throughout the region including high country farmland, wharves and lakebed.
2. Originally founded in 1954 by tourism and conservation pioneers Les and Olive Hutchins, the Wayfare Group like the rest of the tourism sector has been heavily impacted by the fallout from COVID-19.
3. In the 2018-19 year Wayfare activities and services attracted about 1.6 million visitors. Wayfare employs over 1200 people (1600 pre COVID-19), some of whom are redeployed between summer and winter-based activities due to seasonable variability and improving staff retention.
4. Through the aforementioned companies Wayfare owns or operates regionally, nationally and internationally recognisable visitor activities and destinations, and has an interest in and will be affected by the policy directives in the Otago Regional Policy Statement. In this matter, Wayfare is particularly interested in and affected by any provision which promotes or restricts the ability of people to use and access natural and physical resources for the primary purpose of transport or the visitor industry, including ancillary commercial and industry services. These activities are centred on supporting people's wellbeing by transporting people to the natural environment for their use and appreciation of the natural environment (i.e. outdoor recreation).

Real Journeys Limited

5. *Real Journeys* is a tourism company based in the southern South Island which has been operating for over 66 years. In 1954 Les and Olive Hutchins began operating the Manapouri-Doubtful Sound Tourist Company, running four-day excursions which included a Lake Manapouri cruise, a trek over the Wilmot Pass to accommodation at Deep Cove, and a cruise on Doubtful Sound. In 1966 Les and Olive acquired Fiordland Travel Limited, with its Te Anau Glow-worm Caves and Milford Track Lake Transport operation and began trading as Fiordland Travel Limited. Ongoing expansion followed with the acquisition of the vintage steamship “TSS Earnslaw” in Queenstown in 1969 and with the establishment of cruises in Milford Sound in 1970. Since 2002 Fiordland Travel operated all of its tourism excursions under the ‘Real Journeys’ brand; in 2004 Stewart Island Experience was established; and in 2006 the company changed its name to Real Journeys Limited.
6. Conservation is part of Real Journeys heritage and a cornerstone of our business. For instance; every year (pre COVID-19) passengers contribute more than \$60,000 to the Leslie Hutchins Conservation Foundation via a passenger levy on our Doubtful Sound operations. Projects supported by the Leslie Hutchins Conservation Foundation include dolphin research, protection programmes for endangered birds, track and interpretation signage developments, outdoor education camps and wilding pine eradication. Real Journeys has also started work on this long-term project to remove predators from Cooper Island - the third largest island in Dusky Sound. The initiative sees Real Journeys join, the Department of Conservation’s Tamatea/Dusky Sound Restoration Programme; sharing its vision to make Dusky Sound one of the most intact ecosystems in the world.
7. In 2013 Real Journeys launched the Go Orange brand; purchased Cardrona Alpine Resort and the 155 hectare property at Walter Peak which Real Journeys previously leased for over two decades. This resort property located at the foot of Walter Peak on the edge of Lake Wakatipu, 13km from Queenstown. The property includes the Colonels Homestead, surrounding buildings and the newly constructed rural demonstration amphitheatre. This land holding has been a visitor destination for a very long time and has been zoned for resort development since the 1980s. Real Journeys uses this location to operate dining and farm experiences serviced by the vintage steamship the “TSS Earnslaw”. Then in 2015 Real Journeys purchased the International Antarctic Centre in Christchurch and in 2016 Real Journeys took over 100% ownership of Queenstown Rafting and purchased Kiwi Discovery which are now operated under the Go Orange brand. Real Journeys now has operational bases in Milford Sound, Te Anau, Manapouri, Queenstown, Bluff and Stewart Island and is the operator of the Go Orange Brand. The company offers a range of quality tourism excursions including multiday Discovery Expeditions around the southern fiords and Stewart Island; day time and overnight cruises on Milford Sound and Doubtful Sound (with daily coach connections from Te Anau and Queenstown); Te Anau Glow-worm Caves excursions; guided Milford Track Day-walks; Stewart Island ferries, accommodation on Stewart Island and tours including a partnership with Rakiura Māori Lands Trust to provide Kiwi spotting tours and the development of another walking opportunity at the Neck (Oneki); in Queenstown, cruises on Lake Wakatipu aboard the “TSS Earnslaw” combined with Walter Peak High Country Farm excursions and dining options at the Colonel’s Homestead.

Cardrona Alpine Resort Limited (CARL)

8. *Cardrona Alpine Resort* caters for the broadest range of ski/board related activities in New Zealand and is the premier resort for snow sports in Australasia. Cardrona Alpine Resort Limited employs around 1100 staff winter peak season, 150 staff summer peak season, and 100 off peak season. Cardrona Alpine Resort also owns the assets and holds the concessions to operate the ***Treble Cone ski field***. Cardrona Alpine Resort caters for guests of all abilities and disciplines making it the most diverse field in New Zealand. The resort is growing into a summer resort offering lift accessible mountain biking, gravity karts, walking and adventure trails and night-time sightseeing adventures. Cardrona Alpine Resort is focused on developing a year-round activity base for summer and winter operation offering year-round lift accessible terrain, on mountain accommodation, food and beverage service, retail, and mountain-based tourism activities. CARL also own and operate transport services to the ski fields from main centres and shuttle services from the base car parks up and down the mountain.
9. As a winter resort, Cardrona caters for all abilities with a focus on families and beginners. Facilities range from ski school to a Ministry of Education certified pre-school and child-care facilities. For the more advanced a "high performance centre" is provided which trains skiers and snowboarders, including top international skiers/snowboarders. Cardrona is regularly a venue for competitive ski and snowboard events and championships attracting competitors from around the globe. The operation of the Cardrona Alpine Resort relies on the ability to develop, operate, maintain and upgrade a considerable network of built infrastructure, primarily relating to the ski field, including a network of roads/trails, parking areas, buildings, energy generation, snow making, communication, accommodation, retail and cafe facilities. Recreation activities at the Cardrona Alpine Resort were historically carried out during the ski season. However, the resort lends itself to the provision of four-season tourism activities such as mountain biking, accommodation, tramping, sightseeing, and mountain adventure activities. Development of new buildings, supporting infrastructure, and land and some wetland modification, (earthworks and vegetation clearance) are required to operate, maintain, upgrade and grow the provision of outdoor recreation and other tourism services at the Cardrona Alpine Resort.

Go Orange Brand

10. ***Go Orange*** is a comprehensive outdoor recreation activity and passenger transport brand based in Queenstown, with offerings including jet boating, white water rafting, sightseeing, water taxis, cruises, and sea kayaking (including on Milford and Doubtful Sounds). Go Orange operates jet boating and white-water rafting on the iconic Lake Whataktipu Wai Maori and Shotover and Kawarau Rivers, day and multi-day sea kayaking expeditions in Fiordland, full-package hiking/walking on the 'great walks', and the Landsborough Wilderness Experience - a multi-day adventure tour incorporating a 3 day white water raft down the Landsborough River in South Westland.

Provision	Position	Reason(s)	Decision Sought
<p>Entire RPS – new provisions sought</p>	<p>Oppose</p>	<p>The pRPS fails to include recognition of and provision for people and communities' health and wellbeing, by not sufficiently recognising or providing for the benefits of transport and tourism activities and development, in particular activities centred on supporting people's wellbeing by transporting people to the natural environment so people can use and appreciate the natural environment.</p> <p>It should go without saying that people (residents and visitors) rely on access to and use of the natural environment to support their health (mental and physical) and cultural, social and economic wellbeing. Similarly, obviously that the health and wellbeing of communities including many local businesses benefit directly and indirectly from providing services associated with transporting and accommodating people to and within the natural environment so people can use and appreciate the natural environment.</p> <p>Like many transport, and nature/adventure based tourism companies, Wayfare owns and operates numerous transport and recreation related activities which support these well-beings. Wayfare, in particular, also contributes a lot to the enhancement and restoration of nature conservation and indigenous biodiversity restoration initiatives in the Otago and Southland regions.</p> <p>The failure to recognise and provide for activities which directly or indirectly support people's ability to connect with the natural environment, so people can use and appreciate the natural environment, undermines the above benefits and is contrary to the concept of sustainable management of Otago's natural and physical resources, because fundamentally these activities generally:</p> <ul style="list-style-type: none"> • are part of Otago's identity which the current generations of the region rely on; and • maintain, enhance or do not significantly compromise the health and wellbeing of the region's natural environment • do not undermine or threaten the well-being of future generations. 	<p>Insert new provisions which explicitly recognise, protect and promote the benefits of and provide for people's well-being, including the use of and access to the natural environment for transport, the visitor industry inclusive of commercial recreation, and ancillary commercial and industry services.</p> <p>This relief should flow through each level or place in the plan architecture, including for example:</p> <ul style="list-style-type: none"> • Description of the Region • Significant Resource Management Issues • Integrated Management • Domains • Topics, including Transport and Historical and Cultural Values, Natural Features and Landscapes, Urban Form and Development

Provision	Position	Reason(s)	Decision Sought
Entire RPS – new provisions sought	Support	Unless otherwise discussed or affected by the reasons below the pRPS is supported.	Retain all provisions in the pRPS as notified except as discussed or affected by the reasons discussed and relief sought below.
Entire RPS – new provisions sought	Oppose	The pRPS fails to include any policy direction about how competing demands on water catchments should or will be managed. For example, if a waterbody is supporting agriculture / horticulture use, and someone seeks to plant a plantation forest to take water out of the catchment and compromise agriculture / horticulture how will this be dealt with. Wayfare owns and operates activities in the alpine environment (namely ski field areas) where access to water is constrained by natural elements and in the future could be further constrained by competing interests of other parties.	Insert new provisions or amend the current provisions to provide clearer policy direction about how competing interests for water take and use will be addressed.
Entire RPS – new provisions sought	Oppose	The pRPS fails to include clear direction about or provision for the need for people to repair flood protection devices and clean up after natural hazard events such as flooding. As floods and extreme weather events are likely to be more common in the future, with climate change, there is a need for people to be able to readily clear debris/slip movements out of waterbodies or adjoining land to allow the waterway to flow freely, prevent further flooding, and clean up mess on usable land.	Insert new provisions or amend the current provisions to provide clear policy direction that provides for the ability of people to clear debris/slip movements out of waterbodies or adjoining land.
Entire RPS – new provisions sought	Oppose	The pRPS fails to include clear direction about pest control (namely rabbits and possums) to maintain vegetation cover for intrinsic value of vegetation and erosion control, and to absorb greenhouse gases etc (for example as discussed in the document: <i>NATIVE HABITAT CARBON IN CRISIS: It's time to protect our Natural Ecosystem Carbon Sinks, published by Forest & Bird</i> : https://www.forestandbird.org.nz/sites/default/files/2021-06/Native%20Habitat%20Carbon%20in%20Crisis%20Report%20v2.pdf)	Insert new provisions or amend the current provisions to provide clear policy direction about pest control (namely rabbits and possums <u>[i.e. browsing mammalian pest species]</u>) to maintain and enhance vegetation cover.
All Explanation, Reasons, and AER sections	Oppose	All Explanation, Reasons, and AER provisions unnecessarily lengthen and potentially confuse (not assist) the provisions they are referring to.	Delete all AER provisions. If the AER provisions are to be retained then it is sought that they be amended (where relevant) to align with the relief sought in this submission.

Provision	Position	Reason(s)	Decision Sought
Entire RPS	Oppose	<p>There are numerous vague terms in the pRPS document, for example as listed below:</p> <ul style="list-style-type: none"> • Significant • Sustainable / sustainable development / sustained • Environmental limit • Bottom line • Environments • Statements including or like “important features and values identified by this RPS” <p>These words lack practical or effective meaning and therefore will create uncertainty when applied in practice. Every word in every objective, policy, method, or AER should be clear and explicit about what it means.</p> <p>In respect of environmental limits, the RPS is unclear on what environmental limits are actually being referred to – for example do they refer to limits on landscape and amenity values? Limits should only apply to the natural environment (for example relate to biophysical attributes, and possibly MW matters).</p>	Replace these words with other words which have a practical or clearer/explicit meaning.
Entire RPS	Oppose	There are numerous references to the term “possible”. However, this term is an extremely stringent and potentially unrealistic test to meet.	Delete term “possible” from the pRPS. Replace with clearer achievable or more practicable direction, or alternatively replace with “practicable”.
Entire RPS	Oppose	There are numerous references to “ outstanding natural features or landscapes ” and “ highly valued natural features or landscapes ”. For clarify, these provisions should be amended to include the word “ <i>natural</i> ” before landscapes, because it is the “outstanding natural” landscapes which are to be protected from inappropriate development (under RMA 6b) and presumably the highly valued “natural” landscapes to be maintained (under RMA 7c and 7f).	Insert “natural” before landscape every time there is reference to “outstanding natural features or landscapes” and “highly valued natural features or landscapes”.

