

**Written Submission on Proposed Otago Regional Policy Statement 2021 – Freshwater Provisions**

**To: Otago Regional Council ([rps@orc.govt.nz](mailto:rps@orc.govt.nz))**

1. This is a submission by **Real Group Limited (Realnz)** on the Proposed Otago Regional Policy Statement 2021 – Freshwater provisions.
2. **Realnz:**
  - a. Cannot gain an advantage in trade competition through this submission.
  - b. Is directly affected by an effect of the subject matter of the submission that adversely affects the environment; and does not relate to trade competition or the effects of trade competition
  - c. Does wish to be heard in support of my submission
  - d. Will consider presenting a joint case with them at a hearing if others make a similar submission

**Submission**

3. This submission affects all provisions on the RPS to the extent that they are relevant to the matters stated in the table on the following pages of this submission. In addition, Realnz seeks the following decisions:
  - a. Amendments to all the provisions of the RPS in accordance with and in no way limited to the changes set out on the following pages;
  - b. Or alternatively other amendments, including any such combination of provisions as may be appropriate, to address the matters raised in this submission, and to achieve the intent of this submission.
  - c. Any similar, alternative, consequential and/or other relief as necessary to address the issues raised in this submission.
  - d. Consideration of the matters raised by or on behalf of Wayfare (Realnz's predecessor) in relation to the RPS non-freshwater provisions process (including submissions and evidence). This request is made for the avoidance of doubt in case this submission does not capture all relevant matters raised previously in relation to the non-freshwater provisions process).
4. **Reasons** for this submission are provided throughout this document.
5. Fiona Black, Concessions & Consents Manager at Real Journeys Limited on this day 29 November 2022

**Address for service**

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## Real Group Limited (Realnz)

1. Realnz is the parent company of *Real Journeys*, *Cardrona Alpine Resort*, , and the *International Antarctic Centre*. Realnz owns or has interests in businesses and properties throughout the region including high country farmland, wharves and lakebed.
2. Originally founded in 1954 by tourism and conservation pioneers Les and Olive Hutchins, the Realnz like the rest of the tourism sector has been heavily impacted by the fallout from COVID-19. In the 2018-19 year Realnz activities and services attracted about 1.6 million visitors. Through the aforementioned companies Realnz owns or operates regionally, nationally and internationally recognisable visitor activities and destinations, and has an interest in and will be affected by the policy directives in the Otago Regional Policy Statement. In this matter, Realnz is particularly interested in and affected by any provision which promotes or restricts the ability of people to use and access natural and physical resources for the primary purpose of transport or the visitor industry, including ancillary commercial and industry services. These activities are centred on supporting people's wellbeing by transporting people to the natural environment for their use and appreciation of the natural environment (i.e. outdoor recreation).
3. Given the scale of important of ski areas to the Otago Region, Realnz and NZSki commissioned an independent assessment on the contribution of skiing to the Queenstown Lakes economy. The assessment was prepared by Mr Benje Patterson in October 2021. The key findings of the report included the following:
  - a. There were around 885,000 skier days at Queenstown-Lakes District's four major ski resorts during the 2019 ski season. Locals from Queenstown-Lakes accounted for about one out of every five of these skier days (167,000) with the remaining skier days (approximately 718,000) being visitors. Alongside the 718,000 skier days spent up the mountain by visitors, these visitors were estimated to spend a further 911,000 days off the mountain. Previous research has shown that the average holidaymaker spends approximately 30% more on ski days than on other days during their holiday. It is estimated that total expenditure by skiing holidaymakers in Queenstown-Lakes during the 2019 ski season was \$430.9 million, which was the equivalent of \$207.5 million of economic value add (GDP). Ski tourism GDP is equivalent to 14% of what Queenstown-Lakes' entire tourism industry generated in GDP across 2019, and equates to 6.3% of the district's entire economy across all industries.
  - b. Alongside the economic impacts of ski tourism that accrue directly within Queenstown-Lakes, the rest of Otago also benefits from some spillover. Previous research has shown that skiers spend approximately one day travelling through other parts of Otago for every five days they spend within Queenstown-Lakes. After factoring in this spillover, it is estimated that skiing tourism GDP across the whole of Otago was \$233.8 million in 2019. This estimate is equivalent to 11% of Otago's entire tourism GDP and 1.7% of Otago's entire economy across all industries in 2019. Skier days in Queenstown-Lakes fell one third (32%) from approximately 885,000 in 2019 to 599,000 in 2020. Skiing GDP almost halved (down 45%), falling from \$207.5 million in 2019 to \$114.6 million in 2020. A key factor behind this relatively steeper decline in GDP is because domestic visitors to Queenstown-Lakes typically spend less per day than the international visitor they replaced.
4. This contribution is significant to Otago and New Zealand.

