

**From:** Ann Rodgers <Ann.Rodgers@codc.govt.nz>  
**Sent:** Friday, 3 September 2021 3:42 p.m.  
**To:** RPS  
**Subject:** Submission on behalf of the Central Otago District Council - Proposed Otago Regional Policy Statement 2021  
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Please find attached a submission on the Proposed Regional Policy Statement 2021 on behalf of the Central Otago District Council

Regards

Ann



**ANN RODGERS**  
**PRINCIPAL POLICY PLANNER**  
1 Dunorling Street  
PO Box 122, Alexandra 9340  
New Zealand

**p** +64 3 440 0685  
**m** +64 21 618 579  
**e** [Ann.Rodgers@codc.govt.nz](mailto:Ann.Rodgers@codc.govt.nz)  
**w** [www.codc.govt.nz](http://www.codc.govt.nz)

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# Written Submission on Proposed Otago Regional Policy Statement 2021

**To: Otago Regional Council**

1. This is a submission by the **Central Otago District Council** on the Proposed Otago Regional Policy Statement 2021.
2. The **Central Otago District Council** will not gain an advantage in trade competition through this submission.
3. The **Central Otago District Council** is directly affected by an effect of the subject matter of the submission.
4. The **Central Otago District Council** wishes to be heard in support of this submission.
5. The **Central Otago District Council** does not wish to present a joint case at the hearing.
6. This submission is submitted on behalf of the Central Otago District Council by:

Ann Rodgers



Principle Policy Planner  
Central Otago District Council

3 September 2021

Address for Service:

PO Box 122

Alexandra

Contact Person:

Ann Rodgers

Principle Policy Planner

[ann.rodgers@codc.govt.nz](mailto:ann.rodgers@codc.govt.nz)

021 618 579

Page	RPS Provision	Submission
96	<p><i>IM-O4 – Climate change</i>  <i>Otago’s communities, including Kāi Tahu, understand what climate change means for their future, and climate change responses in the region, including adaptation and mitigation actions, are aligned with national level climate change responses, and are recognised as integral to achieving the outcomes sought by this RPS.</i></p>	<p>Support communities understanding and considering climate change effects to enable sustainable future planning for growth and development.</p>
98	<p><i>IM-P7 – Cross boundary management</i>  <i>Coordinate the management of Otago’s natural and physical resources across jurisdictional boundaries and, whenever possible, between overlapping or related agency responsibilities.</i></p>	<p>Support management of natural and physical resources in a cross jurisdictional way where possible reflecting that natural and physical resources</p>
98	<p><i>IM-P8 – Climate change impacts</i>  <i>Recognise and provide for climate change processes and risks by identifying climate change impacts in Otago, including impacts from a te ao Māori perspective, assessing how the impacts are likely to change over time and anticipating those changes in resource management processes and decisions.</i></p>	<p>Support communities understanding and considering climate change effects to enable sustainable future planning for growth and development.\</p>
98	<p><i>IM-P9 – Community response to climate change impacts</i>  <i>By 2030 Otago’s communities have established responses for adapting to the impacts of climate change, are adjusting their lifestyles to follow them, and are reducing their greenhouse gas emissions to achieve net-zero carbon emissions by 2050</i></p>	<p>Support the principle of the policy but have some concerns that the timeframes may not be achievable for some communities who may not have the resources to understand make the changes necessary.</p> <p>Net-zero carbon emissions is aspirational but may not be achievable.</p>

		There will likely be financial implications associated with responses necessary to achieve the timeframes that may not be able to be met by communities.
98	<p><i>IM-P10 – Climate change adaptation and mitigation Identify and implement climate change adaptation and mitigation methods for Otago that:</i></p> <p><i>(1) minimise the effects of climate change processes or risks to existing activities,</i></p> <p><i>(2) prioritise avoiding the establishment of new activities in areas subject to risk from the effects of climate change, unless those activities reduce, or are resilient to, those risks, and</i></p> <p><i>(3) provide Otago’s communities, including Kāi Tahu, with the best chance to thrive, even under the most extreme climate change scenarios.</i></p>	Support in principle but as noted in relation to IM-P9 have concerns about how achievable the timeframes for adaptation are and what the financial impacts might be on communities.
100	<p><i>IM-M2 – Relationships Starting immediately, local authorities must:</i></p> <p><i>(1) partner with Kāi Tahu to ensure mana whenua involvement in resource management,</i></p> <p><i>(2) work together and with other agencies to ensure consistent implementation of the objectives, policies, and methods of this RPS, and</i></p> <p><i>(3) consult with Otago’s communities to ensure policy frameworks adequately respond to the diverse facets of environmental, social, cultural, and economic well-being.</i></p>	Support partnering with mana whenua, consulting with communities, and working with other key stakeholders.
100/101	<p><i>IM-M4 – Climate change response By January 2027, local authorities (led by Otago Regional Council) must together, in partnership with Kāi Tahu and in consultation with Otago’s communities, develop climate change responses</i></p>	Support partnering with mana whenua, consulting with communities, and working with other key stakeholders to develop climate change responses.

