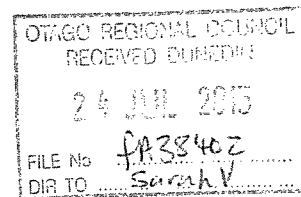


Submission on the Proposed Otago Regional Policy Statement

Sent via email to: Otago Regional Council: rps@orc.govt.nz

Submitter: Real Journeys

Submission: This submission contains two appendices. Appendix 2, which is provided in a table format, lists the decisions requested in this submission. Appendix 1 provides a summary of reasons for amending the Proposed Regional Policy Statement (PRPS). In summary, Real Journeys requests that each provision in the PRPS be retained as notified except for the amendments shown in Appendix 2.

Hearings & Meetings: Real Journeys is willing to participate in pre-hearing meetings (if held) and present expert planning evidence at relevant hearings.

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A handwritten signature in black ink, appearing to read "Warwick Goldsmith".

Date: 24 July 2015

Appendix 1 – Reasons for amendments to the PRPS

The submitter requests numerous amendments to the PRPS, as listed in Appendix 2. The following provides a summary of the reasons for these requested amendments:

General

1. The PRPS contains unnecessary or ambiguous text which should be deleted. To provide clearer direction and strengthen the applicability of the PRPS, various provisions are sought to be deleted because they are not necessary, including all “need” statements provided in each chapter overview, Method 7, any text that begins with “Including”, and all “may methods”. There would be significant efficiency gains in removing unnecessary provisions and producing a more succinct document.
2. The PRPS should be focused on resource management issues of regional significance. Accordingly, numerous amendments have been sought to ensure the provisions in the PRPS are targeted at this regional overarching level without interfering with local resource management issues that are not of regional significance. It is submitted that regional issues include natural resource management issues and those land use issues that traverse territorial boundaries and would therefore benefit from a regionally integrated approach. Where the RPS delves into local matters there is the risk of efficiencies arising from added assessment requirements, inconsistent policies for resource consents and requirements to amend District Plans to achieve consistency.
3. Various amendments are requested to ensure the PRPS reflects the direction provided in Part 2 of the RMA, particularly in terms of protecting matters of national importance from inappropriate subdivision, use and development. Currently, the PRPS fails to correctly provide for subdivision, use and development that may be appropriate even when matters of national importance are adversely affected. It is submitted that for the RPS to phrase resource management issues, objectives, policies and methods differently from Part 2 of the RMA, the Section 32 analysis needs to set out how and why Otago is regionally distinctive in a manner which would justify a different test being applied.

Schedule 3 – Significance of Effects Criteria

4. Schedule 3 is unlikely to assist assessment of effects. It is not clear from the Section 32 evaluation where this criteria originated, and the efficiency and effectiveness of the Schedule was not evaluated as part of the section 32 evaluation. The criteria are insufficient to capture the variable environmental conditions required to be taken into account when determining if an adverse effect is significant. The criteria are set out in broad general terms that are therefore unhelpful, and are inconsistent with case law. We request this schedule be deleted. If the Schedule is not deleted we have requested additional criteria be included to ensure other relevant factors will be taken into account when determining if an adverse effect is significant, and amendment to bring the criteria in line with caselaw.

Cross boundary issues

5. A number of amendments are sought to improve the way resources are managed across administrative boundaries and environmental effects of activities on the whole of a resource are considered.

Significant Infrastructure

6. Significant infrastructure should be specifically defined, recognised and provided for in the PRPS.

Significant Economic Industry Activities

7. Significant Industry Activities in Otago (tourism and primary production) should be defined, recognised and provided for. The rural provisions in the PRPS are too focused on recognising and

providing for the primary production sector, with not enough recognition of and provision for the tourism sector and education sector.

8. Issue 4.3 (and related objectives policies) should be rephrased to avoid implying that existing activities should always be prioritised. For example, when an area is rezoned, it is appropriate to find that existing uses are no longer optimal for a site.

Urban Growth

9. The section 32 analysis supporting the case for urban growth boundaries is weak and fails to appropriately evaluate whether the objectives are appropriate to give effect to the purpose of the Act, particularly in the context of the shortage of land supply addressed below, and the implications of this for enabling people and communities to provide for the well-being, health and safety. The section 32 analysis also fails to comprehensively assess the benefits and costs of the policies, nor properly identify reasonably practicable alternatives.
10. Otago lacks complex cross boundary issues between territorial authorities with respect to urban areas justifying growth boundaries in the RPS. It is therefore questioned whether urban growth is a regional issue and therefore the extent to which the RPS should provide policy direction on this matter.
11. Currently, the PRPS does not adequately address the issue of the shortage of zoned land supply and affordable housing. We seek amendments to recognise the issue of the shortage of land supply required for urban growth and housing in some places in the region, particularly Queenstown.
12. There is no rationale for “10 years” of supply for urban growth. Planning only for 10 years of supply is inconsistent with case law. It is not clear how it should be measured or whether 10 years’ of capacity would be sufficient. Sufficient land to cater for growth is extremely important to the economic and social wellbeing of communities. It would be more useful to compel territorial authorities in high growth areas to undertake studies of demand for land across various sectors and of the amount of zoning necessary to service that demand in a manner which prevents significant supply shortages.
13. The PRPS favours the protection of highly valued soils over urban growth and development. This is not appropriate for all rural parts of the region.
14. “Avoiding” additional costs of infrastructure provision is far too high a requirement. Higher infrastructure costs may well be appropriate when there is a net benefit to the community in rezoning an area (for example where zoned land supply is increased to meet demand). Territorial authorities, who are well attuned to the costs of infrastructure provision, should be well placed to make such assessments without direction from an RPS. It would be useful also to clarify that relevant costs are those borne by the community.
15. “Considering the need for urban growth boundaries” (in policy 3.8.1) would be best dropped to a method, if retained at all. Territorial authorities can use a variety of methods to manage growth whether they are through setting out spatially defined growth boundaries, establishing objective and policy frameworks for assessing proposed urban extensions, providing zoning or using rates and contributions as incentives. It is not appropriate that the RPS specify a method in this manner.
16. Referencing to staging and limiting the release of land in policy 3.8.2 do not reflect the realities of urban development and does not represent an efficient use of resource, nor an effective means of controlling effects. Whether and how growth occurs cannot be entirely predicted and attempts to highly regulate the release of urban land for urban development are most likely to result in greater community costs than benefits in high growth areas. Such approaches may result in insufficient supply of land for urban growth which can result in significant adverse economic and social effects. If policy 3.8.2 is to be retained, it needs modifying. The words “as detailed in Schedule 8” should be deleted for several reasons. It is inconsistent with the glossary which states that urban growth areas are as defined in a District Plan (which is a more appropriate method). There would be significant

inefficiencies in detailing growth boundaries in an RPS, including that a private plan change cannot apply to change an RPS. It is not appropriate regional council become embroiled in growth management at a local level, and whether it could act quickly to adapt its RPS to accommodate growth which achieves the purpose of the Act.

Schedule 6

17. Schedule 6 is unlikely to serve a useful purpose and the efficiency and effectiveness, costs and benefits of it and the detailed urban design principles it set out, were not assessed at all in the section 32 evaluation. There are likely to continue to be other references to principles of urban design such as the urban design protocol and those matters set out in District Plans. The effect of having Schedule 6 is therefore likely to be adding substantially to the assessment requirements of plan changes and resource consents, often in duplication of other similar assessments for little added benefit, and possibly to the detriment of good urban design of specific sites. Schedule 6 is best deleted.

Natural Hazards

18. "Avoidance" of natural hazards needs to be widened to "avoid, remedy or mitigate". It is consistent with case law and the RMA for a residual level of risk to be acceptable, particularly in hazard prone areas such as the Queenstown Lakes District. For example, designing to a 100 year level flood may be appropriate, but it would often not be reasonable to design to a 1000 year event or greater (which "avoidance" may imply).

Contaminated Land

19. Avoiding the creation of new contaminated land may not always be appropriate or practical. The emphasis should be on avoiding risks to human health or the environment. To provide an example, in remediating contaminated land it may be appropriate to move soil to another location. That location may receive a level of contamination, but this may be appropriate given where it is situated and how that land is to be used.

Offsetting effects on indigenous biodiversity

20. The appropriateness of policy 4.5.7 – is questioned. The fact that policy 4.5.8 requires no net loss of biodiversity should provide sufficient protection. It is further noted that offsetting is considered when effects cannot be avoided remedied or mitigated – offsetting is sometimes a form of mitigation and sometimes compensation where mitigation is not possible. If the policy is retained, this should be clarified and the policy corrected.

Outstanding Natural Landscapes and Features

21. The importance of managing development and subdivision in outstanding natural landscapes and features is not disputed. However it is submitted that the balance of these values with other important values as set out in the RMA could be disrupted if amendments to proposed RPS provisions, including policies 2.2.3 and 2.2.4 are not made. For example, it has been accepted for good reason that ski fields are appropriate to locate in alpine environments that may otherwise be considered outstanding natural landscapes. Ensuring that such businesses can continue to operate and provide an important recreational and economic resource to Otago's communities should be borne in mind in formulating RPS policy. Amendments are requested in Appendix 2.
22. With respect to Policy 2.2.3 and Schedule 4, these matters are now well set out by case law and District Plans. Introducing Schedule 4 risks inefficiencies and inaccuracies, particularly if any part is inconsistent with how such assessments are normally carried out. If they are consistent, the RPS would seem to be adding little in this respect. Schedule 4 is best deleted.

Special amenity landscapes

23. The PRPS affords special amenity landscapes a level of status and protection that is not consistent with sustainable management. Sustainable management will not be achieved by seeking to protect these areas from development or avoiding adverse effects from development in these areas. Doing so will frustrate efficient use and development of resources and worst case could prevent it. Rather, sustainable management will be achieved by ensuring these regionally significant, but not outstanding, landscape values are identified and managed to maintain and enhance amenity values and the quality of the local environment.
24. We are concerned about the introduction of the term Special Amenity Landscapes. While it is acknowledged that it is desirable to align District Plan policy frameworks where landscapes traverse territorial authority boundaries, there is a considerable risk of different criteria being applied to those contained within settled or proposed District Plans. This risks giving rise to significant inefficiencies including slowing the consideration of forthcoming District Plan reviews until the RPS has been settled and complexities in resource consent assessments. This concern also applies to Schedule 4, which proposes criteria which would apply to all landscape assessments.
25. Wording is recommended in Appendix 2 for how these landscape policies could be reworded. This includes a policy on the need to consider cross boundary issues for landscape matters. It is submitted that this can be an equally effective and significantly more efficient way in which to manage the occasional proposals that give rise to such matters.
26. The implications of policies such as Policy 2.2.4 need to be carefully considered. It is important to recognise that, arguably, most of those parts of the Queenstown Lakes District that are not Outstanding Natural Landscapes could fall within this category. Amendments are requested in Appendix 2 to make it clear that such environments are living environments where day to day activities need to be carried out. By way of example, it is noted that the current Queenstown Lakes District Plan which has a strong landscape management focus allows for appropriately managed and located urban growth and resort style developments in those areas classified as “visual amenity landscapes”. The economic and social wellbeing of communities could be adversely affected by the RPS indicating that such activities may no longer be appropriate.

Glossary

27. To reduce ambiguity and enable more efficient implementation of the PRPS, we have requested the inclusion of the following new definitions: Define Significant infrastructure; Significant Community Facility; Urban; Regionally Significant Soil Resources; Regionally Significant Industry Activity; Hard mitigation measures. We have also sought clarification about the difference between “kai tahu” and “Ngai Tahu”.
28. A single Glossary containing both English and Te Reo terms is requested, not two separated sections which is unnecessary.

Appendix 2 – Table of relief sought

No	Requested amendments are <u>underlined</u> and struck out	
	Whole Document	
1	-	Retention of all provisions in the PRPS, as notified, except as requested in this table to be deleted or amended.
2	-	Any consequential or other amendment required to give effect, or like effect, to any matter raised in this submission.
3	-	Deletion of or amendments to any text in the PRPS that: <ul style="list-style-type: none"> • Is duplicated within document; • Is vague or ambiguous; • Duplicates the RMA or other statutory documents, including any provision stated in the RMA (provisions should be referenced but not quoted), and any definition already defined in the RMA or other legislation; and • Is not required by section 62 of the RMA or is not an active directive (for example the “need” statements provided in each chapter overview, Method 7, any text that begins with “Including”, and all “may methods”).
4	Objective 1.1: The principles of Te Tiriti o Waitangi are <u>identified and taken into account</u> in resource management decisions	
5	<i>Issue</i>	The principles of Te Tiriti o Waitangi are not formally codified and in many cases refer to broad concepts that need further exploration when applied to specific circumstances. This can make it challenging to effectively incorporate the principles of the Treaty into planning documents, as these principles are not formally codified in any way
6	<i>Need</i>	Te Tiriti o Waitangi creates a special relationship between takata whenua and the Crown. The RMA requires local authorities to take the principles of Te Tiriti o Waitangi into account, and have particular regard to kaitiakitaka. Local authorities need to find a way to give effect to these principles that ensures they are properly applied, and that accounts for the effects of resource management decisions on Kāi Tahu values, including those described in iwi resource management plans
7	Policy 1.1.1	<u>Promoting awareness of treaty obligations</u> Promote awareness and understanding of local authorities’ obligations regarding the principles of Te Tiriti o Waitangi, tikaka Māori and kaupapa Māori
8	Policy 1.1.2	<u>Identifying and taking the principles of Te Tiriti o Waitangi into account</u> Ensure that local authorities exercise their functions and powers, to take into account the principles of Te Tiriti o Waitangi identified in Appendix 1A by: a) <u>Providing</u> Accord Kāi Tahu a status distinct from that of interest groups and members of the public, consistent with their position as a Treaty partner; and b) <u>Involving</u> Kāi Tahu in resource management decision-making processes and implementation; and c) <u>Taking</u> e into account Kāi Tahu views in resource management decision-making processes and implementation, particularly regarding the relationship of their culture and traditions with their ancestral lands, water, sites, wāhi tapu, and other taoka; and d) <u>Ensuring</u> e Kāi Tahu have the prerogative to: i. <u>Identifying</u> their relationship with their ancestral lands, water, sites, wāhi tapu, and other taoka; and ii. <u>Determining</u> e how best to express that relationship; and e) <u>Ensuring</u> e Kāi Tahu are able to exercise kaitiakitaka; and f) <u>Ensuring</u> e that district and regional plans: i. <u>Giving</u> e effect to the Ngāi Tahu Claims Settlement Act 1998; and ii. <u>Recognising</u> e and <u>providing</u> e for statutory acknowledgement areas, as detailed in Schedule 2; and iii. <u>Providing</u> e for other areas in Otago that are recognised as significant to Kāi Tahu in a manner similar to that prescribed for statutory acknowledgement areas.
9	Objective 1.2: Kāi Tahu values, rights and customary resources are <u>identified and sustained</u>	
10	<i>Issue</i>	Historically, decision makers have had difficulty understanding the takata whenua point of view. Some places, sites and values of cultural, spiritual or historic

