

**Before the Hearings Panel
For the Proposed Otago Regional Policy Statement**

Under the Resource Management Act 1991 (“**Act**”)

In the matter of Submissions on the Proposed Otago Regional Policy Statement 2021 (excluding parts determined to be a freshwater planning instrument)

Between **Otago Fish and Game Council and Central Otago Fish and Game Council**
Submitter #231 & FS00231

Real Group Limited
Submitter #00411

NZSki Limited
Submitter #00206

Planning Evidence of Ben Farrell
Recommended Amendments (Real Group Ltd & NZSki Ltd)

16 March 2023

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Key:

The amendments recommended in this document show:

- Underline or ~~strike through~~: Amendments from the **s42A Report**
- **Double underline** or ~~**bold double strike through**~~: Specific amendment recommended by Ben Farrell 16 March 2023 (most cut & paste from EiC dated 28 November 2022 but some have been updated)
- Double underline or ~~double strike through~~ shaded in grey: to be addressed later (F&G interests)
- **Blue highlight**: Amendments recommended to SRMR19 (freshwater provisions)

1. Description of the Region – Natural Character and landscapes

Recommendation

Insert the following statement in the section:

There is an extensive and important amount of unmodified land and water, particularly in National Parks and other Public Conservation Areas.

2. New SRMR Section and various minor amendments

Recommendation

Insert a new section, as follows. Alternatively, insert a narrower section related only to the benefits of human health and well-being benefits associated with accessing (i.e. transport to and within) and recreating in (i.e. using) natural resources/natural environment.

SRMR-112 – Social, cultural and economic wellbeing of Otago’s communities depends on use and development of natural and physical resources

Statement

The social, cultural and economic health and wellbeing of Otago’s people and communities relies on the ability of people being able to access, use and develop the region’s natural and physical resources.

Context

The social, cultural and economic wellbeing of Otago’s communities depends on use and development of natural and physical resources. Loss or degradation of resources can diminish their intrinsic values and constrains opportunities for use and development now and into the future. Some of Otago’s resources are nationally or regionally important for their natural values and economic potential and so warrant careful management.

Sustainable management under the RMA includes enabling social, economic and cultural wellbeing for present and future generations. Resource management decisions need to recognise that individual and community wellbeing depends on use, development and protection of natural and physical resources.

Impact snapshot

Environmental

Subdivision, use and development of natural resources can result in appropriate environmental effects including net environmental benefits, particularly where that subdivision, use or development results in enhancement and restoration of degraded parts of the natural environment.

Human use (associative) benefits of from human use of accessing and using natural resources contributes to the significant values of highly valued natural features and natural landscapes, and outstanding waterbodies.

Enabling people to access and use natural resources results in significantly positive human health and well-being benefits.

Social and economic

Enabling people to access and use natural resources is required to support a prosperous regional economy. Limiting people's ability to access and use resources use can limit productive economic opportunities and adversely impact the health and well-being of Otago's people and communities.

3. SRMR Section: Various minor amendments

Recommended Amendments

Add the following to end of the paragraph following Figure 2:

Finally, issues of economic and domestic pressures, cumulative impacts and resilience, and social and economic wellbeing, are considered.

Add the following to the economic description for SRMR-15

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, tourism (for example water supply for visitor destinations and snowmaking), and mineral extraction.

Add the following to the social description for SRMR-15

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).

Add the following to the statement under SRMR17:

Subdivision, development and changing land use can result in ecological enhancement and restoration benefits, particularly in areas where indigenous biodiversity has been degraded.

Add the following to the context description for SRMR-17

A means of enhancing and restoring indigenous biodiversity in the Region includes promoting subdivision and changes in land use (including development) which results in ecological enhancement and restoration benefits, including outside SNAs where indigenous biodiversity has been heavily degraded or lost.