Provision	Position	Specific Reason(s) if any	Amendment Sought
Description of the Region	Oppose	Tourism has a significant positive impact on the economy.	... Tourism has also has a significant impact on the regional economy, contributing about a quarter of the region's total gross domestic product...
Coast	Oppose	Fix typos and clarify what is meant by commercial fishing "ramps", shouldn't this be "commercial fleet"	The Otago coastline stretches for 480 km and is extremely diverse, encompassing pebble and sandy beaches, basalt formations, dune systems, eelgrass and saltmarshes, estuaries, rolling downlands, and striking cliff heads. Significant coastal settlements include Dunedin and Oamaru, with the Otago port based in Port Chalmers. Otago Harber Harbour is the region's only commercial freight handling harber harbour, however commercial fishing ramps-fleet are present in <u>Careys Bay</u> , Oamaru, Moeraki, Karitane, and Taieri Mouth. Coastal erosion and the decline of the regional coastline is well documented, posing a long-term threat to residential and commercial coastal developments.
Waterbodies	Oppose	The description understates the amount and importance of unmodified natural environment throughout Otago.	Otago's landscapes are diverse. Moving inland from Otago's diverse and varied coastline, the landscapes change dramatically. Rolling plains separated by mountain ranges, steep hillsides of tussock, and deep gorges make up a lot of South and Central Otago. This <i>land</i> is dissected by flowing bodies of water, towering mountainscapes, and fascinating geological formations. Modified landscapes encompassing farmland and remnants of the region's early gold mining activity are ever-present, creating a rich sense of heritage and regional identity. <u>There is a tremendous amount of unmodified land in our National Parks and other Public Conservation- Land Parks.</u>
Urban form	Oppose		Urbanised areas in Otago occupy only about 1% of total <i>land</i> area, however 87% of people live in urban settlements. Dunedin is Otago's largest urban area, surrounded by hills and harber harbour, and has a large suburban area and commuter catchment especially to the south, with more recent expansion moving out to connect with an expanding Mosgiel. The Queenstown Lakes District population is approximately 91% urban. Its outstanding landscape has historically-determined , and will continue to <u>influence urban growthdetermine, how urban form develops.</u>
Definitions minimise	- Oppose	The term minimise is used in the pRPS but it is not defined.	Insert definition for " minimise ", as below: <u>Reduce to the smallest amount reasonably practicable. Minimised, minimising and minimisation have the corresponding meaning.</u>
Definitions natural environment	- Oppose	The term natural environment is used in the pRPS but it is not defined.	Insert definition of " natural environment ", as follows: <u>Means (a) land, water, air, soil, minerals, energy, and all forms of plants, animals, and other living organisms (whether native to New Zealand or introduced) and their habitats; and (b) ecosystems and their constituent parts.</u>

Provision	Position	Specific Reason(s) if any	Amendment Sought
Definitions – pests	Oppose		Insert definition of “pests” as described in the Regional Pest Management Plan
Definitions – resilient or resilience	Oppose	No need for “quick” recovery	Resilient or resilience Means the capacity and ability to withstand or recover quickly from adverse conditions.
Definitions – rural industry	Oppose	The term rural industry is term is used in the RPS provisions but is not defined. The term should be defined. The first definition provided is drawn on the definition in the QLDC PDP, while the second definition is from the National Planning Standards.	Insert definition of Rural Industry , like the following: <u>Means the use of land and buildings for the purpose of manufacturing, fabricating, processing, packing and/or storage of goods and materials grown or sourced outside the urban environment and the storage of goods, materials and machinery associated with commercial contracting undertaken outside the urban environment.</u> OR <u>Means an industry or business undertaken in a rural environment that directly supports, services, or is dependent on primary production.</u>
Definitions – ski field infrastructure	Oppose	Infrastructure associated with accessing and using the Cardrona Alpine Resort, Coronet Peak Ski field, The Remarkables Ski field, and the Treble Cone Ski field is regionally and nationally significant and therefore should be specified as such. Means of achieving this is to define “Ski Area Infrastructure” and list Ski Area Infrastructure in the definition of Regionally Significant Infrastructure.	<u>Ski Area Infrastructure</u> <u>Means infrastructure associated with the construction, operation, maintenance, upgrading, or expansion of the following existing ski areas:</u> <u>(a) Cardrona Alpine Resort</u> <u>(b) Coronet Peak</u> <u>(c) Remarkables</u> <u>(d) Treble Cone</u>

Provision	Position	Specific Reason(s) if any	Amendment Sought
Definitions – rural area	Oppose	The definition of Rural area (“means any area of land that is not an urban area”) is not appropriate in the context of environmental or resource management of Otago where a lot of the non-urban environment is natural/unmodified. The term rural has a connotation of primary production activities (as reinforced by the definition of rural industry in the National Planning Standards. However, a lot of the non-urban area in Otago is unmodified natural environment, where primary production has not occurred and is not appropriate (but some activities and development, such as some visitor activities/services and outdoor recreation), are entirely appropriate.	Delete definition of rural area . Alternatively amend definition to exclude unmodified natural areas, and include a new definition for natural environment or similar.

Provision	Position	Specific Reason(s) if any	Amendment Sought
Definitions regionally significant infrastructure	– Oppose	<p>Infrastructure associated with accessing and using the Cardrona Alpine Resort, Coronet Peak Ski field, The Remarkables Ski field, and the Treble Cone Ski field is regionally and nationally significant and therefore should be specified as such. Means of achieving this is to define “Ski Area Infrastructure” and list Ski Area Infrastructure in the definition of Regionally Significant Infrastructure (RSI).</p> <p>If Ski area infrastructure is not listed as RSI then the ability of these ski areas to operate and grow is unreasonably restricted by the NESFM regulations which do not provide an explicit consenting pathway for activities which may drain or partially drain, or otherwise modify, a natural inland wetland.</p>	<p>Regionally significant infrastructure means:</p> <ol style="list-style-type: none"> (1) roads classified as being of regional importance in accordance with the One Network Road Classification, (2) electricity sub-transmission infrastructure, (3) renewable electricity generation facilities that connect with the local distribution network but not including renewable electricity generation facilities designed and operated principally for supplying a single premise or facility, (4) telecommunication and radiocommunication facilities, (5) facilities for public transport, including terminals and stations, (6) the following airports: Dunedin, Queenstown, Wanaka, Alexandra, Balclutha, Cromwell, Oamaru, Taieri. (7) navigation infrastructure associated with airports and commercial ports which are nationally or regionally significant, (8) defence facilities, (9) community drinking water abstraction, supply treatment and distribution infrastructure that provides no fewer than 25 households with drinking water for not less than 90 days each calendar year, and community water supply abstraction, treatment and distribution infrastructure (excluding delivery systems or infrastructure primarily deployed for the delivery of water for irrigation of land or rural agricultural drinking-water supplies) (10) community stormwater infrastructure, (11) wastewater and sewage collection, treatment and disposal infrastructure serving no fewer than 25 households, and (12) Otago Regional Council’s hazard mitigation works including flood protection infrastructure and drainage schemes. (13) <u>Ski Area Infrastructure</u>
MW–O1 Principles of Te Tiriti o Waitangi	– Oppose	It is difficult to comprehend how parties other than government can give effect to Te Tiriti.	<p>MW–O1 – Principles of Te Tiriti o Waitangi</p> <p>The principles of Te Tiriti o Waitangi are given effect in resource management processes and decisions, utilising a partnership approach between councils and Papatipu Rūnaka to ensure that what is valued by <i>mana whenua</i> is actively protected <u>considered</u> in <u>decision-making</u> the region.</p>

Provision	Position	Specific Reason(s) if any	Amendment Sought
IM-O3	Oppose	There is no need to refer to “environmental” when referring to sustainable. A sustainable impact is one that is inherently sustainable across the different domains of sustainability (ecologically, socially, economically).	IM-O3 – Environmentally sSustainable impact
IM-P1	Oppose	The term “environmental constraint” is unclear. It is appropriate for activities to be carried out within limits of attributes of the natural environment.	IM-P1 – Integrated approach The objectives and policies in this RPS form an integrated package, in which: <ol style="list-style-type: none"> (1) all activities are carried out within limits of natural environmental attributes the environmental constraints of this RPS, (2) all provisions relevant to an issue or decision must be considered, (3) if multiple provisions are relevant, they must be considered together and applied according to the terms in which they are expressed, and (4) notwithstanding the above, all provisions must be interpreted and applied to achieve the integrated management objectives IM-O1 to IM-O4.
IM-P2 – Decision priorities	Oppose	A “long-term” period creates uncertainty (unless it is defined which it is not) and the feasibility of “securing” a long term objective is questioned.	IM-P2 – Decision priorities Unless expressly stated otherwise, all decision making under this RPS shall <u>promote</u> : <ol style="list-style-type: none"> (1) firstly, secure the long-term life-supporting capacity and mauri of the natural environment, (2) secondly, promote the health needs of people, and (3) thirdly, safeguard the ability of people and communities to provide for their social, economic, and cultural well-being, now and in the future.

Provision	Position	Specific Reason(s) if any	Amendment Sought
IM-P4 – Setting a strategic approach to ecosystem health	Oppose	Use and development of resources can result in considerable benefits through ecological and conservation enhancement and restoration initiatives. There should be more emphasis and policy direction for supporting activities which will result in healthy ecosystems and ecosystem services are achieved.	<p>IM-P4 – Setting a strategic approach to ecosystem health</p> <p>Healthy ecosystems and ecosystem services are achieved through a planning framework that:</p> <ol style="list-style-type: none"> (1) protects their <i>intrinsic values</i>, (2) takes a long-term strategic approach that recognises changing <i>environments</i>, (3) recognises and provides for ecosystem complexity and interconnections, and (4) anticipates, or responds swiftly to, changes in activities, pressures, and trends. <p>(4)(5) <u>Promotes use and development of resources which support 1-3 above.</u></p>
IM-P9 – Community response to climate change impacts	Oppose	Climate change response will be a process – there is a need to continually adapt over time.	<p>IM-P9 – Community response to <i>climate change</i> impacts</p> <p>By 2030 Otago’s communities have established <u>initial</u> responses for adapting to the impacts of <i>climate change</i>, are adjusting their lifestyles to follow them, and are reducing their <i>greenhouse gas</i> emissions to achieve net-zero carbon emissions by 2050.</p>
IM-P10 – Climate change adaptation and mitigation	Oppose	<p>The term “minimise” should be defined.</p> <p>Why “prioritise”? Prioritise against what. What does including “prioritise” actually mean?</p> <p>This policy should relate to “significant risk” and should also focus on “new zoned land” and new activities not anticipated in a plan.</p>	<p>IM-P10 – <i>Climate change</i> adaptation and mitigation</p> <p>Identify and implement <i>climate change</i> adaptation and mitigation methods for Otago that:</p> <ol style="list-style-type: none"> (1) minimise the <i>effects</i> of <i>climate change</i> processes or <i>risks</i> to existing activities, (2) prioritise avoiding the establishment of new activities in areas subject to <u>significant risk</u> from the <i>effects</i> of <i>climate change</i>, unless those activities reduce, or are resilient to, those <u>significant risks</u>, and (3) provide Otago’s communities, including Kāi Tahu, with the best chance to thrive, even under the most extreme <i>climate change</i> scenarios.

Provision	Position	Specific Reason(s) if any	Amendment Sought
<p>IM-P12 – Contravening environmental bottom lines for climate change mitigation</p>	<p>Oppose</p>	<p>Acknowledging that Bottom line is referred to in the NPSFM, it could also apply to any other environmental bottom line. Consider changing to another term such as limit, or threshold.</p> <p>Either way, “bottom line” or an alternative term should be defined in the RPS to clarify which provisions (bottom lines) are being referred to.</p> <p>The term “smallest possible” is an extremely onerous and probably cost prohibitive test. Minimise could be more appropriate.</p> <p>Environmental impacts can be positive, and positive impacts should be encouraged not discouraged.</p> <p>Offsets and compensation is not always just about ecological matters.</p> <p>The Otago RPS should not require administrators of the RPS to implement RM documents applying to other regions – that will make application of this provision difficult and probably ultra vires.</p>	<p>IM-P12 – Contravening environmental bottom lineslimits for climate change mitigation</p> <p>Where a proposed activity provides or will provide enduring regionally or nationally significant mitigation of <i>climate change</i> impacts, with commensurate benefits for the well-being of people and communities and the wider <i>environment</i>, decision makers may, at their discretion, allow non- compliance with an environmental limit bottom line set in any policy or method of this RPS only if they are satisfied that:</p> <ol style="list-style-type: none"> (1) the activity is designed and carried out to minimise have the smallest possible <u>adverse</u> environmental impact consistent with its purpose and <i>functional needs</i>, (2) the activity is consistent and coordinated with other regional and national <i>climate change</i> mitigation activities, (3) adverse <i>effects</i> on the <i>environment</i> that cannot be avoided, remedied, or mitigated are offset, or compensated for if an offset is not possible, in accordance with any specific criteria for using offsets or compensation, and ensuring that any offset <u>relating to ecological matters</u> is: <ol style="list-style-type: none"> (a) undertaken where it will result in the best ecological outcome, (b) close to the location of the activity, and (c) within the same ecological district or coastal marine biogeographic region, (4) the activity will not impede either the achievement of the objectives of this RPS or the objectives of regional policy statements in neighbouring regions, and (5) the activity will not contravene a bottom line <u>natural environmental limit</u> set in a national policy statement or national environmental standard.

Provision	Position	Specific Reason(s) if any	Amendment Sought
IM-P13 – Managing cumulative effects	Oppose	<p>The environment captures both natural and physical resources, but “resources” does not capture all of the “environment”. It makes sense to manage cumulative effects on the environment.</p> <p>The term accounting has a financial connotation. It would be better to refer to “addressing”.</p>	<p>IM-P13 – Managing cumulative effects</p> <p>Otago’s environmental integrity, form, function, and <i>resilience</i>, and opportunities for future generations, are protected by recognising and specifically managing the cumulative <i>effects</i> of activities_ on <u>the environment natural and physical resources</u> in plans and explicitly accounting for<u>addressing</u> these <i>effects</i> in other resource_ management decisions.</p>
IM-P14 – Human impact	Oppose	<p>Opportunities for future generations will be preserved by operating within the limits of the natural environment, not other environmental limits as these are human centric significantly influenced by cultural conditions and individual/social perceptions, and readily change over time</p>	<p>IM-P14 – Human impact</p> <p>Preserve opportunities for future generations by:</p> <p>(1) identifying limits to both growth and adverse <i>effects</i> of human activities beyond which the <u>natural environment</u> will be degraded,</p>
IM-P15 – Precautionary approach	Oppose	<p>A precautionary approach should be taken when an activity operates (or is proposed to operate) in a degraded environment</p> <p>A degraded environment is where the application site or receiving environment is known to have an environmental value or condition below a desired threshold/limit/bottom line.</p>	<p>IM-P15 – Precautionary approach</p> <p>Adopt a precautionary approach towards proposed activities whose <i>effects</i> are uncertain, unknown or little understood, but could be significantly adverse, particularly where the areas and values within_ Otago <u>are in a degraded state or</u> have not been identified in plans as required by this RPS.</p>

Provision	Position	Specific Reason(s) if any	Amendment Sought
<p>IM-M1 – Regional and district plans</p>	<p>Oppose</p>	<p>This method is unclear. What precisely is it requiring to be undertaken by 2030? Which climate change responses in this RPS are being referred to?</p> <p>The criteria in clause 4 will create an unreasonable cost and administrative burden on RM processes. Moreover, the criteria does not provide clear guidance that will actually deal with cumulative adverse effects, particularly where the existing environment is already degraded or where key values that should be protected (to manage cumulative effects) have not been identified.</p> <p>The environment(s) are integrated so there should be no direction to “treat” them as such. The policy should reinforce this understanding, as a matter of fact.</p>	<p>IM-M1 – Regional and district plans</p> <p><i>Local authorities</i> must prepare or amend and maintain their <i>regional and district plans</i> to:</p> <p>(1) ...</p> <p>(2) ...</p> <p>(3) ...</p> <p>(4) ensure cumulative <i>effects</i> of activities on the environment natural and physical resources are accounted <u>addressed</u> for in resource management decisions by recognising and managing such <i>effects</i>, <u>including:</u></p> <p>(5) the same effect occurring multiple times,</p> <p>(6) different effects occurring at the same time,</p> <p>(7) different effects occurring multiple times,</p> <p>(8) one effect leading to different effects occurring over time,</p> <p>(9) different effects occurring sequentially over time,</p> <p>(10) effects occurring in the same place,</p> <p>(11) effects occurring in different places,</p> <p>(12) effects that are spatially or temporally distant from their cause or causes, and,</p> <p>(13)<u>(5)</u> more than minor cumulative effects resulting from minor or transitory effects,</p> <p>(14)<u>(6)</u> adopt a ki uta ki tai approach to resource management by establishing policy and implementation frameworks that treat <u>reinforce</u> Otago’s <i>environments</i> as an integrated system, including <u>collaboration</u> between local authorities to achieve consistent management of resources or <i>effects</i> that cross jurisdictional boundaries, and</p>