		significance to takata whenua have been destroyed or degraded. Sometimes, no access is available to important sites. Sometimes, it has been difficult to use Māori land for the purposes for which it was originally granted.
11	<i>Need</i>	The RMA requires local authorities to recognise and provide for the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, wāhi tapu, and other taoka. In managing our natural resources, local authorities need to recognise Kāi Tahu values and plans more effectively, and enable the exercise of customary rights
12	Policy 1.2.1	<u>Managing the natural environment to support Kāi Tahu wellbeing</u> Manage the natural environment to support Kāi Tahu wellbeing by: a) Ensuring <u>sustainable management of resources</u> supports their customary uses and cultural values (as detailed in Schedules 1A and B); and b) Safe-guarding the life-supporting capacity of natural resources.
13	Policy 1.2.2	<u>Recognising important sites of cultural significance to Kāi Tahu</u> Recognise wāhi tūpuna, including sites and landscapes of cultural significance to Kāi Tahu such as wāhi tapu and other elements, as detailed in Schedule 1C.
14	Policy 1.2.3	<u>Protecting important sites and values of cultural significance to Kāi Tahu</u> Protect important values, as detailed in schedules 1A and B, and sites of cultural significance to Kāi Tahu as detailed in Schedule 1C by: a) Avoiding significant adverse effects <u>from inappropriate subdivision, uses and development</u> on those values and sites, as detailed in Schedule 3; and b) Avoiding remedying or mitigating other adverse effects on those values and sites; and c) Managing those values and sites in a culturally appropriate manner.
15	Policy 1.2.4	<u>Enabling Kāi Tahu relationships with wāhi tūpuna and associated sites</u> Enable Kāi Tahu relationships with wāhi tūpuna and associated sites by: a) Facilitating Kāi Tahu access to sites of cultural significance; and b) Recognising that relationships between sites of cultural significance are an important element of wāhi tūpuna; and c) Recognising traditional place names.
16	Policy 1.2.5	<u>Enabling sustainable use of Māori land</u> Enable Kāi Tahu to protect, develop and use land within native reserves in a way consistent with their culture and traditions, and economic, cultural and social aspirations, including for papakāika, marae and marae related activities, while: a) Avoiding adverse effects on the health and safety of people; and b) Avoiding significant adverse effects <u>from inappropriate development</u> on matters of national importance; and e) Assessing the significance of adverse effects on those matters and values, as detailed in Schedule 3; and; d) Remedying or mitigating other adverse effects on other values.
17	Objective 2.1: The <u>regionally significant values of Otago's natural and physical resources are recognised and protected from inappropriate subdivision, use and development, maintained and enhanced</u>	
18	<i>Issue</i>	Degradation of <u>natural</u> values and natural systems risks loss of complexity, which in turn jeopardises the life sustaining capacity of the environment, and the ecosystem services provided to the community. Knowledge of these systems and their interdependencies is often imperfect. Cumulative effects of human activities on the <u>natural</u> environment may be difficult to pinpoint initially, but over time will <u>can cause serious damage</u> .
19	<i>Need</i>	We need to know enough about the many values and characteristics of Otago's natural and physical resources, and the ecosystem services they provide for us, to be able to manage the effects of human activities on the environment's life supporting capacity adequately.
20	Policy 2.1.1	<u>Managing for freshwater values</u> Recognise <u>regionally significant</u> freshwater values, and manage freshwater, to: a) Support healthy ecosystems in all Otago aquifers, and rivers, lakes, wetlands, and their margins; and b) Retain the range and extent of habitats provided by freshwater; and c) Protect outstanding water bodies and wetlands <u>from inappropriate subdivision, use and development;</u> and

		<p>d) Protect migratory patterns of freshwater species <u>from inappropriate subdivision, use and development</u>, unless detrimental to indigenous biodiversity; and</p> <p>e) Avoid aquifer compaction, and seawater intrusion in aquifers; and</p> <p>f) Maintain good water quality, including in the coastal marine area, or enhance it where it has been degraded; and</p> <p>g) Maintain or enhance coastal values supported by freshwater values; and</p> <p>h) Maintain or enhance the natural functioning of rivers, lakes, and wetlands, their riparian margins, and aquifers; and</p> <p>i) Retain the quality and reliability of existing drinking water supplies; and</p> <p>j) Protect Kāi Tahu values <u>from inappropriate subdivision, use and development</u>; and</p> <p>k) Provide for other cultural values, <u>as identified in Schedule 1A</u>; and</p> <p>l) Protect important recreation values <u>from inappropriate subdivision, use and development</u>; and</p> <p>m) Maintain the aesthetic and landscape values of rivers, lakes, and wetlands; and</p> <p>n) Avoid the adverse effects of pest species, prevent their introduction and reduce their spread; and</p> <p>o) Mitigate the adverse effects of natural hazards, including flooding and erosion; and</p> <p>p) Maintain the ability of existing infrastructure to operate within their design parameters.</p>
21	Policy 2.1.2	<p><u>Managing for the values of beds of rivers and lakes, wetlands, and their margins</u> Recognise the values of beds of rivers and lakes, wetlands, and their margins, and manage them to:</p> <p>a) Protect or restore their natural functioning; and</p> <p>b) Protect outstanding water bodies and wetlands <u>from inappropriate subdivision, use and development</u>; and</p> <p>c) Maintain good water quality, or enhance it where it has been degraded; and</p> <p>d) Maintain ecosystem health and indigenous biodiversity; and</p> <p>e) Retain the range and extent of habitats supported; and</p> <p>f) Maintain or enhance natural character; and</p> <p>g) Protect Kāi Tahu values <u>from inappropriate subdivision, use and development</u>; and</p> <p>h) Provide for other cultural values, <u>as identified in Schedule 1A</u>; and</p> <p>i) Maintain their aesthetic and amenity values; and</p> <p>j) Avoid the adverse effects of pest species, prevent their introduction and reduce their spread; and</p> <p>k) Mitigate the adverse effects of natural hazards, including flooding and erosion; and</p> <p>l) Maintain bank stability.</p>
22	Policy 2.1.3	<p><u>Managing for coastal water values</u> Recognise coastal water values, and manage coastal water, to:</p> <p>a) Support healthy coastal ecosystems; and</p> <p>b) Retain the range of habitats provided by the coastal marine area; and</p> <p>c) Protect migratory patterns of coastal water species <u>from inappropriate subdivision, use and development</u>, unless detrimental to indigenous biodiversity; and</p> <p>d) Maintain coastal water quality, or enhance it where it has been degraded; and</p> <p>e) Maintain or enhance coastal values; and</p> <p>f) Protect Kāi Tahu values; and</p> <p>g) Provide for other cultural values, <u>as identified in Schedule 1A</u>; and</p> <p>h) Protect important recreation values <u>from inappropriate subdivision, use and development</u>; and</p> <p>i) Avoid the adverse effects of pest species, prevent their introduction and reduce their spread.</p>
23	Policy 2.1.4	<p><u>Managing for air quality values</u> Recognise air quality values, and manage air quality, to:</p> <p>a) Maintain good ambient air quality that supports human health, or enhance air quality where it has been degraded; and</p>

		<p>b) Protect Kāi Tahu values <u>from inappropriate subdivision, use and development</u>; and</p> <p>c) Maintain other cultural, aesthetic and amenity values.</p>
24	Policy 2.1.5	<p><u>Managing for soil values</u> Recognise soil values <u>that are of a regional significance</u>, and manage <u>those soils</u>, to:</p> <p>a) Maintain their life supporting capacity; and</p> <p>b) Maintain soil biodiversity; and</p> <p>c) Maintain biological activity in soils; and</p> <p>d) Maintain soil's function in the storage and cycling of water, nutrients, and other elements through the biosphere; and</p> <p>e) Maintain soil's function as a buffer or filter for pollutants resulting from human activities, including aquifers at risk of leachate contamination; and</p> <p>f) Retain <u>Ensure the primary use of regionally significant soil resources is for primary production purposes</u>; and</p> <p>g) Protect Kāi Tahu values <u>from inappropriate subdivision, use and development</u>; and</p> <p>h) Provide for other cultural values <u>as identified in Schedule 1A</u>; and</p> <p>i) Maintain the soil mantle where it acts as a repository of heritage objects; and</p> <p>j) Maintain highly valued soil resources; and</p> <p>k) Avoid contamination of soil <u>from inappropriate subdivision, use and development</u>; and</p> <p>l) Avoid the adverse effects of pest species, prevent their introduction and reduce their spread.</p>
25	Policy 2.1.6	<p><u>Managing for ecosystem and indigenous biodiversity values</u> Recognise the values of ecosystems and indigenous biodiversity, and manage ecosystems and indigenous biodiversity, to:</p> <p>a) Maintain or enhance ecosystem health and indigenous biodiversity; and</p> <p>b) Maintain or enhance areas of predominantly indigenous vegetation; and</p> <p>c) Buffer or link existing ecosystems; and</p> <p>d) Protect important hydrological services, including the services provided by tussock grassland; and</p> <p>e) Protect natural resources and processes that support indigenous biodiversity <u>from inappropriate subdivision, use and development</u>; and</p> <p>f) Maintain habitats of indigenous species that are important for recreational, commercial, cultural or customary purposes; and</p> <p>g) Protect biodiversity significant to Kāi Tahu <u>from inappropriate subdivision, use and development</u>; and</p> <p>h) Avoid the adverse effects of pest species, prevent their introduction and reduce their spread.</p>
26	Policy 2.1.7	<p><u>Recognising the values of natural features, landscapes, and seascapes</u> Recognise the values of natural features, landscapes, seascapes and the coastal environment are derived from the following attributes, as detailed in Schedule 4:</p> <p>a) Biophysical attributes, including:</p> <p>i. Natural science factors;</p> <p>ii. The presence of water;</p> <p>iii. Vegetation (indigenous and introduced);</p> <p>iv. The natural darkness of the night sky;</p> <p>b) Sensory attributes, including:</p> <p>i. Legibility or expressiveness;</p> <p>ii. Aesthetic values;</p> <p>iii. Transient values, including nature's sounds;</p> <p>iv. Wild or scenic values;</p> <p>c) Associative attributes, including:</p> <p>i. Whether the values are shared and recognised;</p> <p>ii. Cultural and spiritual values for Kāi Tahu;</p> <p>iii. Historical and heritage associations.</p>
27	Policy 2.1.8	<p><u>Recognising the values of natural character in the coastal environment</u> Recognise the values of natural character in the coastal environment are derived from the following attributes:</p>

		<p>a) Natural elements, processes and patterns;</p> <p>b) Biophysical, ecological, geological and geomorphological aspects;</p> <p>c) Natural landforms such as headlands, peninsulas, cliffs, dunes, wetlands, estuaries, reefs, freshwater springs and surf breaks;</p> <p>d) The natural movement of water and sediment;</p> <p>e) The natural darkness of the night sky;</p> <p>f) Places or areas that are wild or scenic;</p> <p>g) A range of natural character from pristine to modified;</p> <p>h) Experiential attributes, including the sounds and smell of the sea; and their context or setting.</p>
28		Objective 2.2 Otago's significant and highly valued natural resources are identified, and protected or enhanced to maintain their distinctiveness
29	<i>Issue</i>	Otago has a distinct range of outstanding natural features, landscapes, seascapes, indigenous biodiversity, water bodies and soil which have intrinsic value and help to create the region's identity and support the region's wellbeing. These highly valued resources risk becoming degraded if they are not adequately protected from inappropriate <u>subdivision, use and development</u> . In turn, resource degradation reduces the attractions Otago can offer to tourists, residents and businesses, and could lead to wider adverse economic impacts
30	<i>Need</i>	It is a matter of national importance to recognise and provide for natural resources systems and processes. We need to recognise the importance of these matters in sustaining Otago's economic advantage and quality of life.
31	Policy 2.2.1	<u>Identifying areas of significant indigenous vegetation and significant habitats of indigenous fauna</u> Identify areas and values of significant indigenous vegetation and significant habitats of indigenous fauna, using the attributes detailed in Schedule 5.
32	Policy 2.2.2	<u>Managing significant indigenous vegetation and significant habitats of indigenous fauna</u> Protect and enhance <u>Manage subdivision, use and development that affects</u> the values of areas of significant indigenous vegetation and significant habitats of indigenous fauna, by: a) Avoiding adverse effects on these values which contribute to which will result in the area or habitat <u>losing its being significant status</u> ; and b) Avoiding significant adverse effects from <u>in appropriate subdivision, use and development</u> on other values of the area or habitat; and c) Assessing the significance of adverse effects on these values, as detailed in Schedule 3; and d) Remediating, when adverse effects cannot be avoided; and e) Mitigating where adverse effects cannot be avoided or remediated; and f) Encouraging enhancement of those areas and values.
33	Policy 2.2.3	<u>Identifying outstanding natural features, landscapes and seascapes</u> Identify areas and values of outstanding natural features, landscapes and seascapes, using the attributes as detailed in Schedule 4.
34	Policy 2.2.4	<u>Managing outstanding natural features, landscapes, and seascapes</u> Protect, enhance and restore <u>Manage subdivision, use and development that affects</u> the values of outstanding natural features, landscapes and seascapes, by: a) Avoiding adverse effects on these values which contribute to which will result in the <u>loss of the significance of the natural feature, landscape or seascape</u> ; and b) Avoiding, remedying or mitigating other adverse effects on other values; and c) Assessing the significance of adverse effects from inappropriate use and development on values, as detailed in Schedule 3; and d) Recognising and providing for positive contributions of existing introduced species to those values; and e) Controlling the adverse effects of pest species, preventing their introduction and reducing their spread; and f) Encouraging enhancement of those areas and values. <u>g) Recognising that appropriately designed and managed recreational activities in such locations can be appropriate, and can entail community benefits such as the enjoyment of landscape values</u>