Amend the context description for SRMR8 as follows:

Such activities ~~can be~~ are important contributors to the ~~existing and future~~ health and well-being of people and communities. ~~when they are located and managed appropriately.~~

Amend the statement for SRMR19 as follows:

The beauty, recreational opportunities and regional climate of Lakes Wanaka, Wakatipu, Hāwea and Dunstan and their environs provides significant recreational benefits to people and attract visitors and residents from around the region, the country and the world. This supports human health and well-being and ~~influe~~ brings economic ~~benefit through urban growth and tourism~~ opportunities, but the activities and services created to take advantage of it can degrade the environment and undermine the experience that underpins their attractiveness

Amend the context description for SRMR19 as follows:

... The values assigned to lakes include the natural features and landscapes, the quality and quantity of water accessible to the Otago communities, the accessibility of these resources for recreation and transport, the health of native flora and fauna associated with Otago's rivers and lakes, and renewable energy production.

...

This desire of New Zealanders and international visitors to enjoy the outstanding natural environments of the Otago lakes has placed significant pressures on the environment, transport, energy and other infrastructure, health services and social structures. Individual and community benefits associated with using the lakes are significant, including from recreation which supports human health and wellbeing.

Amend the economic description for SRMRI9 as follows:

The economic benefits of urban development, tourism, agriculture, energy production and water supply are significant to 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 risk the environment highly prized by residents and visitors. There are also impacts between industry sectors. However, For example,~~ the clean green image of New Zealand, of which a large part of the Otago Lakes area is symbolic, is at risk of being compromised because of poorly designed development, inadequate infrastructure and over-crowding in some location, peak tourism seasons. This has the potential to ~~adversely affect the existing regional economy and future economic development; and the tourism industry's social licence to operate. At the same time tourism can negatively impact on how agriculture can operate, potentially limiting its contribution to the regional economy.~~

Add the following to the start of social description for SRMRI9 as follows:

The social benefits of urban development, tourism and recreation are significant to the Otago-Lakes' communities and visitors.

Amend the statement for SRMRI10 as follows:

Tourism and recreation, which relies on the environment and provides significant benefits to the economy and people's health and well-being, can also put pressure on natural environments.

4. Definitions: 'Natural Environmental Limits' and 'Other Environmental Limits'

Recommendation

Retain references to 'biophysical limit' and amend references to 'environmental limit' or 'limit' to 'biophysical limit', and include meaning for 'biophysical limit' to accord with the meaning of environmental limit adopted in the NBEA bill. Suggested wording is:

Biophysical limit

A biophysical environmental limit must be expressed as relating to the ecological integrity of the natural environment or to human health.

A biophysical limit may be:

(a) qualitative or quantitative:

(b) set at different levels for different management units:

(c) set in a way that integrates more than 1 of the aspects of the natural environment.

Any consequential amendments (if required) to avoid overlap with the references to 'limit (in relation to freshwater)' and 'limit on resource use'.

5. Definitions: Natural Environment

Recommendation

Provide a definition of natural environment as sought by the submitter. Suggested wording is that identified in the NBEA bill:

Natural environment means:

(a) the resources of 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

6. Definitions: Minimise

Recommended Amendment

Minimise means to reduce to the smallest amount reasonably practicable. Minimised, minimising and minimisation have the corresponding meaning.

7. Definitions: Precautionary approach

Recommendation

Provide a definition of or meaning for 'precautionary approach':

Precautionary approach means an approach that:

(a) avoids not acting due to uncertainty about the quality or quantity of the information available, and

(b) interprets uncertain information in a way that best supports the health, well-being and resilience of the natural environment

8. Definitions: Restore

Recommendation

Restore means to return to a state of good health, well-being and resilience.

9. Definitions: Regionally Significant Infrastructure

Recommendation

Add Ski Area Infrastructure (as defined by and sought by Realnz and NZSki) to the list of matters identified as Regionally Significant Infrastructure.

10. Definitions: Ski Area Infrastructure

Recommendation

Include definition of Ski Area Infrastructure as sought by Realnz and NZSki:

Means infrastructure associated with the construction, operation, maintenance, upgrading, or expansion of the following existing ski areas:

(a) Cardrona Alpine Resort

(b) Coronet Peak

(c) Remarkables

(d) Treble Cone

11. IM-P1 - Integrated approach to decision-making, IM-P2 – Decision priorities

Recommended Amendment

IM-P1 – Integrated approach to decision-making and prioritisation

Giving effect to the integrated package of objectives and policies in this RPS requires decision-makers to:

(1) place limits on resource use unless exceptional circumstances stated in this RPS apply; and

(2) consider all provisions relevant to an issue or decision and apply them according to the terms in which they are expressed unless exceptional circumstances stated in this RPS apply, and if there is a conflict between provisions that cannot be resolved by the application of higher order documents, prioritise:

~~(1)~~ (a) the life-supporting capacity and mauri of the natural environment and the health needs of people, and then

~~(2)~~ (b) the ability of people and communities to provide for their social, economic, and cultural well-being, now and in the future.