Provision	Position	Specific Reason(s) if any	Amendment Sought
IM-M2 – Relationships	Oppose	The term environmental has a broad meaning and captures social, cultural, and economic well beings, so it is better to use “ecological” or “natural environment” rather than environmental.	<p>IM-M2 – Relationships</p> <p>Starting immediately, <i>local authorities</i> must:</p> <ol style="list-style-type: none"> (1) partner with Kāi Tahu to ensure <i>mana whenua</i> involvement in resource management, (2) work together and with other agencies to ensure consistent implementation of the objectives, policies and methods of this RPS, and (3) consult with Otago’s communities to ensure policy frameworks adequately respond to the diverse facets of environmental<u>ecological</u>, social, cultural, and economic well-being.
IM-M3 – Identification of <i>climate change</i> impacts and community guidance	Oppose	It is not appropriate for the RPS to avoiding significant natural hazard risk without understanding the tolerability of affected stakeholders. At a community scale, this requires input through meaningful engagement from the affected community.	<p>IM-M3 – Identification of <i>climate change</i> impacts and community guidance</p> <p>By December 2025, Otago Regional Council must:</p> <ol style="list-style-type: none"> (1) identify the specific types and locations of <i>climate change</i> impacts in Otago by undertaking a <i>climate change risk</i> assessment, including an assessment <u>based on meaningful engagement with affected communities and</u> that incorporates a Kāi Tahu approach to <i>climate change risk</i> identification and evaluation, and (2) develop <u>with meaningful engagement from affected communities</u> guidance to support <u>those</u> communities to be prepared and <i>resilient</i>.
IM-M5 – Other methods	Oppose	The term “possible” is an extremely stringent and probably unrealistic test.	<p>IM-M5 – Other methods</p> <p><i>Local authorities</i> should:</p> <ol style="list-style-type: none"> (1) at their next plan review or by December 2030, whichever is sooner, align (to the extent possible<u>practicable</u>) all strategies and management plans prepared under other legislation to contribute to the attainment of the long-term vision for Otago, and

Provision	Position	Specific Reason(s) if any	Amendment Sought
AIR-M3 Territorial authorities	Oppose	Electric vehicles will not have an impact on air quality.	<p>AIR-M3 – Territorial authorities</p> <p>No later than 31 December 2029, <i>territorial authorities</i> must prepare or amend and maintain their <i>district plans</i> to include provisions that direct an urban form that assists in achieving good air quality by:</p> <ol style="list-style-type: none"> (1) reducing reliance on private <u>non-electric motorised</u> vehicles and enabling the adoption of <i>active transport</i>, shared transport and <i>public transport</i> options to assist in achieving good air quality, and (2) managing the spatial distribution of activities.
LF-WAI-O1 – Te Mana o te Wai	Oppose	The term “maintained” would accord with policy LF-FW-P7.	<p>LF-WAI-O1 – Te Mana o te Wai</p> <p>The mauri of Otago’s <i>water bodies</i> and their health and well-being is protected<u>maintained</u>, and restored where it is <i>degraded</i>, and the management of <i>land</i> and <i>water</i> recognises and reflects that...</p>
All FMU vision statements, in particular LF- VM-O2 – Clutha Mata- au FMU vision	Oppose	A new clause should be inserted into the vision for all FMUs (although Wayfare’s interests relate to the Clutha Mata-au FMU) seeking direction to provide for human wellbeing through thriving outdoor recreation opportunities, including access to waterbodies and use of water for outdoor recreation activities and water based transport.	<p>LF-VM-O2 – Clutha Mata-au FMU vision</p> <p>In the Clutha Mata-au <i>FMU</i>:</p> <ol style="list-style-type: none"> (1) <u><i>water bodies support human wellbeing through thriving outdoor recreation opportunities, including access to waterbodies and use of water for outdoor recreation and water based transport activities</i></u>

Provision	Position	Specific Reason(s) if any	Amendment Sought
LF-FW-08 – Fresh water	Oppose	<p>Clause 5 should be amended to clarify that the significant highly valued and outstanding values of Otago's outstanding water bodies are identified and protected from inappropriate subdivision, use and development. It is not appropriate to have blanket unqualified protection.</p> <p>Note the term "highly valued" is more appropriate than significant, given that it is a defined term and directly linked to section 7 (c), and the maintenance and protection of amenity values.</p>	<p>LF-FW-08 – Fresh water</p> <p>In Otago's <i>water bodies</i> and their catchments:</p> <ol style="list-style-type: none"> (1) the health of the wai supports the health of the people and thriving mahika kai, (2) <i>water</i> flow is continuous throughout the whole system, (3) the interconnection of <i>fresh water</i> (including <i>groundwater</i>) and <i>coastal waters</i> is recognised, (4) native fish can migrate easily and as naturally as possible and taoka species and their habitats are protected, and (5) the significant-highly valued and outstanding values of Otago's <i>outstanding_ and highly valued water bodies</i> are identified and protected <u>from inappropriate subdivision, use and development</u>.
LF-FW-09 – Natural wetlands	Oppose	<p>Some (small) reduction in ecosystem health and amenity values could be appropriate, for example as provided for in the NESFM.</p> <p>Wetlands do not need to be protected for their amenity values as this gives rise to too much uncertainty about what is to be protected, especially if utility / recreation structures are proposed.</p>	<p>LF-FW-09 – Natural wetlands</p> <p>Otago's <i>natural wetlands</i> are protected or restored so that:</p> <ol style="list-style-type: none"> (1) mahika kai and other <i>mana whenua</i> values are sustained and enhanced now and for future generations, (2) there is no decrease in the range and diversity of indigenous ecosystem types and habitats in <i>natural wetlands</i>, (3) there is no <u>discernible</u> reduction in their ecosystem health, hydrological functioning, amenity values, extent or <i>water</i> quality, and if degraded they are improved, and (4) their flood attenuation capacity is maintained.

Provision	Position	Specific Reason(s) if any	Amendment Sought
<p>LF-FW-P9 – Protecting <i>natural wetlands</i></p>	<p>Oppose</p>	<p>The construction of specified infrastructure or other infrastructure should be provided for, not just maintenance.</p> <p>The matters of assessment should be “tightened” to restrict the matters of assessment to the natural values of the wetland, not any possible adverse effects associated with the proposal.</p>	<p>LF-FW-P9 – Protecting <i>natural wetlands</i> Protect <i>natural wetlands</i> by:</p> <p>(1) avoiding a reduction in their values or extent unless:</p> <p>(a) the <i>loss of values</i> or extent arises from:</p> <p>(i) the customary harvest of food or resources undertaken in accordance with tikaka Māori,</p> <p>(ii) restoration activities,</p> <p>(iii) scientific research,</p> <p>(iv) the sustainable harvest of sphagnum moss,</p> <p>(v) the construction or maintenance of <i>wetland utility structures</i>,</p> <p>(vi) the <u>construction, maintenance or operation of <i>specified infrastructure</i>, or other infrastructure</u>,</p> <p>(vii) <i>natural hazard works</i>, or</p> <p>(b) the Regional Council is satisfied that:</p> <p>(i) the activity is necessary for the construction or upgrade of <i>specified infrastructure</i>,</p> <p>(ii) the <i>specified infrastructure</i> will provide significant national or regional benefits,</p> <p>(iii) there is a <i>functional need</i> for the <i>specified infrastructure</i> in that location,</p> <p>(iv) the <i>effects</i> of the activity on indigenous <i>biodiversity</i> are managed by applying either ECO-P3 or ECO-P6 (whichever is applicable), and</p> <p>(v) the other effects <u>the other effects of the activity on the loss of values or extent of the natural wetland</u> (excluding those managed under (1)(b)(iv)) are managed by applying the <i>effects management hierarchy</i>, and</p> <p>(2) not granting resource consents for activities under (1)(b) unless the Regional Council is satisfied that:</p> <p>(a) the application demonstrates how each step of the <i>effects management hierarchies</i> in (1)(b)(iv) and (1)(b)(v) will be applied to the <i>loss of values</i> or extent of the <i>natural wetland</i>, and</p> <p>(b) any consent is granted subject to conditions that apply the <i>effects management hierarchies</i> in (1)(b)(iv) and (1)(b)(v) <u>in respect of any loss of values or extent of the natural wetland</u>.</p>

Provision	Position	Specific Reason(s) if any	Amendment Sought
New Policy	Oppose	Suggest new policy to get some policy support for activities which result in these benefits – as currently is there isn't any really.	<p><u>LF-FW-NEW POLICY – Promoting awareness of and access to natural wetlands</u></p> <p><u>Support activities which result in either of 1-4 of LF-FW-P10 above, or improve people's awareness of, and access to, natural wetlands for customary, or scientific, or education, or recreational uses.</u></p>
LF-FW-P12 – Protecting outstanding water bodies	Oppose	The NPSFM directs that the significant values of OWB be protected. The policy as notified in the RPS goes much further (is more stringent) than the requirements of the NPSFM.	<p>LF-FW-P12 – Protecting <i>outstanding water bodies</i></p> <p>The significant and outstanding values of <i>outstanding water bodies</i> are:</p> <ol style="list-style-type: none"> (1) identified in the relevant <i>regional</i> and <i>district plans</i>, and (2) protected by <u>managing activities to avoid, remedy or mitigate</u> adverse <i>effects</i> on those values.

<p>LF-FW-P13 – Preserving natural character</p>	<p>Oppose</p>	<p>Clause 1(b) does not really make sense and should be reworded. Also, in respect of 1(b)(ii), the management hierarchy is not designed to apply to lakes. It is not appropriate to apply the hierarchy in respect of all effects, for example general landscape character and amenity values.</p> <p>It is possible that some modification of braided river character could be appropriate, particularly if that modification is associated with activities which avoid or mitigate risk to peoples health and safety, or is associated with significant infrastructure.</p>	<p>LF-FW-P13 – Preserving natural character</p> <p>Preserve the natural character of <i>lakes</i> and <i>rivers</i> and their <i>beds</i> and margins by:</p> <ol style="list-style-type: none"> (1) avoiding the <i>loss of values</i> or extent of a <i>river</i>, unless: <ol style="list-style-type: none"> (a) there is a <i>functional need</i> for the activity in that location, and (b) the <i>effects</i> of the activity are managed by applying: <ol style="list-style-type: none"> (i) for <i>effects</i> on indigenous <i>biodiversity</i>, either ECO-P3 or ECO-P6 (whichever is applicable), and (ii) for other <i>effects</i> <u>on the natural character of rivers</u>, the <i>effects management hierarchy</i>, (2) not granting resource consent for activities in (1) unless Otago Regional Council is satisfied that: <ol style="list-style-type: none"> (a) the application demonstrates how each step of the <i>effects management hierarchies</i> in (1)(b) will be applied to the <i>loss of values</i> or extent of the <i>river</i>, and (b) any consent is granted subject to conditions that apply the <i>effects management hierarchies</i> in (1)(b) <u>where relevant</u>, (3) establishing environmental flow and level regimes and <i>water</i> quality standards that support the health and well-being of the <i>water body</i>, <u>acknowledging that environmental flow and level regimes may change over time due to climate change</u> (4) wherever possible, sustaining the form and function of a <i>water body</i> that reflects its natural behaviours, (5) recognising and implementing the restrictions in Water Conservation Orders, (6) preventing the impounding or control of the level of Lake Wanaka, (7) preventing modification that would <u>permanently</u> reduce the <i>active</i> braided character of a <i>river</i>, <u>unless the modification is necessary to avoid or mitigate risk to people's health and safety</u>, and
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Provision	Position	Specific Reason(s) if any	Amendment Sought
			(8) controlling the use of <i>water</i> and <i>land</i> that would adversely affect the natural character of the <i>waterbody</i> .
LF-FW-P14 – Restoring natural character	Oppose	There needs to be a qualifier like ‘where practical’ because it is not always practical to “improve” margins, for example in built up areas that are subject to flooding (for example in central Queenstown and Taieri River).	<p>LF-FW-P14 – Restoring natural character</p> <p>Where the natural character of <i>lakes</i> and <i>rivers</i> and their margins has been reduced or lost, promote actions that:</p> <ol style="list-style-type: none"> (1) restore a form and function that reflect the natural behaviours of the <i>water body</i>, (2) improve <i>water</i> quality or quantity where it is <i>degraded</i>, (3) increase the presence, <i>resilience</i> and abundance of indigenous flora and fauna, including by providing for fish passage within <i>river</i> systems, (4) improve <i>water body</i> margins by naturalising bank contours <u>where practicable</u> and establishing indigenous vegetation and habitat, and (5) restore <i>water</i> pathways and natural connectivity between <i>water</i> systems.
LF-FW-P15 – Stormwater and wastewater discharges	Oppose	It is not always desirable for sewage, industrial or trade waste to be discharged to a reticulated system, especially if alternative regimes have better environmental (ecological, social, cultural and economic) outcomes.	<p>LF-FW-P15 – Stormwater and wastewater discharges</p> <p>Minimise the adverse <i>effects</i> of direct and indirect <i>discharges</i> of <i>stormwater</i> and <i>wastewater</i> to <i>freshwater</i> by:</p> <ol style="list-style-type: none"> (1) except as required by LF-VM-O2 and LF-VM-O4, preferring <i>discharges</i> of <i>wastewater</i> to <i>land</i> over <i>discharges</i> to <i>water</i>, unless adverse <i>effects</i> associated with a <i>discharge</i> to <i>land</i> are greater than a <i>discharge</i> to <i>water</i>, and (2) requiring: <ol style="list-style-type: none"> (a) all sewage, industrial or trade waste to be <i>discharged</i> into a reticulated <i>wastewater</i> system, where one is available, <u>unless alternative treatment and disposal methods will result in improved environmental outcomes.</u>