		<p><u>h) Recognising that when activities have a functional need to locate within such places and emphasis on mitigating or remedying adverse effects rather than avoiding them may be appropriate.</u></p>
35	Policy 2.2.5	<p><u>Identifying special amenity landscapes and highly valued natural features</u> Identify areas and values of special amenity landscape or natural features which are highly valued for their contribution to the amenity or quality of the environment, but which are not outstanding, using the attributes detailed in Schedule 4.</p>
xx	<u>New policy</u>	<p><u>Managing cross boundary landscape effects</u></p> <p><u>Promote alignment of District Plans and integrated assessments of environmental effects when assessing landscape values and effects in landscapes which traverse territorial authority boundaries.</u></p>
36	Policy 2.2.6	<p><u>Managing special amenity landscapes and highly valued natural features</u> Protect or enhance the values of <u>Manage</u> special amenity landscapes and highly valued natural features, by:</p> <p>a) Avoiding, remedying or mitigating significant adverse effects on those values which contribute to the special amenity of the landscape or high value of the natural feature; and</p> <p>b) Avoiding, remedying or mitigating other adverse effects on other values; and</p> <p>c) Assessing the significance of adverse effects on these values, as detailed in Schedule 3; and</p> <p>d) Recognising and providing for positive contributions of existing introduced species to those values; and</p> <p>e) Controlling the adverse effects of pest species, preventing their introduction and reducing their spread; and</p> <p>f) Encouraging enhancement of those values.</p> <p><u>g) Recognising and providing for the use of such resources including as places where productive activities, tourism, recreation, infrastructure, education facilities, homes and work places are located.</u></p> <p><u>h) allowing values to adapt over time as communities and economies change</u></p>
37	Policy 2.2.7	<p><u>Identifying the landward extent of the coastal environment</u> Identify the landward extent of the coastal environment, using the following criteria:</p> <p>a) Area or landform dominated by coastal vegetation or habitat of indigenous coastal species; and</p> <p>b) Landforms and the margins of landforms where active coastal processes, influences or qualities are significant; and</p> <p>c) Any landscapes or features, including coastal escarpments, which contribute to the natural character, visual quality or amenity values of the coast; and</p> <p>d) Any physical resource or built form, including infrastructure, that has modified the coastal environment and retains a connection to or derives character from connection to the coast; and</p> <p>e) The relationship of takata whenua with the coastal environment.</p>
38	Policy 2.2.8	<p><u>Identifying areas of high and outstanding natural character in the coastal environment</u> Identify areas and values of high and outstanding natural character in the coastal environment, using the attributes detailed in Policy 2.1.8.</p>
39	Policy 2.2.9	<p><u>Managing the natural character of the coastal environment</u> Preserve or enhance the natural character values of the coastal environment, by:</p> <p>a) Avoiding adverse effects of activities on natural character in areas of the coastal environment with <u>on these values which contribute to the outstanding natural character of an area; and</u></p> <p>b) Avoiding significant adverse effects and avoiding, remedying or mitigating other adverse effects of activities on natural character in all other areas of the coastal environment on these values which contribute to the high natural character values of an area; and</p> <p>c) Assessing the significance of adverse effects on these values, as detailed in Schedule 3; and</p> <p>d) Avoiding, remedying or mitigating other adverse effects on other values; and</p>

		<p>e) Recognising and providing for the contribution of existing introduced species to the natural character of the coastal environment; and</p> <p>f) Encouraging enhancement of those values; and</p> <p>g) Controlling the adverse effects of pest species, prevent their introduction and reduce their spread.</p>
40	Policy 2.2.10	<p><u>Identifying surf breaks of national importance</u> Recognise the surf breaks of national importance at:</p> <p>a) Karitane; b) Papatowai; c) The Spit; d) Whareakeake.</p>
41	Policy 2.2.11	<p><u>Managing surf breaks of national importance</u> Protect surf breaks of national importance, by:</p> <p>a) Avoiding adverse effects on the natural and physical processes contributing to their existence; and</p> <p>b) Avoiding adverse effects of other activities on access to, and use and enjoyment of, those surf breaks.</p>
42	Policy 2.2.12	<p><u>Identifying outstanding water bodies and wetlands</u> Identify outstanding water bodies and wetlands and their values, using the following criteria:</p> <p>a) A high degree of naturalness; b) Outstanding aesthetic or landscape values; c) Significant takata whenua cultural values; d) Significant recreational values; e) Significant ecological values; f) Significant hydrological values.</p>
43	Policy 2.2.13	<p><u>Managing outstanding water bodies and wetlands</u> Protect <u>Manage subdivision, use and development that affects the values of</u> outstanding water bodies and wetlands by:</p> <p>a) Avoiding significant adverse effects <u>from inappropriate subdivision, use and development</u>, including cumulative effects, on those values which contribute to the water body or wetland being outstanding; and</p> <p>b) Avoiding, remedying or mitigating other adverse effects on the water body or wetland's values; and</p> <p>c) Assessing the significance of adverse effects on values, as detailed in Schedule 3; and</p> <p>d) Controlling the adverse effects of pest species, preventing their introduction and reducing their spread; and</p> <p>e) Encouraging enhancement of outstanding water bodies and wetlands.</p>
44	Policy 2.2.14	<p><u>Identifying highly-regionally significant valued soil resources</u> Identify areas and values of highly-valued <u>regionally significant</u> soil resources, using the following criteria:</p> <p>a) Degree of versatility for primary production; b) Significance for providing pollutant buffering or filtering services; c) Significance for providing water storage or flow retention services; d) Degree of rarity.</p>
45	Policy 2.2.15	<p><u>Managing highly-valued regionally significant soil resources</u> Protect the values of <u>areas of highly-valued regionally significant</u> soil resources, by:</p> <p>a) Avoiding significant adverse effects <u>from inappropriate subdivision, use and development</u> on those values which contribute to the soil being <u>highly valued regionally significant</u>; and</p> <p>b) Avoiding, remedying or mitigating other adverse effects on values of those soils; and</p> <p>c) Assessing the significance of adverse effects on values, as detailed in Schedule 3; and</p> <p>d) Recognising that <u>loss of regionally significant soils to urban expansion development may be appropriate near due to location and proximity to existing urban development, and infrastructure particularly when there is a lack of supply of land available for urban development.</u></p>
46	Objective 2.3: Natural sSystems and interdependencies are recognised and sustained	

47	<i>Issue</i>	Natural-Environmental systems and resources are interconnected, complex and difficult to manage in a consistent and effective way. Sometimes, the use of one resource adversely affects the <u>environmental</u> value of another. Sometimes, other relevant legislation results in conflicting management directives. Sometimes, activities affecting a resource are managed by different authorities
48	<i>Need</i>	The RMA requires that resources are managed in an integrated way. Integration among interdependent resources, within resources that span management and administrative unit boundaries, and among different decision makers will reduce the risk of adverse and unintended consequences arising from a proposal.
49	Policy 2.3.1	Applying an integrated management approach among resources Apply an integrated approach to the management of Otago's natural and physical resources, to achieve sustainable management, by: a) Taking into account the impacts of management of one resource on the <u>environmental</u> values of another, or on the environment in general; and b) Recognising that the form and function of a resource may extend beyond the immediate, or directly adjacent, area of interest. <u>c) Ensuring that resource objectives are complementary across administrative boundaries; and</u> <u>d) Ensuring that environmental effects of activities on the whole of a resource are considered when that resource is managed by sub-units.</u>
50	Policy 2.3.2	Applying an integrated management approach within a resource Apply an integrated management approach within a natural and physical resource, to achieve sustainable management, by: a) Ensuring that resource objectives are complementary across administrative boundaries; and b) Ensuring that effects of activities on the whole of a resource are considered when that resource is managed by sub-units.
51	Policy 2.3.3	Applying an integrated management approach for freshwater catchments Apply an integrated management approach to activities in freshwater catchments, by: a) Using consistent freshwater objectives for interconnected water bodies; and b) Recognising the importance of river morphology, catchment hydrology, natural processes and land cover in supporting catchment values; and c) Coordinating the management of land use and freshwater, to: i. Maintain or enhance freshwater values; and ii. Maintain or enhance the wetland values; and iii. Maintain or enhance the values of beds of rivers and lakes, wetlands, and their margins; and iv. Reduce the potential for health and nuisance effects.
52	Policy 2.3.4	Applying an integrated management approach for the coastal environment Apply an integrated management approach to activities in the coastal environment, by: a) Recognising the importance of coastal morphology, coastal processes and land cover in supporting coastal environment values; and b) Coordinating the management of land use, freshwater, and coastal water, to: i. Maintain or enhance coastal values; and ii. Reduce the potential for health and nuisance effects.
53	Policy 2.3.5	Applying an integrated management approach for airsheds Apply an integrated management approach to activities that affect air quality, by: a) Setting emission standards for airsheds that take into account foreseeable demographic changes, and their effects on cumulative emissions; and b) Co-ordinating the management of land use and air quality, to: i. Maintain or enhance air quality values; and ii. Reduce the potential for adverse health and nuisance effects.
54	<u>New Policy</u>	<u>Applying an integrated management approach for significant infrastructure and activities that affect significant infrastructure</u> <u>Apply an integrated management approach to the management of significant infrastructure and activities that affect significant infrastructure. by:</u> <u>a) Promoting consistent corridor management methods throughout the region.</u>
55	Objective 3.1 Protection, subdivision, use and development of natural and physical resources	

recognises environmental constraints		
56	<i>Issue</i>	Activities that utilise resources are undertaken without regard to their local environmental values are at greater risk inappropriately compromising of overreaching the at environment's ability to sustain the activity.
57	<i>Need</i>	We need to manage our activities with regard to constraints to improve our resilience.
58	Policy 3.1.1	Recognising natural and physical environmental constraints Recognise the natural and physical environmental constraints of a resources area, the environmental effects of those constraints on activities utilising those resources , and the environmental effects of those activities on those constraints, including with particular recognition of: a) The availability of natural resources necessary to sustain the activity; and b) The ecosystem services the activity is dependent on; and c) The sensitivity of the natural and physical resources to adverse effects from the proposed activity/land use; and d) Exposure of the activity to natural and technological hazard risks; and e) The functional necessity for the activity to be located where there are significant constraints.
59	Objective 3.2 Inappropriate Risk that natural hazards pose to Otago's communities are minimised	
60	<i>Issue</i>	Natural hazard events, such as flooding and earthquakes, have the potential to injure people and damage property. Sometimes, it is difficult and costly for a community to recover from a hazard event.
61	<i>Need</i>	While many of these events are beyond our control, we need to reduce their potential impacts on people's safety, health and wellbeing.
62	Policy 3.2.1	Identifying natural hazards Identify natural hazards that may adversely affect Otago's communities, including hazards of low likelihood and high consequence.
63	Policy 3.2.2	Assessing natural hazard likelihood Assess the likelihood of natural hazard events occurring, having regard to a timeframe of no less than 100 years, including by considering: a) Hazard type and characteristics; b) Multiple and cascading hazards; c) Cumulative effects, including from multiple hazards with different risks; d) Effects of climate change; e) Using the best available information for calculating likelihood; f) Exacerbating factors.
64	Policy 3.2.3	Assessing natural hazard consequence Assess the consequences of natural hazard events, including by considering: a) The nature of activities in the area; b) Individual and community vulnerability; c) Impact on individual and community health and safety; d) Impact on social, cultural and economic wellbeing; e) Impact on infrastructure and property, including access and services; f) Risk reduction and hazard mitigation measures; g) Lifeline utilities, essential and emergency services, and their co-dependence; h) Implications for civil defence agencies and emergency services; i) Cumulative effects; j) Factors that may exacerbate a hazard event.
65	Policy 3.2.4	Managing natural hazard risk Manage natural hazard risk, including with particular regard to: a) The risk they posed , considering the likelihood and consequences of natural hazard events; and b) The implications of residual risk, including the risk remaining after implementing or undertaking risk reduction and hazard mitigation measures; and c) The community's tolerance of that risk, now and in the future, including the community's ability and willingness to prepare for and adapt to that risk, and respond to an event; and d) The changing nature of tolerability and risk; and e) Sensitivity of activities to risk.

66	Policy 3.2.5	<p><u>Assessing activities for natural hazard risk</u> Assess activities in areas known to be subject to an identified for natural hazard risk, by considering:</p> <ul style="list-style-type: none"> a) The natural hazard risk identified, including residual risk; and b) Any measures to avoid, remedy or mitigate those risks, including relocation and recovery methods; and c) The long term viability and affordability of those measures; and d) Flow-on effects of the risk to other activities, individuals and communities; and e) The availability of, and ability to provide, lifeline utilities, and essential and emergency services, during and after a natural hazard event.
67	Policy 3.2.6	<p><u>Avoiding increased natural hazard risk from inappropriate subdivision, use and development</u> Avoid, remedy or mitigate increasing increased natural hazard risk from inappropriate subdivision, use and development, including by:</p> <ul style="list-style-type: none"> a) Avoiding activities that significantly increase risk, including displacement of risk off-site; and b) Encouraging design that facilitates: <ul style="list-style-type: none"> i. Recovery from natural hazard events; or ii. Relocation to areas of lower risk.
68	Policy 3.2.7	<p><u>Reducing existing natural hazard risk</u> Reduce existing natural hazard risk, including particularly by:</p> <ul style="list-style-type: none"> a) Encouraging activities that: <ul style="list-style-type: none"> i. Reduce risk; or ii. Reduce community vulnerability; and b) Discouraging activities that: <ul style="list-style-type: none"> i. Increase risk; or ii. Increase community vulnerability; and c) Considering the use of exit strategies for areas of significant risk; and d) Encouraging design that facilitates: <ul style="list-style-type: none"> i. Recovery from natural hazard events or ii. Relocation to areas of lower risk; and e) Relocating lifeline utilities, and facilities for essential and emergency service, to areas of reduced risk, where appropriate and practicable; and f) Enabling development, upgrade, maintenance and operation of lifeline utilities and facilities for essential and emergency services; and g) Re-assessing natural hazard risk, and community tolerance of that risk, following significant natural hazard events.
69	Policy 3.2.8	<p><u>Applying a precautionary approach</u> Where natural hazard risk-probability is uncertain or unknown, but <u>consequence is likely potentially-significant</u> or irreversible, apply a precautionary approach to identifying, assessing and managing that risk.</p>
70	Policy 3.2.9	<p><u>Protecting features and systems that provide hazard mitigation</u> Protect, restore, enhance and promote the use of natural or modified features and systems, which contribute to mitigating the effects of both natural hazards and climate change.</p>
71	Policy 3.2.10	<p><u>Mitigating natural hazards</u> Give preference to risk management approaches that reduce the need for hard mitigation measures or similar engineering interventions, and provide for hard mitigation measures only when:</p> <ul style="list-style-type: none"> a) Those measures are essential to reduce risk to a level the community is able to tolerate; and b) There are no reasonable alternatives; and c) It would not result in an increase in risk, including displacement of risk off-site; and d) The adverse effects can be adequately managed; and e) The mitigation is viable in the reasonably foreseeable long term.
72	Policy 3.2.11	<p><u>Locating hard mitigation measures</u> Enable the location of hard mitigation measures or similar engineering interventions on public land only when:</p> <ul style="list-style-type: none"> a) There is significant public or environmental benefit in doing so; or