(c) if there are competing directives within the matters in priority ~~(4a)~~ above then priority shall be given to the principles of sustainability, equity, and efficiency ensuring that the principles of the Treaty of Waitangi are given effect:

(d) if there are competing directive within the matters in priority ~~(2b)~~ above then priority shall be given to the principles of sustainability, equity, and efficiency, ensuring that the principles of the Treaty of Waitangi are given effect.

12. IM-P4 – Setting a strategic approach to ecosystem health

Recommended Amendment

Amend policy as follows:

IM-P4 – Setting a strategic approach to ecosystem services ~~health~~

Healthy and resilient ecosystems and ecosystem services are achieved by developing regional and district plans through a planning framework that:

(1) ~~protects having~~ have particular regard to ~~their~~ the intrinsic values of ecosystems,

(2) ~~takes taking~~ take a long-term strategic approach that recognises ~~changing environments and~~ ongoing environmental change, including the impacts of climate change,

(3) ~~recognises recognising~~ recognise and ~~provides providing~~ provide for ecosystem complexity and interconnections, and

(4) ~~anticipates anticipating~~ anticipate, or ~~responds responding~~ respond swiftly to, changes in activities, pressures, environmental state and trends,

(5) ~~measures cumulative effects on the environment and requires their proactive management, and~~

(6) Identifies and implements environmental limits in at least the following matters: (a) air, (b) coastal waters, (c) estuaries, (d) freshwater, (e) wetlands, and (f) soil.

(7) Promotes use and development of resources which support the above.

13. IM-P5 – Managing environmental interconnections, IM-P13 – Managing cumulative effects

Recommendation

IM-P5 – Managing environmental interconnections

In resource management decision-making, manage the use and development ~~Coordinate the management~~ of interconnected *natural and physical resources* by recognising and providing for:

(1) situations where the value and function of a natural or physical resource, or the natural environment, extends beyond the immediate, or directly adjacent, area of interest, in time or space,

(2) the effects of activities on a natural or physical resource, or the natural environment, as a whole when that resource is managed as sub-units, and

(3) the impacts of management of one natural or physical resource on the values of another, or on the environment, and

(4) the impact of individual and cumulative effects on the form, function, and resilience of Otago's environment such that the sum of human activity in Otago supports a healthy environment and provides opportunities available for future generations.

14. IM-P10 – Climate change adaptation and climate change mitigation

Recommendation

Adopt s42A version and add a clause and associated amendment to IM-M1 directing councils to include in their plans ways for reducing climate change emissions and improving energy efficiency, for example:

(5) Provide measures or guidance for reducing climate change emissions and improving energy efficiency.

15. IM-P12 – Contravening environmental limits for climate change mitigation

Recommendations

...

(5) the activity will not contravene ~~a bottom line~~ an environmental limit set in a national policy statement or national environmental standard, and

(6) there are no other reasonable alternatives, including changes in the nature or scale of associated activities.

16. IM-P14 – Human Impact

Recommendation

IM-P14 – Human impact

When preparing *regional plans and district plans*, ~~P~~preserve opportunities for future generations by:

(1) identifying environmental and resource use limits ~~wherever practicable, to both growth and adverse effects~~ of human activities beyond which the environment or resources will be degraded,

(2) requiring that activities are established in places, and carried out in ways, that support the health, well-being and resilience of the environment and are within those environmental and resource use limits and are compatible with the natural capabilities and capacities of the resources they rely on, and

(3) regularly assessing and adjusting environmental and resource use limits ~~and thresholds~~ for activities over time in light of the actual and potential environmental impacts, including those related to climate change, and

(4) promoting activities that reduce, mitigate, or avoid adverse effects on the environment.

17. IM-M1 – Regional plans and district plans

Recommendation

IM-M1 – Regional plans and district plans

Local authorities must prepare or amend and maintain their *regional plans* and *district plans* to:

...