Provision	Position	Specific Reason(s) if any	Amendment Sought
LF-FW-M5 – Outstanding water bodies	Oppose	It is not appropriate, practical or reasonable to include provisions in regional plans which avoid the adverse effects of activities on significant and outstanding values of outstanding water bodies, especially as these values are yet to be identified. The focus could be on managing activities to protect the significant and outstanding values.	<p>LF-FW-M5 – Outstanding water bodies</p> <p>No later than 31 December 2023, Otago Regional Council must:</p> <p>....</p> <p>(5) include provisions in <i>regional plans</i> to manage avoid the adverse effects of activities to protect on the significant and outstanding values of <i>outstanding water bodies</i>.</p>
LF-FW-M6 – Regional plans	Oppose	Environmental flow and level regimes for water bodies should include provision for human wellbeing through protecting and enhancing people's ability to access waterbodies and use water to support outdoor recreation activities and water transport.	<p>LF-FW-M6 – Regional plans</p> <p>Otago Regional Council must publicly notify a Land and Water <i>Regional Plan</i> no later than 31 December 2023 and, after it is made operative, maintain that <i>regional plan</i> to:</p> <p>(1) include environmental flow and level regimes for <i>water bodies</i> (including <i>groundwater</i>) that give effect to <i>Te Mana o te Wai</i> and provide for:</p> <p>(a) ...</p> <p>(a)(b) <u>human wellbeing through protecting and enhancing people's ability to access waterbodies and use water to support outdoor recreation and water based transport activities, and</u></p>
LF-FW-M7 – District plans	Oppose	<p>It is not appropriate, practical or reasonable to avoid adverse effects of activities on the significant and outstanding values of outstanding water bodies.</p> <p>It is not appropriate or necessary to adopt water sensitive urban design techniques to all land development outside the urban environment.</p>	<p>LF-FW-M7 – District plans</p> <p><i>Territorial authorities</i> must prepare or amend and maintain their <i>district plans</i> no later than 31 December 2026 to:</p> <p>(1) map <i>outstanding water bodies</i> and identify their outstanding and significant values using the information gathered by Otago Regional Council in LF-FW-M5, and</p> <p>(2) include provisions to avoid <u>remedy or mitigate</u> the adverse <i>effects</i> of activities on the significant and outstanding values of <i>outstanding water bodies</i>,</p> <p>(3) require, wherever practicable, the adoption of water sensitive urban design techniques when managing the <i>subdivision</i>, use or development of <u>urban land</u>, and</p>

Provision	Position	Specific Reason(s) if any	Amendment Sought
LF-LS-P19 – Highly productive land	Oppose	<p>The reference to including rural lifestyle and rural residential areas is not necessary, and adds confusion (not clarity) to the policy.</p> <p>Clause (3) could be deleted altogether because it is redundant (it is not necessary to cross reference to implementation of other policies in the RPS) i.e. policies UFD 4,7,8 will be implemented irrespective of this policy.</p>	<p>LF-LS-P19 – Highly productive land</p> <p>Maintain the availability and productive capacity of highly productive <i>land</i> by:</p> <ol style="list-style-type: none"> (1) identifying and mapping highly productive <i>land</i> based on the following criteria: <ol style="list-style-type: none"> (a) the capability and versatility of the <i>land</i> to support primary production based on the Land_Use Capability classification system, (b) the suitability of the climate for primary production, particularly crop production, and (c) the size and cohesiveness of the area of <i>land</i> for use for primary production, and (2) prioritising the use of highly productive <i>land</i> for primary production ahead of other <i>land</i> uses, and (3) managing urban development in rural areas, including rural lifestyle and rural residential areas, in accordance with UFD-P4, UFD-P7 and UFD-P8.

Provision	Position	Specific Reason(s) if any	Amendment Sought
LF-LS-P22 – Public access	Oppose	It can be appropriate to restrict public access to areas where plantings (e.g. restoration projects or riparian areas) to avoid or minimise damage to young / establishing vegetation.	<p>LF-LS-P22 – Public access</p> <p>Provide for public access to and along <i>lakes</i> and <i>rivers</i> by:</p> <ol style="list-style-type: none"> (1) maintaining existing public access, (2) seeking opportunities to enhance public access, including by <i>mana whenua</i> in their role as <i>kaitiaki</i> and for gathering of <i>mahika kai</i>, and (3) encouraging landowners to only restrict access where it is necessary to protect: <ol style="list-style-type: none"> (a) public health and safety, (b) <i>significant natural areas</i>, (c) areas of outstanding natural character, (d) outstanding natural features and landscapes, (e) places or areas with special or outstanding <i>historic heritage</i> values, or (f) places or areas of significance to <i>takata whenua</i>, including <i>wāhi tapu</i> and <i>wāhi tūpuna</i>. <p>(f)(g) <u>Areas of establishing vegetation / restoration projects</u></p>

Provision	Position	Specific Reason(s) if any	Amendment Sought
LF-LS-M12 – District plans	Oppose	It is generally appropriate to promote improved public access to and along the margins of waterbodies, and to use any means legally or practically available to do this.	<p>LF-LS-M12 – District plans</p> <p><i>Territorial authorities</i> must prepare or amend and maintain their <i>district plans</i> no later than 31 December 2026 to:</p> <ol style="list-style-type: none"> (1) manage <i>land</i> use change by: <ol style="list-style-type: none"> (a) controlling the establishment of new or any spatial extension of existing <i>plantation forestry activities</i> where necessary to give effect to an objective developed under the NPSFM, and (b) minimising the removal of tall tussock grasslands, and (2) provide for and encourage the creation and enhancement of vegetated riparian margins and constructed <i>wetlands</i>, and maintain these where they already exist, and (3) facilitate public access to, <u>and along the margin of,</u> <i>lakes</i> and <i>rivers</i> by: <ol style="list-style-type: none"> (a) requiring the establishment of <i>esplanade reserves</i> and <i>esplanade strips</i>, and (b) promoting the use of legal <i>roads</i>, including paper <i>roads</i>, <u>and any other means of public access rights, to that</u> connect with <i>esplanade reserves</i> and <i>esplanade strips</i>.

Provision	Position	Specific Reason(s) if any	Amendment Sought
ECO-P3 – Protecting significant natural areas and taoka	Oppose	This policy effectively says that no vegetation within a SNA can be removed. This does not accord with the concept of sustainable management, as some removal of vegetation within an identified SNA can have indiscernible or appropriate adverse effects, and can often be offset or compensated.	<p>ECO-P3 – Protecting significant natural areas and taoka</p> <p>Except as provided for by ECO-P4 and ECO-P5, protect <i>significant natural areas</i> and indigenous species and ecosystems that are taoka by:</p> <ol style="list-style-type: none"> (1) avoiding adverse <i>effects</i> that result in: <ol style="list-style-type: none"> (a) any <u>discernible</u> reduction of the area or values (even if those values are not themselves significant) identified under ECO-P2(1), or (b) any loss of Kāi Tahu values, and (2) after (1), applying the <i>biodiversity effects management hierarchy</i> in ECO-P6, and (3) prior to <i>significant natural areas</i> and indigenous species and ecosystems that are taoka being identified in accordance with ECO-P2, adopt a precautionary approach towards activities in accordance with IM-P15.
ECO-P5 – Existing activities in significant natural areas	Oppose	Some new land use can be appropriate in some significant natural areas.	<p>ECO-P5 – Existing activities in significant natural areas</p> <p>Except as provided for by ECO-P4, provide for existing activities <u>and land uses</u> within <i>significant natural areas</i> and that may adversely affect indigenous species and ecosystems that are taoka, if:</p> <ol style="list-style-type: none"> (1) the continuation <u>or expansion</u> of an existing <u>or anticipated</u> activity/<u>land use</u> will not lead to the loss (including through cumulative loss) of extent or <i>degradation</i> of the ecological integrity of any <i>significant natural area</i> or indigenous species or ecosystems that are taoka, and (2) the adverse <i>effects</i> of an existing activity/<u>land use</u> are no greater in character, <u>overall</u> spatial extent, intensity or scale than they were before this RPS became operative.

Provision	Position	Specific Reason(s) if any	Amendment Sought
ECO-P8 – Enhancement	Oppose	It is appropriate to promote subdivision, use and development which will support the achievement of the matters in clause 1-3.	<p>ECO-P8 – Enhancement</p> <p>The extent, occupancy and condition of Otago’s indigenous <i>biodiversity</i> is increased by:</p> <ol style="list-style-type: none"> (1) restoring and enhancing habitat for indigenous species, including taoka and mahika kai species, (2) improving the health and <i>resilience</i> of indigenous <i>biodiversity</i>, including ecosystems, species, important ecosystem function, and <i>intrinsic values</i>, and (3) <u>(3)</u> buffering or linking ecosystems, habitats and ecological corridors; (3)(4) <u>(4)</u> <u>promoting subdivision, use and development of resources which support 1-3 above.</u>
ECO-P9 – Wilding conifers	Oppose	Wayfare questions why clause 1 is restricted to conifers (as other tree species are pests) and replanting or plantation forestry, as opposed to simply reducing the amount of planting wilding conifers overall.	<p>ECO-P9 – Wilding conifertree species</p> <p>Reduce the impact of <i>wilding trees conifers</i> on indigenous <i>biodiversity</i> by:</p> <ol style="list-style-type: none"> (1) avoiding <i>afforestation</i> and <i>replanting</i> of plantation forests with wilding conifer tree species listed in APP5 within: <ol style="list-style-type: none"> (a) areas identified as <i>significant natural areas</i>, and (b) buffer zones adjacent to <i>significant natural areas</i> where it is necessary to protect the <i>significant natural area</i>, and (2) supporting initiatives to control existing <i>wilding trees conifers</i> and limit their further spread.
ECO-M5 – District plans	Oppose	District plans should provide for activities which promote as well as undertake the restoration or enhancement of habitats of indigenous flora and fauna	<p>ECO-M5 – District plans</p> <p><i>Territorial authorities</i> must prepare or amend and maintain their <i>district plans</i> to:</p> <ol style="list-style-type: none"> (a) ... (2) provide for activities <u>which promote or</u> undertake <u>the n for the purpose of restorationing</u> or <u>enhancementing</u> the habitats of indigenous <u>flora and</u> fauna, and

Provision	Position	Specific Reason(s) if any	Amendment Sought
EIT-EN-02 – Renewable electricity generation	Oppose	It is not appropriate, nor achievable, to “maximise” the generation capacity of renewable electricity generation activities in Otago.	<p>EIT-EN-02 – Renewable electricity generation</p> <p>The generation capacity of <i>renewable electricity generation activities</i> in Otago:</p> <ol style="list-style-type: none"> (1) is maintained and, if practicable maximised<u>increased</u>, within environmental limits, and (2) contributes to meeting New Zealand’s national target for <i>renewable electricity generation</i>.

Provision	Position	Specific Reason(s) if any	Amendment Sought
<p>EIT-EN-P5 – Non-renewable energy generation</p>	<p>Oppose</p>	<p>In certain situations it is not always practical to avoid the development of non-renewable energy sourced activities, for example activities in remote locations with a lack of daylight, or wind or water supply especially in winter and that rely on constant or secure electricity supply (so often require generators or backup generators).</p> <p>In respect of clause (3) it is appropriate that adverse effects of REG beyond those on waterbodies should be managed.</p>	<p>EIT-EN-P5 – Non-renewable energy generation</p> <p><u>Where use of renewable energy is a practical alternative to the use of non-renewable energy, a</u>Avoid the development of non-renewable energy generation activities in Otago and facilitate the replacement of non-renewable energy sources, including the use of fossil fuels, in energy generation.</p> <ol style="list-style-type: none"> (1) provide for activities associated with the investigation, identification and assessment of potential sites and energy sources for <i>renewable electricity generation</i>, (2) require the prioritisation of sites for new <i>renewable electricity generation activities</i> where adverse <i>effects</i> on highly valued <i>natural and physical resources</i> and <i>mana whenua</i> values can be avoided or, at the very least, minimised, (3) manage the adverse <i>effects</i> of developing or upgrading <i>renewable electricity generation activities</i>, that: <ol style="list-style-type: none"> (a) — are within the beds of lakes and rivers and the coastal marine area, or (b)(a) involve the taking, use, damming or diversion of water and discharge of water or contaminants, (4) provide for the operation and maintenance of existing <i>renewable electricity generation activities</i>, including their <i>natural and physical resource</i> requirements, within the environmental limits, and (5) restrict the establishment of activities that may adversely affect the efficient functioning of <i>renewable electricity generation infrastructure</i> (including impacts on generation capacity).