		b) The work relates to the functioning ability of <u>significant infrastructure a lifeline utility, or a facility used for essential or emergency services, or a significant community facility.</u>
73	Objective 3.3: Otago's communities are prepared for and able to adapt to the effects of climate change	
74	<i>Issue</i>	Climate change is expected to bring higher sea levels and an increased frequency of climate-related natural hazard events, which will increase the risk that Otago's communities face.
75	<i>Need</i>	We need to have consistent guidance on sea level rise, and managing for adverse effects that will occur beyond the life of this RPS.
76	Policy 3.3.1	<u>Adapting to, or mitigating the effects of, sea level rise</u> Ensure Otago's people and communities are able to adapt to, or mitigate the effects of sea level rise, over no less than 100 years, by using: a) A sea level rise of at least 1 metre by 2115, relative to 1990 mean sea level (Otago Metric Datum); and b) Adding an additional 10mm per year beyond 2115.
77	Policy 3.3.2	<u>Adapting to, or mitigating the effects of, climate change</u> Ensure Otago's people and communities are able to adapt to, or mitigate the effects of climate change, over no less than 100 years, by: a) Taking into account the effects of climate change, including by using the best relevant climate change data; and b) Applying a precautionary approach to assessing the effects of climate change, where there is scientific uncertainty and potentially significant or irreversible effects; and c) Encouraging activities that assist to reduce or mitigate the effects of climate change.
78	Objective 3.4 Good quality infrastructure and services meet community needs	
79	<i>Issue</i>	Aging and sub-standard infrastructure risks creating safety, health and access problems, and as a consequence, threatens community resilience
80	<i>Need</i>	Infrastructure needs to meet community, business, and environmental needs. We need lifeline utilities and essential and emergency services that are able to operate through disruptive events.
81	Policy 3.4.1	<u>Integrating infrastructure with land use</u> Achieve the strategic integration of infrastructure with land use, by: a) Recognising functional needs of infrastructure of regional or national importance; and b) Designing infrastructure to take into account: i. Actual and reasonably foreseeable land use change; and ii. The current population and projected demographic changes; and iii. Actual and reasonably foreseeable change in supply of, and demand for, infrastructure services; and iv. Natural and physical Resource constraints; and v. Effects on the values of natural and physical resources; and vi. Co-dependence with other infrastructural services; and vii. The effects of climate change on the long term viability of that infrastructure; and c) <u>Managing urban growth in a coordinated manner to ensure:</u> i. Within areas that have sufficient infrastructure services capacity are provided; or ii. Where infrastructure services can be upgraded or extended efficiently and effectively; and d) Co-ordinating the design and development of infrastructure with the staging of land use change, including with: i. Structural design and release of land for new urban development; or ii. Structural redesign and redevelopment within existing urban areas.
82	Policy 3.4.2	<u>Managing infrastructure activities</u> Manage infrastructure activities, to: a) Maintain or enhance the health and safety of the community; and b) Reduce <u>Avoid, remedy or mitigate</u> adverse effects of those activities, including cumulative adverse effects on natural and physical resources; and

		<p>c) Support economic, social and community needsactivities; and</p> <p>d) Improve efficiency of use of natural resources; and</p> <p>e) Protect infrastructure corridors for infrastructure needsfrom inappropriate subdivision, use and development, now and for the future; and</p> <p>f) Increase the ability of communities to respond and adapt to emergencies, and disruptive or natural hazard events; and</p> <p>g) Protect the functioning of significant infrastructure lifeline utilities and essential or emergency services.</p>
83	Policy 3.4.3	<p>Designing lifeline utilities<u>Designing significant infrastructure and facilities for essential or emergency services</u></p> <p>Design lifeline utilities<u>significant infrastructure</u>, and facilities for essential or emergency services, to:</p> <p>a) Maintain their ability to function to the fullest extent possible, during and after natural hazard events; and</p> <p>b) Take into account their operational co-dependence with other lifeline utilities and essential services to ensure their effective operation.</p>
84	Policy 3.4.4	<p>Managing hazard mitigation measures, lifeline utilities<u>Managing hazard mitigation measures, lifeline utilities, and essential and emergency services</u></p> <p>Protect the functioning of hazard mitigation measures, lifeline utilities, and essential or emergency services, including by:</p> <p>a) Restricting the establishment of those activities that may result in reverse sensitivity effects; and</p> <p>b) Avoiding significant adverse effects on those measures, utilities or services; and</p> <p>c) Avoiding, remedying or mitigating other adverse effects on those measures, utilities or services; and</p> <p>d) Assessing the significance of adverse effects on those measures, utilities or services, as detailed in Schedule 3; and</p> <p>e) Maintaining access to those measures, utilities or services for maintenance and operational purposes; and</p> <p>f) Managing other activities in a way that does not foreclose the ability of those mitigation measures, utilities or services to continue functioning.</p>
85	Objective 3.5: <u>Significant Infrastructure of regional and national significance is recognised and provided for managed in a sustainable way</u>	
86	<i>Issue</i>	<p>It is important to recognise and provide for Significant Infrastructure, of regional and national significance even though it may result in local adverse environmental effects<u>impacts, or adversely affect other nationally important values. Some infrastructure can only be located in particular areas, and it may not always be possible to avoid significant adverse effects.</u></p>
87	<i>Need</i>	<p>We need infrastructure of regional and national significance that operates efficiently and effectively, and recognises other values, including local impacts.</p>
88	Policy 3.5.1	<p>Recognising national and regional<u>and providing for significance of infrastructure</u></p> <p><u>Recognise and provide for the national and regional significance of the following infrastructure:</u></p> <p>a) Renewable electricity generation facilities, where they supply the national electricity grid and local distribution network; and</p> <p>b) Electricity transmission infrastructure; and</p> <p>c) Telecommunication and radio communication facilities; and</p> <p>d) Roads classified as being of national or regional importance; and</p> <p>e) Ports and airports; and</p> <p>f) Structures for transport by rail and tourism activities.</p>
89	Policy 3.5.2	<p>Managing adverse effects of significant infrastructure that has national or regional significance</p> <p><u>Minimise Avoid, remedy or mitigate</u> adverse effects from <u>significant infrastructure</u> that has national or regional significance, by:</p> <p>a) Giving<u>Requiring comprehensive alternative site assessments to be provided if a new development is proposed that will result in significant adverse effect</u> on preference to avoiding their location in:</p> <p>i. Areas of significant indigenous vegetation and significant habitats of indigenous</p>

		<p>fauna; and</p> <p>ii. Outstanding natural features, landscapes and seascapes; and</p> <p>iii. Areas of outstanding natural character; and</p> <p>iv. Outstanding water bodies or wetlands; and</p> <p>b) Where it is not possible to avoid locating in the areas listed in a) above, avoiding <u>minimising</u> significant adverse effects on those values that contribute to the significant or outstanding nature of those areas; and</p> <p>c) Avoiding, remedying or mitigating other adverse effects on values; and</p> <p>d) Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and</p> <p>e) Considering <u>Enabling</u> infrastructure providers to employ the use of offsetting, or other compensatory measures to address, for residual adverse effects on <u>the environment</u> indigenous biodiversity.</p>
90	Policy 3.5.3	<p><u>Protecting significant infrastructure of national or regional significance</u></p> <p>Protect infrastructure of national or regional significance, by:</p> <p>a) Restricting the establishment of activities that may result in reverse sensitivity effects; and</p> <p>b) Avoiding significant adverse effects on the functional needs of such infrastructure; and</p> <p>c) Avoiding, remedying or mitigating other adverse effects on the functional needs of such infrastructure; and</p> <p>d) Assessing the significance of adverse effects on these needs, as detailed in Schedule 3; and</p> <p>e) Protecting infrastructure corridors for infrastructure needs, now and for the future.</p>
91	Objective 3.6:	Energy supplies to Otago's communities are secure and sustainable
92	<i>Issue</i>	Although Otago is rich in renewable energy sources, it is also an importer of fossil fuels. Any constraints on energy and fuel supply could affect the way we live and are able to respond to disruptive events.
93	<i>Need</i>	We need to reduce our dependency on fossil fuels and improve our energy resilience.
94	Policy 3.6.1	<p><u>Using existing renewable electricity generation structures and facilities</u></p> <p>Give preference to the use of existing structures or facilities to increase the region's renewable electricity generation capacity over developing new structures in new locations.</p>
95	Policy 3.6.2	<p><u>Promoting small and community-scale renewable electricity generation</u></p> <p>Promote small and community-scale renewable electricity generation activities, that:</p> <p>a) Increase the local community's resilience and security of energy supply; and</p> <p>b) Avoid, remedy or mitigate adverse effects from that activity.</p>
96	Policy 3.6.3	<p><u>Protecting the generation capacity of renewable electricity generation activities</u></p> <p>Protect the generation capacity of nationally or regionally significant renewable electricity generation activities, by:</p> <p>a) Recognising the functional needs of renewable electricity generation activities, including physical resource supply needs; and</p> <p>b) Restricting the establishment of those activities that may result in reverse sensitivity effects; and</p> <p>c) Avoiding, remedying or mitigating adverse effects from other activities on the functional needs of that infrastructure; and</p> <p>d) Assessing the significance of adverse effects on these needs, as detailed in Schedule 3.</p>
97	Policy 3.6.4	<p><u>Enabling more efficient transport of electricity</u></p> <p>Enable electricity transmission and distribution infrastructure activities that:</p> <p>a) Maintain or improve the security of supply of electricity; or</p> <p>b) Enhance the efficiency of transporting electricity; and</p> <p>c) Avoid, remedy or mitigate adverse effects from that activity.</p>
98	Policy 3.6.5	<p><u>Protecting electricity distribution infrastructure</u></p> <p>Protect electricity distribution infrastructure, by:</p> <p>a) Recognising the functional needs of electricity distribution activities; and</p> <p>b) Restricting the establishment of those activities that may result in reverse</p>

		<p>sensitivity effects; and</p> <p>c) Avoiding, remedying or mitigating adverse effects from other activities on the functional needs of that infrastructure; and</p> <p>d) Assessing the significance of adverse effects on these needs, as detailed in Schedule 6; and</p> <p>e) Protecting existing distribution corridors for infrastructure needs, now and for the future.</p>
99	Policy 3.6.6	<p><u>Reducing long term demand for fossil fuels</u></p> <p>Reduce the long term demand for fossil fuels from Otago's communities, by:</p> <p>a) Encouraging the development of compact and well integrated urban areas, to reduce travel needs within those areas; and</p> <p>b) Ensuring that transport infrastructure in urban areas has good connectivity, both within new urban areas and between new and existing urban areas, by:</p> <p>i. Placing a high priority on walking, cycling, and public transport, where appropriate; and</p> <p>ii. Maximising pedestrian and cycling networks connectivity, and integration with public transport; and</p> <p>iii. Having high design standards for pedestrian and cyclist safety and amenity; and</p> <p>c) Enabling the development or upgrade of transport infrastructure and associated facilities that:</p> <p>i. increase freight efficiency; or</p> <p>ii. Foster the uptake of new technologies for more efficient energy uses, or renewable or lower emission transport fuels.</p>
100	Objective 3.7:	Urban areas are well designed, sustainable and reflect local character
101	<i>Issue</i>	In the past, urban development has not always had regard to the local environment, or considered the mobility needs for different people. There are high costs to improve buildings and infrastructure to meet modern standards.
102	<i>Need</i>	We need communities that are designed to improve our quality of life and resilience and create more attractive opportunities for business investment. We need infrastructure that meets modern standards, is future proofed, and is affordable.
103	Policy 3.7.1	<p><u>Using the principles of good urban design</u></p> <p>Encourage the use of good urban design principles in subdivision and development in urban areas, as detailed in Schedule 6, to:</p> <p>a) Provide a resilient, safe and healthy community, including through use of crime prevention through environmental design principles; and</p> <p>b) Ensure that the built form relates well to its <u>surrounding</u> natural environment, including by:</p> <p>i. Reflecting natural features such as rivers, lakes, wetlands and topography; and</p> <p>ii. Providing for ecological corridors in urban areas; and</p> <p>iii. Protecting areas of indigenous biodiversity and habitat for indigenous fauna; and</p> <p>iv. Encouraging use of low impact design techniques; and</p> <p>v. Encouraging construction of warmer buildings; and</p> <p>c) Reduce risk from natural hazards, including by avoiding areas of significant risk; and</p> <p>d) Ensure good access and connectivity within and between communities; and</p> <p>e) Create a sense of identity, including by recognising features of heritage and cultural importance; and</p> <p>f) Create areas where people can live, work and play, including by:</p> <p>i. Enabling a diverse range of housing, commercial, industrial and service activities; and</p> <p>ii. Enabling a diverse range of social and cultural opportunities.</p>
104	Policy 3.7.2	<p><u>Encouraging use of low impact design techniques</u></p> <p>Encourage the use of low impact design techniques in subdivision and development, to:</p> <p>a) Reduce potential adverse environmental effects, including on water and air quality; or</p> <p>b) Mitigate the effects of natural hazards and climate change; or</p>