	<p><i>for the region that achieve climate change adaptation and mitigation, and that include:</i></p> <p><i>(1) identifying natural and built resources vital to environmental and community resilience and well-being, 101</i></p> <p><i>(2) identifying vulnerable resources and communities and developing adaptation pathways for them where possible, and</i></p> <p><i>(3) developing plans and agreements for implementation</i></p>	<p>The timeframe may be tight given extent of change currently being faced by Local Government.</p> <p>Resourcing will be tight local authorities who are already under pressure from resource management and water reforms.</p>
<b>Part 3 – Domains and Topics</b>		
103	<p><i>AIR–P1 – Maintain good ambient air quality Good ambient air quality is maintained across Otago by:</i></p> <p><i>(1) ensuring discharges to air comply with ambient air quality limits where those limits have been set, and</i></p> <p><i>(2) where limits have not been set, only allowing discharges to air if the adverse effects on ambient air quality are no more than minor.</i></p>	<p>Support in principle Air – P1.</p> <p>Central Otago District has towns that are identified as having poor ambient air quality.</p> <p>Central Otago experiences some of the coldest temperatures in the country during winter months requiring significant heating to maintain a healthy home environment. Electricity is expensive and subject to outages.</p> <p>The timing for phasing out of non-complying solid fuel wood-burners as noted in AIR-P2 (2) has the potential to adversely affect the health of communities who may not be able to replace their heating or have an ability to fund the on-going costs of any replacements.</p> <p>Residents not having access to affordable heating options during winter months will have a significant impact on the health and wellbeing of the community.</p>

		<p>It is not clear whether a switch to low emission, compliant heating appliances (wood burners), will have the desired impact on the ambient air quality.</p> <p>The Central Otago District Council would welcome the opportunity to understand whether the use of low emission wood-burners and/or electricity will have the necessary effect on the ambient air quality.</p>
103	<p><i>AIR-P2 – Improve poor ambient air quality Poor ambient air quality is improved across Otago by:</i></p> <p><i>(1) establishing, maintaining, and enforcing plan provisions that set limits and timeframes for improving ambient air quality, including by managing the spatial distribution of activities and transport, and</i></p> <p><i>(2) prioritising actions to reduce PM10 and PM2.5 concentrations in polluted airsheds, including phasing out existing domestic solid fuel burning appliances and preventing any discharges from new domestic solid fuel burning appliances that do not comply with the standards set in the <b>NESAQ</b></i></p>	
104	<p><i>AIR-M1 – Review airshed boundaries</i></p> <p><i>.... no later than 31 December 2022, the Otago Regional Council must review existing airshed boundaries and apply to the Ministry for the Environment to gazette amended boundaries where airsheds do not account for:</i></p> <p><i>(1) current or anticipated areas of development,</i></p> <p><i>(2) weather patterns and geography, or</i></p> <p><i>(3) existing areas of poor air quality</i></p>	<p>Support in principle a review of the airshed areas considering development areas and weather patterns, provided the review is undertaken in consultation with territorial authorities and other stakeholders.</p> <p>Have some concerns regarding the timeframes set for the review and the potential for more properties being included, the prospect of residents not having access to affordable heating options during winter months will have a significant impact on the health and wellbeing of the community.</p>

105	<p><i>AIR–M3 – Territorial authorities No later than 31 December 2029, territorial authorities must prepare or amend and maintain their district plans to include provisions that direct an urban form that assists in achieving good air quality by:</i></p> <p><i>(1) reducing reliance on private motor vehicles and enabling the adoption of active transport, shared transport, and public transport options to assist in achieving good air quality, and</i></p> <p><i>(2) managing the spatial distribution of activities.</i></p>	<p>Support in principle providing for walking and cycling connectivity and active transport options in the District Plan, reducing dependence on motor vehicles.</p> <p>For smaller communities' public transport is not currently a viable option. Support managing spatial growth by consolidation of towns and urban development will assist by making active transport options a more attractive option.</p>
105	<p><i>AIR–M5 – Incentives and other mechanisms</i></p>	<p>Support the use of a variety of mechanisms to improve ambient air quality through education; raising awareness; supporting the upgrade of existing housing stock; lobbying of energy providers to ensure reliability of supply and providing financial support through subsidies available for any necessary upgrades that may result in a move away from solid fuel burners.</p>
129	<p><i>LF–FW–O10 – Natural character</i></p> <p><i>The natural character of wetlands, lakes and rivers and their margins is preserved and protected from inappropriate subdivision, use and development.</i></p>	<p>Support preservation of natural character from inappropriate development.</p>
130	<p><i>LF–FW–P8 – Identifying natural wetlands Identify and map natural wetlands that are:</i></p> <p><i>(1) 0.05 hectares or greater in extent, or</i></p> <p><i>(2) of a type that is naturally less than 0.05 hectares in extent (such as an ephemeral wetland) and known to contain threatened species.</i></p>	<p>The identification of natural wetlands for protection is supported. Availability of suitably qualified and experienced persons financial resources to undertake the work necessary is of concern.</p>



