

Form 6

Further submission in support of, or in opposition to, submission on proposed Otago Regional Policy Statement – Freshwater Planning Instrument Parts [Clause 8 of Schedule 1](#), Resource Management Act 1991

To Otago Regional Council

Name of person making further submission: Alyson Hutton, Manager Planning Policy, Queenstown Lakes District Council

This is a further submission on the Otago Regional Policy Statement – Freshwater Planning Instrument Parts.

The Queenstown Lakes District Council represents a relevant aspect of the public interest and has an interest in the proposal greater than the interest the general public has, and is a local authority in the area.

The particular parts of the submission the Queenstown Lakes District Council supports or opposes are detailed and attached in the letter dated 3 February 2023 and Appendix 1 attached to this further submission form.

The reasons for support or opposition are detailed and attached in Appendix 1.

Queenstown Lakes District Council wishes to be heard in support of this further submission.

Signature of person making further submission
(or person authorised to sign on behalf of person making further submission)



Alyson Hutton
Manager Planning Policy
Queenstown Lakes District Council

Date: 3 February 2023

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3 February 2023

Via Email: fpisubmission@orc.govt.nz

Dear Sir / Madam,

FURTHER SUBMISSION ON THE PROPOSED OTAGO REGIONAL POLICY STATEMENT - PARTS CONSIDERED TO BE A FRESHWATER PLANNING INSTRUMENT UNDER SECTION 80A OF THE RESOURCE MANAGEMENT ACT 1991

Thank you for providing the Queenstown Lakes District Council (QLDC) with the opportunity to make a further submission on the abovementioned document.

Queenstown Lakes District Council's original submission broadly supported the intent of the Freshwater Planning Instrument (FWPI) component of the Regional Policy Statement (RPS) notified on 30 September 2022.

This further submission outlines recommendations of QLDC on several original submission points made on the proposed FWPI. In summary, QLDC supports some original submission points, and opposes others. The specific further submission points are attached to this letter as Appendix 1.

Yours faithfully,



Alyson Hutton
Planning Policy Manager
Queenstown Lakes District Council

Appendix 1 - Queenstown Lakes District Council Further Submission Points on the Proposed Freshwater Planning Instrument

Original Submission Point number	Provision	QLDC Further Submission Position	Summary of decision requested	QLDC Reason	Original Submitter
FPI001.042	General	Support	The Dunedin City Council supports the ORC in its consideration of the Treaty of Waitangi and its commitment to working with Mana Whenua in its use of Te Mana o te Wai as a national framework.	The Treaty of Waitangi is identified in Part 2 Section 8 of the RMA.	DCC
FPI037.067	General	Support	Give effect to higher order documents, including by reconciling competing tensions	The hierarchy of planning documents is set out in the RMA, s61 states that the preparation of regional policy statements must be in accordance with higher order instruments.	Fish and Game
FPI001.051	General	Support	In several places it is unclear whether the RPS refers to climate change adaptation (preparing for the effects of climate change) and/or climate mitigation (reducing net greenhouse gas emissions). It will be important to undertake both mitigation and adaptation, and therefore refer specifically to both throughout the RPS.	The Otago Region, including the Queenstown Lakes District will experience impacts from climate change. Effective and efficient provisions	DCC

				are required in regard to climate change adaptation and/or mitigation.	
FPI041.014	General	Support	There should be greater policy direction in the PORPS in regard to promoting and providing for land and water uses that are efficient, have minimal impact on the environment, and that provide significant economic and social benefits. Viticulture is one example, and other uses could also fall into this category (for example, orchards).	For the reasons outlined in QLDC's Original Submission	McArthur Ridge Vineyard Ltd
FPI012.002	SRMR	Support	Recommend adding in a discussion around the over-allocation and the historic context of deemed mining permits.	For the reasons outlined in QLDC's Original Submission	MFE