		c) Enhance amenity; or d) Enhance habitat for indigenous species and biodiversity values.
105	Policy 3.7.3	<u>Designing for warmer buildings</u> Encourage the design of subdivision and development to reduce the adverse effects of Otago's colder climate, and higher demand and costs for energy, including by: a) Maximising <u>optimising</u> passive solar gain; and b) Insulating to warmer standards than those set under building legislation.
106	Policy 3.7.4	<u>Designing for good access in public spaces</u> Design and <u>maintain</u> public spaces, including streets and open spaces, to <u>provide for a range of uses and meeting</u> the reasonable access and mobility needs of all sectors within the community, including the young and those with mobility impairments.
107	Objective 3.8: Urban growth is well designed and integrates effectively with adjoining urban and rural environments	
108	<i>Issue</i>	Unplanned urban growth risks exceeding the carrying capacity of existing infrastructure and services, adversely affecting community resilience. Sometimes, unplanned growth places pressure on adjoining productive land, and risks losing connectivity with adjoining urban areas.
109	<i>Need</i>	We need well designed and integrated urban growth, to achieve effective and affordable infrastructure, and improve resilience. We need to make the best use of our natural and physical resources and reduce the effects of unplanned growth.
110	Policy 3.8.1	Managing <u>Providing for urban growth</u> Manage <u>Provide for urban growth and creation of new urban land in a strategic and co-ordinated way, by:</u> a) Understanding demand and supply of <u>Managing land use to ensure</u> there is sufficient residential, commercial and industrial zoned land capacity, to and catering for that demand for such land, projected over at least the next 10 years; and b) Co-ordinating urban growth and extension of urban areas with relevant infrastructure development programmes, to: i. Provide infrastructure in an efficient and effective way; and ii. Avoid <u>Discouraging</u> additional costs <u>on the public</u> that arise from unplanned infrastructure expansion; and c) Identifying future growth areas that: i. Minimise significant adverse effects on rural <u>the productivity of the rural and tourism sectors, including loss of highly valued soils or creating competing urban demand for water and other resources;</u> and ii. Can be developed without resulting in significant adverse effects on <u>Maintain or enhance any matter of national importance or national significance</u> significant biodiversity, landscape or natural character values; and iii. Maintain important cultural or heritage values; and iiii. Avoids <u>land with significant risk from natural hazards which cannot be remedied or mitigated;</u> and d) Considering the need for urban growth boundaries to control <u>potentially inappropriate</u> urban expansion; and e) Ensuring efficient use of land; and f) Requiring the use of low or no-emission heating systems in buildings, when where ambient air quality in or near the growth area is: i. Below standards for human health; or ii. Vulnerable to degradation given the local climatic and geographical context; and g) Giving effect to the principles of good urban design, as detailed in Schedule 6; and h) Giving effect to the principles of crime prevention through environmental design. i) <u>Ensure sufficient land is supplied for residential uses to assist with housing affordability.</u>
110	Policy 3.8.2	Controlling urban growth where there are identified urban growth boundaries or future urban development areas <u>Where urban growth boundaries, as detailed in Schedule 8, or future urban</u>

		<p>development areas, are needed to control urban expansion, control the release of land within these boundaries or areas, by:</p> <p>a) Staging development, using identified triggers to release new stages for development; or</p> <p>b) Releasing land in a way that ensures a logical spatial development, and efficient use of existing land and infrastructure before new land is released; and</p> <p>c) Avoiding urban development beyond the urban growth boundary or future urban development area, <u>unless there is a shortage of land available for urban development.</u></p> <p><i>Method 2: Regional, City and District Council Relationships</i> <i>Method 4: City and District Plans</i> <i>Method 5: Regional Policy Statement</i> <i>Method 7: Strategies and Plans (non-RMA)</i></p>
111	Policy 3.8.3	<p><u>Managing fragmentation of rural land</u> Manage subdivision, use and development of rural land, to:</p> <p>a) Avoid <u>inappropriate</u> development or fragmentation of land, <u>particularly</u> which undermines or forecloses the potential of rural land:</p> <p>i. For primary production <u>or tourism</u>; or</p> <p>ii. In areas identified for future urban uses; or</p> <p>iii. In areas having the potential for future comprehensive residential development; and</p> <p>b) Have particular regard to whether the proposal will result in a loss of the productive potential of <u>regionally significant highly versatile soils</u>, unless:</p> <p>i. The land adjoins an existing urban area and there is no other land suitable for urban expansion, <u>or there is a shortage of land available for urban development</u>; and</p> <p>ii. There highly versatile soils are needed for urban expansion, any change of land use from rural activities achieves an appropriate and highly efficient form of urban development; and</p> <p>iii. reverse sensitivity effects on rural productive activities can be <u>satisfactorily avoided</u>; and</p> <p>c) Avoid unplanned demand for provision of <u>public infrastructure investment</u>, including domestic water supply and waste disposal; and</p> <p>d) Avoid creating <u>significant competing demand for water or other resources.</u></p>
112	Objective 3.9: Hazardous substances and waste materials do not <u>pose a significant risk to harm human health or the quality of the environment in Otago</u>	
113	<i>Issue</i>	Waste materials risk creating adverse effects on the environment. Hazardous substances have adverse effects on community health and safety
114	<i>Need</i>	We need to make the best use of our resources and minimise the materials disposed of as waste. We need to carefully manage waste materials and hazardous substances to avoid creating environmental problems or adversely affecting human health.
115	Policy 3.9.1	<p><u>Integrating management of hazardous substances and waste</u> Promote an integrated approach to the management of hazardous substances and waste in Otago.</p>
116	Policy 3.9.2	<p><u>Managing the use, storage and disposal of hazardous substances, and the storage and disposal of waste materials</u> Manage the use, storage and disposal of hazardous substances, and the storage and disposal of waste materials, to avoid accidental spillage or release of those substances and materials, by:</p> <p>a) Providing secure containment of those substances in case of accidental spillage; and</p> <p>b) Minimising risk associated with natural hazard events; and</p> <p>c) Avoiding <u>significant</u> adverse effects of those substances and materials on the health and safety of people, and on other values; and</p> <p>d) Providing for the development of facilities to safely store, transfer, process, handle and dispose of hazardous waste and waste materials; and</p> <p>e) Ensuring hazardous substances are treated or disposed at authorised facilities, in accordance with the relevant disposal instructions; and</p>

		f) Restricting the location of activities that may result in reverse sensitivity effects near: i. Authorised facilities for hazardous substance treatment or disposal; or ii. Waste transfer or disposal facilities.
117	Policy 3.9.3	<u>Identifying contaminated land</u> Identify sites of known or potentially contaminated land in Otago.
118	Policy 3.9.4	<u>Managing the use of contaminated land</u> Manage the use of contaminated land, to protect people and the environment from adverse effects, by: a) Prior to subdivision or development of potentially contaminated land, <u>requiring ensure a site investigation is undertaken to determine the nature or extent of any contamination</u> ; and b) Where there is contamination: i. Requiring an assessment of associated environmental risks; and ii. Remediating land; and c) Considering the need for ongoing monitoring of contaminant levels and associated risks.
119	Policy 3.9.5	<u>Avoiding the creation of new contaminated land</u> Avoid the creation of new contaminated land <u>which would give rise to risks to human health or would measurably degrade natural values</u> .
120	Policy 3.9.6	<u>Encouraging use of best management practices for hazardous substance use</u> Encourage the use of best management practices to prevent or mitigate adverse effects of the use of hazardous substances on the environment, including reducing their use.
121	Policy 3.9.7	<u>Encouraging services for hazardous substance collection, recycling and disposal</u> Encourage the establishment of hazardous substance collection, disposal and recycling services across the region.
122	Objective 4.1: Public access to areas of value to the community is maintained or enhanced	
123	<i>Issue</i>	Sometimes, public access to areas of value to the community is limited or inappropriate
124	<i>Need</i>	Access to the natural environment and areas of cultural and historic significance is highly valued by residents and visitors. We need to use the opportunities subdivision and development create, to improve access to Otago's natural environment, or to limit access to more sensitive places.
125	Policy 4.1.1	<u>Maintaining and enhancing public access</u> Maintain and, where possible, enhance public access to the natural environment, including to the coast, lakes, rivers and their margins, and areas of cultural or historic significance, unless restricting access is necessary to: a) Protect public health and safety; or b) Protect the natural heritage and ecosystem values of sensitive natural areas or habitats; or c) Protect identified sites and values associated with historic heritage or cultural significance to takata whenua.
126	Objective 4.2: Significant historic heritage resources are recognised and contribute to the region's character and sense of identity	
127	<i>Issue</i>	Sometimes, subdivision, use, and development risk damage to Otago's rich historic heritage
128	<i>Need</i>	Protection of historic heritage from inappropriate activities is required under the RMA as a matter of national importance.
129	Policy 4.2.1	<u>Recognising heritage themes</u> Recognise the following elements as characteristic or important to Otago's historic heritage: a) Residential and commercial buildings; b) Māori cultural and heritage values; c) 19th and early 20th century pastoral sites; d) Early surveying, communications and transport, including roads, bridges and routes; e) Early industrial heritage, including mills and brickworks; f) Gold mining systems and settlements; g) Dredge and ship wrecks;

		h) Coastal heritage, particularly takata whenua occupation sites and those associated with early European activity such as whaling; i) Memorials.
130	Policy 4.2.2	<u>Identifying historic heritage</u> Identify historic heritage places and areas of regional or national significance and their values, using the following attributes, detailed in Schedule 7: a) Physical values, including: i. Archaeological information; ii. Architecture; iii. Technology; iv. Scientific; v. Rarity; vi. Representativeness; vii. Integrity; viii. Vulnerability; ix. Context or group; b) Historic values, including: i. People; ii. Events; iii. Patterns; c) Cultural values, including: i. Identity; ii. Public esteem; iii. Commemorative; iv. Education; v. Takata whenua; vi. Statutory recognition.
131	Policy 4.2.3	<u>Managing historic heritage values</u> Manage historic heritage values to p Protect and enhance the values of places and areas of historic heritage from inappropriate development, by: a) Recognising that some places or areas are known or strongly suspected of containing archaeological sites, wāhi tapu or wāhi taoka which could be of significant historic or cultural value; and b) Applying these provisions immediately upon discovery of such hitherto unidentified archaeological sites or areas, wāhi tapu or wāhi taoka; and c) Avoiding, <u>remedying or mitigating</u> adverse effects on those values which contribute to the area or place being of regional or national significance; and d) Avoiding significant adverse effects on other values of areas and places of historic heritage; and e) Assessing the significance of adverse effects on these values, as detailed in Schedule 3; and f) Remediating, when adverse effects on other values cannot be avoided; and g) Mitigating when adverse effects on other values cannot be avoided or remediated; and h) Encouraging the integration of historic heritage values into new activities; and i) Enabling adaptive reuse or upgrade of historic heritage places and areas where heritage values can be maintained.
132	Objective 4.3:	Sufficient land is managed and protected for economic production
133	<i>Issue</i>	Sometimes, e Existing businesses activities are susceptible to may be placed at reverse sensitivity effects, risk by pressure to change particularly when land use changes, to activities that may compete or conflict, creating reverse sensitivities.
134	<i>Need</i>	We need some degree of spatial separation of incompatible activities and control over land use change to ensure efficient use of land and continuing economic vitality.
135	Policy 4.3.1	Managing <u>Protecting for rural</u> regionally significant industry activities from inappropriate subdivision, use and development Manage activities in rural areas, to support the region's economy and communities, by: a) <u>Enabling</u> regionally significant industry activities, farming and other rural

		<p>activities that support the rural economy; and</p> <p>b) Minimising the loss of <u>regionally significant soils</u> highly valued for their versatility for primary production; and</p> <p>c) Restricting the establishment of activities in rural areas that may lead to reverse sensitivity effects <u>on regionally significant industry activities</u>; and</p> <p>d) Minimising Restricting the subdivision of productive rural land into smaller lots that may result in <u>inappropriate</u> rural residential activities; and</p> <p>e) Providing for other activities that have a functional need to locate in rural areas, including tourism and recreational activities that are of a nature and scale compatible with rural activities.</p>
136	Policy 4.3.2	<p><u>Managing land use change in dry catchments</u></p> <p>Manage land use change in dry catchments, to avoid any significant reduction in water yield, by:</p> <p>a) Restricting any extension of forestry activities within those catchments that would result in a significant reduction in water yield, including cumulative reductions; and</p> <p>b) Minimising the conversion of tussock grasslands to species which are less able to capture and hold precipitation.</p>
137	Policy 4.3.3	<p><u>Recognising and providing for the values of Otago's central business districts</u></p> <p>Recognise <u>and provide</u> for the values of Otago's central business districts, including as the primary focal point for social, cultural and economic activities within a community.</p>
138	Policy 4.3.4	<p><u>Managing the distribution of commercial activities in larger urban areas</u></p> <p>Manage the distribution of commercial activities in larger urban areas, to maintain the vibrancy of the <u>Otago's central business districts</u> and support local commercial needs, by:</p> <p>a) Enabling a wide variety of commercial, social and cultural activities in the central business districts; and</p> <p>b) Encouraging the adaptive re-use of existing buildings in ways that complement commercial functions; and</p> <p>c) Avoiding unplanned extension of commercial activities that has significant adverse effects on the <u>a central business district</u>, including on the efficient use of infrastructure, employment and services; and</p> <p>d) Enabling smaller centres to service local community needs.</p>
139	Policy 4.3.5	<p><u>Managing for industrial land uses</u></p> <p>Manage the finite nature of land suitable and available for industrial activities, by:</p> <p>a) Providing specific areas to accommodate the effects of industrial activities; and</p> <p>b) Providing a range of land suitable for different industrial activities, including land extensive activities; and</p> <p>c) Restricting the establishment of activities in industrial areas that may result in:</p> <p>i. Reverse sensitivity effects <u>on industrial activities</u>; or</p> <p>ii. Inefficient use of industrial land or infrastructure.</p>
140	Policy 4.3.6	<p><u>Managing locational needs for mineral and gas exploration, extraction and processing</u></p> <p>Recognise the needs of mineral exploration, extraction and processing activities to locate where the resource exists, and manage them by:</p> <p>a) Giving preference to avoiding their location in:</p> <p>i. Areas of significant indigenous vegetation and significant habitats of indigenous fauna; or</p> <p>ii. Outstanding natural features, landscapes and seascapes; or</p> <p>iii. Areas of outstanding natural character; or</p> <p>iv. Outstanding water bodies; or</p> <p>v. Areas subject to significant natural hazard risk; and</p> <p>b) Restricting the establishment of these activities in areas used for mineral and gas exploration, extraction and processing that may result in reverse sensitivity effects <u>on mineral and gas exploration and extraction activities</u>.</p>
141	Objective 4.4: Otago's communities can make the most of the natural and built resources available for use	
142	<i>Issue</i>	Many natural and physical resources we rely on for economic activity and wellbeing are finite and under pressure from different uses and users.