130	<p><i>LF–FW–P10 – Restoring natural wetlands Improve the ecosystem health, hydrological functioning, water quality and extent of natural wetlands that have been degraded or lost by requiring, where possible:</i></p> <p><i>(1) an increase in the extent and quality of habitat for indigenous species,</i></p> <p><i>(2) the restoration of hydrological processes,</i></p> <p><i>(3) control of pest species and vegetation clearance, and</i></p> <p><i>(4) the exclusion of stock.</i></p>	<p>Restoration of natural wetlands is supported. Availability of suitably qualified and experienced persons financial resources to undertake the work necessary is of concern.</p>
132	<p>LF–FW–P15 – Stormwater and wastewater discharges</p>	<p>Support in principle moving towards discharge of wastewater to land rather than water, the use of water sensitive urban design techniques and reticulation of stormwater in urban areas.</p>
134	<p>LF–FW–M7 – District plans Territorial authorities must prepare or amend and maintain their district plans no later than 31 December 2026 to:</p> <p>(1) map outstanding water bodies 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 the adverse effects of activities on the significant and outstanding values of outstanding water bodies,</p> <p>(3) require, wherever practicable, the adoption of water sensitive urban design techniques when managing the subdivision, use or development of land, and</p> <p>(4) reduce the adverse effects of stormwater discharges by managing the subdivision, use and development of land to:</p> <p>(a) minimise the peak volume of stormwater needing off-site disposal and the load of contaminants carried by it,</p>	<p>Support in principle but have some concerns that the timeframes may not be achievable.</p>

	<p>(b) minimise adverse effects on fresh water and coastal water as the ultimate receiving environments, and the capacity of the stormwater network,</p> <p>(c) encourage on-site storage of rainfall to detain peak stormwater flows, and</p> <p>(d) promote the use of permeable surfaces</p>	
134	<p><i>LF-LS-O11 – Land and soil</i></p> <p><i>The life-supporting capacity of Otago’s soil resources is safeguarded and the availability and productive capacity of highly productive land for primary production is maintained now and for future generations.</i></p>	<p>Support objective in principle, noting in Central Otago there is little land categorised as being Highly Productive in the context of LUC 1-3. Despite this the land is very productive (i.e., vineyards, horticulture, and pastoral farming).</p> <p>Highly productive land should be identified at a regional level acknowledging that productivity varies depending on the land use activity.</p>
138	<p><i>LF-LS-P19 – Highly productive land</i></p> <p><i>Maintain the availability and productive capacity of highly productive land</i></p>	<p>Support policy in terms of the focus on productive capacity rather than LUC 1-3.</p> <p>Consider that mapping of highly productive land should be done at a regional level.</p>
139	<p><i>LF-LS-P22 – Public Access</i></p> <p><i>Provide for public access to and along lakes and rivers by:</i></p> <p><i>(1) maintaining existing public access,</i></p> <p><i>(2) seeking opportunities to enhance public access, including by mana whenua in their role as kaitiaki and for gathering of mahika kai, and</i></p> <p><i>(3) encouraging landowners to only restrict access where it is necessary to protect:</i></p> <p><i>(a) public health and safety,</i></p> <p><i>(b) significant natural areas,</i></p> <p><i>(c) areas of outstanding natural character,</i></p>	<p>Support policy that provides for and enables public access to lakes and rivers.</p>