Provision	Position	Specific Reason(s) if any	Amendment Sought
EIT-INF-P13 – Locating and managing effects of infrastructure	Oppose	It is not always possible or practical to avoid all adverse effects from infrastructure, and all forms of infrastructure could potentially be appropriate if effects are minimised depending on the circumstances of each particular case.	<p>EIT-INF-P13 – Locating and managing effects of infrastructure</p> <p>When providing for new <i>infrastructure</i> outside the coastal environment:</p> <p>(1) avoid, as the first priority, locating <i>infrastructure</i> in all of the following:</p> <ul style="list-style-type: none"> (a) <i>significant natural areas</i>, (b) outstanding natural features and landscapes, (c) <i>natural wetlands</i>, (d) <i>outstanding water bodies</i>, (e) areas of high or outstanding natural character, (f) areas or places of significant or outstanding <i>historic heritage</i>, (g) wāhi tapu, wāhi taoka, and areas with protected customary rights, and (h) areas of high recreational and high amenity value, and <p>(2) if it is not possible to avoid locating in the areas listed in (1) above because of the <i>functional or operational needs</i> of the <i>infrastructure</i> manage adverse effects as follows:</p> <p>(a) — for nationally or regionally significant infrastructure:</p> <p>(b)(a) in <i>significant natural areas</i>, in accordance with ECO-P4,</p> <p>(c)(b) in <i>natural wetlands</i>, in accordance with the relevant provisions in the NESF,</p> <p>(d)(c) in <i>outstanding water bodies</i>, in accordance with LF-P12.5,</p> <p>(e) — in other areas listed in EIT-INF-P13 (1) above, minimise the adverse effects of the infrastructure on the values that contribute to the area's importance, and</p> <p>(f) — for all infrastructure that is not nationally or regionally significant, avoid adverse effects on the values that contribute to the area's outstanding nature or significance.</p>

Provision	Position	Specific Reason(s) if any	Amendment Sought
EIT-INF-M4 – Regional plans	Oppose	Clause 2 is ambiguous and unnecessarily onerous. How will a regional plan prioritise sites, sites from what types of activities?	<p>EIT-INF-M4 – Regional plans</p> <p>Otago Regional Council must prepare or amend and maintain its <i>regional plans</i> to:</p> <p>(1) manage the adverse <i>effects</i> of <i>infrastructure</i> activities that:</p> <ul style="list-style-type: none"> (a) are in the <i>beds</i> of <i>lakes</i> and <i>rivers</i>, or (b) are in the <i>coastal marine area</i>, or (c) involve the taking, use, damming or diversion of <i>water</i> or, (d) involve the <i>discharge</i> of <i>water</i> or <i>contaminants</i>, and <p>(2) require the prioritisation of sites for infrastructure where adverse effects on highly valued natural and physical resources and mana whenua values can be avoided or, at the very least, minimised.</p>

Provision	Position	Specific Reason(s) if any	Amendment Sought
EIT-INF-M5 – District plans	Oppose	<p>Clause 6 should be deleted or amended to allow non-urban activities to proceed or non-urban areas to be developed without being serviced by infrastructure.</p> <p>Clause 7 is ambiguous and unnecessarily onerous. How will a district plan prioritise sites, sites from what types of activities?</p>	<p>EIT-INF-M5 – District plans</p> <p><i>Territorial authorities</i> must prepare or amend and maintain their <i>district plans</i> to:</p> <p>(1) ...</p> <p>(2) ...</p> <p>(3) ...</p> <p>(4) ...</p> <p>(5) ...</p> <p>(6) ensure that <u>new urban</u> development is avoided where:</p> <p>(a) it cannot be adequately served with <i>infrastructure</i>,</p> <p>(b) it utilises <i>infrastructure</i> capacity for other planned development, or</p> <p>(c) the required upgrading of <i>infrastructure</i> is not funded, and</p> <p>(7) require the prioritisation of sites where adverse effects on highly valued natural and physical resources and mana whenua values can be avoided or, at the very least, minimised.</p>
EIT-TRAN-07 – Effective, efficient, and safe transport	Oppose	Wayfare operates water ferry and taxi services, which are not on the sea. The RPS should recognise that water based transport occurs in the region.	<p>EIT-TRAN-07 – Effective, efficient, and safe transport</p> <p>Otago has an integrated air, <i>land</i> and <u>sea-water-based</u> transport network that...</p>

Provision	Position	Specific Reason(s) if any	Amendment Sought
EIT-TRAN-P19 – Transport system design	Oppose	Consideration of transport options to key visitor destinations should be a strategic priority. Key visitor destinations should be identified by ORC or relevant TA, and included in transport strategies.	<p>EIT-TRAN-P19 – Transport system design</p> <p><i>Resilience</i> and adaptability of the transport system supports efficient networks for the transport of people and goods that are sustained and improved by:</p> <ol style="list-style-type: none"> (1) promoting a consolidated urban form that integrates <i>land</i> use activities with the transport system, (2) placing a high priority on <i>active transport</i>, and <i>public transport</i> <u>and passenger transport</u> and their integration into the design of development and transport networks, and (3) encouraging improved access to public spaces, including the <i>coastal marine area, lakes and rivers</i>, <u>and key visitor destinations</u>.

Provision	Position	Specific Reason(s) if any	Amendment Sought
EIT-TRAN-M8 – District plans	Oppose	It is not practical for some activities outside urban locations to be integrated with public transport services. An effective transport system in Otago (and Southland) relies on integration with private transport services – the system is more than just about public transport.	<p>EIT-TRAN-M8 – District plans</p> <p><i>Territorial authorities</i> must prepare or amend and maintain their <i>district plans</i> to:</p> <ol style="list-style-type: none"> (1) require a strategic approach to the integration of the transport system with <i>land</i> uses and between modes, (2) <u>define require</u> high trip generating activities <u>and, require high trip generating activities in urban areas</u> to be integrated with <u>public-passenger</u> transport services <u>(where sufficient public transport services exist or are planned)</u> and provide for safe pedestrian and cycling access, (3) include <i>subdivision</i> and <i>infrastructure</i> design standards to <u>encourage the minimisation of</u> private vehicle use, enable public transport networks to operate and recognise the accessibility needs of the community, including the mobility impaired, the elderly and children, (4) restrict or prevent the establishment or expansion of activities adjacent to transport <i>infrastructure</i> that may compromise the operation or safety of the transport system, (5) provide for the establishment of transport <i>infrastructure</i> that supports modes of transport that are not reliant on fossil fuels, and (6) include policies and methods that provide for <i>commercial port activities</i> associated with the operations at Otago Harbour and the ports at Port Chalmers and Dunedin.
HAZ-NH-P2 – Risk assessments	Oppose	Refer comments on APP6 below.	<p>HAZ-NH-P2 – Risk assessments</p> <p>Assess the level of <i>natural hazard risk</i> by determining a range of <i>natural hazard</i> event scenarios and their potential consequences in accordance with:</p> <p><u>(1) A risk table or matrix at a district or community scale undertaken in a consultation process with communities, stakeholders and partners regarding risk levels thresholds; or if this process has not been undertaken</u></p> <p>(1)<u>(2)</u> _____ the criteria set out within APP6.</p>

Provision	Position	Specific Reason(s) if any	Amendment Sought
HAZ–NH–P3 – New activities	Oppose	All of the Otago region is subject to some type of natural hazard risk, including risks associated with a major earthquake (AF8). This risk cannot be avoided.	<p>HAZ–NH–P3 – New activities</p> <p>Once the level of <i>natural hazard risk</i> associated with an activity has been determined in accordance with HAZ–NH–P2(1), manage new activities to achieve the following outcomes:</p> <ol style="list-style-type: none"> (1) when the <i>natural hazard risk of new activities</i> is significant, the activity is avoided, (2) when the <i>natural hazard risk</i> is tolerable, manage the level of <i>risk</i> so that it does not become significant, and (3) when the <i>natural hazard risk</i> is acceptable, maintain the level of <i>risk</i>.
HAZ–NH–P4 – Existing activities	Oppose	It is not necessary or appropriate to restrict existing activities which will not have or result in a significant natural hazard risk.	<p>HAZ–NH–P4 – Existing activities</p> <p>Reduce existing <i>natural hazard risk</i> by:</p> <ol style="list-style-type: none"> (1) encouraging activities that reduce <i>risk</i>, or reduce community vulnerability, (2) restricting activities that increase <i>risk to a significant risk</i>, or increase community vulnerability <u>to a significant risk</u>, (3) managing existing <i>land</i> uses within areas of significant <i>risk</i> to people and communities, (4) encouraging design that facilitates: <ol style="list-style-type: none"> (a) recovery from <i>natural hazard</i> events, or (b) relocation to areas of acceptable <i>risk</i>, or (c) reduction of <i>risk</i>, (5) relocating <i>lifeline utilities</i>, and facilities for essential and emergency services, away from areas of significant <i>risk</i>, where appropriate and practicable, and (6) enabling development, upgrade, maintenance and operation of <i>lifeline utilities</i> and facilities for essential and emergency services.

Provision	Position	Specific Reason(s) if any	Amendment Sought
HAZ-NH-M2 – Local authorities	Oppose	The method can be simplified; refer back to the policy, which clarifies how the policy is to be implemented.	<p>HAZ-NH-M2 – Local authorities</p> <p><i>Local authorities</i> must:</p> <p>(1) assess the level of <i>natural hazard risk</i> in their region or district in accordance with HAZ-NH-P2 and APP6, including by:</p> <p>(2) consulting with communities, stakeholders and partners regarding risk levels thresholds, and</p> <p>(3)<u>(1)</u> developing a Risk Table in accordance with Step 3 of APP6 at a district or community scale,</p> <p>(4)<u>(2)</u> continue to undertake research on the identification of <i>natural hazard risk</i> and amend <i>natural hazard</i> registers, databases, <i>regional</i> and/or <i>district plans</i> as required,</p> <p>(5)<u>(3)</u> investigate options for reducing the level of <i>natural hazard risk</i> within areas of existing development to a tolerable or lower level, including by managing existing use rights under Sections 10 and 20A of the RMA,</p> <p>(6)<u>(4)</u> prepare or amend and maintain their <i>regional</i> or <i>district plans</i> to take into account the <i>effects of climate change</i> by:</p> <ul style="list-style-type: none"> (a) using the best relevant <i>climate change</i> data and projections to 2115, (b) taking a precautionary approach when assessing and managing the <i>effects of climate change</i> where there is scientific uncertainty and potentially significant or irreversible <i>effects</i>, (c) providing for activities that assist to reduce or mitigate the <i>effects of climate change</i>, and (d) encouraging system <i>resilience</i>.

Provision	Position	Specific Reason(s) if any	Amendment Sought
HAZ-NH-M3 – <i>Regional plans</i>	Oppose	Clause 2 could have significant and adverse implications which have not been justified. It is not appropriate to restrict existing land use until after the community has been involved in decision making processes about the real life consequences of the policy direction suggesting removal of existing use rights.	<p>HAZ-NH-M3 – <i>Regional plans</i></p> <p>Otago Regional Council must prepare or amend and maintain its <i>regional plans</i> to:</p> <ol style="list-style-type: none"> (1) manage activities in the <i>coastal marine area, beds of lakes and rivers, and wetlands</i> to achieve policies HAZ-NH-P2 to HAZ-NH-P6 and APP6, (2) include <i>natural hazard</i> reduction measures, such as removing or restricting existing land uses, where there is significant risk to people or property, (3) protect natural or modified features and systems that provide mitigation from the adverse <i>effects</i> of <i>natural hazards</i> in accordance with HAZ-NH-P6, (4) provide for <i>hard protection structures</i> in accordance with HAZ-NH-P7, (5) provide for the <i>functional needs</i> of hazard mitigation measures, <i>lifeline utilities</i>, and essential or emergency services in accordance with HAZ-NH-P8 and HAZ-NH-P9, (6) include provisions that require decision makers to apply the precautionary approach set out in HAZ-NH-P5 when considering applications for <i>resource consent</i> for activities that will change the use of <i>land</i> and thereby increase the <i>risk</i> from <i>natural hazards</i> within areas subject to <i>natural hazard risk</i> that is uncertain or unknown, but potentially significant or irreversible, and (7) require a <i>natural hazard risk</i> assessment be undertaken where an activity requires a <i>resource consent</i> to change the use of <i>land</i> which will increase the <i>risk</i> from <i>natural hazards</i> within areas subject to <i>natural hazards</i>, and where the <i>resource consent</i> is lodged prior to the <i>natural hazard risk</i> assessment required by HAZ-NH-M2(1) being completed, the <i>natural hazard risk</i> assessment must include: <ol style="list-style-type: none"> (a) an assessment of the level of <i>natural hazard risk</i> associated with the proposal in accordance with APP6, and (b) an assessment demonstrating how the proposal will achieve the outcomes set out in Policies HAZ-NH-P3 and HAZ-NH-P4.

Provision	Position	Specific Reason(s) if any	Amendment Sought
HAZ–NH–M4 – District plans	Oppose	There should be no direction to require TAs to amend their district plans unless activities are subject to tolerable or significant natural hazard risk (i.e there should be no need to amend plans if risks are identified as “insignificant”).	<p>HAZ–NH–M4 – District plans</p> <p><i>Territorial authorities</i> must prepare or amend and maintain their <i>district plans</i> to:</p> <p>(1) achieve policies HAZ–NH–P2 to HAZ–NH–P6 and APP6 on <i>land</i> outside the <i>coastal marine area</i>, <i>beds of lakes and rivers</i>, and <i>wetlands</i> by managing the location, scale and density of activities that are may be subject to <u>tolerable or significant natural hazard risk</u>,</p>
HCV–HH–P4 – Identifying historic heritage	Oppose	This policy and APP8 do not match up (work effectively) because there is no distinction between what is “special” versus what is “outstanding”.	<p>HCV–HH–P4 – Identifying historic heritage</p> <p>Identify the places and areas of <i>historic heritage</i> in Otago in accordance with APP8-and categorise them as:</p> <p>places and areas with special or outstanding historic heritage values or qualities, or places and areas with historic heritage values or qualities.</p>
HCV–HH–P5 – Managing historic heritage	Oppose	It is not appropriate to set a policy directive of “avoid” when the community is not aware of the activities which could potentially be restricted (or prevented) from occurring	<p>HCV–HH–P5 – Managing historic heritage</p> <p>Protect <i>historic heritage</i> by:</p> <p>(1) requiring the use of accidental discovery protocols,</p> <p>(2) avoiding adverse effects on areas or places with special or outstanding historic heritage values or qualities,</p> <p>(3) avoiding significant adverse <i>effects</i> on areas or places with <i>historic heritage</i> values or qualities,</p> <p>(4) avoiding, as the first priority, other adverse <i>effects</i> on areas or places with <i>historic heritage</i> values or qualities,</p> <p>(5) where adverse <i>effects</i> demonstrably cannot be completely avoided, remedying or mitigating them, and</p> <p>(6) recognising that for <i>infrastructure</i>, EIT–INF–P13 applies instead of HCV–HH–P5(1) to (5).</p>

Provision	Position	Specific Reason(s) if any	Amendment Sought
NFL-O1 – Outstanding and highly valued natural features and landscapes	Oppose	There is no justification for removing this qualifier which is explicit in Part 2 of the RMA	<p>NFL-O1 – Outstanding and highly valued natural features and landscapes</p> <p>The areas and values of Otago's outstanding and <i>highly valued natural features and landscapes</i> are identified, and the use and development of Otago's <i>natural and physical resources</i> results in:</p> <ol style="list-style-type: none"> (1) the protection of outstanding natural features and <u>outstanding natural landscapes from inappropriate subdivision, use and development</u>, and (2) the maintenance or enhancement of <i>highly valued natural features and landscapes</i>.
NFL-P1 – Identification	Oppose	Identification of ONFLs and HVNLs include subjective attributes which should be informed by input from ngai tahu, communities and stakeholders (not just council appointed staff and experts).	<p>NFL-P1 – Identification</p> <p>In order to manage outstanding and <i>highly valued natural features and landscapes</i>, identify:</p> <ol style="list-style-type: none"> (1) the areas and values of outstanding and <i>highly valued natural features and natural landscapes</i> in accordance with APP9, and (2) <u>in consultation with Kai Tahu, communities, and stakeholders including affected landowners,</u> the capacity of those natural features and landscapes to accommodate use or development while protecting the values that contribute to the natural feature and <u>natural</u> landscape being considered outstanding or highly valued.

