

**From:** [Paul Thompson](#)  
**To:** [RPS](#)  
**Subject:** proposed Otago Regional Policy Statement 2021 - submission by Environment Canterbury  
**Date:** Wednesday, 25 August 2021 11:41:44 a.m.  
**Attachments:** [Environment Canterbury submission on proposed ORC RPS August 2021.pdf](#)

---

Kia ora

Please find attached Environment Canterbury's submission on the proposed Otago Regional Policy Statement 2021.

We hope that you find the comments helpful, if you would like to discuss further please don't hesitate to get in touch with us.

Kind Regards

Paul  
On behalf of Andrew Parrish

---

**Paul Thompson**

Principal Planner  
Environment Canterbury  
Christchurch Office

+64 27 314 0397  
Paul.Thompson@ecan.govt.nz

PO Box 345, Christchurch 8140  
Customer Services: 0800 324 636  
24 Hours: 0800 76 55 88

[ecan.govt.nz](http://ecan.govt.nz)



# Notice of Submission on Proposed Otago Regional Policy Statement 2021

## Resource Management Act 1991 - Form 5

**Name of Submitter:** Canterbury Regional Council (Environment Canterbury)

**Physical Address:** 200 Tuam Street, Christchurch, 8011

**Address for service:** Canterbury Regional Council  
PO Box 345  
Christchurch 8140

**Contact Person:** Paul Thompson

**Email:** paul.thompson@ecan.govt.nz

**Telephone:** 027 314 0397

## This is a submission on the Proposed Otago Regional Policy Statement 2021

Environment Canterbury thanks the Otago Regional Council (the Council) for the opportunity to provide a formal submission on the Proposed Otago Regional Policy Statement 2021. We wish to acknowledge the extensive work that has been undertaken by the Council in preparing the Proposed Regional Policy Statement, including the early engagement with Environment Canterbury.

Environment Canterbury is supportive of the Regional Policy Statement review process the Council has undertaken and the proposed provisions are generally consistent with the regional planning framework in Canterbury. In acknowledgement of this the Environment Canterbury submission contains many submission points in full support of the proposed provisions, particularly in relation to the identification of cumulative effects and the co-ordinated management of natural and physical resources for the management of cross boundary issues.

Our submission also contains a number of submission points that seek amendments to the proposed provisions. The submission points support the intent of the proposed provisions but are seeking amendments to better recognise the potential for cross boundary issues and the need to involve local authorities in neighbouring regions where this may occur.

These submission points have been included as a table in **Appendix A** to indicate the relevant provisions submitted on, the relief sought, and our reasons for seeking amendments. The order of the table follows the same structure of the Proposed Statement.

Where amendments have been sought, we have used underlined text to indicate recommended additions to the provisions and ~~striketrough~~ to indicate recommendations for the removal of the proposed text. Please note to avoid the potential for confusion, we have removed in **Appendix A** any hyperlinks (which also appear as underlined text) from the proposed provisions.

**Appendix A** can be provided in MSWord format if this would be more useful to the Hearing Officers or to the Panel.

Thank you again for this opportunity to provide a submission. For any clarification on the submission points contained within **Appendix A**, please contact Paul Thompson (paul.thompson@ecan.govt.nz) and he will be happy to assist the Hearing Officers.

We wish to retain the opportunity to speak in support of our submission.

A handwritten signature in black ink, appearing to be 'AP' followed by a long horizontal stroke.

Andrew Parrish

Planning Section Manager

(Authorised under delegated authority from the Canterbury Regional Council)