	<p>(d) outstanding natural features and landscapes,  (e) places or areas with special or outstanding historic heritage values, or  (f) places or areas of significance to takata whenua, including wāhi tapu and wāhi tūpuna.</p>	
<b>ECO – Ecosystems and indigenous biodiversity</b>		
144	<i>ECO–P10 – Integrated management</i>	Support integrated and co-ordinated approach to managing ecosystems and indigenous biodiversity and the use of statutory and non-statutory approaches to their management.
145	<p><i>ECO–M1 – Statement of responsibilities</i></p> <p><i>In accordance with section 62(1)(i)(iii) of the RMA 1991, the local authorities responsible for the control of land use to maintain indigenous biological diversity are:</i></p> <p><i>(1) the Regional Council and territorial authorities are responsible for specifying objectives, policies, and methods in regional and district plans for managing the margins of wetlands, rivers, and lakes,</i></p> <p><i>(2) the Regional Council is responsible for specifying objectives, policies, and methods in regional plans:</i></p> <p><i>(a) in the coastal marine area,</i></p> <p><i>(b) in wetlands, lakes, and rivers, and</i></p> <p><i>(c) in, on or under the beds of rivers and lakes,</i></p> <p><i>(3) in addition to (1), territorial authorities are responsible for specifying objectives, policies and methods in district plans outside of the areas listed in (2) above if they are not managed by the Regional Council under (4), and</i></p> <p><i>(4) the Regional Council may be responsible for specifying objectives, policies, and methods in regional plans outside of the areas listed (1) above if:</i></p>	<p>Support in principle but lacks clarity around territorial authority responsibilities. Preference would be for areas of responsibility to be specifically identified rather than referencing areas ‘outside the areas listed’.</p> <p>Concerns about resourcing and timeframes for achieving.</p>

	<p><i>(a) the Regional Council reaches agreement with the relevant territorial authority or territorial authorities, and</i>  <i>(b) if applicable, a transfer of powers in accordance with section 33 of the RMA 1991 occurs from the relevant territorial authority or territorial authorities to the Regional Council.</i></p>	
145	<p><i>ECO–M2 – Identification of significant natural areas Local authorities must:</i>  <i>(1) in accordance with the statement of responsibilities in ECO–M1, identify the areas and values of significant natural areas as required by ECO–P2, and</i>  <i>(2) map the areas and include the values identified under (1) in the relevant regional and district plans,</i>  <i>(3) recognise that indigenous biodiversity spans jurisdictional boundaries by:</i>  <i>(a) working collaboratively to ensure the areas identified by different local authorities are not artificially fragmented when identifying significant natural areas that span jurisdictional boundaries, and</i>  <i>(b) ensuring that indigenous biodiversity is managed in accordance with this RPS,</i>  <i>(4) require ecological assessments to be provided with applications for resource consent and notices of requirement that identify whether affected areas are significant natural areas in accordance with APP2,</i>  <i>(5) in the following areas, prioritise identification under (1) no later than 31 December 2025:</i>  <i>(a) intermontane basins that contain indigenous vegetation and habitats,</i>  <i>(b) areas of dryland shrubs,</i></p>	<p>Support in principle but have concerns about resourcing and timeframes. The timeframe may be tight given extent of change currently being faced by territorial authorities.</p> <p>Resourcing will be challenging for local authorities who are already under pressure from central government resource management and water reforms.</p>

	<p><i>(c) braided rivers, including the Makarora, Mātukituki and Lower Waitaki Rivers,</i></p> <p><i>(d) areas of montane tall tussock grasslands, and</i></p> <p><i>(e) limestone habitats</i></p>	
147	<p><i>ECO–M6 – Engagement</i></p> <p><i>Local authorities, when implementing the policies in this chapter, will:</i></p> <p><i>(1) work collaboratively with other local authorities to adopt an integrated approach to managing Otago’s biodiversity across administrative boundaries,</i></p> <p><i>(2) engage with individuals (including landowners and land occupiers), community groups, government agencies and other organisations with a role or an interest in biodiversity management, and</i></p> <p><i>(3) consult directly with landowners and land occupiers whose properties potentially contain or are part of significant natural areas.</i></p>	Support collaboration with other local authorities and stakeholders
148	<p><i>ECO–M7 – Monitoring Local authorities will:</i></p> <p><i>(1) establish long-term monitoring programmes for areas identified under ECO–P1 that measure the net loss and gain of indigenous biodiversity,</i></p> <p><i>(2) record information (including data) about the state of species, vegetation types and ecosystems,</i></p> <p><i>(3) to the extent possible, use mātauraka Māori and tikaka Māori monitoring methods, as well as scientific monitoring methods, and</i></p> <p><i>(4) regularly report on matters in (1) and (2) and publish these reports.</i></p>	It is not clear whether this responsibility will lie with territorial or the Regional Authority. The monitoring of ecosystems would most logically sit with Regional Council who have the technical expertise to undertake the monitoring.