(6) establish clear environmental thresholds and biophysical limits ~~wherever practicable to support clear thresholds for, and limits on, and manage resource use to conform to these thresholds and limits, clear thresholds for, and limits' on, activities that have the potential to adversely affect healthy ecosystem services and intrinsic values, which to support the health, well-being and resilience of the environment.~~

...

(7) Include provisions that encourage or require reductions in greenhouse gas emissions and improving energy efficiency.

Consequential amendments to implement the IMP policies (discussed above).

18. IM-M2 – Relationships

Recommendation

IM-M2 – Relationships

Local authorities must:

...

(3) consult with Otago's communities to ensure policy frameworks adequately respond to the diverse facets of environmental, ecological, social, cultural, and economic well-being.

19. LF-WAI-P3 – Integrated management/ki uta ki tai

Recommendation

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:

- (1) recognises, ~~and~~ sustains and, where degraded or lost, restores the natural connections and interactions between *water bodies* (large and small, surface and ground, fresh and coastal, permanently flowing, intermittent and ephemeral),
- (2) sustains and, ~~wherever possible~~ where degraded or lost, restores the natural connections and interactions between *land* and *water*, from the mountains to the sea,
- (3) sustains and, wherever possible, restores the habitats of mahika kai and indigenous species, including taoka species associated with the ~~water body~~ bodies,
- (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,
- (5) ~~requires~~ ~~encourages~~ the coordination and sequencing of regional or urban growth to ensure it is sustainable,
- (6) has regard to foreseeable *climate change* risks and the potential effects of climate change on water bodies, including on their natural functioning, and
- (7) has regard to cumulative *effects*, and
- (8) ~~the need to apply~~ applies a precautionary approach where there is limited available information or uncertainty about potential adverse *effects*.
- (9) preferentially considers effects against the naturalised flow and unpolluted state of a water body when making flow and quality decisions about the health, well-being and resilience of water bodies and freshwater ecosystems, including when setting limits or environmental outcomes, and
- (10) requiring all activities affecting water bodies to support the health, well-being and resilience of relevant water bodies and associated freshwater ecosystems.
- (11) Recognise and provide for the human health and well-being benefits that people and communities derive from accessing and using water, including outdoor recreation and harvesting natural resources for personal use.

20. LF-FW-P12 – Identifying and managing outstanding water bodies

Recommendation

Amend policy as follows:

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 outstanding and significant values by avoiding adverse effects on them, except as provided by EIT-INF-P13 and EIT-INF-P13A.

21. LF-FW-P13 – Preserving natural character and instream values

Recommended amendment

LF-FW-P13 – Preserving natural character and instream values

...

(1)(b)(ii) for other effects on the natural character and instream values (excluding those managed under (1)(b)(i)), the effects management hierarchy (in relation to natural wetlands and rivers) in LF-FW-P13A

...

(3) establishing environmental flow and level regimes and water quality standards that support the health and well-being, and resilience, of the water body,

(4) wherever practicable possible, sustaining the form and function of a water body that reflects its natural behaviours,

...

(3) establishing environmental flow and level regimes and *water* quality standards that support the health and well-being of the *water body*, acknowledging that environmental flow and level regimes may change over time due to climate change

...

(7) preventing permanent modification that would reduce the braided character of a river, unless the modification is necessary to avoid or mitigate risk to people's health and safety, and

22. LF-FW-P13A – Effects management hierarchy (in relation to natural wetlands and rivers)

Recommendation

Reference to 'natural wetlands' should be amended to 'wetlands'. While this approach is more stringent than the direction in the NPSFM, the regional council is required under its functions under s.30(ga) to establish, implement, and review of objectives, policies, and methods for maintaining indigenous biological diversity; and the NPSFM allows regional council protections on wetlands to be more stringent than the NPSFM directives and there has been such extensive depletion of Otago's low-lying wetlands that it is appropriate for the RPS to provide some level of protection for all wetlands in the Region.