Date: 25/08/2021

## Appendix A – Table of Submission Points

The specific provisions of the proposal that my submission relates to are:	Support or oppose or amend	Reasons	Decision requested
<p>Part 1 Introduction and General Provisions            ...            How the policy statement works            ...            Cross-boundary matters</p>	<p>Amend under the heading 'Cross-boundary matters'</p>	<p>The identification of Otago's cross-boundary matters as including those situations where adverse effects in one jurisdiction arise due to the activities in another (particularly where territorial authority boundaries do not match catchment boundaries) is supported. In connection with this type of cross-boundary matter, the reference to the Waitaki River catchment (which Otago and Canterbury Regionals share jurisdiction for) is also supported.</p> <p>For similar reasons an amendment is proposed in connection with the subsequent reference made to Otago's coastal environment. The proposed amendment seeks to ensure adequate recognition is given to the potential for cross-boundary matters in the coastal environment to occur between the Otago and Canterbury region as well as between territorial authorities (within the Otago region).</p> <p>The proposed relief is consistent with the Regional Coastal Environment Plan for the Canterbury Region (RCEP) which identifies (at Chapter 10.1) the need for integrated resource management in the coastal environment. The RCEP identifies this arises from, inter alia, the need to ensure consistent management of resource issues occurs along the entire coast of the region and with adjacent territorial local authorities and between regions. The RCEP identifies (at Chapter 10.2) that a principal cross boundary</p>	<p><b>Cross-boundary matters</b>            Ecosystems and human activities cross jurisdictional boundaries. When different jurisdictions manage similar activities or resources in different ways there is potential for inconsistent outcomes, resulting in inefficient and ineffective management.</p> <p>To achieve integration, those involved in resource management need to coordinate their policies, plans and actions. This is encompassed by the philosophy "ki uta ki tai" – from the mountains to the sea. Accordingly, section 62 of the RMA 1991 requires regional councils to include in the RPS the processes to be used to deal with issues that cross <i>local authority</i> boundaries, and issues between <i>territorial authorities</i> or between regions.</p> <p>Cross-boundary issues can arise in several ways, and generally manifest in issues for either plan preparation and review, or plan</p>

		<p>issue for the Canterbury region in this regard is the effect on coastal water quality from land areas and for Tāngata whenua, Otago Regional Council and Marlborough District Council.</p>	<p>administration and the processing of applications for resource consents. Otago’s cross-boundary matters include:</p> <ul style="list-style-type: none"> <li>• adverse <i>effects</i> in one jurisdiction due to the activities in another, particularly where <i>territorial authority</i> boundaries do not match catchment boundaries, as with the Clutha Mata-au, or the Waitaki River catchment over which Otago and Canterbury Regional Councils share jurisdiction, or Otago’s coastal environment, which covers three <i>territorial authorities’</i> jurisdictions, and may be affected by <i>land uses</i> in the other two (through sediment flowing down the Clutha Mata-au, for instance) <u>and which may also have adverse effects on the Canterbury coastal environment;</u></li> <li>• ...</li> </ul>
<p>Part 1 Introduction and General Provisions ... How the policy statement works ...</p>	<p>Support under the heading ‘Cooperation and partnerships with other</p>	<p>The recognition that the processes that can be used to address cross boundary matters includes cooperation and partnerships with other local authorities such as the sharing information to ensure natural resources are not artificially fragmented is consistent with the Canterbury regional planning framework.</p>	<p>Retain as notified or preserve the original intent.</p>

Cross-boundary matters ... Cooperation and partnerships with other <i>local authorities</i>	<i>local authorities'</i>		
How the policy statement works ... Interpretation Definitions ... Local authority	Support the definition of 'Local authority'	The proposed definition of 'Local authority' is supported in connection with the other relief sought in this submission.	Retain as notified or preserve the original intent.
Part 2 – Resource management overview ... IM – Integrated Management ... Policies ... IM-P7 – Cross boundary management	Support IM-P7	The co-ordinated management of natural and physical resources across jurisdictional boundaries is necessary for the management of cross boundary issues, including boundaries shared with neighbouring regions.	Retain as notified or preserve the original intent.
Part 2 – Resource management overview ... IM – Integrated Management	Support clause 4 of IM-P12	The recognition provided by clause 4 of Policy IM-P12 that the objectives of regional policy statements in neighbouring regions may also be relevant to activities under this policy is supported.	Retain as notified or preserve the original intent.