## ***Realnz Limited***

5. *Realnz* is a tourism company based in the southern South Island which has been operating for over 66 years. In 1954 Les and Olive Hutchins began operating the Manapouri-Doubtful Sound Tourist Company, running four-day excursions which included a Lake Manapouri cruise, a trek over the Wilmot Pass to accommodation at Deep Cove, and a cruise on Doubtful Sound. In 1966 Les and Olive acquired Fiordland Travel Limited, with its Te Anau Glow-worm Caves and Milford Track Lake Transport operation and began trading as Fiordland Travel Limited. Ongoing expansion followed with the acquisition of the vintage steamship “TSS Earnslaw” in Queenstown in 1969 and with the establishment of cruises in Milford Sound in 1970. Since 2002 Fiordland Travel operated all of its tourism excursions under the ‘Real Journeys’ brand; in 2004 Stewart Island Experience was established; and in 2006 the company changed its name to Real Journeys Limited.
6. In 2013 Real Journeys launched the Go Orange brand; purchased Cardrona Alpine Resort and the 155 hectare property at Walter Peak which Real Journeys previously leased for over two decades. This resort property located at the foot of Walter Peak on the edge of Lake Wakatipu, 13km from Queenstown. The property includes the Colonels Homestead, surrounding buildings and the recently constructed rural demonstration amphitheatre. This land holding has been a visitor destination for a very long time and has been zoned for resort development since the 1980s. Real Journeys uses this location to operate dining and farm experiences serviced by the vintage steamship the “TSS Earnslaw”. Then in 2015 Real Journeys purchased the International Antarctic Centre in Christchurch and in 2016 Real Journeys took over 100% ownership of Queenstown Rafting and purchased Kiwi Discovery which were operated under the Go Orange brand.
7. However, in 2018 Real Journeys was restructured to be a wholly owned subsidiary of the Wayfare Group along with Cardrona Alpine Resort and Christchurch International Antarctic Centre. Also in 2018, Queenstown businessman John Darby and Cardrona Alpine Resort partnered to develop the new "Soho Basin" ski area. This development sees Cardrona Alpine Resort more than doubling in size to over 900 hectares of skiable terrain, while Soho Basin adds an additional 500ha of high-altitude skiable terrain. Moreover, in 2019 Cardrona Alpine Resort purchased the assets of the 500ha Treble Cone Ski Field (on public conservation land). Accordingly, the company has interests in at least 2105 hectares of land in the Queenstown Lake District.
8. Due to the fallout from COVID-19 in early 2021 Go Orange was absorbed into Real Journeys and later in 2021 Wayfare became Realnz and while Cardrona Alpine Resort, Treble Cone and the International Antarctic Centre maintain their individual brands as Realnz experiences, all the company’s tourism brands come under the umbrella of Realnz brand. Accordingly, the Realnz remains in private ownership and is now the largest transport, tourism and recreation activity operator in the region and has a well-earned reputation for providing high quality experiences enjoyed by visitors from New Zealand and around the world.
9. Realnz now has operational bases in Christchurch, Milford Sound/Piopiotahi, Te Anau, Manapouri, Queenstown, Wanaka, Bluff and Stewart Island/Rakiura. Along with the operation of Cardrona Alpine Resort; Treble Cone Ski Field and the International Antarctic Centre; the company offers a range of quality tourism excursions including multiday Discovery Expeditions around the southern fiords and Stewart Island/Rakiura; day time and overnight cruises on Milford

Sound/Piopiotahi and Doubtful Sound/Patea (with daily coach connections from Te Anau and Queenstown); Te Anau Glow-worm Caves excursions; guided Milford Track day-walks; Stewart Island ferries, tours on Rakiura including a partnership with Rakiura Māori Lands Trust to provide Kiwi spotting tours, the development of another walking opportunity at the Neck (Oneki) and accommodation on Stewart Island/Rakiura; in Queenstown, water ferry services on Lake Whakatipu, Queenstown Jet Boating (on Kawarau River), Queenstown Rafting (on Shotover, Kawarau and Landsborough Rivers), cruises on Lake Whakatipu aboard the “TSS Earnslaw” combined with Walter Peak High Country Farm excursions and dining options at the Colonel’s Homestead.