FPI038.020	SRMR	Support	<p>Freshwater in the Otago region is a factor of production that directly contributes to human needs (urban water supply), agriculture (including irrigation), hydro-electric power supply, <u>tourism (for example water supply for visitor destinations and snowmaking)</u>, and mineral extraction. Freshwater also indirectly contributes to the tourism industry through maintenance of freshwater assets for aesthetic and commercial recreational purposes. Lack of freshwater can negatively impact economic output of those industries that rely on water in the production process. To varying degrees these impacts can be mitigated through water efficiency measures and innovation. At the same time other industries, such as <u>tourism activities</u> that rely on the aesthetic characteristic of rivers and lakes, do not have such opportunities available to them and instead rely on management regimes that sustain flows and water levels suitable for their activities.</p> <p>...</p> <p>Ensuring appropriate freshwater supply for human use is available <u>is essential</u>, including as part of planned urban growth is essential. It is possible this may require consideration of additional freshwater storage in the future. The region's freshwater assets also support a range of recreation uses, for example camping, fishing, water sports, and swimming. These values are strongly linked to environmental values and as such, reduced environmental flows have a corresponding negative impact on social and cultural values (<u>including people's wellbeing</u>).</p>	For the reasons outlined in QLDC's Original Submission	NZ Ski
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FPI019.001	SRMR 15	Support	Amend the text under the heading “Economic” to read: ... Economic Freshwater in the Otago region is a factor of production that directly contributes to human needs (urban water supply), agriculture, <u>industry, rural industry</u> , hydro-electric power supply, and mineral extraction.	For the reasons outlined in QLDC’s Original Submission	Fonterra Co-operative Group Ltd
FPI047.009	SRMR 15	Support	Amend SRMR–15 context as follows: “... Population growth, <u>food production</u> and land-use intensification in urban and rural environments can create increased demand for freshwater for human consumption, irrigation and other economic uses.	For the reasons outlined in QLDC’s Original Submission	Horticulture New Zealand
FPI025.010	SRMR 15	Oppose	Remove reference to goal of improving freshwater quality within 5 years.	For the reasons outlined in QLDC’s Original Submission	Beef + Lamb New Zealand Ltd and Deer Industry New Zealand
FPI045.003	SRMR-16	Support	Retain as notified	For the reasons outlined in QLDC’s Original Submission	Forest & Bird
FPI030.013	RMIA-WAI-11	Support	Retain as notified	For the reasons outlined in QLDC’s Original Submission. Further, the matters outlined in the issues of significance statement apply to the Queenstown Lakes District.	Kāi Tahu ki Otago

FPI044.004	RMIA-WAI-I3	Support	Retain as notified, subject to any changes sought by Ngāi Tahu papatipu rūnaka.	For the reasons outlined in QLDC's Original Submission. Further, the matters outlined in the issues of significance statement apply to the Queenstown Lakes District.	Director General of Conservation
FPI030.016	LF-WAI-P1	Support	Amend as follows: In all management of fresh water in Otago, prioritise: (1) first, the health and well-being of water bodies, freshwater ecosystems, te hauora o te wai, <u>and the contribution of this to te hauora o te taiao</u> , and the exercise of mana whenua to uphold these, ... (2) second, the health and well-being needs of people, te hauora o te tangata; interacting with water through ingestion (such as drinking water and consuming harvested <u>harvested from the water body</u>) and immersive activities (such as harvesting resources and bathing), and ...	For the reasons outlined in QLDC's Original Submission. Further, this provision impacts the ability of people and communities in the Queenstown Lakes District to provide for their social, economic, and cultural wellbeing, now and in the future.	Kāi Tahu ki Otago
FPI032.017	LF-WAI - Te Mana o te Wai	Support	Retain as notified	For the reasons outlined in QLDC's Original Submission. Further, this provision impacts the ability of people and communities in the	Te Rūnanga o Ngāi Tahu

				Queenstown Lakes District to provide for their social, economic, and cultural wellbeing, now and in the future.	
FPI044.007	LF-VM - Visions and management	Support	Amend all freshwater visions to: <ul style="list-style-type: none"> - provide a consistent and clear structure across and between each FMU / rohe (which could include an over-arching vision or visions), - appropriately recognise the relevant values and issues in every FMU / rohe, - provide appropriate timeframes and staged targets, and in addition, incorporate further specific relief as set out below 	For the reasons outlined in QLDC's Original Submission. Further, the matters raised in the submission promote efficient and effective land use management, including through District Plan preparation and administration.	Director General of Conservation
FPI038.008	LF-VM-O2	Support	In the Clutha Mata-au FMU: <p><u>(1) Water bodies support human wellbeing through thriving outdoor recreation opportunities, including access to waterbodies and use of water for outdoor recreation activities</u></p>	For the reasons outlined in QLDC's Original Submission. Further, the social and economic wellbeing of people and communities in the Queenstown Lakes District is closely related to	NZSki Ltd