<p>...</p> <p>Policies</p> <p>...</p> <p>IM-P12 – Contravening environmental bottom lines for climate change mitigation</p>			
<p>Part 2 – Resource management overview</p> <p>...</p> <p>IM – Integrated Management</p> <p>...</p> <p>Policies</p> <p>...</p> <p>IM-P13 – Managing cumulative effects</p>	Support IM-P13	The management of cumulative effects may be necessary for the management of cross boundary issues, including boundaries shared with neighbouring regions.	Retain as notified or preserve the original intent.
<p>Part 2 – Resource management overview</p> <p>...</p> <p>IM – Integrated Management</p> <p>...</p> <p>Methods</p> <p>...</p> <p>IM-M1 – Regional and district plans</p>	Support clause 5 of IM-M1	Clause 5 of Method IM-M1 requires a ki uta ki tai approach to resource management is adopted and should involve collaboration between local authorities to achieve consistent management of resources or effects that cross jurisdictional boundaries. The proposed definition of ‘local authorities’ includes a regional council or territorial authority and as such clause 5 recognises that such collaboration may involve local authorities in neighbouring regions. This matter is necessary as the Method IM-M1 implements in part the management of cumulative effects (as proposed by Policy IM-P7) and the co-ordinated management of natural and physical resources (as proposed by Policy IM-P13) which may involve cross boundary matters including boundaries with neighbouring regions.	Retain as notified or preserve the original intent.

<p>Part 2 – Resource management overview ... IM – Integrated Management ... Methods ... IM-M2 - Relationships</p>	<p>Amend clause 2 of IM-M2</p>	<p>The intent of IM-M2 is supported. The proposed amendment seeks to give stronger recognition to working with local authorities in neighbouring regions to enable IM-M2 to implement in part the management of cumulative effects (as proposed by Policy IM-P7) and the co-ordinated management of natural and physical resources (as proposed by Policy IM-P13) which may involve cross boundary matters including boundaries with neighbouring regions. The proposed amendment is consistent with IM-M1.</p>	<p><b>IM–M2 – Relationships</b></p> <p>Starting immediately, <i>local authorities</i> must:</p> <ol style="list-style-type: none"> <li>1. partner with Kāi Tahu to ensure mana whenua involvement in resource management,</li> <li>2. work together and with other agencies <u>including local authorities in neighbouring regions</u> to ensure consistent implementation of the objectives, policies and methods of this RPS, and</li> <li>3. ...</li> </ol>
<p>Part 3 - Domains and Topics</p> <p>Domains ... CE - Coastal Environment ... Methods</p> <p>CE-M1 – Identifying the coastal environment</p>	<p>Amend clause 1 of CE-M1</p>	<p>The intent of CE-M1 is supported. The proposed amendment seeks to ensure the identification of the coastal environment across regional boundaries takes place in an integrated form. The proposed amendment gives stronger recognition to the need to work collaboratively with regional and territorial councils in neighbouring regions when identifying the landward extent of the coastal environment.</p> <p>This relief acknowledges that while NZCPS Policy 1 recognises the extent and characteristics of the coastal environment vary from region to region and locality to locality; and the issues that arise may have different effects in different localities, NZCPS Policy 1 recognises the coastal environment includes a variety of areas and features including, inter alia, elements and features that contribute to the natural character, landscape, visual qualities or amenity values (NZCPS Policy 1 clause (2)(f)). Proposed Policy CE-P2(1)(f)</p>	<p><b>CE–M1 – Identifying the coastal environment</b></p> <p><i>Local authorities</i> must:</p> <ol style="list-style-type: none"> <li>1. no later than 31 May 2023, work collaboratively, <u>including with local authorities in neighbouring regions</u>, to <ol style="list-style-type: none"> <li>a. identify the landward extent of the coastal environment, in accordance with CE-P2(1),</li> <li>b. map the landward extent of the coastal environment area in the</li> </ol> </li> </ol>