Provision	Position	Specific Reason(s) if any	Amendment Sought
NFL-P2 – Protection of outstanding natural features and landscapes	Oppose	<p>There should be no direction to protect ONFLs beyond the requirement of s6(2), which is to protect these locations (or values) from inappropriate subdivision, use and development.</p> <p>There should be no requirement to avoid effects on landscape values which do not contribute to the ONFL being outstanding.</p> <p>The reference to “other effects” should clarify the assessment of “other effects” is limited to the ONFL value/attribute.</p>	<p>NFL-P2 – Protection of outstanding natural features and landscapes</p> <p>Protect outstanding natural features and landscapes <u>from inappropriate subdivision, use and development</u> by:</p> <ol style="list-style-type: none"> (1) avoiding <u>significant</u> adverse <i>effects</i> on the values that contribute to the natural feature or <u>natural</u> landscape being considered outstanding, even if those values are not themselves outstanding, and (2) avoiding, remedying or mitigating other adverse <i>effects</i> <u>that contribute to the natural feature or natural landscape being considered outstanding</u>.
NFL-P3 – Maintenance of highly valued natural features and landscapes	Oppose	<p>The reference to “other effects” should clarify the assessment of “other effects” is limited to the HVNFL value/attribute.</p>	<p>NFL-P3 – Maintenance of highly valued natural features and landscapes</p> <p>Maintain or enhance <i>highly valued natural features and landscapes</i> by:</p> <ol style="list-style-type: none"> (1) avoiding significant adverse <i>effects</i> on the values of the natural feature or <u>natural</u> landscape, and (2) avoiding, remedying or mitigating other adverse <i>effects</i> <u>on the values of the natural feature or landscape</u>.
NFL-P4 – Restoration	Oppose	<p>The policy directive should clarify that it is the restoration of “natural” values that is being referred to, not restoration of any landscape or other value.</p>	<p>NFL-P4 – Restoration</p> <p>Promote restoration of the areas and values of outstanding and <i>highly valued natural features and natural landscapes</i> where those areas or <u>natural</u> values have been reduced or lost.</p>

Provision	Position	Specific Reason(s) if any	Amendment Sought
NFL-P5 – Wilding conifers	Oppose	All wilding tree species should be referred to, as the problem is wider than just Conifers (for example sycamores and other deciduous trees are wilding species). Also, all planting of wilding trees should be avoided/prohibited, not just replanting/plantation forestry.	<p>NFL-P5 – Wilding conifers <u>Tree Species</u></p> <p>Reduce the impact of <i>wilding trees <u>conifers</u></i> on outstanding and <i>highly valued natural features and landscapes</i> by:</p> <ol style="list-style-type: none"> (1) avoiding <i>afforestation</i> and <i>replanting</i> of plantation forests with wilding tree <u>conifer</u> species listed in APP5 within: <ol style="list-style-type: none"> (a) areas identified as outstanding natural features or landscapes, and (b) buffer zones adjacent to outstanding natural features and landscapes where it is necessary to protect the outstanding natural feature or landscape, and (2) supporting initiatives to control existing <i>wilding trees <u>conifers</u></i> and limit their further spread.
NFL-M1 – Identification	Oppose	<p>The identification criteria fails to require a comparison test and include input from the local community. These matters should be included in the identification of an ONL or a HVNL and the respective outstanding and highly valued attributes.</p> <p>The Appendix fails to take into account the recreation and amenity focus of section 7(c) values.</p>	<p>NFL-M1 – Identification</p> <p><i>Territorial authorities</i> must:</p> <ol style="list-style-type: none"> (1) include in their <i>district plans</i> a map or maps and a statement of the values of the areas of outstanding and <i>highly valued natural features and <u>natural</u> landscapes, prepared</i> in accordance with NFL-P1, (2) include in their <i>district plans</i> a statement of the capacity of outstanding and <i>highly valued natural features and <u>natural</u> landscapes</i> to accommodate change in use and development without their values being materially compromised or lost, <i>prepared</i> in accordance with NFL-P1, (3) recognise that natural features and <u>natural</u> landscapes may span jurisdictional boundaries and work together, including with the Regional Council, to identify areas under (1) to ensure that the identification of natural features and landscapes are treated uniformly across district boundaries, and (4) prioritise identification under (1) in areas that are likely to contain outstanding natural features or <u>natural</u> landscapes and are likely to face development or growth pressure over the life of this RPS.

Provision	Position	Specific Reason(s) if any	Amendment Sought
UFD–O1 – Form and function of <i>urban areas</i>	Oppose	It is unclear what “significant values and features identified in this RPS” is referring to. This objective is vague and uncertain.	UFD–O1 – Form and function of <i>urban areas</i> The form and functioning of Otago’s <i>urban areas</i> : (1) ... (2) maintains or enhances the significant values and features identified in this RPS, and the character and resources of each <i>urban area</i>.

Provision	Position	Specific Reason(s) if any	Amendment Sought
<p>UFD–O4 – Development in rural areas</p>	<p>Oppose</p>	<p>There are at least two issues with clause 1. First, “avoiding impact” is an extremely low threshold that effectively could prevent any development from occurring. Second, the significant values and features identified in this RPS are not actually identified, therefore it is difficult to comprehend the actual reach of this policy and its costs and benefits.</p> <p>These provisions should be limited to urban development, given the section is about urban form and development – not use of rural resources.</p> <p>Rural lifestyle and rural residential development is not defined in this RPS. Therefore, the policy could be interpreted as saying any scale of rural lifestyle or residential development (e.g. 1 house) requires “strategic planning” or “zoning”, which is too onerous and not necessary or appropriate in respect of implementing the objective, any other objective of the RPS, or the purpose of the Act.</p> <p>The term “rural” has a connotation which includes modified landscapes. It is appropriate to acknowledge that non-urban areas are characterised by more than just “rural character”, for example natural (unmodified) character. Non-rural and non-urban areas have tangible uses (e.g. tourism) and stakeholders.</p>	<p>UFD–O4 – <u>Urban</u> Development in <u>existing rural</u> areas</p> <p><u>Urban dD</u> development in Otago’s <i>rural areas</i> occurs in a way that:</p> <ol style="list-style-type: none"> (1) avoids impacts on significant values and features identified in this RPS, (2) avoids as the first priority, land and soils identified as highly productive by LF–LS–P19 unless there is an <i>operational need</i> for the development to be located in <i>rural areas</i>, (3) only provides for urban expansion, rural lifestyle and rural residential development and the establishment of <i>sensitive activities</i>, in locations identified through strategic planning or zoned within <i>district plans</i> as suitable for such development; and (4) outside of areas identified in (3), maintains and enhances the <i>natural and physical resources</i> that support the productive capacity, rural-non-urban character, and long-term viability of the non-urban rural sector and non-urban rural communities.

Provision	Position	Specific Reason(s) if any	Amendment Sought
UFD-P1 – Strategic planning	Oppose	The term “maximise” is not achievable (either practically or in an aspirational sense) and should not be used in any RM planning instrument.	<p>UFD-P1 – Strategic planning</p> <p>Strategic planning processes, undertaken at an appropriate scale and detail, precede urban growth and <u>urban</u> development and:</p> <p>(1) ...</p> <p>(2) ...</p> <p>(3) maximise-increase current and future opportunities for increasing resilience, and facilitating adaptation to changing demand, needs, preferences and <i>climate change</i>,</p>

<p>UFD-P5 – Commercial activities</p>	<p>Oppose</p>	<p>The term important features and values identified by this RPS has no practical meaning – what are these? Also, this language is different to that used in other provisions (e.g. “outstanding”, “special”, “highly valued”).</p> <p>There is no need to maintain the amenity and character of rural areas, because if they are special (or important, or highly valued, or outstanding), then they will be managed in accordance with other provisions in the RPS. Clause P7(1) should be deleted or the specific “important features values” being referred to should be listed/articulated.</p> <p>Referent to the term “amenity” is problematic because ultimately “amenity values” are subjective and sit in the eye of the beholder.</p> <p>If amenity is to be used, it should be “amenity values” in accordance with 7c of the RMA, and direction should be provided how to identify or articulate the values that contribute to the amenity of that place/area (or non-urban environment).</p>	<p>UFD-P5 – Commercial activities</p> <p>Provide for <i>commercial activities</i> in urban areas by:</p> <ol style="list-style-type: none"> (1) enabling a wide variety and scale of <i>commercial activities</i>, social activities, <u>commercial recreational activities</u>, and cultural activities in central business districts, town centres and commercial areas, especially if they are highly accessible by <i>public transport</i> and <i>active transport</i>, (2) enabling smaller local and neighbourhood centres and rural settlements to accommodate a variety of <i>commercial activities</i>, social activities, <u>commercial recreational activities</u>, and cultural activities of a scale appropriate to service local community needs, (3) providing for the expansion of existing areas or establishment of new areas identified in (1) and (2) by first applying UFD-P1 and UFD-P2, and (4) outside the areas described in (1) and (2), allow for small scale retail and service activities, <u>commercial recreation</u>, home occupations and <i>community services</i> to establish within or close to the communities they serve. <p>UFD-P7 – Non-Urban Rural Areas</p> <p>The management of <u>rural-non-urban areas</u>:</p> <ol style="list-style-type: none"> (1) provides for the maintenance and, wherever possible, enhancement of important features and values identified by this RPS, (2) outside areas identified in (1), maintains the productive capacity, amenity and character of rural areas, (3) enables <i>primary production</i> particularly on land or soils identified as highly productive in accordance with LF-LS-P19, (4) facilitates <i>rural industry</i> and supporting activities, (5) identifies directs rural residential and rural lifestyle development to areas <u>to be zoned for rural residential and rural lifestyle that</u> purposes in accordance with UFD-P8, (6) restricts the establishment of <u>urban activity and urban development residential activities, sensitive activities, and non-rural businesses</u> which could adversely
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Provision	Position	Specific Reason(s) if any	Amendment Sought
			<p>affect, including by way of reverse sensitivity, the productive capacity of highly productive <i>land, primary production</i> and <i>rural industry</i> activities, and</p> <p><u>(7) enables outdoor recreation (including commercial recreation).</u></p> <p><u>(8) facilitates growth or expansion of existing visitor destination places and activities.</u></p> <p>(7)(9) otherwise limits the establishment of <u>urban development and urban residential</u> activities and, sensitive activities, and non-rural businesses to those that can demonstrate an <i>operational need</i> to be located in <u>non-urban-rural</u> areas.</p>

Provision	Position	Specific Reason(s) if any	Amendment Sought
<p>UFD-P8 – Rural lifestyle and rural residential zones</p>	<p>Oppose</p>	<p>The term “adjacent” is problematic because it implies there is no physical separation between the urban and non-urban location. New rural lifestyle or residential activity could be appropriate if ready access and services is available (e.g. locations of land across a river or lake from an existing urban area which can be readily serviced by a bridge or water transport service).</p> <p>As above, clause 6 should be deleted or the specific “important features values” being referred to should be listed/articulated.</p>	<p>UFD-P8 – Rural lifestyle and rural residential zones</p> <p>The establishment, development or expansion of rural lifestyle and rural residential zones only occurs where:</p> <ol style="list-style-type: none"> (1) the <i>land</i> is adjacent to existing or planned <i>urban areas</i> and-or ready access to employment and services is available, (2) despite the direction in (1), also avoids-discourages <i>land</i> identified for future urban development in a relevant plan or land reasonably likely to be required for its future urban development potential, where the rural lifestyle or rural residential development would foreclose or reduce efficient realisation of that urban development potential, (3) minimises impacts on rural production potential, amenity values and the potential for reverse sensitivity <i>effects</i> to arise, (4) avoids, as the first priority, highly productive land identified in accordance with LF-LS-P16, (5) the suitability of the area to accommodate the proposed development is demonstrated, including <ol style="list-style-type: none"> (a) capacity for servicing by existing or planned <i>development infrastructure</i> (including self- servicing requirements), (b) particular regard is given to the individual and cumulative impacts of domestic <i>water</i> supply, <i>wastewater</i> disposal, and <i>stormwater</i> management including self-servicing, on the receiving or supplying environment and impacts on capacity of <i>development infrastructure</i>, if provided, to meet other planned urban area demand, and (c) likely future demands or implications for publicly funded services and additional infrastructure, and <p>provides for the maintenance and wherever possible, enhancement, of important features and values identified by this RPS.</p>

Provision	Position	Specific Reason(s) if any	Amendment Sought
UFD-M1 – Strategic planning	Oppose	Spatial Plans should identify key visitor destinations located outside the urban environment, these include highly popular locations which attract and service many people. For example in the Queenstown Lakes District places like entrances to Mt Aspiring National Park, Skyline, the ski fields, and Walter Peak Farm.	<p>UFD-M1 – Strategic planning</p> <p>Amend clause 6 to require spatial plans to identify key visitor destinations outside the urban environment, for example:</p> <p>Otago Regional Council and <i>territorial authorities</i>:</p> <p>(6) must individually or jointly develop further regulatory or non-regulatory methods and actions to implement strategic and spatial plans, including to guide the detail of how, when and where <i>development</i> occurs, including matters of urban design, requirements around the timing, provision, and responsibilities for open space, connections and infrastructure, including by third parties, and the ongoing management of effects of urban development on matters of local importance, and <u>any spatial plan shall identify key visitor destinations outside the urban environment, and</u></p>
UFD-M2 – District plans	Oppose	<p>Clause 3(d) includes the term “water sensitive design”, however this does not have a practical or clear meaning. Clause 7 should be amended to clarify that development outside urban areas should be managed in accordance with UFD-P7, not just rural areas. Note also this is a potential consequence of deleting the definition of “rural area”.</p> <p>It is not necessary to include “rural areas” in clause (8), as rural residential and rural lifestyle activities cannot occur in urban locations.</p>	<p>Clarify or define what is meant by “water sensitive design” in clause 3(d).</p> <p>Amend clauses 7 and 8 as follows:</p> <p><i>Territorial authorities</i> must prepare or amend their <i>district plans</i> as soon as practicable, and maintain thereafter, to:</p> <p>(7) manage development in <u>rural non-urban areas</u> in accordance with UFD-P7,</p> <p>(8) manage rural residential and rural lifestyle activities in <u>rural areas</u> in accordance with UFD-P8,</p>