<b>Energy</b>		
152	<p><i>EIT-EN-P6 – Managing effects</i>  <i>Manage the adverse effects of renewable electricity generation activities by:</i>  <i>(1) applying EIT-INF-P13,</i>  <i>(2) having regard to:</i>  <i>(a) the functional need to locate renewable electricity generation activities where resources are available,</i>  <i>(b) the operational need to locate where it is possible to connect to the National Grid or electricity sub-transmission infrastructure, and</i>  <i>(c) the extent and magnitude of adverse effects on the environment and the degree to which unavoidable adverse effects can be remedied or mitigated, or residual adverse effects are offset or compensated for; and</i>  <i>(3) requiring consideration of alternative sites, methods and designs, and offsetting or compensation measures (in accordance with any specific requirements for their use in this RPS), where adverse effects are potentially significant or irreversible.</i></p>	Support in principle including provision for the offsetting of effects.
152	<p><i>EIT-EN-P8 – Small and community scale distributed electricity generation</i>  <i>Provide for small and community scale distributed electricity generation activities that increase the local community’s resilience and security of energy supply.</i></p>	Support in principle provision for small community scale electricity generation activities.
<b>Infrastructure</b>		
156	<p><i>EIT-INF-O4 – Provision of infrastructure</i>  <i>Effective, efficient, and resilient infrastructure enables the people and communities of Otago to provide for their social and cultural well-being, their health and safety, and</i></p>	Support providing for efficient and resilient infrastructure.

	<i>supports sustainable economic development and growth within the region within environmental limits.</i>	
156	<i>EIT-INF-05 – Integration Development of nationally and regionally significant infrastructure, as well as land use change, occurs in a co-ordinated manner to minimise adverse effects on the environment and increase efficiency in the delivery, operation and use of the infrastructure.</i>	It is not clear what is meant by nationally and regionally significant infrastructure, clarity is sought.
156	<i>EIT-INF-P13 – Locating and managing effects of infrastructure contribute to the area’s outstanding nature or significance.</i>	Support avoidance of new infrastructure in areas with high ecological, cultural, heritage landscape and amenity values.
<b>Transport</b>		
161	<i>EIT-TRAN-07 – Effective, efficient, and safe transport Otago has an integrated air, land, and sea transport network that: (1) is effective, efficient, and safe, (2) connects communities and their activities within Otago, with other regions, and internationally, and (3) is resilient to natural hazard</i>	Support development of an integrated transport network for the region that connects communities and is resilient in terms of natural hazard risks.
161	<i>EIT-TRAN-08 – Transport system The transport system within Otago supports the movement of people, goods, and services, is integrated with land use, provides a choice of transport modes and is adaptable to changes in demand.</i>	Support Objective
	<i>EIT-TRAN-09 – Effects of the transport system The contribution of transport to Otago’s greenhouse gas emissions is reduced and communities are less reliant on fossil fuels for transportation.</i>	Support in principle but the viability of alternative forms of transport may be challenging for some communities.  Support providing for increased opportunities for passive transport including requiring new developments to specifically provide for

		connectivity and opportunities for walking and cycling within new developments.
161	<p><i>Policies EIT-TRAN-P18 – Integration of the transport system</i></p> <p><i>The transport system contributes to the social, cultural, and economic well-being of the people of Otago through:</i></p> <p><i>(1) integration with land use activities and across transport modes, and</i></p> <p><i>(2) provision of transport infrastructure that enables service delivery as demand requires.</i></p>	Support providing for integration of transport and land use that provides for the social, cultural, and economic well-being of communities.
161	<p><i>EIT-TRAN-P20 – Public transport Plans and proposals for maintenance and development of the transport system enhance the uptake of public transport by:</i></p> <p><i>(1) providing safe and reliable alternatives to private vehicle transport,</i></p> <p><i>(2) including measures to ensure pedestrian and cyclist safety and amenity, and</i></p> <p><i>(3) taking into consideration the accessibility needs of the community</i></p>	Support in principal but not sure how a viable a public transport system might be or how it might work in parts of Central Otago, given the population base. Support ensuring safe active transport routes.
163	<p><i>EIT-TRAN-M8 – District plans</i></p> <p><i>Territorial authorities must prepare or amend and maintain their district plans to:</i></p> <p><i>(1) require a strategic approach to the integration of the transport system with land uses and between modes,</i></p> <p><i>(2) require high trip generating activities to be integrated with public transport services and provide for safe pedestrian and cycling access,</i></p> <p><i>(3) include subdivision and infrastructure design standards to minimise private vehicle use, enable public transport networks to operate and recognise the accessibility needs</i></p>	<p>Support District Plans requiring integration of the transport system and including performance standards that minimise vehicle use and provide for accessibility needs of communities.</p> <p>There is currently no public transport in the Central Otago District, and in the short to medium term it is unlikely that an effective and efficient system will be in place. The requirement that high trip generating activities integrate with public transport services that don't exist cannot be met.</p>