		<p>also recognises that these features are to be taken into account when identifying the landward extent of the coastal environment.</p> <p>The potential for natural character to involve cross boundary matters with neighbouring regions is recognised by clause 5(c) of ECO-M2 which identifies the lower Waitaki River as a significant natural area noting that Part 1 - <i>Introduction and General Provisions</i> recognises that the Otago and Canterbury Regional Councils share jurisdiction of the Waitaki River catchment.</p> <p>The potential for landscape, visual qualities and amenity values to involve cross boundary matters with the Canterbury region can also be found in connection with the relief sought to clause 3 of Method NFL-M1.</p> <p>The proposed relief is consistent with the Canterbury regional planning framework. Policy 8.3.2 of the Canterbury Regional Policy Statement (CRPS) provides for the integration of management of natural and physical resources and activities in the coastal environment, including those that cross administrative boundaries.</p>	<p>relevant <i>regional and district plans</i>.</p>
<p>Part 3 - Domains and Topics</p> <p>Domains</p> <p>...</p> <p>CE - Coastal Environment</p> <p>...</p> <p>Methods</p>	<p>Amend clause 1 of CE-M2</p>	<p>The intent of CE-M2 is supported. The proposed amendment seeks to ensure the identification of 'other areas' in the coastal environment takes place in an integrated form. The proposed amendment gives stronger recognition to the need to work collaboratively with regional and territorial councils in neighbouring regions when identifying 'other areas' in the coastal environment.</p> <p>The proposed relief is consistent with the identification of Otago's cross-boundary matters in Part 1 – <i>Introduction and General Provisions</i> which recognises resources that cross local</p>	<p><b>CE–M2 – Identifying other areas</b></p> <p><i>Local authorities</i> must work collaboratively together, <u>including with local authorities in neighbouring regions</u>, to:</p> <ol style="list-style-type: none"> <li>1. identify areas and values of high and outstanding natural character within their jurisdictions in accordance with CE–P4(1), map the areas and describe their values in the</li> </ol>

<p>CE-M2 – Identifying other areas</p>		<p>authority boundaries must be managed in a uniform manner, such as outstanding natural features, outstanding natural landscapes and significant natural areas. The potential for natural character to involve cross boundary matters with neighbouring regions is recognised by clause 5(c) of ECO-M2 which identifies the lower Waitaki River as a significant natural area noting that Part 1 - <i>Introduction and General Provisions</i> recognises that the Otago and Canterbury Regional Councils share jurisdiction of the Waitaki River catchment</p> <p>The proposed relief is consistent with the Canterbury regional planning framework. Policy 8.3.2 of the CRPS provides for the integration of management of natural and physical resources and activities in the coastal environment, including those that cross administrative boundaries. CRPS Policy 12.3.4 <i>Consistency of identification and management of outstanding natural features and outstanding natural landscapes</i> recognises that although a uniform management framework is not expected, widely varying methods of management in adjacent districts or regions have the potential to create different outcomes for the same outstanding natural landscape area. This may create inequalities for landowners and resource users across local authority boundaries. It is appropriate that landscape management is addressed as a cross-boundary issues requiring some consistency in their identification and management.</p>	<p>relevant <i>regional and district plans</i>, and identify their capacity to accommodate change through use or development while protecting the values that contribute to the natural character of the area being considered high or outstanding,</p> <ol style="list-style-type: none"> <li>2. identify areas and values of outstanding natural features, landscapes, and seascapes (in the coastal environment) within their jurisdictions in accordance with CE-P6(1), map the areas and describe their values in the relevant <i>regional and district plans</i>, and identify their capacity to accommodate change through use or development while protecting the values that contribute to the natural features, landscapes, and seascapes being considered outstanding,</li> <li>3. identify areas and values of indigenous <i>biodiversity</i> within their jurisdictions in accordance with CE-P5, map the areas and describe their values in the relevant <i>regional and district plans</i>, and</li> </ol>
--	--	---	---