<p>APP6 – Methodology for natural hazard risk assessment</p>	<p>Oppose</p>	<p>Step 2 should be amended to clarify that community input is required to determine risk level thresholds at a district or community wide scale. In the absence of this being undertaken, for individual sites, the consequence criteria in Table 7, in respect of buildings, should be clarified to stipulate that any activity which is anticipated by a district plan will have no worse than moderate effects on buildings unless those buildings are lifeline or critical buildings and structures.</p> <p>The Criteria Step 2 should also be amended to include numerous other matters that is relevant to tolerability, for example, the matters resolved in the QLDC PDP Natural Hazards chapter (which Wayfare was involved in), including:</p> <ul style="list-style-type: none"> • the nature and scale of the activity, and activities in the area, including any existing lawfully established land use or zoning; • the actual and potential adverse effects of the natural hazard on people and communities; • the consequence of and response to past natural events; • the effectiveness and implementation of responses, adaptations or mitigation measures • individual and community vulnerability and resilience 	<p>APP6 – Methodology for natural hazard risk assessment</p> <p>Undertake the following four step process to determine the natural hazard risk.</p> <p>Step 2 – Natural hazard consequence</p> <p>HAZ–NH–M2 requires local authorities to undertake a consultation process with communities, stakeholders and partners regarding risk levels thresholds and develop a risk table / matrix at a district or community scale. Tables 7A and 7B provide a region-wide baseline to be applied in the absence of the district or community scale risk table being completed.</p> <p>Using Table 7 and the matters listed in (1) to (150) below, <u>and Tables 7A and 7B as a guideline</u>, assess the consequence (catastrophic, major, moderate, minor, or insignificant) of the <i>natural hazard</i> scenarios identified in step 1 considering:</p> <p><u>(1) the nature and scale of the activity, and activities in the area, including any existing lawfully established land use or zoning;</u></p> <p><u>(2) the actual and potential adverse effects of the natural hazard on people and communities;</u></p> <p><u>(3) the consequence of and response to past natural events;</u></p> <p>(4)<u>(4) the effectiveness and implementation of responses, adaptations or mitigation measures</u></p> <p>(2)<u>(5) individual and community vulnerability and resilience,</u></p> <p>(3)<u>(6) impacts on individual and community health and safety,</u></p> <p>(4)<u>(7) impacts on social, cultural and economic well-being,</u></p> <p>(5)<u>(8) impacts on infrastructure and property, including access and services,</u></p> <p>(6)<u>(9) available and viable risk reduction and hazard mitigation measures,</u></p> <p>(7)<u>(10) lifeline utilities, essential and emergency services, and their co-dependence,</u></p> <p>(8)<u>(11) implications for civil defence agencies and emergency services,</u></p> <p>(9)<u>(12) the changing natural hazard environment,</u></p>
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	<p>will not have a significant natural hazard risk unless certain criteria are met. Accordingly, different.</p> <p>These factors are in the operative QLDC district plan for determining risk tolerability (chapter 28). The operative QLDC District Plan was prepared in accordance with the pRPS 2015.</p> <p>Step 4(1) should be amended because it doesn't make sense to have "natural hazard risk" as a criteria for identifying natural hazard risk</p> <p>Quantification of natural hazard risk can be expensive, full of uncertainty (as its only models) is [at this stage] scientific jargon, and prevents affected stakeholders tolerability being applied and tested on a case-by-case basis.</p> <p>Quantitative assessments are appropriate for risk assessment where those assessments are undertaken by Councils or applicants for plan changes and resource consent applications for activities which are not existing or are not anticipated by a district plan.</p>	<p>(10)<u>(13)</u> cumulative effects including <i>multiple</i> and <i>cascading hazards</i>, where present, and</p> <p>(11)<u>(14)</u> factors that may exacerbate a <i>natural hazard</i> event including the <i>effects of climate change</i>.</p> <p>Amend Table 7 as follows:</p> <ul style="list-style-type: none"> Rename as: <u>Table 7A: Consequence table – to be used in plan changes & activities not anticipated by a zone in a district plan</u> Amend headings by inserting (if applicable) after the terms "Buildings", "Critical Buildings", and "Lifelines" Insert new Table as below <p><u>Table 7B: Consequence table – to be used for individual sites or individual activities anticipated under a district plan</u></p> <table border="1" data-bbox="1058 800 2024 1347"> <thead> <tr> <th><u>Severity of Impact</u></th> <th><u>Buildings (not critical or lifeline)</u></th> <th><u>Critical or lifeline buildings/structures</u></th> <th><u>Health & Safety</u></th> </tr> </thead> <tbody> <tr> <td><u>Catastrophic (V)</u></td> <td>=</td> <td><u>Out of service for > 1 month (affecting ≥20% of the town/city population) OR suburbs out of service for > 6 months (affecting < 20% of the town/city population)</u></td> <td><u>> 101 dead and/or > 1001 injured</u></td> </tr> <tr> <td><u>Major (IV)</u></td> <td>=</td> <td><u>Out of service for 1 week – 1 month (affecting ≥20% of the town/city population) OR suburbs out of service for 6 weeks to 6 months (affecting < 20% of the town/city population)</u></td> <td><u>11 – 100 dead and/or 101 – 1000 injured</u></td> </tr> </tbody> </table>	<u>Severity of Impact</u>	<u>Buildings (not critical or lifeline)</u>	<u>Critical or lifeline buildings/structures</u>	<u>Health & Safety</u>	<u>Catastrophic (V)</u>	=	<u>Out of service for > 1 month (affecting ≥20% of the town/city population) OR suburbs out of service for > 6 months (affecting < 20% of the town/city population)</u>	<u>> 101 dead and/or > 1001 injured</u>	<u>Major (IV)</u>	=	<u>Out of service for 1 week – 1 month (affecting ≥20% of the town/city population) OR suburbs out of service for 6 weeks to 6 months (affecting < 20% of the town/city population)</u>	<u>11 – 100 dead and/or 101 – 1000 injured</u>
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			<p>Moderate</p> <p>(III)</p> <p>=</p> <p>Out of service for 1 day to 1 week (affecting ≥20% of the town/city population) OR suburbs out of service for 1 week to 6 weeks (affecting < 20% of the town/city population)</p> <p>2 – 20 dead and/or 11 – 100 injured</p>
			<p>Minor</p> <p>(II)</p> <p>A proposed building on the site is functionally compromised</p> <p>Out of service for 2 hours to 1 day (affecting ≥20% of the town/city population) OR suburbs out of service for 1 day to 1 week (affecting < 20% of the town/city population)</p> <p>1 dead and/or 1 = 10 injured</p>
			<p>Insignificant</p> <p>(I)</p> <p>No proposed building is functionally compromised</p> <p>Out of service for up to 2 hours (affecting ≥20% of the town/city population) OR suburbs out of service for up to 1 day (affecting <20% of the town/city population)</p> <p>No dead No injured</p>
<p><u>When assessing consequences within this matrix, the final level of impact is assessed on the 'first past the post' principle, in that the consequence with the highest severity of impact applies.</u></p> <p><u>When this assessment is being undertaken in accordance with HAZ-NH-M3(7)(a) or HAZ-NH-M4(7)(a) the text within Step 2 shall guide the assessment of natural hazard consequence.</u></p>			
<p>Amend Step 3(1) (Assessing activities for natural hazard risk) as follows:</p> <p>Using the information within steps 1 and 2 above, and Table 8, assess whether the natural hazard scenarios will have an acceptable, tolerable, or significant risk to people, property and communities, by considering:</p> <p>(1) <u>the natural hazard risk identified, including residual risk peoples and communities awareness and experiences of the risk, including any investigations, initiatives or natural hazard risk engagement that have been undertaken,</u></p> <p>Delete Step 4 or clarify that it need only be used by xx</p>			

Provision	Position	Specific Reason(s) if any	Amendment Sought
APP9	Oppose	<p>The identification criteria fails to require a comparison test and include input from the local community. These matters should be included in the identification of an ONL or a HVNL and the respective outstanding and highly valued attributes.</p> <p>The Appendix fails to take into account the recreation and amenity focus of section 7(c) values.</p>	<p>APP9 – Identification criteria for outstanding and <i>highly valued natural features, landscapes and seascapes</i></p> <p>The areas and the values of outstanding and <i>highly valued natural features, <u>natural landscapes</u></i> and seascapes are identified using the following attributes, <u>compared with other natural features, natural landscapes and seascapes in the applicable District, and undertaken in consultation with the community:</u></p> <p>Also expand the criteria in APP9 to encompasses the use values associated with people's appreciation and use of resources, including waterbodies.</p>

Provision	Position	Specific Comment	Decision / amendment sought
SRMR – entire section	Oppose	The SRMR section fails to identify or discuss, in a positive frame, the benefits to people and the environment from subdivision, use and development of natural and physical resources. Wayfare is particularly concerned that the SRMR section does not discuss the wellbeing benefits (and need) of ensuring people can access and use the rural and natural environment.	<p>Insert new section to identify and discuss, in a positive frame, the benefits to people and the environment from subdivision, use and development of natural and physical resources.</p> <p>This section should also identify and discuss the wellbeing benefits (and need) of ensuring people can access and use the rural and natural environment.</p>
SRMR – entire section	Oppose	The SRMR section is written too negatively, with limited reference to any positive or beneficial resource management issues. If the focus is to remain on adverse effects (or negative significant resource management issues then the headings of each “Impact Snapshot” section should be amended to say “Adverse Impact Snapshot”.	Amend each “Impact Snapshot” to say “Adverse Impact Snapshot”.
SRMR-11 – Context	Oppose	Natural hazard events occur all the time without any discernible impact.	The Otago region is exposed to a wide variety of <i>natural hazards</i> that impact on people, property, <i>infrastructure</i> , historic heritage and the wider <i>environment</i> . When a <u>major natural hazard</u> event occurs, it is usually difficult and costly for a community to recover. ..
Entire RPs	Oppose	The term natural capital is used in the RPS but is not defined. Wayfare supports the use of the term natural capital, provided it is defined in the RPS.	Define Natural Capital.

<p>SRMR-12 - Climate change is likely to impact our economy and environment – Economy</p>	<p>Oppose</p>	<p>The statement as written is misleading as it suggests “snow days” are the same as “skiing day”s”. Moreover, the MfE reference which does not link the reduced snowfall to skiing. The MfE website says:</p> <p><i>Snowfall</i> <i>The Otago region is likely to experience significant decreases in seasonal snow. By the end of the century, the number of snow days experienced annually could decrease by as much as 30-40 days in some parts of the region. The duration of snow cover is also likely to decrease, particularly at lower elevations.</i></p> <p><i>Less winter snowfall and an earlier spring melt may cause marked changes in the annual cycle of river flow in the region. Places that currently receive snow are likely to see increasing rainfall as snowlines rise to higher elevations due to rising temperatures. So for rivers where the winter precipitation currently falls mainly as snow and is stored until the snowmelt season, there is the possibility for larger winter floods.</i></p>	<p>For Some tourism activities may be affected. For example, <u>the amount of natural snowfall is expected to reduce; meaning ski fields will be more reliant on snowmaking.</u> there will be negative impacts on skiing where the number of snow days experienced annually could decrease by as much as 30-40 days in some parts of the region. The duration of snow cover is also likely to decrease, particularly at lower elevations. This will also lead to reduced summer waterflows</p>
<p>SRMR-13 – statement</p>	<p>Oppose</p>	<p>The issue of wilding tree species is not limited to conifers.</p>	<p>Replace reference to “wilding conifers” with Wilding Tree Species.</p>
<p>SRMR-13 – context – economic</p>	<p>Oppose</p>	<p>Weeds such as didymo and lake snow clogs up pumps – increased costs with frequent inspections & cleaning required.</p>	<p>Weeds, <u>including didymo and lake snow</u> can also adversely impact <i>infrastructure</i>, for example, <i>water</i> systems including irrigation, dams, and levies; power systems (e.g. generation penstock, gates, valves, surge tanks, transmission lines); and transportation systems (e.g. <i>road</i> beds, <i>lake</i> and <i>river</i> transportation, airstrips).</p>

SRMR-14 – STATEMENT	Oppose	The majority of urban growth has occurred in modified rural landscape, not “natural landscape”.	Natural resources used for urban development are permanently transformed – with the opportunity cost of removing urban activity being too high for land to revert to productive uses. Frequently, places that are attractive for urban growth also have landscape and productive values all of which must be balanced and where possible protected. The growth of Wanaka and Queenstown is changing the natural landscape. Mosgiel’s growth is occurring on some of Otago’s most highly productive soil, which removes the option for agriculture. Towns like Arrowtown, Clyde and Milton experience poor airquality in winter, while experiencing pressure to grow.
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<p>SRMR-14 – STATEMENT – CONTEXT</p>	<p>Oppose</p>	<p>The discussion about rural areas does not sufficiently identify or discuss the unmodified naturalness of many parts of non-urban areas.</p> <p>The last sentence is fanciful and meaningless.</p>	<p>Otago’s urban areas, like its people and landscapes, are also diverse. The attraction of urban areas results from the benefits of proximity and access to a variety of other people, experiences, goods, services (e.g., shopping, education, specialist service providers, recreation and leisure facilities and <i>infrastructure</i> (usually described as agglomeration effect)). These are generally considered to exceed the inconveniences such as congestion, pollution, and noise. Growth in some urban areas and demand for living in and visiting Otago can also be driven by proximity and access to highly valued natural features, such as the coast, mountains, <i>lakes</i>, and <i>rivers</i>. The open space and landscapes provided in rural <u>and unmodified natural areas additionally also</u> drives demand for rural residential/<u>lifestyle</u> living, particularly in areas with these qualities that are <u>similarly also</u> in relative proximity to urban services.</p> <p>Well-functioning urban places need to be dynamic and efficient, enable human social interactions and provide a wide variety of housing, employment, service and recreational opportunities that meet changing needs and preferences, in a way that maximises the well-being of all its present and future inhabitants, and respects its history and historic heritage, its setting and the <i>environment</i>. This requires well located development, supported by the necessary infrastructure.</p> <p>Urban growth, especially if it exceeds <i>infrastructure</i> capacity (either through sheer pace and scale or by lack of planning) or if it occurs in a way or at a rate that mean that appropriate <i>infrastructure</i> is not provided, is lagging or is inefficient, can result in adverse impacts on the <i>environment</i>, existing residents, business and wider society. Quality urban environments are those that maximise the positive aspects of urban areas and minimise the negative.</p>
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<p>SRMR – 15 – context</p>	<p>Oppose</p>	<p>“balancing” is not an appropriate term to use given the hierarchy of obligations under TMOTW.</p>	<p><i>Freshwater</i>, including <i>rivers</i> and streams, <i>lakes</i>, <i>groundwater</i> systems, and <i>wetlands</i>, is a finite <u>non-exclusive</u> resource, critical to the <u>natural</u> environment, society and the economy. In Otago, access to, allocation, and <i>use</i> of <i>freshwater</i> reflects current demands and historical development associated with “deemed permits” (water permits under the RMA 1991) and a permissive water resource management regime. The deemed permits originated from mining licences issued under historic mining legislation and which enable water to continue to be used for a range of uses until October 2021.</p> <p>Population growth and land-use intensification in urban and rural environments can create increased demand for <i>freshwater</i> for human consumption, irrigation and other economic uses. <i>Freshwater</i> resources in some places are reaching, or are beyond, their sustainable abstraction limits. However, there continues to be debate in the community about how historical <i>freshwater</i> allocations can be adjusted to achieve a <u>sustainable outcome balance-of-economic, environmental, social and cultural needs</u>.</p>
<p>SRMR 15 – Impact Snapshot Economic</p>	<p>Oppose</p>	<p>Minor edit, relevant to tourism.</p>	<p><i>Freshwater</i> in the Otago region is a factor of production that directly contributes to human needs (urban <i>water</i> supply), agriculture (including irrigation), hydro-electric power supply, <u>tourism (for example water supply for visitor destinations and snowmaking)</u>, and mineral extraction. <i>Freshwater</i> also indirectly contributes to the tourism industry through maintenance of <i>freshwater</i> assets for aesthetic and commercial recreational purposes. Lack of <i>freshwater</i> can negatively impact economic output of those industries that rely on <i>water</i> in the production process. To varying degrees these impacts can be mitigated through <i>water</i> efficiency measures and innovation. At the same time other industries, such as tourism <u>activities</u> that rely on the aesthetic characteristic of <i>rivers</i> and <i>lakes</i>, do not have such opportunities available to them and instead rely on management regimes that sustain flows and <i>water</i> levels suitable for their activities.</p>