**10.** Along with this commercial success, Realnz also remains committed to conservation which was instilled into the company by its founders Sir Leslie and Lady Olive Hutchins. The late Les Hutchins, DCNZM,OBE, JP, had a lifetime passion for Fiordland and conservation issues. He was a key member of what is widely regarded as the start of New Zealand’s conservation movement - the successful "Save Manapouri Campaign" - which stopped the raising of Lakes Te Anau and Manapouri for power generation. As the small tourism company began to expand, they started directing some of the profits into conservation work. Specifically, in 1994 Les Hutchins formed the Leslie Hutchins Conservation Foundation which is funded via a passenger levy on our Doubtful Sound/Patea operations and raised (pre COVID-19) \$60,000 per annum. Some of the Projects supported by the Leslie Hutchins Conservation Foundation include dolphin research, protection programmes for endangered birds, track and interpretation signage developments, support for students to attend outdoor education camps and wilding pine eradication. Since 2017 Real Journeys has been supporting a long-term project to remove predators from Cooper Island Ao-ata-te-pō - the third largest island in Tamatea/Dusky Sound. This initiative sees Real Journeys join, the Department of Conservation’s Tamatea/Dusky Sound Restoration Programme; sharing its vision to make Tamatea/Dusky Sound one of the most intact ecosystems in the world.

**11.** Realnz’s most recent conservation and sustainability initiatives include:

- a) In the last 12 months Realnz has facilitated several tree planting days across its various operation locations including at Cardrona, Walter Peak and Manapouri. It purchased the native plants with staff taking time to undertake the planting.
- b) In March 2022 Realnz purchased and deployed 200 predator traps across its property at Walter Peak, Queenstown.
- c) In May 2022 Milford Wanderer nature guides established a trap line at Wet Jacket Arm/Moanauta between Herrick Creek and Moose Lake with Realnz funding 18 traps.
- d) In May 2022 Realnz purchased and deployed a further 120 predator traps for Glory Cove Scenic Reserve, Rakiura.
- e) In July 2022 Realnz funded replacement traps for Anchor Island / Pukenui especially critical for the protection of the Kākāpō.
- f) Between 22 and 25 September 2022, Realnz effectively donated the Milford Wanderer including crew to support and assist DOC to promptly address the recent mammalian pest incursion on Resolution Island/Mauīkatau.

### ***Cardrona Alpine Resort Limited (CARL)***

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

<b>Provision</b>	<b>Position</b>	<b>Reason(s)</b>	<b>Decision Sought</b>
<b>Entire RPS – new provisions sought</b>	Support in part	The pRPS fails to include recognition of and provision for people and communities' health and wellbeing by not sufficiently recognising or providing for the benefits of transport and tourism activities and development, in particular activities centred on supporting people's wellbeing by transporting people to the natural environment so people can use and appreciate the natural environment. It should go without saying that people (residents and visitors) rely on access to and use of the natural environment to support their health (mental and physical) and cultural, social and economic wellbeing. Similarly, it should go without saying that the health and wellbeing of communities including many local business benefit directly and indirectly from providing services associated with transporting people to the natural environment so people can use and appreciate the natural environment. Realnz owns and operates recreation related activities which support these well-beings. The lack of provision for activities which directly or indirectly support people's ability to the natural environment, so people can use and appreciate the natural environment undermines the above benefits and is contrary to the concept of sustainable management of Otago's natural and physical resources, because fundamentally these activities generally: (i) are part of Otago's identity which the current generations of the region rely on; (ii) maintain, enhance or do not significantly compromise the health and wellbeing of the region's natural environment; and (iii) do not undermine or threaten the well-being of future generations.	Insert new provisions which explicitly promote the benefits of and provide for people's well-being, including the use of and access to the natural environment for transport, the visitor industry inclusive of commercial recreation, and ancillary commercial and industry services.
<b>Entire RPS – new provisions sought</b>	Support in part	Unless otherwise discussed or affected by the reasons below the pRPS is supported.	Retain all provisions in the pRPS as notified except as discussed or affected by the reasons discussed and relief sought below.
<b>Entire RPS</b>	Support in part	The pRPS fails to include any policy direction about how competing demands on water catchments should or will be managed. For example, if a waterbody is supporting agriculture / horticulture use, and someone seeks to plant a plantation forest to take water out of the catchment and compromise agriculture / horticulture how will this be dealt with. Realnz owns and operates activities in the alpine environment (namely ski field areas) where access to water is constrained by natural elements and in the future could be further constrained by competing interests of other parties.	Insert new provisions or amend the current provisions to provide clearer policy direction about how competing interests for water take and use will be addressed.
<b>Entire RPS</b>	Support in part	The pRPS fails to include clear direction about or provision for the need for people to repair flood protection devices and clean up after natural hazard events such as flooding. As floods and extreme weather events are likely to be more common in the future, with climate change, there is a need for people to be able to readily clear debris/slip movements out of waterbodies or adjoining land to allow the waterway to flow freely, prevent further flooding, and clean up mess on usable land.	Insert new provisions or amend the current provisions to provide clear policy direction that provides for the ability of people to clear debris/slip movements out of waterbodies or adjoining land.
<b>Entire RPS – reference to and use of Environmental limits and bottom lines</b>	Support in part	In respect of environmental limits (or bottom lines) the RPS is unclear on what environmental limits are actually being referred to – e.g. do they refer to limits on landscape and amenity values? Limits should only apply to the natural environment (for example relate to biophysical attributes, and possibly ngai tahu rights and interests).	