			<p>4. prioritise identification under (1) – (3) in areas that are:</p> <ul style="list-style-type: none"> <li>a. likely to face development or growth pressure over the life of this RPS, or</li> <li>b. likely to contain outstanding natural character areas, outstanding natural features or landscapes, and areas of significant indigenous biodiversity, including the areas in the table below:</li> </ul> <p><i>Table 2: Areas likely to contain significant values</i></p> <table border="1" data-bbox="1491 839 2040 1342"> <tr> <td>Oamaru Harbour</td> <td>Te Whakarekaiwi</td> </tr> <tr> <td>Breakwater</td> <td>Papanui Inlet</td> </tr> <tr> <td>Moeraki Beach</td> <td>Hoopers Inlet</td> </tr> <tr> <td>Moeraki Peninsula</td> <td>Kaikorai Estuary</td> </tr> <tr> <td>Shag Point &amp; Shag</td> <td>Brighton</td> </tr> <tr> <td>River Estuary</td> <td>Akatore Creek</td> </tr> <tr> <td>Stony Creek Estuary</td> <td>Estuary</td> </tr> <tr> <td>Pleasant River</td> <td>Tokomairiro Estuary</td> </tr> <tr> <td>Estuary</td> <td>Wangaloa</td> </tr> <tr> <td>Hawksbury Inlet</td> <td>Clutha River Mata-</td> </tr> <tr> <td>Waikouaiti River</td> <td>au, Matau Branch</td> </tr> <tr> <td>Estuary</td> <td>Nugget Point</td> </tr> <tr> <td>Karitane Headland</td> <td>Surat Bay</td> </tr> <tr> <td>Puketeraki</td> <td>Catlins Lake Estuary</td> </tr> </table>	Oamaru Harbour	Te Whakarekaiwi	Breakwater	Papanui Inlet	Moeraki Beach	Hoopers Inlet	Moeraki Peninsula	Kaikorai Estuary	Shag Point & Shag	Brighton	River Estuary	Akatore Creek	Stony Creek Estuary	Estuary	Pleasant River	Tokomairiro Estuary	Estuary	Wangaloa	Hawksbury Inlet	Clutha River Mata-	Waikouaiti River	au, Matau Branch	Estuary	Nugget Point	Karitane Headland	Surat Bay	Puketeraki	Catlins Lake Estuary
Oamaru Harbour	Te Whakarekaiwi																														
Breakwater	Papanui Inlet																														
Moeraki Beach	Hoopers Inlet																														
Moeraki Peninsula	Kaikorai Estuary																														
Shag Point & Shag	Brighton																														
River Estuary	Akatore Creek																														
Stony Creek Estuary	Estuary																														
Pleasant River	Tokomairiro Estuary																														
Estuary	Wangaloa																														
Hawksbury Inlet	Clutha River Mata-																														
Waikouaiti River	au, Matau Branch																														
Estuary	Nugget Point																														
Karitane Headland	Surat Bay																														
Puketeraki	Catlins Lake Estuary																														

			Blueskin Bay Orokonui Inlet Mapoutahi Purakanui Inlet Aramoana Otago Harbour Historic Walls Otakou & Taiaroa Head Pipikaretu Point	Jacks Bay Waiheke Beach Tahakopa Estuary Oyster Bay Tautuku Estuary Waipati Estuary & Kinakina Island
Part 3 - Domains and Topics  Domains ... LF – Land and freshwater ... LF-VM – Visions and management  Objectives ... LF-VM-O3 – North Otago FMU vision	Support clause 1 of Objective LF-VM-03	The reach of the lower Waitaki River within the Otago region is located within the North Otago FMU. The recognition that the Waitaki River in Otago is influenced in part by catchment areas within the Canterbury region is supported.	Retain Objective LF-VM-03 clause 1 as notified or preserve the original intent.	
Part 3 - Domains and Topics  Domains ...	Amend clause 1 and clause 3 of LF-FW-M5	The intent of LF-FW-M5 is supported. The proposed amendment to clause 3 of LF-FW-M5 seeks to require consultation with local authorities in the identification outstanding water bodies. The intent of the proposed relief is to promote integrated management of any outstanding water bodies that cross local authority	<b>LF-FW-M5 – Outstanding water bodies</b>  No later than 31 December 2023, Otago Regional Council must:	