143	<i>Need</i>	We need efficient allocation and use of these resources to maximise socio-economic and cultural benefits, as well as sustain environmental wellbeing.
144	Policy 4.4.1	<u>Ensuring efficient water allocation and use</u> Ensure an efficient allocation and use of water by: a) Requiring that the volume of water allocated does not exceed what is necessary for the purpose of use; and b) Requiring the development or upgrade of infrastructure that increases use efficiency; and c) Encouraging collective coordination and rationing of take and use of water when river flows or aquifer levels are lowering, to avoid breaching any minimum flow or aquifer level restriction; and d) Enabling water harvesting and storage, to reduce pressure on water bodies during periods of low flows.
145	Policy 4.4.2	<u>Encouraging waste minimisation</u> Encourage activities to give effect to the waste minimisation hierarchy of responses, by: a) Giving preference to reducing waste generated; then b) Reusing waste; then c) Recycling waste; then d) Recovering resources from waste; then e) Disposing residual waste to authorised landfill.
146	Policy 4.4.3	<u>Encouraging environmental enhancement</u> Encourage activities which contribute to enhancing the natural environment, including to: a) Improve water quality; or b) Protect or restore habitat for indigenous species; or c) Regenerate indigenous species; or d) Mitigate natural hazards; or e) Restore the natural character of wetlands; or f) Improve the health and resilience of: i. Ecosystems supporting indigenous biodiversity; or ii. Important ecosystem services, including pollination; or g) Improve access to rivers, lakes, wetlands and their margins; or h) Buffer or link ecosystems, habitats and areas of significance that contribute to ecological corridors; or i) Control pest species.
147	Objective 4.5: Adverse effects of using and enjoying Otago's natural and built environment are minimised	
148	<i>Issue</i>	Resource use can create adverse effects on other resources, their values and for other resource users and the wider community. Otago's significant areas of biodiversity and outstanding landscapes, for example, are under pressure from the direct effects of human activities, as well as indirect effects, including the spread of multiple pest species.
149	<i>Need</i>	It is important to avoid effects that, individually or cumulatively, degrade Otago's natural and built environment, where possible.
150	Policy 4.5.1	<u>Avoiding objectionable discharges</u> Avoid discharges that are objectionable or offensive to takata whenua and the wider community, including: a) Discharges of human or animal waste: i. Directly to water; or ii. In close proximity to water; or iii. In close proximity to mahika kai sites; or b) Discharges of hazardous or noxious substances close to sensitive activities, including: i. Residential activities; or ii. Schools and other educational activities; or iii. Places of public access to the natural environment; or iv. In close proximity to mahika kai sites; or c) Odorous or conspicuous discharges.
151	Policy 4.5.2	<u>Applying an adaptive management approach</u>

		Apply an adaptive management approach, to address adverse effects that might arise and that can be remedied before they become irreversible, by: a) Setting appropriate indicators for effective monitoring of those adverse effects; and b) Setting thresholds to trigger remedial action before the effects result in irreversible damage.
152	Policy 4.5.3	<u>Applying emission standards on domestic fuel burners</u> Apply emission standards to domestic heating appliances, to achieve ambient air quality that supports good human health while ensuring homes in Otago have adequate heating.
153	Policy 4.5.4	<u>Minimising soil erosion</u> Minimise soil erosion resulting from activities, by: a) Using appropriate erosion controls; and b) Maintaining vegetative cover on erosion prone land; and c) Remediating land where significant soil erosion has occurred; and d) Encouraging activities that enhance soil retention.
154	Policy 4.5.5	<u>Controlling the introduction and spread of pest plants and animals</u> Control the adverse effects of pest species, prevent their introduction and reduce their spread, to safeguard: a) The viability of indigenous species and habitats for indigenous species; or b) Ecosystem services that support economic activities; or c) Water quality; or d) Soil quality; or e) Human and animal health; or f) Recreation values; or g) Takata whenua values.
155	Policy 4.5.6	<u>Managing adverse effects from mineral and gas exploration, extraction and processing</u> Minimise adverse effects from the exploration, extraction and processing of minerals, by: a) Giving preference to avoiding their location in: i. Areas of significant indigenous vegetation and significant habitats of indigenous fauna; and ii. Outstanding natural features, landscapes and seascapes; and iii. Areas of outstanding natural character; and iv. Outstanding water bodies; and v. Areas subject to significant natural hazard risk; b) Where it is not possible to avoid locating in the areas listed in a) above, avoiding significant adverse effects of the activity on those values that contribute to the significant or outstanding nature of those areas; and c) Avoiding adverse effects on the health and safety of the community; and d) Remedying or mitigating adverse effects on other values; and e) Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and; f) Reducing unavoidable adverse effects by i. Staging development for longer term activities; and ii. Progressively rehabilitating the site, where possible. g) Considering the use of offsetting, or compensatory measures, <u>to address for residual adverse effects on the environment</u> ; and h) Applying a precautionary approach to assessing the effects of the activity, where there is scientific uncertainty, and potentially significant or irreversible adverse effects.
156	Policy 4.5.7	<u>Enabling offsetting of indigenous biodiversity</u> Enable offsetting of adverse effects on indigenous biodiversity values, only when: a) The activities causing these <u>adverse effects</u> have a functional necessity to locate in significant or outstanding areas; and b) These <u>adverse effects</u> cannot be avoided, remedied or mitigated; and c) These <u>adverse effects</u> do not result in the loss of irreplaceable or vulnerable biodiversity.
157	Policy 4.5.8	<u>Providing for Offsetting for adverse effects on indigenous biodiversity</u>

		Provide for offsetting for from <u>adverse effects on</u> indigenous biodiversity, when it is enabled, by ensuring that: a) The offset achieves no net loss and preferably a net gain in indigenous biodiversity values; and b) The offset is undertaken close to the location of development, where this will result in the best ecological outcome; and c) The ecological values being achieved are the same or similar to those being lost; and d) The positive ecological outcomes of the offset last at least as long as the impact of the activity, if practicable.
158	Policy 4.5.9	<u>Offsetting for air quality</u> Provide for offsetting of adverse effects of discharges to air on ambient air quality, only when: a) The ambient air quality of the relevant airshed breaches air quality standards for human health; and b) Offsetting will reduce the cumulative effect of discharges to air in the relevant airshed by the same, or greater amount, than the proposed discharge; and c) Offsetting improves access to reliable and affordable domestic heating in the relevant airshed.
159	<u>New Objective</u>	<u>Significant industry activities and physical resources are provided for</u>
160	<u>New Policy</u>	<u>Recognising and providing for significant industry activities and physical resources</u> <u>Recognising and providing for significant industry activities and physical resources, by:</u> a) <u>Recognising that the use, development and protection of physical resources enables people and communities to provide for their social, economic, and cultural well-being and for their health and safety;</u> b) <u>Protecting significant industry activities from inappropriate subdivision, use, and development;</u> c) <u>Enabling new and expanded significant industry activities and development that does not have a significant adverse effect on the environment; and providing for all other significant industry activities and development if adverse effects on the environment are avoided, remedied, or mitigated.</u>
162	<u>New Method</u>	<u>Regional, city and district councils will ensure Regional and District Plans set objectives, policies and methods to:</u> a) <u>Recognise that development, use, and protection of physical resources and the urban environment enables people and communities to provide for their social, economic, and cultural well-being;</u> b) <u>Protect significant industry activities from inappropriate subdivision, use, and development;</u> c) <u>Enable significant industry activities and development that does not have a significant adverse effect on the environment;</u> d) <u>Provide for urban development and all other significant industry activities and development that does not have a significant adverse effect on any matter of national importance or national significance.</u>
Method 1: Kāi Tahu Relationships		
163	1.1	<u>Regional, city and district councils will develop processes to:</u>
164	1.1.1	Establish and maintain effective resource management relationships with Kāi Tahu;
165	1.1.2	Have regard to Iwi Management Plans;
166	1.1.3	Consult Kāi Tahu in resource management decision-making and implementation.
167	1.1.4 (New method)	<u>Facilitate efficient and effective processes for applicants to consult Kāi Tahu on resource consent applications and private plan change requests</u>
168	1.2	<u>Regional, city and district councils will collaborate with Kāi Tahu to:</u>
169	1.2.1	Identify, and protect <u>from inappropriate subdivision, use and development,</u> places, areas or landscapes of cultural, spiritual or traditional significance to them;
170	1.2.2	Identify, and protect <u>from inappropriate subdivision, use and development,</u> the values that contribute to their significance;

171	1.2.3	Identify areas or values that may contribute to the importance of outstanding; natural features and landscapes, and special amenity landscapes to Kāi Tahu;
172	1.2.4	Determine appropriate naming for places of significance in Otago.
173	1.2.5 (New method)	Facilitate efficient and effective processes for applicants to consult Kāi Tahu on resource consent applications and private plan change requests
174	1.3	<u>1.3 Regional, city and district councils will:</u>
175	1.3.1	Seek opportunities to assess and improve knowledge of tikaka and the principles of Te Tiriti o Waitangi among staff and stakeholders.
176	1.4	<u>Regional, city and district councils may:</u>
178	1.4.4	Delegate and transfer RMA plan administration functions to an iwi authority, where this provides an efficient and effective service.
179	Method 2: Regional, City and District Council Relationships	
180	2.1	<u>Regional, city and district councils together will:</u>
181	2.1.1	Share information on matters of common interest;
182	2.1.2	Work together to ensure RMA plan provisions are complementary for overlapping or abutting responsibilities.
183	2.2	<u>Regional, city and district councils may:</u>
184	2.2.1	Establish joint processes for working together on common resource management matters or cross boundary issues, such as: a) Joint committees; b) Joint working groups; c) Joint project management; d) Joint or combined hearings;
185	2.2.2	Prepare combined regional and district documents;
186	2.2.3	Delegate or transfer RMA functions, where this provides an efficient and effective service, from: a) One local authority to another; b) A local authority to an iwi authority;
187	2.2.4	Establish joint management agreements with another statutory body (such as Te Rūnanga o Ngāi Tahu or the Crown);
188	2.2.5	Establish protocols and processes for resolving cross boundary issues through the triennial agreement under the Local Government Act 2002.
189	2.3	<u>Regional council may, at the request of city or district councils:</u>
190	2.3.1	Make a regional rule for the purpose of extinguishing existing use rights under Section 10 of the RMA to address specific natural hazard risk;
191	2.3.2	Delegate the administration of that regional rule to the city or district council.
192	Method 3: Regional Plans	
193	3.1	<u>Regional Plans will set objectives, policies and methods to implement policies in the RPS as they relate to Regional Council areas of responsibility.</u> More specific direction is provided in the following areas:
194	3.1.1	Regional Plans will set objectives, policies and methods to implement Policy 1.2.3 by providing for the management of culturally sensitive information and the protection of culturally sensitive areas through the use of silent files and heritage alert layers by local authorities;
195	3.1.2	Regional Plans will set objectives, policies and methods to implement Policy 1.2.5 by promoting or restricting access to historic heritage places or areas to ensure the values Kāi Tahu associate with these places may be upheld in accordance with tikaka Māori;
196	3.1.3	Regional Plans will set objectives, policies and methods to implement Policy 1.1.2 by having regard to the Te Rūnanga o Ngāi Tahu, Hazardous Substances and New Organisms Policy Statement, 2008 when developing objectives, policies and methods for the management of hazardous substances and new organisms;

197	3.1.4	Regional Plans will set objectives, policies and methods to implement policies 2.1.1 – 6, 2.2.4, 3.9.4, 4.2.3, and 4.5.1, by including provisions to: a) Manage land uses and vegetation removal within the beds of lakes and rivers and the coastal environment; b) Manage change in river morphology; c) Encourage restoration of water margins; d) Apply emission standards to domestic fuel burners, that support good human health while ensuring homes in Otago have adequate heating; e) Managing noise in the coastal marine area; f) Identifying, and protecting from inappropriate subdivision, use and development, historic heritage places or, areas or landscapes located in the beds of rivers, lakes and wetlands or the coastal marine area; g) Manage the effects of the use of contaminated land on: i) The quality of air, water or land; ii) In the coastal marine area, and the beds of rivers, lakes and other waterbodies; h) Require solid waste facilities to monitor, record and report on the type and amount of material entering the waste stream and solid waste deposited to landfill; i) Implement policy 3.2.2 and 3.2.3 by using the criteria when undertaking natural hazard assessments;
198	3.1.5	Regional Plan will set objectives, policies and methods to implement policy 2.1.2 and 2.3.3 by developing river management strategies, including recommendations on: a) The management of riparian margins along rivers and lakes; b) The management of bed alterations.
199	3.2	<u>Implementing Regional Plans:</u>
200	3.2.1	Regional council will implement Policies 3.2.2 and 3.2.3 when undertaking natural hazard assessments;
201	3.2.2	Regional council will implement Policy 3.9.3 by investigating land for the purpose of identifying contaminated or potentially contaminated sites.
202	3.3	<u>Monitoring and reviewing Regional Plans:</u>
203	3.3.1	Regional Council will monitor and review regional plans to give effect to its responsibilities under the RMA.
204	Method 4: City and District Plans	
205	4.1	<u>City and district plans will set objectives, policies and methods to implement policies in the RPS as they relate to the City or District Council areas of responsibility.</u> More specific direction is provided in the following areas:
206	4.1.1	City or district plans will implement Policies 3.2.1 to 3.2.11 by determining the appropriate level of regulatory response to natural hazard risk by: a) Identifying areas subject to natural hazards in plans and/or natural hazard registers and databases; b) Applying the plan principles to the management of recently identified natural hazards; c) Considering the use of adaptive management techniques;
207	4.1.2	City or district plans will implement Policy 3.8.1 by putting conditions on development and subdivisions consents, and in district plans, on the type of heating systems allowed, consistent with ORC's discharge rules;
208	4.1.3	City or district plans will implement Policy 4.5.1 by including provisions to manage the discharge of dust associated with earthworks and land use
209	4.1.4	City or district plans will implement Policy 4.3.2 by including provisions managing land use in dry catchments where this will impact on water yield;
210	4.1.5	Include subdivision and infrastructure design standards to recognise the access

		needs of different sections of the community, including the mobility impaired, the elderly and children;
211	4.1.6	City or district plans will implement Policy 2.2.11 by maintaining and where possible enhance access to surf breaks of national importance;
212	4.1.7	City or district plans will implement Policy 3.9.2 including by managing the actual or potential adverse effects of the use or storage of hazardous substances, including on: a) Other land use activities; b) The health and safety of the community; c) Groundwater protection, or community water supplies; d) Amenity values, and community and takata whenua resources, cultural and spiritual values; e) Other activities or environmental values as a result of location in hazard prone areas;
213	4.1.8	City or district plans will implement Policy 3.5.2 by providing for and managing the land use effects associated with the establishment of waste management activities and facilities;
214	4.1.9	City or district plans will implement Policy 4.3.2 by: a) Including accidental discovery protocols as conditions on consent for earthworks or other activities that may unearth archaeological features providing for activities which contribute to the retention of historic heritage places, areas or landscapes, including maintenance and seismic strengthening; b) Providing for the recording of culturally sensitive information and the protection of culturally sensitive areas through the use of silent files, heritage alert layers or other methods satisfactory to Kāi Tahu
215	4.1.10	City or district plans will implement Policy 1.2.5 by making allowance for native reserves to be used in the manner intended by the Crown at the time of their establishment, including Papakāika and marae related activities;
216	4.1.11	City or district plans will implement Policy 1.2.3 and 1.2.4 by promoting or restricting access, as required by circumstances, to historic heritage places and areas and identified sites in accordance with tikaka Māori
217	4.1.12	City or district plans may implement Policy 3.8.2 by: a) Establishing urban growth boundaries where required to manage pressure for urban development; b) Ensuring urban growth boundaries contain sufficient capacity, when measured district wide, to accommodate 10 years urban growth based on demographic growth projections; c) Requesting the ORC to include urban growth boundaries in the RPS
218	4.2	<u>Implementing District Plans</u>
219	4.2.1	City or district councils will implement Policies 3.2.2 and 3.2.3, <u>to the extent applicable</u> , when undertaking natural hazard assessments;
220	4.2.2	City or district councils will implement Policies 2.2.1, 2.2.3, 2.2.5 and 2.2.8 to assess the values of places of potential significance to inform the decision making process;
221	4.2.3	City or district councils will implement Policy 4.2.3 by including accidental discovery protocols as conditions on consent for earthworks or other activities that may unearth archaeological features;
222	4.2.4	City or district councils will implement Policies 4.3.1, 4.3.2, 3.8.1 and 3.8.2 by preparing structure plans for large scale land use changes;
223	4.2.5	City or district councils will implement Policy 4.2.3 by ensuring methods for protecting culturally important sites are culturally appropriate;
224	4.2.6	City or district councils may implement Policies 3.2.2 and 3.2.3 by:

		<p>a) Requiring site specific investigation where there is limited information available on natural hazard or climate change risk or effects;</p> <p>b) Requesting the regional council develop a regional rule for the purpose of extinguishing existing use rights under Section 10 of the RMA to address specific natural hazard risk;</p>
225	4.2.7	City or district councils may implement Policy 1.2.4 and 4.1.1 by including conditions to maintain or enhance access to the natural environment or sites of cultural significance.
226	4.3	Monitoring and reviewing city and district plans:
227	4.3.1	City and district councils will monitor and review regional plans to give effect to its responsibilities under the RMA.
228	Method 5: Regional Policy Statement	
229	5.1	<u>Regional Policy Statement</u>
230	5.1.1	<p>City or district councils may:</p> <p>a) Implement Policy 3.8.2 by requesting the regional council include urban growth boundaries in the Regional Policy Statement;</p>
231	5.1.2	<p>The regional council may:</p> <p>a) At the request of city or district councils, include urban growth boundaries, future urban development areas or their equivalent in the RPS, where:</p> <p>i) Those urban growth boundaries are necessary to sustainably manage urban growth within the district;</p> <p>ii) The boundaries are robust in terms of providing sufficient capacity for 10 years urban growth;</p> <p>iii) Those urban growth boundaries are consistent with the policy direction of the RPS in terms of priorities for the management of environment and natural hazards;</p> <p>b) Administer a change to the RPS where the relevant city or district council identifies a need to modify existing urban growth boundaries to maintain a minimum of 10 years capacity for urban growth.</p>
232	Method 6: Research, Monitoring and Reporting	
233	6.1	<u>Identification of important resources</u>
234	6.1.1	<p>Regional, city and district councils will:</p> <p>a) Work collaboratively to identify the landward extent of the coastal environment;</p>
235	6.1.2	<p>Regional, city and district councils, in their areas of responsibility, will identify:</p> <p>a) Significant indigenous vegetation and significant habitat of indigenous fauna;</p> <p>b) Areas of outstanding natural character in the coastal environment;</p> <p>c) Outstanding natural features, and outstanding natural landscapes and seascapes;</p> <p>d) Special amenity landscapes;</p> <p>e) Outstanding water bodies;</p> <p>f) The values of water margins critical to threatened or rare indigenous flora and fauna;</p> <p><u>g) Regionally significant soil resources;</u></p> <p><u>h) Significant infrastructure;</u></p>
236	6.1.3	<p>Regional council will:</p> <p>a) Identify airsheds based on geographical and physical boundaries, for the management of air quality;</p> <p>b) Identify dry catchments and areas of tussock grasslands where rules are required by TAs to manage water quantity;</p> <p>c) Identify highly valued soil resources;</p>
237	6.1.4	<p>Regional council will engage with Kāi Tahu to:</p> <p>a) Identify the cultural values of resources and requirements for customary uses;</p>

		b) Identify wāhi tupuna and the values that contribute to their significance, including sites and landscapes of cultural significance to Kāi Tahu such as wāhi tapu and other elements identified in schedule 1C.
238	6.2	<u>Research</u>
239	6.2.1	<p>The regional council will:</p> <p>a) Undertake investigation for the identification of catchment values, and the resources and processes those values depend on, with a particular focus on:</p> <p>i) The interconnections between water bodies, including coastal water;</p> <p>ii) The role of river and catchment morphology and natural functioning in supporting those values;</p> <p>iii) The maintenance and enhancement of indigenous biodiversity and ecosystem health;</p> <p>iv) Erosion risk mitigation;</p> <p>v) Providing for the natural functioning of rivers and lakes;</p> <p>b) Identify the values of Otago's coast, and the processes and resources those values are dependent on;</p> <p>c) Identify airsheds based on geographical and physical boundaries, for the management of air quality;</p> <p>d) Investigate and provide guidance on:</p> <p>i. The inventory and mapping of Otago's soil resources;</p> <p>ii. The location and extent of high class and versatile soil in Otago;</p> <p>iii. Identification of threats to the life-supporting capacity of Otago's soil resources;</p> <p>iv.</p> <p>e) Develop and maintain a register of sites of known or potentially contaminated land in Otago. Share information regarding Otago's soil resources and contaminated land with city and district councils;</p> <p>f) Provide city and district councils with regional data on the quantity and composition of waste entering the waste stream and being disposed for strategic forecasting and planning;</p> <p>g) Undertake research, in collaboration with local authorities and other stakeholders as appropriate, into natural hazards and climate change in Otago;</p> <p>h) Support city and district councils with information on natural hazards for:</p> <p>i) The preparation of district plan reviews or changes;</p> <p>ii) Inclusion in Land and Project Information Memoranda;</p> <p>i) Collect, centralise and share information on erosion-prone land in Otago;</p> <p>j) Collect, centralise, and make available any information on the expected effects of climate change in Otago.</p>
240	6.2.2	<p>Regional, city and district councils will:</p> <p>a) Research and share information relevant to the effects of land use on water, including:</p> <p>i) The values supported by the catchment;</p> <p>ii) Riparian vegetation cover or any land cover which contributes to supporting freshwater values, such as tussock grasslands;</p> <p>iii) Land use changes which might have significant effects on freshwater values;</p> <p>iv) Areas particularly sensitive to land use changes, such as sensitive aquifers and water-short catchments;</p> <p>v) The effects of land use on erosion;</p> <p>b) Research and share information relevant to the effects of land use on coastal values and coastal network infrastructure with city and district councils, including:</p> <p>i) Coastal values;</p>

		<ul style="list-style-type: none"> ii) Coastal hazards; iii) Riparian vegetation cover or any land cover which contributes to supporting coastal values, or mitigating coastal hazards; iv) Land use changes which might have significant effects on coastal values or the consequences of coastal hazards; v) Areas particularly sensitive to land use changes.
241	6.2.3	<p>City and district councils will:</p> <ul style="list-style-type: none"> a) Research demographic changes within the district, including the relationship between housing demand and population growth, and residential capacity within existing urban areas. b) Share information with other local authorities on relevant regional rules, when approving a land use, development or subdivision by consent, including: <ul style="list-style-type: none"> i) Rules on discharges to water, or to land in circumstances which may result in contaminant entering water; ii) Rules on discharges to air; iii) Rules on discharges to land; iv) Provide information to the regional council, on any land use, development or subdivision approved by consent, which have the potential to adversely affect air quality and breach regional rules
242	6.3	<u>State of Environment reporting</u>
243	6.3.1	<p>Regional, city and district councils will:</p> <ul style="list-style-type: none"> a) Carry out state of the environment reporting
244	6.4	<u>RMA plan effectiveness reporting</u>
245	6.4.1	<p>Regional, city and district councils will:</p> <ul style="list-style-type: none"> a) Include indicators for determining plan effectiveness in all plans developed under the RMA, including the RPS; b) Report on the efficiency and effectiveness of plans based on those indicators.
246	6.5	<u>Plan implementation reporting</u>
247	6.5.1	<p>Regional council will:</p> <ul style="list-style-type: none"> a) Monitor and report publicly on the achievement of regional and district plan objectives, policies and methods
248	6.5.2	<p>City and district councils will:</p> <ul style="list-style-type: none"> a) Monitor and report publicly on the achievement of regional and district plan objectives, policies and methods.
249	<u>Method 7: Strategies and Plans (non-RMA)</u>	
250	7.1	<u>Natural hazard strategies</u>
251	7.1.1	<p>Regional, city and district councils may:</p> <ul style="list-style-type: none"> a) Prepare strategies or other similar documents to assist in the: <ul style="list-style-type: none"> i) Management and reduction of natural hazard risk; ii) Adaptation to, and mitigation of, climate change; b) Develop community relevant responses to the impacts of natural hazards and climate change in Otago, in collaboration with the relevant local authority, key stakeholders and affected community.
252	7.2	<u>Air Strategy</u>
253	7.2.1	<p>Regional, city and district councils may:</p> <ul style="list-style-type: none"> a) Jointly develop and implement, in collaboration with other key stakeholders, a strategy for: <ul style="list-style-type: none"> i) The upgrading of housing stock and their thermal envelopment; ii) The reduction of domestic emissions to air.
254	7.3	<u>Regional Plan Land Transport will set objectives, policies and methods to implement policy 3.4.1 2, 3.5.1, 3.7.1 and 3.7.4 with a particular focus on:</u>
255	7.3.1	<u>Enhancing road safety;</u>

256	7.3.2	Ensuring travel needs in Otago are met;
257	7.3.3	Enabling increased freight efficiency;
258	7.3.4	Managing Otago's public transport services.
259	7.4	<u>Pest management strategy</u>
260	7.4.1	The regional council will: a) Develop and implement a pest management strategy, for the control of pest species, including those which: i) Have adverse effects on the natural character of the coastal environment; ii) Have adverse effects on significant indigenous biodiversity; iii) Have significant adverse effects on indigenous biodiversity; b) Have regard to indigenous biodiversity values when preparing any Regional Pest Management Strategy and prioritising pest management activities, including: i) Any areas of significant indigenous vegetation and significant habitats of indigenous fauna; ii) Any local indigenous biodiversity strategies
261	7.5	<u>Pan-regional pest management strategy</u>
262	7.5.1	The regional council may: a) Develop a joint pest management strategy with neighbouring regions.
263	7.6	<u>Urban stream plans</u>
264	7.6.1	District and city councils may: a) Develop and implement urban stream restoration plans, for the restoration of the natural character and natural functioning of urban streams.
265	Method 8: Education and Information	
266	8.1	<u>Providing public information</u>
267	8.1.1	Regional, district and city councils may: a) Provide information and education about the maintenance, restoration and enhancement of indigenous ecosystems and habitats; b) Provide guidance on: i) Natural hazard risk responses; ii) Ways to adapt to, and mitigate the effects of, climate change; iii) The benefits of natural features and systems in mitigating natural hazards.
268	8.1.2	Regional council will: a) Educate and provide available information on: i) Natural hazards; ii) Rainfall and river flow; iii) Climate change. b) Provide guidance on: i) Measures to mitigate erosion risks resulting from land uses; ii) Riparian margin management, especially on flooding and erosion risks; iii) Measures to maintain or enhance soil quality; iv) Discharge management, including on reducing domestic discharges to air; v) The management of diffuse discharges to water; vi) Waste management. c) Provide information material on: i) The ecosystem services derived from indigenous biodiversity; ii) On the benefits of riparian margin management, especially on flooding and erosion risks
269	8.1.3	City and district councils will: a) Collate and make available any information on the projected demographic changes to local communities;

		<p>b) Provide available natural hazard information through the Land (LIM) and Project Information Memorandum (PIM) process;</p> <p>c) Provide available information on known or potentially contaminated sites through the Land (LIM) and Project Information Memorandum (PIM) process;</p>
270	8.1.4	<p>City and district councils may:</p> <p>a) Provide information and guidance on crime prevention through environmental design and urban design principles to inform local development proposals;</p> <p>b) Provide information and guidance on urban design techniques to respond to the different access requirements or needs of the community;</p> <p>c) Provide information and guidance on design techniques to enable adaptive reuse of buildings;</p> <p>d) Provide guidance material for water conservation and the efficient domestic use of water;</p> <p>e) Provide guidance on measures for increased energy efficiency and energy conservation;</p> <p>f) Provide guidance on opportunities for the development of small scale renewable electricity generation.</p>
271	Method 9: Funding	
272	9.1	Providing financial support
273	9.1.1	<p>Regional, city and district councils may:</p> <p>a) Establish and administer funds to provide public access or services to sites of significance on privately owned land;</p> <p>b) Fund community groups and projects with aims that complement RPS objectives and policies.</p>
274	Method 10: Service Provision	
275	10.1	Public Services
276	10.1.1	Regional, city and district councils will provide public services according to their functions, roles and responsibilities
277	Method 11: Advocacy and Facilitation	
278	11.1	Promotion
279	11.1.1	Regional, city and district councils will work with stakeholders, including central government agencies and other interested parties, on resource management matters;
280	11.1.2	<p>Regional, city and district councils may:</p> <p>a) Advocate for:</p> <p>i) Initiatives and proposals which support or complement the goals of the RMA, RPS and supporting documents;</p> <p>ii) Subdivision and building design that increases passive solar gain and uses higher levels of insulation in buildings to improve energy efficiency;</p> <p>iii) The implementation of the waste hierarchy throughout the region;</p> <p>iv) National guidance on managing natural hazards, and mitigating and adapting to climate change;</p> <p>v) Legislative change to improve resilience and reduce the risk of natural hazards and climate change to individuals and communities;</p> <p>b) Enhance individual and community resilience by encouraging activities and actions that:</p>

