

**BEFORE THE OTAGO REGIONAL COUNCIL**

**IN THE MATTER** of the Resource Management Act 1991

**AND**

**IN THE MATTER** of the Proposed Otago Regional Policy Statement 2021 –  
Chapter 9 LF – Land and freshwater

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**STATEMENT OF EVIDENCE OF VICTORIA SIAN JONES ON BEHALF OF  
QUEENSTOWN LAKES DISTRICT COUNCIL (138)**

**23 NOVEMBER 2022**

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## **1. INTRODUCTION**

- 1.1 My name is Victoria (Vicki) Sian Jones. I am a planning consultant contracted by the Queenstown Lakes District Council (**QLDC**) to prepare planning evidence on Chapter 9 – Land and Freshwater of the Otago Regional Council's Proposed Regional Policy Statement (**pORPS**).
- 1.2 I hold the qualifications of Bachelor of Resource and Environmental Planning (First class honours), with a major in economics from Massey University and am a full member of the New Zealand Planning Institute. I have 27 years planning experience and have worked as a planner in the Queenstown Lakes District (**District**) for the past 23 years. During my time in this district, I have held the positions of Consent Planner, Policy Planner, and Policy Manager with CivicCorp Limited and Strategy and Planning Manager with QLDC. I have since worked as a planning consultant for the past 15 years.
- 1.3 Of particular relevance, I have been extensively involved in the development of the Queenstown Lakes District Proposed District Plan (**PDP**) over the past eight years and recently represented QLDC in proceedings relating to its submissions on Plan Change 8 (Discharge Management) to the Regional Plan: Water for Otago.
- 1.4 I confirm that I have read the Code of Conduct for Expert Witnesses contained in the Environment Court's Practice Note 2014 and that I agree to comply with it. I confirm that I have considered all the material facts that I am aware of that might alter or detract from the opinions that I express, and that this evidence is within my area of expertise.

## **2. PURPOSE AND STRUCTURE OF EVIDENCE**

- 2.1 The purpose of my evidence is to provide evidence in support of QLDC's submissions in relation to the following matters:
- (a) Understanding the difference between 'outstanding' and 'significant' values of Outstanding Water Bodies.
  - (b) The integrated management of effects on water.
  - (c) Provisions relating to land, soils, and the identification and management of highly productive land.
  - (d) The removal of montane tall tussock.

- 2.2 I note for completeness that the QLDC submitted in support of a relatively large number of provisions and sought that they be retained, as notified. Changes have since been recommended to a number of these provisions in the s 42A report and the supplementary evidence. I have considered these changes in the context of whether the recommended amendments change the fundamental intent of the provision, conflict with the reasons for support outlined in the QLDC's submission or change the provision such that it is no longer appropriate. Where I am satisfied that the changes are appropriate, I have not provided evidence on those provisions<sup>1</sup>.
- 2.3 In addition, where the s 42A report has recommended changes that satisfy the QLDC's submission (for example, the inclusion of a definition of kawa' in the Mana Whenua chapter), I have not provided evidence on those matters.
- 2.4 I have not provided evidence on any of the Freshwater Planning Instrument components that the QLDC submitted on given that these have been removed from the pORPS.
- 2.5 In preparing this evidence I have read and considered the following documents:
- (a) The various versions of the pORPS,
  - (b) The Chapter 9: Land and Freshwater s 42A report 4 May 2022 (updated 7 October 2022) prepared by Felicity Boyd (**s 42A report**)
  - (c) The brief of supplementary evidence of Felicity Ann Boyd: LF – Land and Freshwater (**supplementary evidence**)
  - (d) The brief of second supplementary evidence of Felicity Ann Boyd: LF – Land and Freshwater (highly productive land) (**second supplementary evidence**)
  - (e) The brief of supplementary evidence of Felicity Ann Boyd: LF – Land and Freshwater (LF-WAI-P3) (**third supplementary evidence**)
  - (f) The National Policy Statement for Highly Productive Land 2022 (**NPS-HPL**).