<p>LF – Land and freshwater ... LF-FW - Freshwater ... Methods ... LF-FW-M5 – Outstanding water bodies</p>		<p>boundaries. The proposed relief recognises that the criteria for identifying outstanding water bodies (contained in proposed Appendix APP1) includes, inter alia, ecology, landscape and natural character matters. The proposed relief is consistent with the relief sought in relation to CE-M1, CE-M2 and NFL-M1 in connection with the identification of the coastal environment, ‘other areas’ in the coastal environment and natural features and landscapes outside of the coastal environment respectively and recognition that these features may span jurisdictional boundaries. Part 1 – <i>Introduction and General Provisions</i> recognises that Otago’s cross-boundary matters include resources that cross local authority boundaries, and these are to be managed in a uniform manner, such as outstanding natural features, outstanding natural landscapes and significant natural areas.</p> <p>The proposed relief is consistent with the Canterbury regional planning framework. CRPS Policy 12.3.4 seeks to ensure consistency in the identification and management of outstanding natural features and outstanding natural landscapes. This policy recognises that these features do not always begin and end within regional or district boundaries.</p> <p>A minor correction is also proposed in connection with an incorrect cross-reference in clause 1 of LF-FW-M5. It is proposed the cross reference in clause 1 to Policy LF-VM-P6 <i>Relationship between FMUs and rohe</i> is amended to Policy LF-FW-P11 <i>Identifying outstanding water bodies</i>.</p>	<ol style="list-style-type: none"> <li>1. in partnership with Kāi Tahu, undertake a review based on existing information and develop a list of <i>water bodies</i> likely to contain outstanding values, including those <i>water bodies</i> listed in <del>LF-VM-P6</del>, <u>LF-FW-P11</u>,</li> <li>2. identify the outstanding values of those <i>water bodies</i> (if any) in accordance with APP1,</li> <li>3. consult with the public during the identification process, <u>and local authorities</u>,</li> <li>4. map <i>outstanding water bodies</i> and identify their outstanding and significant values in the relevant <i>regional plan(s)</i>, and</li> <li>5. include provisions in regional plans to avoid the adverse <i>effects</i> of activities on the significant and outstanding values of <i>outstanding water bodies</i>.</li> </ol>
<p>Part 3 - Domains and Topics ... Topics</p>	<p>Support clause 3 of ECO-M2</p>	<p>The direction under clause 3 of ECO-M2 that identification of significant natural areas (that span jurisdictional boundaries) by local authorities must involve collaborative working to ensure</p>	<p>Retain as notified or preserve the original intent.</p>

<p>ECO - Ecosystems and indigenous biodiversity ... Methods ... ECO-M2 – Identification of significant natural areas</p>		<p>areas identified by different local authorities are not artificially fragmented is supported.</p> <p>Clause 5(c) of ECO-M2 identifies the Lower Waitaki River as a significant natural area. Part 1 – <i>Introduction and General Provisions</i> recognises that the Otago and Canterbury Regional Councils share jurisdiction of the Waitaki River catchment. The identification of Otago’s cross-boundary matters (also in Part 1) includes resources that cross local authority boundaries which must be managed in a uniform manner, such as outstanding natural features, outstanding natural landscapes and significant natural areas. Clause 3 of ECO-M2 is consistent with ECO-M6.</p> <p>Clause 3 of ECO-M2 is consistent with the Canterbury regional planning framework. CRPS Policy 9.3.3 <i>Integrated Management Approach</i> which adopts an integrated and co-ordinated management approach to halting the decline in Canterbury’s indigenous biodiversity through, inter alia, collaboration between key agencies and individuals. The Canterbury Biodiversity Strategy recognises that biodiversity crosses regional authority boundaries and it will be necessary to work with adjacent Regional Councils (and relevant District Councils).</p>	
<p>Part 3 - Domains and Topics ... Topics  ECO - Ecosystems and indigenous biodiversity ...</p>	<p>Support</p>	<p>The direction in ECO-M6 that local authorities will work collaboratively with other local authorities to adopt an integrated approach to manage biodiversity across administrative boundaries is supported.</p> <p>Clause 5(c) of ECO-M2 identifies the Lower Waitaki River as a significant natural area. Part 1 – <i>Introduction and General Provisions</i> recognises that the Otago and Canterbury Regional Councils share jurisdiction of the Waitaki River catchment. The</p>	<p>Retain as notified or preserve the original intent.</p>