				recreational activities.	
FPI042.010	LF-VM-O2	Support	Amend LF-VM-O2 to avoid unnecessary duplication between the overarching vision for the freshwater management unit (FMU) of Te Mata-au as a whole and visions for the five rohe that has been identified within it to make it clear where distinct outcomes are sought in the rohe.	The submission promotes efficient and effective plan document preparation.	Ngāi Tahu ki Murihiku
FPI045.011	LF-VM-O4	Support	Make the required consequential amendments to specific FMU visions in LF-VM-O2 to LF-VM-O6 to ensure the overarching vision above applies to all of them while retaining FMU specific provisions and timeframes where these are more stringent than what is provided for in LF-VM-O1	For the reasons outlined in QLDC's Original Submission. Further, the submission may influence the preparation of District Plans in the Region.	Forest & Bird
FPI044.019	LF-FW-P15	Support	Amend by separating into two policies - one specific to wastewater and one specific to stormwater – and review to ensure that the effects of these two types of discharges are both adequately addressed.	For the reasons outlined in QLDC's Original Submission.	Director General of Conservation
FPI044.022	LF-LS-P21	Support	Amend as follows or words to like effect: "Achieve the improvement or maintenance of freshwater quantity, or quality, <u>and ecosystem values</u> to meet environmental outcomes set for Freshwater Management Units and/or rohe by: (1) ... (2) ..., <u>and</u> (3) <u>managing riparian margins to maintain or enhance their habitat and biodiversity values, reduce sedimentation of water</u>	For the reasons outlined in QLDC's Original Submission	Director General of Conservation

			<u>bodies, and support improved functioning of catchment processes.”</u>		
FPI030.043	LF-LS-M11	Support	Amend as follows: Otago Regional Council must publicly notify a Land and Water Regional Plan no later than 31 December 2023 and then, when it is made operative, maintain that regional plan to: (1) ... (a) the development and implementation of certified freshwater farm plans as required by the RMA and any regulations, (b) ... (c) effective management of effluent storage and applications systems, and (d) ... (2) provide for changes in land use that improve the sustainable and efficient allocation and use of <u>and reduce demand on</u> fresh water <u>to give effect to objectives developed under the NPSFM,</u> and	For the reasons outlined in QLDC’s Original Submission. Further, QLDC has an interest in the operation of regional plans.	Kāi Tahu ki Otago
FPI038.022	SRMR	Support	Insert statement/discussion in this section about the need to restore biodiversity, not just maintain or protect what’s left.	For the reasons outlined in QLDC’s Original Submission	NZSki Ltd
FPI037.023	Map	Support	Provide an accompanying descriptive text defining the spatial extent of the FMUs and Rohe.	For the reasons outlined in QLDC’s Original Submission	Fish and Game

FPI023.011	General	Oppose	Moutere Station opposes the Freshwater Planning Instrument Parts of the Proposed Otago Regional Policy Statement 2021 (pORPS)	For the reasons outlined in QLDC's Original Submission	Moutere Station Ltd
FPI001.044	General	Support	The DCC has concerns with the use of the policy wording "avoid, remedy or mitigating other adverse effects".	The application of policy drafting containing the words 'avoid, remedy or mitigating other adverse effects' will impact the preparation and administration of District Plans.	DCC
FPI037.068	General	Support	Recognise and provide for the way in which people connect with the environment, including recreation in and around water and harvesting food from water bodies	For the reasons outlined in QLDC's Original Submission	Fish and Game
FPI037.053	General	Support	Explicitly acknowledge that water bodies that support recreation and amenity values are highly valued features	For the reasons outlined in QLDC's Original Submission	Fish and Game
FPI039.004	General	Support	Replace the following words with other words which have a practical or clearer/explicit meaning: <ul style="list-style-type: none"> - Significant - Sustainable/sustainable development/sustained - Environmental limit - Bottom line - Environments - Statements including or like "important features and values identified by this RPS" 	For the reasons outlined in QLDC's Original Submission. Further the application of policy drafting containing the matters noted in the submission will impact the preparation and	Realnz

				administration of District Plans.	
FPI001.001	General	Support	<p>In addition to the specific requests, any such necessary, consequential or further relief required to address the concerns identified in the following table, and to:</p> <ul style="list-style-type: none"> - enable the effective and efficient establishment, operation, use and maintenance of wastewater, stormwater and water supply systems and infrastructure; - enable the use and development of land in accordance with the NPS-UD; - enable a coordinated and collaborative approach between the ORC and territorial authorities on climate change adaption; - ensure that the general comments above are implemented throughout the RPS; and better achieve the purpose of the Resource Management Act 1991 (RMA) 	<p>For the reasons outlined in QLDC's Original Submission. The broad nature of the submission has the ability to influence the preparation and administration of District Plans. Further, it is acknowledged that the RPS plays an important role the way wastewater, stormwater and water supply systems and infrastructure are provided by Territorial Authorities.</p>	DCC