	<p><i>of the community, including the mobility impaired, the elderly and children,</i></p> <p><i>(4) restrict or prevent the establishment or expansion of activities adjacent to transport infrastructure that may compromise the operation or safety of the transport system,</i></p> <p><i>(5) provide for the establishment of transport infrastructure that supports modes of transport that are not reliant on fossil fuels.....</i></p>	
<b>Hazards and Risks</b>		
165	<p><i>HAZ–NH–O1 – Natural hazards Levels of risk to people, communities, and property from natural hazards within Otago do not exceed a tolerable level</i></p>	<p>Need clarity regarding what a ‘tolerable level’ means in the context of hazards? How will that be measured and what are the criteria for determining what might be tolerable?</p>
165	<p><i>HAZ–NH–P1 – Identifying areas subject to natural hazards Identify areas where natural hazards may adversely affect Otago’s people, communities, and property by assessing:</i></p> <p><i>(1) the hazard type and characteristics,</i></p> <p><i>(2) multiple and cascading hazards, where present,</i></p> <p><i>(3) any cumulative effects,</i></p> <p><i>(4) any effects of climate change,</i></p> <p><i>(5) likelihood, using the best available information, and (6) any other exacerbating factors.</i></p>	<p>Support in principle. Would seem appropriate that this would be undertaken at a regional level. Hazard identification should be recorded at a land use activity level, reflecting actual risks to communities.</p>
165	<p><i>HAZ–NH–P2 – Risk assessments Assess the level of natural hazard risk by determining a range of natural hazard event scenarios and their potential consequences in accordance with the criteria set out within APP6</i></p>	<p>Who will undertake this assessment? Would seem appropriate that this would be undertaken at a regional level.</p>
169	<p><i>HAZ–NH–M4 – District plans Territorial authorities must prepare or amend and maintain their district plans to:</i></p>	<p>Support in principle providing for management of natural hazards in District Plans. The hazard information should be produced by</p>

<p><i>(1) achieve policies HAZ–NH–P2 to HAZ–NH–P6 and APP6 on land outside the coastal marine area, beds of lakes and rivers, and wetlands by managing the location, scale and density of activities that may be subject to natural hazard risk,</i></p> <p><i>(2) require implementation of natural hazard risk reduction measures, including to existing activities in accordance with HAZ–NH–P4,</i></p> <p><i>(3) protect the role of natural or modified features and systems that provide mitigation from the adverse effects of natural hazards in accordance with HAZ–NH–P6,</i></p> <p><i>(4) provide for hard protection structures in accordance with HAZ–NH–P7,</i></p> <p><i>(5) provide for the functional needs of hazard mitigation measures, lifeline utilities, and essential or emergency services in accordance with HAZ–NH–P8 and HAZ–NH–P9,</i></p> <p><i>(6) include provisions that require decision makers to apply the precautionary approach set out in HAZ–NH–P5 when considering applications for resource consent for activities that will change the use of land and which may increase the risk from natural hazards within areas subject to natural hazard risk that is uncertain or unknown, but potentially significant or irreversible, and</i></p> <p><i>(7) require a natural hazard risk assessment be undertaken where an activity requires a plan change or resource consent to change the use of land which will increase the risk from natural hazards within areas subject to natural hazards, and where the application is lodged prior to the natural hazard risk assessment required by</i></p>	<p>the Otago Regional Council and adjoining regional authorities and made available to District Councils for inclusion in District Plans</p>
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	<p><i>HAZ–NH–M2(1) being completed, the natural hazard risk assessment must include:</i></p> <p><i>(a) an assessment of the level of natural hazard risk associated with the proposal in accordance with APP6, and</i></p> <p><i>(b) an assessment demonstrating how the proposal will achieve the outcomes set out in Policies HAZ–NH–P3 and HAZ–NH–P4.</i></p>	
<b>Heritage and Cultural Values</b>		
176	<p><i>HCV–WT–M2 – Regional and district plans Local authorities must prepare or amend and maintain their regional and district plans to include methods that are in accordance with tikaka to:</i></p> <p><i>(1) control activities in, or adjacent to, wāhi tūpuna sites and areas,</i></p> <p><i>(2) require cultural impact assessments where activities have the potential to adversely affect wāhi tūpuna,</i></p> <p><i>(3) require including conditions on resource consents or designations to provide buffers or setbacks between wāhi tūpuna and incompatible activities,</i></p> <p><i>(4) require including accidental discovery protocols as conditions on resource consents or designations for activities that may unearth archaeological sites, and</i></p> <p><i>(5) maintain existing access to identified wāhi tūpuna sites and areas and promote improved access where practicable</i></p>	Support inclusion of methods to manage adverse effects on wāhi tupuna and accidental discovery protocols in District Plans
176	<p><i>HCV–WT–M3 – Collaboration with Kāi Tahu Local authorities must include Kāi Tahu in all decision-making concerning protection of the values of wāhi tūpuna sites and areas and collaborate with Kāi Tahu to:</i></p>	Support collaboration with Kāi Tahu in all decision making concerning the protection of wāhi tupuna.