<p>Methods ... ECO-M6 – Engagement</p>		<p>identification of Otago’s cross-boundary matters (also in Part 1) includes resources that cross local authority boundaries which must be managed in a uniform manner, such as outstanding natural features, outstanding natural landscapes and significant natural areas..</p> <p>Clause 3 of ECO-M2 is consistent with the Canterbury regional planning framework. CRPS Policy 9.3.3 <i>Integrated Management Approach</i> which adopts an integrated and co-ordinated management approach to halting the decline in Canterbury’s indigenous biodiversity through, inter alia, collaboration between key agencies and individuals. The Canterbury Biodiversity Strategy recognises that biodiversity crosses regional authority boundaries and it will be necessary to work with adjacent Regional Councils (and relevant District Councils).</p>	
<p>Part 3 - Domains and Topics ... Topics ... HAZ – Hazards and risks ... Methods ... HAZ-NH-M2 – <i>Local authorities</i></p>	<p>Amend clause 1(a) of HAZ-NH- M2</p>	<p>The intent of HAZ-NH-M2 is supported. The proposed amendment seeks to require consultation with local authorities in neighbouring regions when identifying the level of natural hazard risk (in the event they are not otherwise deemed to be a partner organisation).</p> <p>The proposed relief is consistent with the implementation methods to CRPS Policy 11.3.9 <i>Integrated management of, and preparedness for, natural hazards</i> which identifies within the Canterbury region that the Canterbury Regional Council is to work as a coordinating agency in partnership with others to address natural hazards and this extends across local and regional boundaries and involves working other regional councils.</p>	<p><b>HAZ-NH-M2 – <i>Local authorities</i></b></p> <p><i>Local authorities</i> must:</p> <ol style="list-style-type: none"> <li>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: <ol style="list-style-type: none"> <li>a. consulting with communities, stakeholders and partners, <u>including with local authorities in neighbouring regions,</u> regarding <i>risk</i> levels</li> </ol> </li> </ol>

			<p>thresholds, and</p> <p>b. ...</p> <p>...</p>
<p>Part 3 - Domains and Topics</p> <p>...</p> <p>Topics</p> <p>...</p> <p>NFL – Natural features and landscapes</p> <p>...</p> <p>Methods</p> <p>NFL-M1 – Identification</p>	<p>Amend clause (3) of NFL-M1</p>	<p>The intent of clause 3 of NFL-M1 which seeks to ensure the identification of outstanding and highly valued natural features and landscapes that span jurisdictional boundaries are treated uniformly across district boundaries, is supported.</p> <p>An amendment is proposed to require consultation with local authorities in neighbouring regions in support of this intent consistent with the identification of Otago’s cross-boundary matters in Part 1 – <i>Introduction and General Provisions</i> which recognises resources that cross local authority boundaries must be managed in a uniform manner, such as outstanding natural features, outstanding natural landscapes and significant natural areas.</p> <p>The proposed relief is consistent with the Canterbury regional planning framework. Appendix 4 of the CRPS identifies the following Canterbury outstanding natural features and landscapes (ONFLs) of potential relevance to both the Canterbury and Otago regions:</p> <ul style="list-style-type: none"> <li>• Lindis and Ahuriri – Waitaki District: with recognition given as an important connection to the Otago region; and the</li> <li>• Hawkdun and St Marys Ranges (Oteake Conservation Park): as a mountainous border between the Canterbury and Otago regions.</li> </ul> <p>CRPS Policy 12.3.4 <i>Consistency of identification and management of outstanding natural features and outstanding natural</i></p>	<p><b>NFL-M1 – Identification</b></p> <p><i>Territorial authorities must:</i></p> <ol style="list-style-type: none"> <li>1. include in their district plans a map or maps and a statement of the values of the areas of outstanding and highly valued natural features and landscapes in accordance with NFL-P1,</li> <li>2. include in their district plans a statement of the capacity of outstanding and <i>highly valued natural features and landscapes</i> to accommodate change in use and development without their values being materially compromised or lost, in accordance with NFL-P1,</li> <li>3. recognise that natural features and landscapes may span jurisdictional boundaries and work together, including with the Regional Council and local authorities in neighbouring <u>regions</u>, to identify areas under (1) to ensure that the identification of</li> </ol>



		<p><i>landscapes</i> recognises that although a uniform management framework is not expected, widely varying methods of management in adjacent districts or regions have the potential to create different outcomes for the same outstanding natural landscape area. This may create inequalities for landowners and resource users across local authority boundaries. It is appropriate that landscape management is addressed as a cross-boundary issues requiring some consistency in their identification and management.</p>	<p>natural features and landscapes are treated uniformly across district boundaries, and</p> <p>4. prioritise identification under (1) in areas that are likely to contain outstanding natural features or landscapes and are likely to face development or growth pressure over the life of this RPS.</p>
--	--	---	--