FPI001.002	General	Support	Amend RPS as required to ensure district plan change requirement dates are realistic and achievable based on current work programme priorities, most of which are tied to implementing national direction, and staff resources available (noting current market constraints in recruiting planning staff). Add content to allow these dates to be changed by mutual agreement in consideration of other priorities. Where possible align dates with the date required to produce a new plan under any replacement legislation being brought forward through the RM System reform.	The obligations that RPS directions place on Territorial Authorities to amend their district plans can have significant impacts.	DCC
FPI001.040	General	Support	Some more work is required to achieve the appropriate balance necessary to promote 'sustainable management', and the wellbeing of people and communities, and the environmental bottom lines. This policy evaluation must include consideration of the costs of improved environmental outcomes and the ability of communities to pay (appropriately weighing the costs and benefits of regulation) as required by Section 32 of the Act.	For the reasons outlined in QLDC's Original Submission.	DCC
FPI001.041	General	Support	Across all content, consider whether any changes to methods are required to reflect proposed changes to the RM system, for example the need to delay timeframes or change references to planning documents (e.g. adding new references to Strategic Spatial Plans) recognising that this RPS is likely to be part of transitional provisions that would under the new system be part of a regional-scale plan.	Changes to the RM system may impact the preparation of the RPS.	DCC
FPI001.047	General	Support	The DCC and other asset managers need certainty that infrastructure can be used to discharge stormwater and wastewater, as well as being able to install the pipes, pumping stations, tanks etc.	It is acknowledged that the RPS plays an important role in the way wastewater, stormwater and water supply systems	DCC

				and infrastructure are provided by Territorial Authorities.	
FPI001.056	General	Support	Consider providing explanatory notes when using technical terminology.	The submission would improve interpretation of the RPS for all users.	DCC
FPI001.057	General	Support	The use of Māori language is supported in the RPS. Explanatory notes may be used when necessary to help in the understanding of te Reo Māori	The submission would improve interpretation of the RPS for all users.	DCC
FPI042.017	General	Support	<p>Provide further clarification within the pORPS provisions regarding the terms cultural landscapes and wāhi tupuna and the intended management approach for these areas, ensuring that it is possible for ngā Rūnanga to describe cultural landscapes or wāhi tupuna within decision-making processes in a manner that fits with their preferred approach, in order to be able to appropriately address effects on them.</p> <p>Reflect the following understanding of cultural landscapes and wāhi tupuna in provisions</p> <ul style="list-style-type: none"> - Cultural landscapes can be found across the region and described by mana whenua according to cultural values and mātauraka - Cultural landscapes can be described as wāhi tupuna - Some wāhi tupuna will be mapped and can include lands, waterbodies and parts of the coastal environment that need to be protected and managed in a culturally appropriate manner 	The submission would improve interpretation of the RPS for all users.	DCC

			- Wāhi tupuna may include outstanding and highly valued natural features, landscapes and seascapes, outstanding water bodies, places and areas of historic heritage Some site specific land based wāhi tupuna will be mapped, including wāhi tapu and wāhi taoka, that need to be protected as they are particularly vulnerable to land uses		
FPI001.036	Definition	Support	Amend to include a definition of 'water sensitive urban design' within the pORPS.	For the reasons outlined in QLDC's Original Submission. Further, the submission may influence the preparation of District Plans and resulting land use, subdivision and development outcomes.	DCC
FPI020.003	Definition	Support	Retain as notified. (natural hazard works)	The submission may influence the	Silver Fern Farms Ltd

				preparation of District Plans and resulting land use, subdivision and development outcomes.	
FPI020.004	Definition	Support	Retain as notified. (natural hazard works)	The submission may influence the preparation of District Plans and resulting land use, subdivision and development outcomes.	Te Rūnanga o Ngāi Tahu
FPI020.006	Definition	Support	DEF – Definitions Other infrastructure	The submission may influence the preparation of District Plans and resulting land use, subdivision and development outcomes.	Silver Fern Farms Ltd
FPI026.005	Definition	Support	DEF – Definitions Wetland utility structure	The submission may influence the preparation of District Plans and resulting land use, subdivision and development outcomes.	Federated Farmers of New Zealand