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<sup>1</sup> LF-WAI-PX, LF-WAI-P2, LF-WAI-P4, LF-WAI-M1 and LF-WAI-M, LF-VM-O7, LF-VM-M3, LF-VM-M4, LF-VM-AER3, LF, FW-O10, LF-FW-P7, LF-FW-P8, LF-FW-P9, LF-FW-P10, LF-FW-P13, LF-FW-P14, LF-FW-P15, LF-FW-M7, LF-FW-M9, LF-FW-M10, LF-FW-AER4 – 1, LF-LS-P16, LF-LS-P18, LF-LS-P20 - LF-LS-P22, and LF-LS-AER12 - 13

2.6 Where I have suggested amendments to provisions, those are shown as double underlined and ~~double strike out~~ and the wording contained in the supplementary evidence version of the pORPS dated 31 October 2022 is used as the base.

### 3. UNDERSTANDING THE DIFFERENCE BETWEEN ‘OUTSTANDING’ AND ‘SIGNIFICANT’ VALUES OF OUTSTANDING WATER BODIES

3.1 QLDC submitted in support of notified policies LF-FW-P11 (identifying outstanding water bodies) and LF-FW-P12 (protecting outstanding water bodies). While changes recommended to LF-FW-P11 in the s 42A report improve the drafting and do not change its general intent, the amendments recommended to LF-FW-P12 in the s 42A report and supplementary evidence<sup>2</sup> are substantive. Those amendments are as follows<sup>3</sup>:

***LF-FW-P12 – ~~Protecting-Identifying and managing outstanding water bodies~~***

*~~The significant and outstanding values of outstanding water bodies are:~~*

*~~(1) identified in the relevant regional and district plans, and  
(2) protected by avoiding adverse effects on those values.~~*

*Identify outstanding water bodies and their significant and outstanding values in the relevant regional plans and district plans and protect those values ~~by avoiding adverse effects on them,~~ except as provided by EIT-INF-P13 and EIT-INF-P13A.*

3.2 Related to this, QLDC also sought that LF-FW-M5(4)<sup>4</sup> be amended to provide additional context in regard to the intent of, and difference between, ‘outstanding’ values and ‘significant’ values.

3.3 I note that the provisions relating to outstanding water bodies are of particular importance to the QLDC given that the two waterbodies specifically identified in LF-FW-P11 are located wholly or predominantly in the Queenstown Lakes district and that a large number of additional waterbodies are likely to be

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<sup>2</sup> Paragraphs 20 - 27

<sup>3</sup> In relation to all citations in my evidence, you are referred to Ms Boyd’s supplementary evidence for the coloration reflecting where each change derived from

<sup>4</sup> Reference to part 4 is in error and this submission should have been lodged against LF-FW-M5(1) and (2)

identified within the district as a consequence of being within outstanding natural features and landscapes.

- 3.4 In supplementary evidence dated 11 October 2022, Ms Boyd has recommended<sup>5</sup> that LF-FW-M5 be further amended to read as follows to reflect the changes she has recommended to LF-FW-P12 outlined above:

***LF-FW-M5 – Outstanding water bodies***

*No later than 31 December 2023, Otago Regional Council must:*

- (1) undertake a review based on existing information and develop a list of water bodies likely to contain outstanding values, including those water bodies listed in ~~LF-VM-P6~~ LF-FW-P11,*
- (2) identify the outstanding values of those water bodies (if any) in accordance with APP1,*
- (3) consult with the public and relevant local authorities during the identification process*
- (4) map outstanding water bodies and identify their outstanding and significant values in the relevant regional plan(s).*
- (5) include provisions in regional plans that protect ~~to avoid the adverse effects of~~ activities on the significant and outstanding values of outstanding water bodies.*

- 3.5 The s 32AA evaluation within the supplementary evidence cites that while the further recommended amendments to LF-FW-P12 and LF-FW-M5 remove some certainty, they do not change the essential requirement to protect the values of outstanding water bodies and have the benefit of providing greater flexibility in terms of how protection will be achieved depending on the characteristics and values of each water body.
- 3.6 As outlined in the supplementary evidence, the ORC currently has a project underway to identify other outstanding water bodies (in addition to those already listed in LF-FW-P11) and to identify the outstanding and significant values of each waterbody. I generally agree with the supplementary evidence that the identification of further waterbodies and their values will greatly assist with developing a policy framework to protect those values and provide for a more nuanced approach.