Provision	Position	Reason(s)	Decision Sought
Entire RPS	Support in part	<p>There are numerous hackneyed vagaries in the pRPS document, for example as listed below:</p> <ul style="list-style-type: none"> <li>• Significant</li> <li>• Sustainable / sustainable development / sustained</li> <li>• Environmental limit</li> <li>• Bottom line</li> <li>• Environments</li> <li>• Statements including or like “important features and values identified by this RPS”</li> </ul> <p>These words lack practical or effective meaning and therefore will create uncertainty when applied in practice. Every word in every objective, policy, method, or AER should be clear and explicit about what it means.</p>	Replace these words with other words which have a practical or clearer/explicit meaning.
Entire RPS	Support in part	There are numerous references to the term “possible”. However, this term is an extremely stringent and potentially unrealistic test to meet.	Delete term “possible” from the pRPS. Replace with clearer achievable or more practicable direction, or alternatively replace with “practicable”.
Interpretation – minimise	Support in part	The term minimise is used in the pRPS but it is not defined.	<p>Insert definition for “<b>minimise</b>”, as below:</p> <p><i>“Reduce to the smallest amount reasonably practicable. Minimised, minimising and minimisation have the corresponding meaning.”</i></p>
Interpretation – natural environment	Support in part	The term natural environment is used in the pRPS but it is not defined.	<p>Insert definition of “<b>Natural Environment</b>”, as follows:</p> <p>Means (a) land, water, air, soil, minerals, energy, and all forms of plants, animals, and other living organisms (whether native to New Zealand or introduced) and their habitats; and (b) ecosystems and their constituent parts.</p>
Interpretation – resilient or resilience	Support in part	No need for “quick” recovery	Means the capacity and ability to withstand or recover from adverse conditions.
LF-WAI-O1 – Te Mana o te Wai	Support in part	The term “maintained” would accord with policy LF-FW-P7.	<p><b>LF-WAI-O1 – Te Mana o te Wai</b></p> <p>The mauri of Otago’s <i>water bodies</i> and their health and well-being is maintained, and restored where it is <i>degraded</i>, and the management of <i>land</i> and <i>water</i> recognises and reflects that...</p>
All FMU vision statements, in particular LF-VM-O2 – Clutha Mata-au FMU vision	Oppose	A new clause should be inserted into the vision seeking direction to provide for human wellbeing through thriving outdoor recreation opportunities, including access to waterbodies and use of water for outdoor recreation activities.	<p><b>LF-VM-O2 – Clutha Mata-au FMU vision</b></p> <p>In the Clutha Mata-au FMU:</p> <p>(1) <i>water bodies</i> support human wellbeing through thriving outdoor recreation opportunities, including access to waterbodies and use of water for outdoor recreation activities</p>