23. LF-FW-P14 – Restoring natural character and instream values

Recommendation

LF-FW-P14 – Restoring natural character and instream values

Where the natural character or instream values of *lakes* and *rivers* ~~and~~ or the natural character of their margins has been reduced or lost, ~~promote~~ require actions that:

(1) restore a form and function that reflect the natural behaviours of the *water body*,

(2) improve *water* quality or quantity where it is *degraded*,

(3) increase the presence, *resilience* and abundance of indigenous flora and fauna, including by providing for fish passage within *river* systems and creating fish barriers to prevent predation where necessary,

24. LF-LS-P20 - Land use change

Recommendation

LF-LS-P20 - Land use change

Promote changes in land use or land management practices that support and improve:

- (1) the sustainability ~~and efficiency~~ of water use,
- (2) resilience to the impacts of climate change,
- (3) the health and quality of soil,
- (4) restoration or enhancement of indigenous vegetation, or
- (5) amenity and recreation values and the ability of the public to freely access the coastal marine area, lakes and rivers.

25. LF-LS-M12 – District Plans

Recommendation

Adopt the s42A version except amend clause (3)(b) as sought by Realnz as follows:

- (3) facilitate public access to and along lakes and rivers by:
 - (a) requiring the establishment of *esplanade reserves* and *esplanade strips*, and
 - (b) promoting the use of legal roads, including paper roads, and any other means of public access rights, to that connect with esplanade reserves and esplanade strips.

26. ECO-O1 – Indigenous biodiversity

Recommendation

ECO-O1 – Indigenous *biodiversity*

Otago's ecosystems and indigenous biodiversity is healthy and thriving and any decline in quality, quantity and diversity is halted.

Objectives still do not recognise the ecosystem part of the chapter. Ecosystems are more than indigenous biodiversity.

27. ECO-P5 – Existing activities in significant natural areas

Recommended amendment

ECO-P5 – Existing activities in significant natural areas

~~Except as provided for by ECO-P4,~~ Provide for existing activities that are lawfully established and land uses within significant natural areas (outside the coastal environment) and that may adversely affect indigenous species and ecosystems that are taoka, if:

- (1) the continuation, expansion, maintenance and minor upgrades of an existing activity that is lawfully established, or an anticipated land use, will not lead to the loss (including through cumulative loss) of extent or degradation of the ecological integrity of any significant natural area or indigenous species or ecosystems that are taoka, and
- (2) the adverse effects from the continuation, expansion, maintenance and minor upgrades of an existing activity that is lawfully established, or an anticipated land use, are no greater in character, overall spatial extent, intensity or scale than they were before this RPS became operative.

28. ECO-P8 – Restoration and enhancement

Recommended amendment

ECO-P8 – Restoration and enhancement

The extent, occupancy and condition of Otago's indigenous biodiversity is increased by:

(1) restoring and enhancing habitat for indigenous species, including taoka and mahika kai species,

(2) improving the health and resilience of indigenous biodiversity, including ecosystems, species, important ecosystem function, and intrinsic values, and

(3) buffering or linking ecosystems, habitats and ecological corridors, ki uta ki tai

(4) provide for subdivision, use and development that support 1-4 above.

29. ECO-M5 – District plans

Recommended Amendment

ECO-M5 – District plans

Territorial authorities must prepare or amend and maintain their district plans to:

...

(5) provide for activities **that promote or undertake a for the purpose of restoration ing or enhancement ing of** the habitats of indigenous flora and fauna, and...

30. ECO-M8 – Other incentives and mechanisms

Recommendation

ECO-M8 – Other incentives and mechanisms

...

(1) providing information and guidance on the maintenance, restoration and enhancement of indigenous ecosystems, indigenous biodiversity and habitats, taoka and mahika kai species and ecosystems.

...

(7) gathering information on indigenous ecosystems, indigenous biodiversity and habitats, including outside significant natural areas.

31. ECO-AER1

Recommended Amendment

There is no further decline in the quality, quantity or diversity of ecosystems and indigenous biodiversity.

32. ECO-AER2

Recommended Amendment

The quality, quantity and diversity of ecosystems and indigenous biodiversity within Otago improves over the life of this Regional Policy Statement.

33. EIT-INF-P13 – Locating and managing effects of infrastructure

Recommended Amendment

EIT-INF-P13 – Locating and managing effects of infrastructure, nationally significant infrastructure and regionally significant infrastructure outside the coastal environment

When providing for new infrastructure, nationally significant infrastructure and regionally significant infrastructure outside the coastal environment

...