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<sup>5</sup> Paragraphs 20 – 27, s 42A report

- 3.7 In terms of QLDC's submission, I understand that the ORC is not yet in a position to provide further clarity on what constitutes significant and outstanding values. Given the level of uncertainty that this creates, until this project is complete and the extent and values of these water bodies is better understood, an 'avoidance' policy such as notified LF-FW-P12(2) and the requirement that regional plans must avoid (all) adverse effects on both outstanding and significant values of outstanding water bodies is inappropriate. For instance, until it is clear where those water bodies are and what values are associated with them, it is not possible to determine if adverse effects on significant values do in fact need to be entirely avoided in order for them to be protected<sup>6</sup>. I also note for completeness that the amendments recommended in the supplementary evidence are consistent with the fact that the National Policy Statement for Freshwater Management 2020 (**NPSFM**) does not specifically require all adverse effects on outstanding water bodies to be avoided.
- 3.8 For these reasons, I accept that the ORC is not yet in a position to provide more certainty around the terms 'significant' and 'outstanding' and therefore support the amended provisions outlined in the supplementary evidence.

#### **4. THE INTEGRATED MANAGEMENT OF EFFECTS ON WATER**

- 4.1 This section of my evidence considers the wording of LF-WAI-P3(4) and LF-WAI-P3(5).
- 4.2 LF-WAI-P3(4) reads as follows (as recommended to be amended by the S42A report):

*LF-WAI-P3 – Integrated management/ki uta ki tai  
Manage the use of freshwater and land, in accordance with tikanga  
and kawa, using an integrated approach that:*

...

*(4) manages the effects of the use and development of land to  
maintain or enhance the health and well-being of freshwater, ~~and~~  
coastal water and associated ecosystems.*

- 4.3 QLDC submitted that it be amended to read as follows:

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<sup>6</sup> As required by Policy 8 of the NPSFM

*(4) manages and restricts the effects of the use and development of land to maintain or enhance the health and well-being of freshwater, ~~and~~ coastal water and associated ecosystems.*

- 4.4 The reasons for the submission are that it is unclear how environmental bottom lines can be achieved solely through a 'manage' approach and that if a bottom line is already exceeded in the environment, then a 'restrict' approach will also be needed to ensure the bottom line threshold is not breached.
- 4.5 While I agree with Ms Boyd that a policy to "manage effects" does not prevent rules in the Regional Plan: Land and Water (**LWRP**) from restricting use and development in order to meet environmental bottom lines, I consider that a stronger, more directive, policy would be more appropriate in order to provide better guidance when drafting the LWRP. However, I also consider that a policy to "restrict effects" is somewhat unusual as the normal approach would be to "restrict" activity in order to "manage" effects.
- 4.6 I therefore consider that the following amended wording is the most appropriate in that it retains the requirement to manage effects using whatever level of control is necessary under the circumstances but acknowledges that, at times, this may require restricting use and development:

*LF-WAI-P3 – Integrated management/ki uta ki tai  
Manage the use of freshwater and land, in accordance with tikanga and kawa, using an integrated approach that:*

*(4) manages the effects of the use and development of land, including restricting use and development where necessary, to maintain or enhance the health and well-being of freshwater, ~~and~~ coastal water and associated ecosystems.*

- 4.7 LF–WAI–P3(5) reads as follows (no changes have been recommended since notification):

***LF-WAI-P3 – Integrated management/ki uta ki tai***

*Manage the use of freshwater and land, in accordance with tikanga and kawa, using an integrated approach that:*

...

*(5) encourages the coordination and sequencing of regional or urban growth to ensure it is sustainable.*

- 4.8 QLDC submitted that it be amended to read as follows on the basis that the term is open to interpretation and may not efficiently or effectively achieve environmental bottom lines:

*5) encourages the coordination and sequencing of regional or urban growth to ensure ~~it is sustainable~~ that sustainable extraction limits are not exceeded and freshwater quality is not adversely affected.*

- 4.9 The s 42A report accepts, at paragraphs 230 and 231, that there is some uncertainty as to what “sustainable” means in this context but that QLDC’s proposed wording is too narrowly focused on the health/ quality of the water and that it’s the well-being of fresh water and associated ecosystems that’s important. Ms Boyd interprets the meaning of ‘sustainable’ in the context of section 5 of the RMA and therefore considers that what is sustainable will depend on the activities, water bodies, and wider environments being considered. Despite the element of uncertainty, without further evidence Ms Boyd has recommended no changes to the clause.

- 4.10 I consider that the notified wording is not appropriate as it is unclear as to what is meant by ‘sustainable’ and how narrowly or broadly it is to be interpreted. However, I also agree with Ms Boyd that the wording in QLDC’s submission is too narrowly focused, particularly given the breadth of Objective LF-WAI-O1, which is appropriately reflective of the concept of Te Mana o te Wai.