FPI038.023	SRMR-19	Support	<p>However, water quality is being adversely impacted by increased population and urban development and tourism demand which is straining existing waste management infrastructure...</p> <p>...</p> <p>...Natural features and landscape values are <u>can</u> also be adversely impacted by tourism and development, urban growth, and energy production.</p> <p>...</p> <p>For example, the clean green image of New Zealand, of which the Otago Lakes area is symbolic, is at risk of being compromised because of over-crowding in peak tourism seasons <u>if the quality of lakes becomes degraded or visitor numbers exceed the servicing capacity of the district.</u></p> <p>...</p> <p><u>Poorly managed activities and over-crowding impacts can</u> adversely affect recreation experiences of both tourists and residents, <u>particularly outdoor recreation such as fishing and water sports, and urban amenity.</u> Infrastructure capacity limits can, for example, result in an increased number of wastewater overflows <u>into</u> the environment when demand on the network exceeds capacity. These can have significant adverse impacts on human health <u>including recreation opportunities</u> as well as recreational amenity.</p>	For the reasons outlined in QLDC's Original Submission.	NZSki
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FPI039.025	SRMR-I9	Support	<p>However, water quality is being adversely impacted by increased population and urban development and tourism demand which is straining existing waste management infrastructure...</p> <p>...</p> <p>...Natural features and landscape values are <u>can</u> also be adversely impacted by tourism and development, urban growth, and energy production.</p> <p>...</p> <p>For example, the clean green image of New Zealand, of which the Otago Lakes area is symbolic, is at risk of being compromised because of over-crowding in peak tourism seasons <u>if the quality of lakes becomes degraded or visitor numbers exceed the servicing capacity of the district.</u></p> <p>...</p> <p><u>Poorly managed activities and over-crowding impacts can</u> adversely affect recreation experiences of both tourists and residents, <u>particularly outdoor recreation such as fishing and water sports, and urban amenity.</u> Infrastructure capacity limits can, for example, result in an increased number of wastewater overflows <u>into</u> the environment when demand on the network exceeds capacity. These can have significant adverse impacts on human health <u>including recreation opportunities</u> as well as recreational amenity.</p>	For the reasons outlined in QLDC's Original Submission.	RealNZ
FPI038.012	LF-FW	Oppose	<p>LF-FW-NEW POLICY – Promoting awareness of and access to natural wetlands</p> <p><u>Support activities which result in either of 1-4 of LF-FW-P10 above, or improve people's awareness of, and access to, natural wetlands for customary, or scientific, or education, or recreational uses.</u></p>	The submission may influence the preparation of District Plans and resulting land use, subdivision and	NZ Ski

				development outcomes.	
FPI039.014	LF-FW	Oppose	LF-FW-NEW POLICY – Promoting awareness of and access to natural wetlands <u>Support activities which result in either of 1-4 of LF-FW-P10 above, or improve people’s awareness of, and access to, natural wetlands for customary, or scientific, or education, or recreational uses.</u>	The submission may influence the preparation of District Plans and resulting land use, subdivision and development outcomes.	Realnz
FPI038.010	LF-FW	Oppose	Otago’s natural wetlands are protected or restored so that: (3) there is no <u>discernible</u> reduction in their ecosystem health, hydrological functioning, extent or water quality, and if degraded they are improved, and	The submission would result in ambiguous policy wording.	NZ Ski
FPI039.012	LF-FW	Oppose	Otago’s natural wetlands are protected or restored so that: (3) there is no <u>discernible</u> reduction in their ecosystem health, hydrological functioning, extent or water quality, and if degraded they are improved, and	The submission would result in ambiguous policy wording.	Realnz
FPI038.011	LF-FW-P9	Oppose	(vi) the <u>construction</u> , maintenance or operation of specified infrastructure, or other infrastructure, ... (v) other effects of the activity <u>on the loss of values or extent of the natural wetland</u> (excluding those managed under (1)(b)(iv)) are managed by applying the effects management hierarchy, and ... (b) any consent is granted subject to conditions that apply the effects management hierarchies in (1)(b)(iv) and (1)(b)(v) <u>in respect of any loss of values or extent of the natural wetland.</u>	The submission may influence the preparation of District Plans and resulting land use, subdivision and development outcomes.	NZSki Ltd