(2) if it is not ~~possible~~ demonstrably practicable to avoid locating in the areas listed in (1) above because of the functional needs or operational needs of the infrastructure, nationally significant infrastructure and regionally significant infrastructure manage adverse effects as follows:

~~(a) for nationally significant infrastructure¹⁰⁷⁹ or regionally significant infrastructure:~~

(i) in significant natural areas, in accordance with ECO-P4,

(ii) in natural wetlands, in accordance with the relevant provisions in the NESF,

(iii) in outstanding water bodies, in accordance with LF-FW-P12,

(iiia) in relation to wāhi tūpuna, in accordance with HCV-WT-P2

(iv) in other areas listed in EIT-INF-P13(1) above, minimise the adverse effects of the infrastructure on the values that contribute to the area's importance,

~~(b) for all infrastructure that is not nationally significant infrastructure or regionally significant infrastructure, avoid adverse effects on the values that contribute to the area's outstanding nature or significance.~~

34. EIT-INF-M4 – Regional plans

Recommended amendment

EIT-INF-M4 – Regional plans

Otago Regional Council must prepare or amend and maintain its regional plans to:

(1) manage the adverse effects of infrastructure activities, including, where appropriate, identifying activities that qualify as minor upgrades, that:

(a) are in the beds of lakes and rivers, or

(b) are in the coastal marine area, or

(c) involve the taking, use, damming or diversion of water or,

(d) involve the discharge of water or contaminants, and

~~(2) require the prioritisation of sites for infrastructure where adverse effects on highly valued natural and physical resources and mana whenua values can be avoided or, at the very least, minimised.~~

35. EIT-INF-M5 – District plans

Recommended amendment

EIT-INF-M5 – District plans

Territorial authorities must prepare or amend and maintain their district plans to:

(1) require a strategic approach to the integration of land use and nationally significant infrastructure or regionally significant infrastructure,

~~(2) enable planning for the electricity transmission network and National Grid to achieve efficient distribution of electricity,~~

~~(3) map the electricity transmission network, and in relation to the National Grid, and 1094 identify a buffer corridor within which sensitive activities shall generally not be allowed, and~~

(4) manage the subdivision, use and development of land to ensure nationally significant infrastructure or regionally significant infrastructure can develop to meet increased demand,

(5) manage the adverse effects of developing, operating, maintaining, or upgrading nationally significant infrastructure or regionally significant infrastructure, including, where appropriate, identifying activities that qualify as minor upgrades, that are on: (a) the surface of rivers and lakes and on land outside the coastal marine area, and (b) the beds of lakes and rivers,

(6) ensure that development is avoided where: (a) it cannot be adequately served with infrastructure, (b) it utilises infrastructure capacity for other planned development, or (c) the required upgrading of infrastructure is not funded, and

~~(7) require the prioritisation of sites for infrastructure, nationally significant infrastructure and regionally significant infrastructure where adverse effects on those matters are addressed by EIT INF-P13 and EIT INF-P13A on highly valued natural and physical resources and mana whenua values can be avoided or, at the very least, minimised.~~

36. EIT-EN-O2 – Renewable electricity generation

Recommended amendment

The total generation capacity of renewable electricity generation activities in Otago:

(1) is maintained or increased and, if practicable maximised, as far as practicable within environmental thresholds and biophysical limits, and

(2) to continue to contributes to meeting New Zealand's national target for renewable electricity generation.

37. EIT-EN-P1 – Operation and maintenance

Recommended amendment

The operation and maintenance of existing renewable electricity generation activities is provided for where it occurs within environmental thresholds and biophysical limits while minimising its adverse effects.

38. EIT-EN-P2 - Recognising renewable electricity generation activities in decision making

Recommended amendment

Recognising renewable electricity generation activities in decision making

Decisions on the allocation and use of natural and physical resources, including the use of fresh water and development of land:

(1) recognise the national, regional and local benefits of existing renewable electricity generation activities,

(2) take into account the ~~benefits of need to~~ at least maintaining current renewable electricity generation capacity, and

(3) recognise that the attainment of increases in renewable electricity generation capacity will require ~~significant~~ development of renewable electricity generation activities.