- 4.11 I therefore consider that the following alternative wording is most appropriate in that it provides direction as to the breadth of what will be considered when considering whether growth is sustainable in the context of Te Mana o te Wai without being too specific. It also has the benefit of using the words that are commonly used elsewhere in the chapter:

***LF-WAI-P3 – Integrated management/ki uta ki tai***

*Manage the use of freshwater and land, in accordance with tikanga and kawa, using an integrated approach that:*

...

*(5) encourages the coordination and sequencing of regional or urban growth to ensure it is sustainable in terms of its effect on the*



health and well-being of freshwater, coastal water, and associated ecosystems.”

- 4.12 While I prefer the above wording, alternatively, the policy could be made more certain and therefore more effective if it was amended in the following manner, noting that the concept of Te Mana o te Wai already embodies the principle of sustainable use and sustaining future and present generations:

***LF-WAI-P3 – Integrated management/ki uta ki tai***

*Manage the use of freshwater and land, in accordance with tikanga and kawa, using an integrated approach that:*

...

*(5) encourages the coordination and sequencing of regional or urban growth. ~~to ensure it is sustainable.~~*

**5. LAND, SOILS, AND HIGHLY PRODUCTIVE LAND (HPL)**

- 5.1 This section relates to the appropriateness of LF-LS-O11, LF-LS-O12, LF-LS-P19, Method LF-LS-M11, and Method LF-LS-M12 as they relate to land and soils generally (LF-LS-O11, LF-LS-O12) and the identification and management of highly productive land.
- 5.2 QLDC submitted in support of notified objectives LF-LS-O11 and LF-LS-O12.
- 5.3 Through the s 42A report and Ms Boyd’s supplementary evidence, these provisions are recommended to be amended and the QLDC therefore has an interest in ensuring that the changes do not change those provisions in a manner that conflicts with the intent of its supporting submission. Those amendments are as follows:

***LF-LS-O11 – ~~Land and soil~~ Soil***

*The life-supporting capacity of Otago’s soil resources is safeguarded or enhanced, and soil quality is maintained, ~~and the availability and productive capacity of highly productive land for primary production food and fibre production is maintained, now and for future generations.~~*

***LF-LS-O11A – Highly productive land***

*The availability and productive capacity of highly productive land for land-based primary production is maintained now and for future generations.*

*LF-LS-O12 – ~~Use of land~~ Land and fresh water*

*The use of land in Otago ~~maintains soil quality and~~ contributes to achieving environmental outcomes for fresh water.*

- 5.4 The change to LF-LS-O12 simply moves the maintenance of soil quality to LF-LS-O11 and is therefore of no particular consequence.
- 5.5 The only changes of substance from that which was notified are the recommended changes from ‘food and fibre production’ to ‘land-based primary production’, the inclusion of various definitions from the National Policy Statement for Highly Productive Land 2022 (**NPS-HPL**) in the pORPS, and the fact that Objective LF-LS-O11 now seeks that the life-supporting capacity of Otago’s soil resources is safeguarded or enhanced, rather than only safeguarded.
- 5.6 In relation to the most appropriate term to be used to describe what purpose highly productive land is to be retained for, the term ‘primary production’ was included in the notified version and this was supported by QLDC. The s 42A report then recommended this be changed to ‘food and fibre production’ (which had the effect of excluding mining, quarry and permanent forestry), in supplementary evidence, this was recommended to be changed to ‘agricultural and horticultural production’, and then in Ms Boyd’s second supplementary evidence, this is recommended to be changed to ‘land-based primary production’. This change has the effect of reintroducing forestry into the term and aligns with the term used in the NPS-HPL. Ms Boyd’s second supplementary evidence also recommends adopting the definitions of ‘land-based primary production’, ‘highly productive land’, and ‘productive capacity’ from the NPS-HPL in the pORPS.
- 5.7 As the NPS-HPL uses the term ‘land-based primary production’<sup>7</sup>, I consider this is the most appropriate term to use throughout the pORPS in relation to identifying and maintaining the productive capacity of highly productive soils.