SRMR 15 – Impact Snapshot Social	Oppose	Minor edit, relevant to people’s well-being.	<p>Ensuring appropriate <i>freshwater</i> supply for human <i>use</i> is available <u>is essential, including</u> as part of planned urban growth—is essential. It is possible this may require consideration of additional <i>freshwater</i> storage in the future. The region’s <i>freshwater</i> assets also support a range of recreation uses, for example camping, fishing, <i>water</i> sports, and swimming. These values are strongly linked to environmental values and as such, reduced environmental flows have a corresponding negative impact on social and cultural values (<u>including people’s wellbeing</u>).</p>
SRMR 16 – heading	Oppose	Point of clarification	<p>Declining <i>water</i> quality has adverse <i>effects</i> on the <u>natural environment</u>, <u>our communities</u>, and the <u>economy</u></p>
SRMR 16 – statement	Oppose	Minor edit	<p>While the pristine areas of Otago generally maintain <u>very</u> good <i>water</i> quality, some areas of Otago demonstrate poorer quality and declining trends in <i>water</i> quality which can be attributed to <i>discharges</i> from <i>land use</i> intensification (both rural and urban) and <i>land</i> management practices. Erosion, run-off and soil loss can lead to sediment and nutrients being deposited into <i>freshwater</i> bodies resulting in declining <i>water</i> quality.</p>
SRMR 16 – context	Oppose	Minor edit, point of clarification.	<p>The health of <i>water</i> is vital for the health of the <u>natural environment</u>, people and the economy. It is at the heart of culture and identity. Nationally, and in parts of Otago, <i>freshwater</i> is facing significant pressure. Population growth and land-use intensification in urban and <u>non-urban rural</u> environments has impacted the quality of <i>water</i>, increasing contamination from nutrients and sediment.</p> <p><i>Water</i> quality affects a wide range of environmental health factors, human survival needs, and cultural, social, recreational, and economic uses. Some of the biggest <u>adverse</u> impacts on <i>water</i> quality in Otago are considered to come from agriculture and urbanisation, through diffuse <i>discharges</i> and point source <i>discharges</i>.</p>

SRMR 17	Oppose	It is important in Otago to promote the need to restore and enhance biodiversity values, not just maintain or protect what is left.	Insert statement/discussion in this section about the need to restore biodiversity, not just maintain or protect what's left.
SRMR 17	Oppose	Hydro have had implications for the natural environment and this should be acknowledge.	Insert statement / discussion in this section to identify/acknowledge the effects Hydro dams are having on coastal erosion for example in respect of lack of sediment coming down Clutha River affecting beaches north of Clutha River outlet. (source https://niwa.co.nz/news/shifting-sands-%E2%80%93-the-end-of-a-kiwi-dream)
SRMR 17 - impact statement	Oppose	Minor point of clarification.	There are 62 ecosystem <u>unitss</u> in the Otago region.
SRMR - 18 Statement	Oppose	Minor point of clarification	Otago's coast provides habitat for rare species (including toroa and hoiho), comprises some of the region's outstanding <u>natural</u> landscapes, is a rich food source, provides many recreation opportunities, is the location for some industries, and has potential for further economic use (aquaculture).
SRMR - 18 Context	Oppose	Minor point of clarification	Activities occurring within or affecting the coastal environment include urban development, recreational activities, transport <i>infrastructure</i> , energy generation and transmission, land and marine based (e.g. aquaculture) food production industries and other rural industry activities, <i>plantation forestry</i> , fishing, tourism, and <i>mineral</i> extraction. Such activities arecan be important contributors to the existing and future health and well-being of <u>people and communities</u> , when they are located and managed appropriately . A number of these activities provide a significant contribution to the regional economy.
SRMR-19 HEADING	- Oppose	Minor point of clarification	<u>Central Otago lakes are subject to pressures from tourism and population growth</u>

SRMR-19 STATEMENT -	Oppose	Point of clarification	<p>The beauty, recreational opportunities and regional climate of Lakes Wanaka, Wakatipu, Hāwea and Dunstan and their environs attract visitors and residents from around the region, the country, and the world. This influx brings economic <u>benefit through urban growth and tourism opportunities</u>, but the activities and services created to take advantage of it can degrade the <u>natural environment</u> and undermine the experience that underpins their attractiveness.</p>
SRMR-19 CONTEXT -	Oppose	Points of clarification	<p>Healthy <i>lakes</i> are one of Otago's most valued natural resources and for the most part <i>water</i> quality is <u>very</u> good. The vValues assigned to <i>lakes</i> include the natural features and <u>natural</u> landscapes, the quality and quantity of <i>water</i> accessible to the Otago communities, the accessibility of these resources for recreation <u>and transport</u>, the health of native flora and fauna associated with Otago's <i>rivers</i> and <i>lakes</i>, and renewable energy production. ...</p>
SRMR-19 SNAPSHOT - environmental -	Oppose	What evidence is this statement based on? What type of tourism demand, as opposed to urban growth, results in degradation of water quality?	<p>...However, <i>water</i> quality is being adversely impacted by increased population <u>and</u>, urban development and<u>tourism demand</u> which is straining existing waste management infrastructure. In addition, localised degradation of some areas is occurring due to overuse and unregulated use (e.g. freedom camping). The amenity of these areas is being compromised in some places by over-crowding.</p> <p>Recreation <i>use</i> impacts on the <i>environment</i> can be a <i>risk</i>, for example the distribution of pest species <u>can</u> be accelerated as has occurred for lake snow and <i>Lagarosiphon</i> weeds, being spread by recreation boating movements. Natural features and landscape values <u>can</u> are also <u>be</u> adversely impacted by tourism <u>development</u>, and urban growth, and energy production.</p>

<p>SRMR-19 - SNAPSHOT - economic</p>	<p>Oppose</p>	<p>These statements are unfounded. Firstly, there is no evidence that international visitors think there is an overcrowding issue in the district (or NZ). Secondly, there is no evidence to suggest tourism income will be adversely affected by NZs reputation. Thirdly, the tourism industry does not have a social license to operate (or at least there is no evidence to say this and there is no such thing in RMA language).</p> <p>How has or can tourism negatively impact agriculture? In fact it is the opposite, e.g. some (probably many) farming activities rely on tourism as an additional source of income.</p>	<p>The economic benefits of urban development, tourism, agriculture, energy production and <i>water</i> supply can be positive for the Otago-Lakes' communities and visitors. It also impacts on the region's natural assets with a growing cost to the region that puts at <i>risk</i> the <i>environment</i> highly prized by residents and visitors. There are also impacts between industry sectors.</p> <p>For example, the clean green image of New Zealand, of which the Otago Lakes area is symbolic, is at <i>risk</i> of being compromised because of over-crowding if the quality of lakes becomes degraded or visitor numbers exceed the servicing capacity of the district in peak tourism seasons. This has the potential to adversely affect the existing regional economy and future economic development, and the tourism industry's social license to operate. At the same time tourism can negatively impact on how agriculture can operate, potentially limiting its contribution to the regional economy.</p> <p>Urban development brings economic development and improved opportunities and standards of living to the Otago lakes area but can adversely impact on both the <i>environment</i> and how agriculture can operate.</p>
<p>SRMR-19 - SNAPSHOT - social</p>	<p>Oppose</p>	<p>Points of clarification.</p>	<p>Poorly managed activities and <u>Over-crowding</u> impacts <u>can</u> adversely affect recreation experiences of both tourists and residents, <u>particularly outdoor recreation, such as fishing and water sports, and urban amenity.</u> Infrastructure capacity limits can, for example, result in an increased number of wastewater overflows <u>into</u> the environment when demand on the network exceeds capacity. These can have significant adverse impacts on human health <u>including recreation opportunities</u> as well as recreational amenity.</p>

SRMR-10 CONTEXT	- Oppose	Minor edits, points of clarification.	<p>... However, economic activity needs to more effectively account for and manage its impacts on the region’s natural resources.⁴⁴ Where business and social activity does not account for its impacts on natural resources in the long term, not only is the sustainability of the region’s natural resources threatened, but equally the associated long term <u>and</u> economic, social and cultural values are also threatened.</p>
SRMR-10 – SNAPSHOT – environmental	Oppose	Minor edits, points of clarification	<p>Economic activities can lead to, for example, biodiversity loss, poor <i>water</i> quality, coastal and marine degradation, and loss of natural features and <u>natural</u> landscapes. These and other matters are considered in further detail elsewhere in this chapter.</p> <p>Negative impacts on the <u>natural environment</u> can also compromise the ecosystems and the services economic activities depend on (ecosystem services), for example loss of <i>wetlands</i> which provide flood attenuation services, loss of biodiversity which provide pest control and pollination services, and loss of soil biodiversity. Economic activity also has the potential to compromise or destroy natural features and <u>natural</u> landscapes. Such impacts are both immediate and cumulative. Cumulative impacts that are not addressed have the potential to lead to tipping points beyond which systems can no longer properly function.</p>
SRMR-10 – SNAPSHOT – social	Oppose	Under social heading: Use of the term “social license” is not a good fit in the context of an RMA policy document. What does it mean? On what basis is it justified?	<p>Damage to or loss of natural features and <u>natural</u> landscapes <u>can</u> compromise amenity values. Failure of business to sustainably manage <u>their impact on</u> natural resources <u>can</u> compromise the social licence of a business sector to operate. This <u>can</u> adversely impacts social capital (trust) and can create community division. In extreme cases it can lead to calls for reduced access to resources.</p>
SRMR-11 HEADING	- Oppose	Minor edits, points of clarification	<p>SRMR-111 – Cumulative impacts and <i>resilience</i> – the <u>natural</u> environmental costs of our activities in Otago are adding up with tipping points potentially being reached</p>

SRMR-11 – CONTEXT	Oppose	Minor edits, points of clarification	<p>The long term environmental, economic, and social well-being of the Otago region requires anticipating and minimising cumulative environmental impacts before they reach a tipping point, beyond which systems can no longer properly function. This requires <i>resilient</i> frameworks that take account of the dynamic relationship between the <u>natural environment</u>, economy and people while acknowledging that the future is always uncertain, and knowledge is imperfect. Should a tipping point be reached a <i>resilient</i> Otago society will have the ability to absorb, respond to, adapt to, and recover from disruptive events.⁴⁵</p>
SRMR-11 – SNAPSHOT – environmental	Oppose	Minor edits, points of clarification	<p>While many ecosystems have a degree of <i>resilience</i>, increasing pressures on the <u>natural environment</u>, typically as a result of human activities (for example economic development), can have an adverse cumulative <u>effect</u>. ...</p> <p>The first and best response is to ensure sustainable management of our natural resources and avoid<u>ing</u> immediate and long-term cumulative effects that degrade the onf<u>environmental values which are already degraded is required to achieve sustainable management of our natural resources</u>. At the same time a <i>resilience</i> approach is needed that identifies thresholds and sets limits on the use of natural resources_ to avoid permanent and potentially catastrophic changes occurring, as would occur if a tipping point is reached.</p>
SRMR-11 – SNAPSHOT – social and economic	Oppose	Minor edits, points of clarification	<p>The well-being of Otago’s people and communities in the long term will be sustained-protected by the enduring ecological health and <i>resilience</i> of the <u>natural environment</u> and by human activity providing for the <u>natural environment</u> in equal or greater measure than is taken from it (in other words, net impact determines net well-being). It will also be sustained-protected through community <i>resilience</i> so that it can adapt and nimbly_<u>respond</u> to future challenges.</p>
RMIA–WAI–I3	Oppose	Wayfare wonders if additional reasons for or issues with loss of access relate to “overfishing” and “pollution”..	Consider adding “overfishing” and “pollution” as issues or reasons for loss of access.

RMIA-MKB-I5	Oppose	The Department of Conservation has obligations under the Conservation Act, also Wildlife Act, and the NZ Coastal Policy Statement (not just the Conservation Act).	<p>RMIA-MKB-I5 – Inconsistent approaches to biodiversity protection amongst regulatory authorities</p> <p>Biodiversity is managed by several entities who have different approaches and powers through their separate governing legislation. For example, regional and district councils have obligations under the Resource Management Act and the Department of Conservation has obligations under the Conservation Act. Different pieces of legislation are not always consistent with each other. There can also be confusion about who is responsible for different aspects of biodiversity management as it is not managed by one entity.</p>
RMIA-CE-I1	Oppose	Wayfare wonders if additional specific issues could be “overfishing” and “pollution”.	Consider adding “overfishing” and “pollution” as specific issues.
RMIA-CE-I2	Oppose	The issue of rubbish occurs in lakes and rivers as well as the coastal environment. This issue is important, and it concerns parties other than iwi. This issue could be repeated elsewhere in the SRMR section.	Consider amending the issue “Proliferation of rubbish in the coastal environment, including materials such as lengths of rope from boats and moorings, plastic packaging strips, discarded and lost fishing gear, glass and plastic bottles as well as other dumped material” to include “in lakes and rivers”, and repeat this issue elsewhere in the document.