39. EIT-EN-P3 – Development and upgrade of renewable electricity generation activities

Recommended amendment

EIT-EN-P3 – Development and upgrade of renewable electricity generation activities

The overall security of renewable electricity supply is maintained or improved in Otago within environmental thresholds and biophysical limits through appropriate provision for the development or upgrading of renewable electricity generation activities and diversification of the type or location of electricity generation activities.

40. EIT-EN-P5 – Non-renewable energy generation

Recommendation

EIT-EN-P5 – Non-renewable energy generation

Where use of renewable energy is not practical, avoid the development of non-renewable energy generation activities in Otago and facilitate the replacement of non-renewable energy sources, including the use of fossil fuels, in energy generation.

41. EIT-TRAN-P19 – Transport system design

Recommendation

EIT-TRAN-P19 – Transport system design

Resilience and adaptability of the transport system supports efficient networks for the transport of people and goods that are sustained, ~~and improved, and responsive to growth~~ by:

(1) promoting a consolidated urban form that integrates land use activities with the transport system,

(2) placing a high priority on active transport, and public transport, and private passenger transport services, and their integration into the design of development and transport networks, and

(3) encouraging ~~regional connectivity, including to key visitor destinations, and~~ improved access to public spaces, including the coastal marine area, lakes and rivers, and key visitor destinations.

42. HCV-HH-P5 – Managing historic heritage

Recommendation

HCV-HH-P5 – Managing historic heritage

Protect historic heritage by:

(1) requiring the use of accidental discovery protocols in accordance with APP11,

~~(2) avoiding adverse effects on areas or places with special or outstanding historic heritage values or qualities, except in the circumstances where HCV-HH-P7 applies~~

~~(3) avoiding significant adverse effects on areas or places with historic heritage values or qualities, except in the circumstances where HCV-HH-P7 applies~~

(4) avoiding, as the first priority, other adverse effects on areas or places with historic heritage values or qualities,

~~(5) and where it is demonstrated that adverse effects demonstrably cannot be completely avoided, they are remedied or mitigated remedying or mitigating them, and~~

(6) recognising that for infrastructure, EIT-INF-P13 applies instead of HCV-HH-P5(1) to (5).

43. NFL-O1 - NFL-O1 – Outstanding and highly valued natural features and landscapes and NFL-P4 – Restoration

Recommended amendments

NFL-O1 – Outstanding and highly valued natural features and landscapes

The areas and values of Otago's outstanding and *highly valued natural features and landscapes* are identified, and the use and development of Otago's *natural and physical resources* results in:

(1) the protection of outstanding natural features and outstanding natural landscapes from inappropriate subdivision, use and development, and

(2) the maintenance or enhancement of *highly valued natural features and landscapes*.

(3) the restoration of outstanding and highly valued natural features and landscapes.

NFL-P4 – Restoration

Promote restoration of the areas and values of outstanding and highly valued natural features and natural landscapes where those areas or natural values have been reduced or lost.

44. UFD-P7 – Rural Areas

Recommended Amendment

The management of rural areas:

...

(8) enables outdoor recreation (including commercial recreation).

(9) facilitates growth or expansion of existing visitor destination places and activities.

45. UFD-M1 – Strategic Planning

Recommended Amendment

UFD-M1 – Strategic planning

Otago Regional Council and territorial authorities:

(6) must individually or jointly develop further regulatory or non-regulatory methods and actions to implement strategic and spatial plans, including to guide the detail of how, when and where development occurs, including matters of urban design, requirements around the timing, provision, and responsibilities for open space, connections and infrastructure, including by third parties, and the ongoing management of effects of urban development on matters of local importance, and any spatial plan shall identify key visitor destinations outside the urban environment, and...

46. APP1 - Criteria for identifying outstanding water bodies

Recommendation

As sought in the submission by Fish and Game.

47. APP6 – Methodology for natural hazard risk assessment

Recommendation

As sought in the submissions by Real Group and Trojan (NZSki), including amendments to HAZ-NH-P2 – (1), HAZ-0MH-M2, M3 and M4.

48. APP9 – Identification criteria for outstanding and highly valued natural features, and landscapes and (including seascapes)

Recommendation

Amend the criteria to:

- (a) Require community consultation as sought in the submissions by Realnz and NZSki.
- (b) Expand the criteria to provide more guidance about how the landscape 'capacity' directives set out in NFL-P1 and CE-P6 are to be implemented.