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



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

Provision	Position	Reason(s)	Decision Sought
<b>Entire LF-LW Section - New Policy</b>	Support in part	The land and freshwater provisions (or the RPS as a whole) fails to recognise and provide policy support activities that result in benefits to wetlands (including restoration, enhancement and construction of new wetlands), as well as improving people's awareness of and access to natural wetlands.	<p><b>LF-FW-NEW POLICY – Promoting awareness of and access to <i>natural wetlands</i></b></p> <p>Support activities which result in either of 1-4 of LF-FW-P10 above, or improve people's awareness of, and access to, natural wetlands for customary, or scientific, or education, or recreational uses.</p>
<b>LF-FW-P15 – Stormwater and wastewater discharges</b>	Support in part	It is not always desirable for sewage, industrial or trade waste to be discharged to a reticulated system, especially if alternative regimes have better environmental (ecological, social, cultural and economic) outcomes.	<p><b>LF-FW-P15 – Stormwater and wastewater discharges</b></p> <p>Minimise the adverse <i>effects</i> of direct and indirect <i>discharges</i> of <i>stormwater</i> and <i>wastewater</i> to <i>freshwater</i> by:</p> <ol style="list-style-type: none"> <li>(1) except as required by LF-VM-O2 and LF-VM-O4, preferring <i>discharges</i> of <i>wastewater</i> to <i>land</i> over <i>discharges</i> to <i>water</i>, unless adverse <i>effects</i> associated with a <i>discharge</i> to <i>land</i> are greater than a <i>discharge</i> to <i>water</i>, and</li> <li>(2) requiring: <ol style="list-style-type: none"> <li>(a) all sewage, industrial or trade waste to be <i>discharged</i> into a reticulated <i>wastewater</i> system, where one is available, unless alternative treatment and disposal methods will result in improved environmental outcomes.</li> </ol> </li> <li>(3) ...</li> </ol>
<b>LF-FW-M6 – Regional plans</b>	Support in part	Environmental flow and level regimes for water bodies should include provision for human wellbeing through protecting and enhancing people's ability to access waterbodies and use water to support outdoor recreation activities.	<p><b>LF-FW-M6 – Regional plans</b></p> <p>Otago Regional Council must publicly notify a Land and Water <i>Regional Plan</i> no later than 31 December 2023 and, after it is made operative, maintain that <i>regional plan</i> to:</p> <ol style="list-style-type: none"> <li>(1) include environmental flow and level regimes for <i>water bodies</i> (including <i>groundwater</i>) that give effect to <i>Te Mana o te Wai</i> and provide for: <ol style="list-style-type: none"> <li>(a) ...</li> <li>(b) human wellbeing through protecting and enhancing people's ability to access waterbodies and use water to support outdoor recreation activities, and</li> </ol> </li> </ol>

Provision	Position	Reason(s)	Decision Sought
<b>LF-FW-M7 – District plans</b>	Support in part	<p>It is not appropriate, practical or reasonable to avoid adverse effects of activities on the significant and outstanding values of outstanding water bodies.</p> <p>It is not appropriate or necessary to adopt water sensitive urban design techniques to all land development outside the urban environment.</p>	<p><b>LF-FW-M7 – District plans</b></p> <p><i>Territorial authorities</i> must prepare or amend and maintain their <i>district plans</i> no later than 31 December 2026 to:</p> <ol style="list-style-type: none"> <li>(1) map <i>outstanding water bodies</i> and identify their outstanding and significant values using the information gathered by Otago Regional Council in LF-FW-M5, and</li> <li>(2) include provisions to avoid, remedy or mitigate the adverse <i>effects</i> of activities on the significant and outstanding values of <i>outstanding water bodies</i>,</li> <li>(3) require, wherever practicable, the adoption of water sensitive urban design techniques when managing the <i>subdivision</i>, use or development of <i>urban</i>, and</li> </ol>
<b>ECO-P3 – Protecting significant natural areas and taoka</b>	Support in part	<p>This policy effectively says that no vegetation within an SNA can be removed. This does not accord with the concept of sustainable management, as some removal of vegetation within an identified SNA can have indiscernible or an appropriate extent of adverse effects, or can be offset or compensated.</p>	<p><b>ECO-P3 – Protecting significant natural areas and taoka</b></p> <p>Except as provided for by ECO-P4 and ECO-P5, protect <i>significant natural areas</i> and indigenous species and ecosystems that are taoka by:</p> <ol style="list-style-type: none"> <li>(1) avoiding adverse <i>effects</i> that result in: <ol style="list-style-type: none"> <li>(a) any discernible reduction of the area or values (even if those values are not themselves significant) identified under ECO-P2(1), or</li> <li>(b) any loss of Kāi Tahu values, and</li> </ol> </li> <li>(2) after (1), applying the <i>biodiversity effects management hierarchy</i> in ECO-P6, and</li> <li>(3) prior to <i>significant natural areas</i> and indigenous species and ecosystems that are taoka being identified in accordance with ECO-P2, adopt a precautionary approach towards activities in accordance with IM-P15.</li> </ol>