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<sup>7</sup> Land-based primary production means production, from agricultural, pastoral, horticultural, or forestry activities, that is reliant on the soil resource of the land

- 5.8 I support adopting the definitions of 'land-based primary production', 'highly productive land', and 'productive capacity' from the NPS-HPL in the pORPS on the basis that there are considerable efficiency benefits in aligning the pORPS as closely as possible with the NPS-HPL through this process.
- 5.9 I therefore consider that the amendments recommended in the supplementary evidence maintain the general intent of objectives LF-LS-O11 and LF-LS-O12, while making them clearer and better aligning them with the NPS-HPL. In turn, for the reasons outlined in the s 32A evaluation in Ms Boyd's second supplementary evidence I consider that the wording in the supplementary evidence of the pORPS is more appropriate than the notified versions.

### **Policy LF-LS-P19**

- 5.10 Policy LF-LS-P19 includes various criteria for identifying HPL. Its drafting predated the NPS-HPL coming into effect in October 2022 and there are therefore unsurprisingly some minor differences between it and clause 3.4 of the NPS-HPL.
- 5.11 In its submission, QLDC sought that the receiving environment and other factors that contribute to land being highly productive such as access to markets and the existing productive systems or agglomeration economies should be added as criteria for identifying highly productive land. The example that QLDC cites in its submission is that while the Gibbston Valley may not have the highest quality soils or climate, its access to the tourism market, benefits from agglomeration economies/ spatial clustering, and the existing productive system that supports it should be taken into account when determining whether it is highly productive land. I understand the key concern for QLDC was to ensure that the criteria would be sufficiently broad to capture all the matters that contribute to viticulture in the Gibbston Valley being economically productive.
- 5.12 While the s 42A report recommends rejecting the submission (for reasons that I do not fully agree with), the submission and the specific recommendations on that, have effectively been superseded by the NPS-HPL coming into effect and essentially mandating the criteria for identifying highly productive land. This is

reflected in the second supplementary evidence, which proposes to align LF–LS–P19 as closely as possible within scope of the submissions to the NPS-HPL.

- 5.13 Ms Boyd’s second supplementary evidence recommends that the criteria in sub clause (1) be fully replaced with that wording that reflects that listed in clause 3.4 of the NPS-HPL for Mapping highly productive land (and that the definition of LUC1 – 2 be changed to align with the NPS). While the structure and wording of her recommended Policy LF–LS–P19 is slightly different to clause 3.4, I am satisfied that it accurately reflects the NPS-HPL.
- 5.14 In terms of QLDC’s submission, while the recommended Policy LF–LS–P19 does not enable the consideration of agglomeration economies or the receiving environment (as sought in the submission), it does include the concept of spatial clustering to some extent through inclusion of LF–LS–P19 (1)(d)(iii). Given that most of the land within the Gibbston Valley meets the requirements of LF–LS–P19 (1)(d), I consider it to be of relatively little consequence that the other matters that are sought in QLDCs submission are not acknowledged in the Policy.
- 5.15 Overarching all this is the fact that the process of identifying highly productive land is now mandated by the NPS-HPL and therefore the content of LF–LS–P19 appears to now be somewhat superfluous.
- 5.16 I note for completeness that in relation to the small areas of land within Gibbston Valley that are not identified as highly productive land, the pORPS provides sufficiently strong support to avoid urban or rural lifestyle development of those parts of the Gibbston Character Zone<sup>8</sup>, through the urban form and development provisions. In particular, in my opinion, policies UDF-P7(2), UDF-P7(4), and UDF-P7(6) will do this by requiring that the management of rural areas:
- (a) maintains the productive capacity, amenity and character;
  - (b) facilitates primary production, rural industry, and supporting activities; and
  - (c) restricts the establishment of residential activities, sensitive activities, and non-rural businesses which could adversely affect the productive capacity of the existing primary production and rural industry activities

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<sup>8</sup> The purpose of the Gibbston Character zone is to provide primarily for viticulture and commercial activities with an affiliation to viticulture within the confined space of the Gibbston Valley. Source: Part 23.1, Queenstown Lakes PDP.

within the valley (unless in accordance with other policies, which, in my opinion, provide no policy support in this instance).

- 5.17 I also note for completeness that, due to QLDC's strategic planning, any proposal for urban expansion into, or rural residential or rural lifestyle development of this area would not be supported by policies UFD-P4, UDF-P7(5), or UFD-P8.
- 5.18 While QLDC did not submit on P19(2) specifically, I note that Ms Boyd's supplementary evidence recommends removing the reference to EIT-INF-P12 and EIT-INF-P16 (specified infrastructure) (which she added in the s 42A version). This is on the basis that such exceptions to the requirement to prioritise land for land-based primary production are set out in the NPS-HPL and will be implemented by Territorial Authorities as they amend their district plans to give effect to the NPS-HPL. I agree with this recommendation.