FPI039.013	LF-FW-P10	Oppose	(vi) the <u>construction</u> , maintenance or operation of specified infrastructure, or other infrastructure, ... (v) other effects of the activity <u>on the loss of values or extent of the natural wetland</u> (excluding those managed under (1)(b)(iv)) are managed by applying the effects management hierarchy, and ... (b) any consent is granted subject to conditions that apply the effects management hierarchies in (1)(b)(iv) and (1)(b)(v) <u>in respect of any loss of values or extent of the natural wetland.</u>	The submission may influence the preparation of District Plans and resulting land use, subdivision and development outcomes.	Realnz
FPI038.013	LF-FW-P15	Oppose	(a) all sewage, industrial or trade waste to be discharged into a reticulated wastewater system, where one is available, <u>unless alternative treatment and disposal methods will result in improved environmental outcomes.</u>	The submission may influence the preparation of District Plans and resulting land use, subdivision and development outcomes.	NZSki Ltd
FPI039.015	LF-FW-P15	Oppose	(a) all sewage, industrial or trade waste to be discharged into a reticulated wastewater system, where one is available, <u>unless alternative treatment and disposal methods will result in improved environmental outcomes.</u>	The submission may influence the preparation of District Plans and resulting land use, subdivision and development outcomes.	Realnz
FPI001.043	General	Support	DCC suggests that 'avoid or minimise' should generally be 'avoid or minimise as far as practicable' or similar	The application of policy drafting containing the words	DCC

				'avoid, remedy or mitigating other adverse effects' will impact the preparation and administration of District Plans.	
FPI001.057	General	Support	The DCC would like the RPS to give greater consideration to how these potential adverse effects [associated with the growth of Dunedin and other parts of Otago] may be otherwise mitigated or remedied.	The submission may influence the preparation of District Plans and resulting land use, subdivision and development outcomes. The Queenstown Lakes District experiences high growth pressures.	DCC
FPI001.030	Definitions	Support	Amend Add a definition of 'community drinking water supply.'	The submission may influence the preparation of District Plans and resulting land use, subdivision and development outcomes.	DCC
FPI001.007	LF-WAI-P1	Support	Consider providing clarification or adding a new policy on the priorities when there is conflict between them e.g. housing	The submission may influence the preparation of	DCC

			development and water needed for drinking water with potential effects on the health and well-being of a water body.	District Plans and resulting land use, subdivision and development outcomes.	
FPI001.021	LF-FW-P15	Support	Retain and amend policy LF-FW-P15 to address the effects of stormwater discharges only. Duplicate policy LF-FW-P15 to create a new policy LF-FW-P15A, and amend wording accordingly to address the effects of wastewater discharges (including discharges containing sewage and other human waste, trade and industrial waste, and animal effluent).	For the reasons outlined in QLDC's Original Submission	DCC
FPI001.033	LF-FW-M6	Support	Amend for consistency with other requested changes in this submission.	For the reasons outlined in QLDC's Original Submission. Further, QLDC has an interest in the operation of regional plans.	DCC
FPI001.035	LF-FW-M7	Support	Amend the timeframe to provide flexibility for issues outside the control of territorial authorities. Amend by replacing 'require' with 'promote'. Amend to "Wherever practicable <u>and beneficial</u> ".	For the reasons outlined in QLDC's Original Submission. Further, QLDC has an interest in the operation of district plans.	DCC
FPI001.037	LF-FW-M7	Support	Amend (4)(a) to "minimise the load of contaminants carried by stormwater needing off-site disposal". Amend by adding "where appropriate" to end of (4)(c). Amend (4)(d) to "control the area of impermeable surfaces where necessary".	For the reasons outlined in QLDC's Original Submission. Further, QLDC has an interest in the	DCC

				operation of district plans.	
FPI001.003	General	Support	Amend to identify damming of the Clutha River/Mata-Au as a regionally significant issue and legacy effect. Amend to include relevant objectives and policies to address this issue.	The Clutha River/Mata-Au is within the Queenstown Lakes District and contributes to the social, economic, cultural and environmental wellbeing of the District's people and communities.	DCC
FPI001.039	LF-LS-P21	Support	Amend to restrict the application of this policy to a more specific and narrower set of land use activities with a more realistic policy outcome threshold. For example: <u>When considering appropriate areas to enable new urban growth or setting rules to manage land uses, consider how land uses may have adverse effects on the flow of water in surface water bodies or the recharge of groundwater, and ensure that management approaches will achieve the environmental outcomes set for Freshwater Management Units and/or rohe.</u>	For the reasons outlined in QLDC's Original Submission.	DCC