	<p><i>(1) identify and protect places, areas, or landscapes of cultural, spiritual, or traditional significance to them,</i></p> <p><i>(2) identify and protect the values that contribute to their significance, and</i></p> <p><i>(3) share information relevant to Kāi Tahu interests.</i></p>	
178	<p><i>HCV-WT-O1 – Kāi Tahu cultural landscapes</i></p> <p><i>Wāhi tūpuna and their associated cultural values are identified and protected.</i></p>	Support identification and protection of wāhi tupuna
178	<p><i>HCV-HH-O3 – Historic heritage resources</i></p> <p><i>Otago’s unique historic heritage contributes to the region’s character, sense of identity, and social, cultural, and economic well-being, and is preserved for future generations.</i></p>	Support preservation of historic heritage for future generations.
178	<p><i>HCV-HH-P3 – Recognising historic heritage</i></p> <p><i>Recognise that Otago’s historic heritage includes:</i></p> <p><i>(1) Māori cultural and historic heritage values,</i></p> <p><i>(2) archaeological sites,</i></p> <p><i>(3) residential and commercial buildings,</i></p> <p><i>(4) pastoral sites,</i></p> <p><i>(5) surveying equipment, communications, and transport, including roads, bridges, and routes,</i></p> <p><i>(6) industrial historic heritage, including mills and brickworks,</i></p> <p><i>(7) gold and other mining systems and settlements,</i></p> <p><i>(8) dredge and ship wrecks,</i></p> <p><i>(9) ruins,</i></p> <p><i>(10) coastal historic heritage, particularly Kāi Tahu occupation sites and those associated with early European activities such as whaling,</i></p> <p><i>(11) memorials, and</i></p>	Support recognition of historic heritage in Otago

	<i>(12) trees and vegetation</i>	
178	<p><i>HCV-HH-P4 – Identifying historic heritage</i></p> <p><i>Identify the places and areas of historic heritage in Otago in accordance with APP8 and categorise them as:</i></p> <p><i>(1) places and areas with special or outstanding historic heritage values or qualities, or</i></p> <p><i>(2) places and areas with historic heritage values or qualities.</i></p>	Support identification of historic heritage in Otago
179	<p><i>HCV-HH-P5 – Managing historic heritage</i></p> <p><i>Protect historic heritage by:</i></p> <p><i>(1) requiring the use of accidental discovery protocols,</i></p> <p><i>(2) avoiding adverse effects on areas or places with special or outstanding historic heritage values or qualities,</i></p> <p><i>(3) avoiding significant adverse effects on areas or places with historic heritage values or qualities,</i></p> <p><i>(4) avoiding, as the first priority, other adverse effects on areas or places with historic heritage values or qualities,</i></p> <p><i>(5) where adverse effects demonstrably cannot be completely avoided, remedying, or mitigating them, and (6) recognising that for infrastructure, EIT-INF-P13 applies instead of HCV-HH-P5(1) to (5).</i></p>	Support protection of historic heritage in Otago
179	<p><i>HCV-HH-P6 – Enhancing historic heritage</i></p> <p><i>Enhance places and areas of historic heritage wherever possible through the implementation of plan provisions, decisions on applications for resource consent and notices of requirement and non-regulatory methods.</i></p>	Support inclusion of non-regulatory methods to enhance historic heritage
181	<p><i>HCV-HH-M5 – District Plans</i></p> <p><i>Territorial authorities must prepare or amend and maintain their district plans to the extent necessary to:</i></p>	<p>Support development of controls in district plans to manage the effects of subdivision and land use on historic heritage.</p> <p>Support requirement for accidental discovery protocols.</p>

*(1) identify places and areas with historic heritage in accordance with HCV-HH-P4 that are located outside the beds of lakes and rivers, wetlands, and the coastal marine area,*

*(2) control the following where they may adversely affect historic heritage:*

*(a) the location, intensity, and form of subdivision,*

*(b) the character, location, scale, and form of activities (including structures) outside the beds of lakes and rivers and the coastal marine area,*