**Method LF-LS-M12 (District Plans) and the recommendation to add a new clause (4) in relation to highly productive land**

- 5.19 In its submission, QLDC sought that LF-LS-M12 be retained as notified.
- 5.20 In relation to highly productive land, through the s 42A report and her second supplementary evidence, Ms Boyd has recommended that the following additional clause be added to LF-LS-M12:

*LF-LS-M12 – District plans*  
*Territorial authorities must prepare or amend and maintain their district plans no later than 31 December 2026 to:*

*(4) maintain the availability and productive capacity of highly productive land identified and mapped under LF-LS-M11A in accordance with LF-LS-P19.*

- 5.21 This wording is more appropriate than the version in the s 42A report in that it aligns with the NPS-HPL insofar as it now explicitly notes that the highly productive land that is to be mapped and protected<sup>9</sup> by territorial authorities are those that are identified and mapped under LF-LS-M11A, which clarifies that the

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<sup>9</sup> Despite the wording in the pORPS the requirement under the NPS-HPL to protect the productive capacity of highly productive land will prevail in all instances.

mapping will be undertaken by the ORC, in collaboration with other parties, and will not be amended in any way when inserted into district plans.

- 5.22 While I am supportive of the intent of the amendments recommended by Ms Boyd, I consider that further amendment is required in order to better align LF-LS-M12 with the timeframes mandated by the NPS-HPL. Whereas LF-LS-M12 requires territorial authorities to change their district plans to maintain, identify, and map highly productive land within 3 years of the ORC having notified the mapping (pursuant LF-LS-M11), clause 3.5(3) of the NPS-HPL is more pragmatic and requires that territorial authorities identify the highly productive land in its district within 6 months after the RPS maps becoming operative. This could potentially extend beyond the December 2026 date specified in LF-LS-M12 and I suggest that it is more appropriate that LF-LS-M12 be amended in the following manner:

*LF-LS-M12 – District plans*

*Territorial authorities must prepare or amend and maintain their district plans no later than 31 December 2026 to:*

..

*(4) maintain the availability and productive capacity of highly productive land.<sup>10</sup>*

*Territorial authorities must:*

*(5) identify the highly productive land that has been identified and mapped under LF-LS-M11A in its district plan within 6 months of the Regional Policy Statement containing those maps becoming operative.*

## **6. THE REMOVAL OF MONTANE TALL TUSSOCK**

- 6.1 QLDC submitted that LF-LS-M11 and LF-LS-M12 be retained as notified. LF-LS-M11 remains unaltered from the notified version but various changes have been recommended to LF-LS-M12. I agree that the recommended changes to clauses 2 and 3 are appropriate and have discussed the recommended changes to clause 4 above. The s 42A report and supplementary evidence recommend that clause 1 of Method LF-LS-M12 be amended in the following manner:

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<sup>10</sup> As required by clauses 3.9, 3.11, and 3.12 of the NPS-HPL

*LF-LS-M12 – District plans*

*Territorial authorities must prepare or amend and maintain their district plans no later than 31 December 2026 to:*

- (1) *manage land use change by:*
  - (a) *controlling the establishment of new or any spatial extension of existing plantation forestry activities or permanent forestry activities where necessary to give effect to an objective developed under the NPSFM, and*
  - (b) *~~minimising~~ avoiding minimising the removal of montane tall tussock grasslands to recognise their ability to capture and hold precipitation and therefore affect water yield*

6.2 The changes essentially rescind Ms Boyd’s previous recommendation to change the word from ‘minimising’ to ‘avoiding’ (such that it is now recommended to remain unchanged from the notified version) and propose adding some further explanation to clarify the purpose of the method without changing it substantively. The above change has the effect of reverting back to the notified version, which QLDC supported in its submission albeit with some additional explanation (and clarifying that it relates exclusively to Montane Tussock).

6.3 I support retaining the less restrictive notified policy wording on the basis that the areas of existing montane tall tussock grasslands are not well understood and have not yet been identified or mapped. As such, the effect of such a strong policy, and therefore its appropriateness, is not sufficiently well understood. I consider the additional explanatory text is helpful to clarify that the purpose of the policy relates to water conservation in this instance rather than to ecological values, which is covered elsewhere in the pORPS.

**Victoria Jones**

**23 November 2022**