Provision	Position	Comment	Decision / amendment sought
<b>SRMR – entire section</b>	Support in part	The SRMR section fails to identify or discuss, in a positive frame, the benefits to people and the environment from subdivision, use and development of natural and physical resources. Realnz is particularly concerned that the SRMR section does not discuss the wellbeing benefits (and need) of ensuring people can access and use the rural and natural environment.	<p>Insert new section to identify and discuss, in a positive frame, the benefits to people and the environment from subdivision, use and development of natural and physical resources.</p> <p>This section should also identify and discuss the wellbeing benefits (and need) of ensuring people can access and use the rural and natural environment.</p>
<b>SRMR – entire section</b>	Support in part	The SRMR section is written too negatively, with limited reference to any positive or beneficial resource management issues. If the focus is to remain on adverse effects (or negative significant resource management issues then the headings of each “Impact Snapshot” section should be amended to say “Adverse Impact Snapshot”.	Amend each “Impact Snapshot” to say “Adverse Impact Snapshot”.
<b>SRMR-11 – Context</b>	Support in part	Natural hazard events occur all the time without any discernible impact.	The Otago region is exposed to a wide variety of <i>natural hazards</i> that impact on people, property, <i>infrastructure</i> , historic heritage and the wider <i>environment</i> . When a major <i>natural hazard</i> event occurs, it is usually difficult and costly for a community to recover. ...
<b>SRMR 15 – Impact Snapshot Economic</b>	Support in part		<i>Freshwater</i> in the Otago region is a factor of production that directly contributes to human needs (urban <i>water</i> supply), agriculture (including irrigation), hydro-electric power supply, tourism (for example <i>water</i> supply for visitor destinations and snowmaking), and mineral extraction. <i>Freshwater</i> also indirectly contributes to the tourism industry through maintenance of <i>freshwater</i> assets for aesthetic and commercial recreational purposes. Lack of <i>freshwater</i> can negatively impact economic output of those industries that rely on <i>water</i> in the production process. To varying degrees these impacts can be mitigated through <i>water</i> efficiency measures and innovation. At the same time other industries, such as tourism activities that rely on the aesthetic characteristic of <i>rivers</i> and <i>lakes</i> , do not have such opportunities available to them and instead rely on management regimes that sustain flows and <i>water</i> levels suitable for their activities.

Provision	Position	Comment	Decision / amendment sought
SRMR 15 – Impact Snapshot Social	Support in part		Ensuring appropriate <i>freshwater</i> supply for human <i>use</i> is available is essential, including as part of planned urban growth. It is possible this may require consideration of additional <i>freshwater</i> storage in the future. The region's <i>freshwater</i> assets also support a range of recreation uses, for example camping, fishing, <i>water</i> sports, and swimming. These values are strongly linked to environmental values and as such, reduced environmental flows have a corresponding negative impact on social and cultural values (including people's wellbeing).
SRMR 16 heading	Support in part		<b>Declining <i>water</i> quality has adverse effects on the natural environment, our communities, and the economy</b>
SRMR 16 statement	Support in part		While the pristine areas of Otago generally maintain very good <i>water</i> quality, some areas of Otago demonstrate poorer quality and declining trends in <i>water</i> quality which can be attributed to <i>discharges</i> from <i>land use</i> intensification (both rural and urban) and <i>land</i> management practices. Erosion, run-off and soil loss can lead to sediment and nutrients being deposited into <i>freshwater</i> bodies resulting in declining <i>water</i> quality.
SRMR 17	Oppose		Insert statement/discussion in this section about the need to restore biodiversity, not just maintain or protect what's left.
SRMR-19 – SNAPSHOT – environmental	Support in part	What evidence is this statement based on? What type of tourism demand, as opposed to urban growth, results in degradation of water quality?	<p>...However, <i>water</i> quality is being adversely impacted by increased population and urban development which is straining existing waste management infrastructure. In addition, localised degradation of some areas is occurring due to overuse and unregulated use (e.g. freedom camping). The amenity of these areas is being compromised in some places by over-crowding.</p> <p>Recreation <i>use</i> impacts on the <i>environment</i> can be a <i>risk</i>, for example the distribution of pest species can be accelerated as has occurred for lake snow and <i>Lagarosiphon</i> weeds being spread by recreation boating movements. Natural features and landscape values can also be adversely impacted by tourism development, urban growth, and energy production.</p>

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