*(c) the location and scale of earthworks and indigenous vegetation removal outside the beds of lakes and rivers and the coastal marine area,*

*(d) the disturbance, demolition or alteration of physical elements or structures with special or outstanding historic heritage value or qualities outside the coastal marine area, beds of lakes and rivers,*

*(3) include implementation methods to protect historic heritage places and areas required by HCV- HH-P5, and may also include:*

*(a) assessment criteria, development standards or thresholds to control the scale, intensity, form, and location of activities (including for the purposes of controlling cumulative adverse effects),*

*(b) conditions on resource consents and designations to provide buffers or setbacks between historic heritage places or areas and other incompatible activity,*

*(c) accidental discovery protocols as conditions on resource consents for earthworks or other activities that may unearth archaeological features, (d) providing for*

	<p><i>activities seeking to retain historic heritage places, areas, or landscapes, including adaptive reuse, maintenance, and seismic strengthening,</i></p> <p><i>(e) including heritage alert layers in plans to inform the public about areas where there is a high probability of the presence of heritage values, particularly archaeological values, and</i></p> <p><i>(4) require the use of accidental discovery protocols as conditions on resource consents and designations for earthworks or other activities that may unearth archaeological features.</i></p>	
<b>Natural features and landscapes</b>		
182	<p><i>NFL-P1 – Identification</i></p> <p><i>In order to manage outstanding and highly valued natural features and landscapes, identify:</i></p> <p><i>(1) the areas and values of outstanding and highly valued natural features and landscapes in accordance with APP9, and</i></p> <p><i>(2) the capacity of those natural features and landscapes to accommodate use or development while protecting the values that contribute to the natural feature and landscape being considered outstanding or highly valued.</i></p>	Support in principle the identification of outstanding natural features and landscapes and the assessment of the carrying capacity in terms of use or development.
<b>Urban form and development</b>		
186	<p><i>UFD-O2 – Development of urban areas</i></p> <p><i>The development and change of Otago’s urban areas:</i></p> <p><i>(1) improves housing choice, quality, and affordability,</i></p> <p><i>(2) allows business and other non-residential activities to meet the needs of communities in appropriate locations,</i></p>	<i>Support objective and approach to development in urban areas.</i>

	<p><i>(3) respects and wherever possible enhances the area's history, setting, and natural and built environment,</i></p> <p><i>(4) delivers good urban design outcomes, and improves liveability,</i></p> <p><i>(5) improves connectivity within urban areas, particularly by active transport and public transport,</i></p> <p><i>(6) minimises conflict between incompatible activities,</i></p> <p><i>(7) manages the exposure of risk from natural hazards in accordance with the HAZ–NH – Natural hazards section of this RPS,</i></p> <p><i>(8) results in sustainable and efficient use of water, energy, land, and infrastructure,</i></p> <p><i>(9) achieves integration of land use with existing and planned development infrastructure and additional infrastructure and facilitates the safe and efficient ongoing use of regionally significant infrastructure,</i></p> <p><i>(10) achieves consolidated, well designed, and located, and sustainable development in and around existing urban areas as the primary focus for accommodating the region's urban growth and change, and</i></p> <p><i>(11) is guided by the input and involvement of mana whenua.</i></p>	
187	<p><i>UFD–P1 – Strategic planning</i></p> <p><i>Strategic planning processes, undertaken at an appropriate scale and detail, precede urban growth and development and:</i></p> <p><i>(1) ensure integration of land use and infrastructure, including how, where and when necessary development infrastructure and additional infrastructure will be provided, and by whom,</i></p>	<p><i>Support the use of strategic planning processes to plan for future growth.</i></p>



	<p><i>(2) demonstrate at least sufficient development capacity supported by integrated infrastructure provision for Otago's housing and business needs in the short, medium, and long term,</i></p> <p><i>(3) maximise current and future opportunities for increasing resilience, and facilitating adaptation to changing demand, needs, preferences and climate change,</i></p> <p><i>(4) minimise risks from and improve resilience to natural hazards, including those exacerbated by climate change, while not increasing risk for other development,</i></p> <p><i>(5) indicate how connectivity will be improved and connections will be provided within urban areas,</i></p> <p><i>(6) provide opportunities for iwi, hapū and whānau involvement in planning processes, including in decision making, to ensure provision is made for their needs and aspirations, and cultural practices and values,</i></p> <p><i>(7) facilitate involvement of the current community and respond to the reasonably foreseeable needs of future communities, and</i></p> <p><i>(8) identify, maintain and where possible, enhance important features and values identified by this RPS.</i></p>	
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