		<ul style="list-style-type: none"> i) Promote interactions and partnerships within and between communities, businesses and organisations; ii) Support self-sufficiency; iii) Improve disaster readiness, response and recovery; iv) Enable opportunities for improvements to be made following a disaster event; v) Contribute to the retention of historic heritage places, areas or landscapes, including maintenance and seismic strengthening; e) Encourage an approach to resource management that assists in reducing individual and community natural hazard risk and in reducing the effects of climate change.
281	11.1.3	<p>Regional, city and district councils may:</p> <ul style="list-style-type: none"> a) Advocate for the development, upgrade or maintenance of infrastructure, when it will enhance Otago's communities' wellbeing or health and safety; b) Promote subdivision and urban development that responds to and anticipates the changing demographic needs of the local community; c) Advocate for the development of infrastructure and services to provide for hazardous substance collection, disposal and recycling services across the region; d) Promote the development and adoption of best practice guidelines for the use and management of hazardous substances, and a reduction in hazardous substance use.
282	11.1.4	<p>City and district councils will:</p> <ul style="list-style-type: none"> a) Promote the integration of new development with existing areas through the use of elements that reflect local character; b) Encourage building design in commercial areas to be designed to facilitate adaptive reuse over time; c) Ensure consideration of orientation and design for solar gain in subdivision and building design; d) Advocate for the establishment of solid waste management and disposal facilities
283	11.2	<u>Facilitation</u>
284	11.2.1	<p>Regional, city and district councils will:</p> <ul style="list-style-type: none"> a) Facilitate the restoration of natural wetlands or construction of artificial wetlands, particularly when it contributes to the: <ul style="list-style-type: none"> i) Management of diffuse discharges to water; ii) Protection or restoration of indigenous species; iii) Mitigation of natural hazards; iv) Restoration of the natural character of wetlands; b) Facilitate the restoration or enhancement of riparian margins, particularly when they: <ul style="list-style-type: none"> i) Improve the health and resilience of ecosystems supporting indigenous biodiversity; ii) Restore or rehabilitate indigenous biodiversity and natural character; iii) Contribute to a safe network of active transport infrastructure; iv) Improve access to rivers, lakes, wetlands and their margins; v) Mitigate risks of erosion; c) Facilitate initiatives that support: <ul style="list-style-type: none"> i) The conservation of indigenous vegetation; ii) Conservation of biodiversity values;

		<ul style="list-style-type: none"> iii) Maintenance or enhancement of coastal values, including restoration or rehabilitation of the natural character; iv) The protection or restoration of the significant values of wetlands; v) Co-ordination of the services provided by operators of lifeline utilities, essential and emergency services across and beyond Otago; vi) Energy conservation and efficiency, at a community or individual scale; vii) Small scale renewable electricity generation; d) Facilitate coordination between <u>significant infrastructure lifeline utilities and significant community facilities used for emergency management</u>, including by: <ul style="list-style-type: none"> i) Recognising the interconnections between <u>significant infrastructure lifeline utilities</u>; ii) Encouraging any development or upgrade of infrastructure which would resolve potential weaknesses in emergency management.
285	11.2.2	<p>Regional council will:</p> <ul style="list-style-type: none"> a) Facilitate the restoration, rehabilitation or creation of freshwater and coastal habitats, particularly when it: <ul style="list-style-type: none"> i) Encourages the natural regeneration of indigenous species; ii) Buffers or links ecosystems, habitats and areas of significance that contribute to ecological corridors; iii) Maintains or enhances the provision of indigenous ecosystem services; b) Facilitate the control of pest species, including wilding pines, particularly when it contributes to the protection or restoration of : <ul style="list-style-type: none"> i) Outstanding or amenity landscapes; ii) Indigenous species; c) Facilitate the establishment of: <ul style="list-style-type: none"> i) Water management groups that co-ordinate the exercise of water-related consents; ii) Water allocation committees for the management of water allocation in case of drought.
286	11.2.3	<p>Regional, city and district councils may:</p> <ul style="list-style-type: none"> a) Facilitate the planning for community infrastructure, when it would increase the efficiency of water use; b) Facilitate negotiations with landowners for public or Kāi Tahu access to sites of significance that do not have suitable access.
287	Schedule 1 Takata whenua values and interests	-
288	Schedule 2 Statutory acknowledgment areas	-
289	Schedule 1A	<u>Specify or identify "other cultural values" referred to in other parts of the RPS</u>
290	Schedule 3 Significance threshold	<p><u>Delete. OR if retained:</u></p> <p><u>Amend provisions so consistent with case law</u></p> <p><u>insert new criteria to reflect the need to consider the ability for the effect to be offset or compensated and to reflect environmental/planning context on a case-by-case basis. For example:</u></p> <p><u>11. Ability for offsetting or compensation</u> <u>The extent to which the adverse effect can be directly offset or otherwise compensated, and consequently reducing the significance of the effect.</u></p>

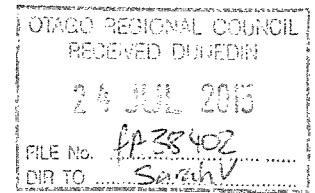
		<p>12. Environmental Context <u>The degree of change in social, economic, cultural, or ecological conditions, and the extent to which these conditions can absorb that change.</u></p> <p>13. Matters of national importance and national significance. <u>The extent to which the adverse effect changes a value recognised as a matter of a national importance under section 6 of the RMA.</u> <u>The extent to which the adverse effect is provided for, or is contrary to, any matter of national significance specified in a NPS or the NZCPS.</u></p>
291	Schedule 4 Criteria for the identification of natural features and landscapes	<u>-Delete Schedule 4</u>
292	Schedule 5 Criteria for the assessment of the significance of indigenous vegetation and habitat of indigenous fauna	=
293	Schedule 6 Urban form and design	<u>Delete Schedule 6</u>
294	Schedule 7 Matters for the identification of historic heritage values	=
295	Schedule 8 Urban growth boundaries	<u>Delete Schedule 8-</u>
296	Appendix 1 Statutory Framework	<u>Delete Appendix 1</u>
297	Appendix 2 Te Tiriti o Waitangi	<u>Delete Appendix 2 or Amend Appendix 2 to identify the principles of the Treaty of Waitangi that are to be applied when giving effect to the Otago RPS</u>
298	Glossary	<u>Define Significant infrastructure – include lifeline utilities and any infrastructure considered to be of regional or national significance</u>
299	Glossary	<u>Define Significant Community Facility – include facilities that provide essential community services</u>
300	Glossary	<u>Define Urban</u>
301	Glossary	<u>Define or identify Regionally Significant Soil Resource – include all soil resources intended to be managed by the PRPS</u>
302	Glossary	<u>Define Regionally Significant Industry Activity – include any activity associated with tourism, education or primary production</u>
303	Glossary	<u>Define Hard mitigation measures</u>

304	Glossary	<u>Amend definition of "kai tahu" to clarify if has the same or different meaning as "Ngai Tahu". having particular regard to the Ngāi Tahu Claims Settlement Act 1998 and other planning documents outside the Otago Region (for example the Canterbury and Southland Regional Policy Statements).</u>
305	Glossary	<u>Introduce all terms listed in the Te Reo Glossary (so that there is a single Glossary)</u>
306	Glossary of Te Reo Terms	<u>Delete – include these terms in the Glossary</u>

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Otago Regional Council,
Private Bag 1954
Dunedin 9054
24th of July 2015

Submission To:
Proposed Regional Policy Statement for Otago

Our organisation wishes to speak to our submission

The Surfbreak Protection Society Inc (SPS) is a representative group of surfers¹ and friends dedicated to the conservation of the "treasures" of the New Zealand Surfing Community (and public generally) - our surfbreaks - through the preservation of their natural characteristics, water quality, marine eco systems and low impact access for all. We strive to be Aotearoa's "Guardians - Trustees" of our surfbreaks and the natural environments that complement them.

Since its establishment in 2006, SPS has successfully been involved with incorporating surf break preservation and sustainability into policy prepared under the Resource Management Act 1991 (RMA). SPS was a successful submitter on the New Zealand Coastal Policy Statement 2010² (NZCPS) containing national direction on surf break Protection.

SPS has also been involved with a number of cases protecting the qualities and enjoyment of surf breaks from inappropriate subdivision, use and development in the coastal environment. This is in regard to issues such as maintaining water quality, access to breaks and wave quality of breaks. SPS is the leading surf break preservation and sustainability organisation in New Zealand and a key 'stakeholder' / surfing interest group in the coastline, with our purpose of protecting surf breaks now mandated by national policy direction in the NZCPS (and by regional policy direction, for example, in the Taranaki Regional Policy Statement 2009).

¹ 1. One who engages in the sport of surfing. Also called *surfer*, <http://www.thefreedictionary.com/surfer>

² The New Zealand Coastal Policy Statement 2010 was issued by notice in the New Zealand Gazette on 4 November 2010 and took effect on 3 December 2010.

Surf breaks are a natural characteristic, and part of the natural character and landscapes, of the New Zealand coastline/coastal environment, of which there are few when compared to the total length of the New Zealand coastline³.

Approximately 7% [310,000] of New Zealanders are estimated to “surf “on a regular basis⁴. Surfing makes a valuable contribution to the wellbeing of New Zealanders by promoting health and fitness, cross cultural and intergenerational camaraderie and a sense of connection to, and respect for, New Zealand’s coastal environment and resources. In terms of Part 2 RMA surf breaks, therefore, contribute to amenity values/recreational amenity and natural character of the coastal environment; surf breaks and surfing enables people and communities to provide for their social, economic, and cultural wellbeing and for their health and safety.

Surf breaks under the Resource Management Act

The maintenance and protection of surf breaks is relevant to several aspects of the RMA, particularly the purpose and principles of the RMA (sections 5, 6, 7) and the purpose of Regional Policy Statements’ (RPS) (section 59).

Section 59 Purpose of regional policy statements

The purpose of a RPS is to achieve the purpose of the RMA by providing an overview of the resource management issues of the region and policies and methods to achieve integrated management of the natural and physical resources of the whole region.

Section 5 Purpose

(1) The purpose of this Act is to promote the sustainable management of natural and physical resources.

(2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural wellbeing and for their health and safety while—

(a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and

(b) safeguarding the life-supporting capacity of air, water, soil, and ecosystems; and

(c) avoiding, remedying, or mitigating any adverse effects of activities on the environment.

³ Scarfe (2008) states that there is only: “one surfing break every 39km to 58km. Many of these surfing breaks are only surfable a few days per month or year when the tide, wind and wave conditions are suitable.”

⁴ Figures sourced from SPARC

Surf breaks are a “natural and physical resource” to be sustainably managed under the RMA. Surf breaks contribute to the “social, economic and cultural wellbeing” of people and communities by providing for the recreation activities of surf-riders, but also have wider benefits in terms of the economic activity of the local area and creation of a distinctive ‘sense of place’ and identity for communities close to surf breaks. International research demonstrates that surf breaks provide for significant social and economic benefits.

There are several places in the Otago Region where surfing is an important element of the character and culture of the local area. Surfing is an activity which draws people to live in the local area and attracts tourists and visitors. In total, the variety and scale of surf breaks around the Otago region contribute to the character and attractiveness of the region. The coast and beaches are consistently given as a key reason as to why people choose to live in coastal communities of the region. In some cases; the rationale to live on the regions coasts relates directly to the opportunities for surfing.

Otago University for example, highlights surfing as a major drawcard for students both inside and out the Otago region, to choose as their faculty to study

However, it is clear that the accessibility of the coast and the range of different activities that are possible around the coast also contribute to the wellbeing of communities.

Globally the numbers of people involved in surfing has increased significantly over recent decades and is expected to rise. At the same time, pressure for development along the coast is growing. Ensuring appropriate management of any potential conflict between such uses of limited coastal space is part of the council’s responsibility to meet the reasonably foreseeable needs of future generations, and to avoid, remedy or mitigate any adverse effects of activities on the environment.

Section 6 Matters of national importance

In achieving the purpose of this Act, all persons exercising functions and powers under it, in relation to managing the use, development, and protection of natural and physical resources, shall recognise and provide for the following matters of national importance:

(a) the protection of the natural character of the coastal environment (including the coastal marine area), wetlands, and lakes and rivers and their margins, and the protection of them from inappropriate subdivision, use, and development:

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

(d) the maintenance and enhancement of public access to and along the coastal marine area, lakes, and rivers: ...

The matters of national importance in section 6(a), (b) and (d) are relevant to the consideration of surf breaks because breaks are natural features and their use depends on public access to the coastal marine area. Surf breaks are an element of natural character in that they rely on the natural formation of swell corridors and reefs, bars, headlands, ledges or beaches for a wave to break.

Nationally and internationally numerous surf breaks have been modified by coastal engineering activities, but they still contain a degree of natural character. The nature of the surfing experience is also affected by the natural character of the surrounding area.

In some places, the lack of built elements adds a remote, wilderness value to the surfing experience. At breaks in more developed areas, the natural elements of cliffs and vegetation along the coast contribute to this. In some places, surf breaks will also be an outstanding natural feature or part of an outstanding natural landscape.

Public access to a surf break is fundamental to its use. Such access can be enhanced by works such as walkways and car parks, or can be diminished through activities such as subdivision which block informal access.

Section 7 Other matters

In achieving the purpose of this Act, all persons exercising functions and powers under it, in relation to managing the use, development, and protection of natural and physical resources, shall have particular regard to—

(c) the maintenance and enhancement of amenity value⁵: ...

(f) maintenance and enhancement of the quality of the environment:

(g) any finite characteristics of natural and physical resources: ...

In places where surf breaks are located, they often provide a major element contributing toward the amenity value of an area. This is because they provide for the recreation of those

⁵ RMA Section 2 (Interpretation) - Amenity values means those natural or physical qualities and characteristics of an area that contribute to people's appreciation of its pleasantness, aesthetic coherence, and cultural and recreational attributes.

people surfing, the pleasantness of a site, and for the enjoyment of people in a community (as well as visitors to a community) who watch surfers and waves from the land.

Therefore, maintenance and enhancement of the quality of the environment is important for retaining the significance of the surfing experience and these community values. Surf breaks are a finite characteristic of the environment as they only occur at specific sites. As features they are reliant on a number of natural processes. They can easily become vulnerable when these processes (which create the break) are disrupted. To date there is no reasonable technology to replicate the natural processes of a surf break, nor is there any feasible technology to replace a natural surf break.

Surf breaks are a relevant matter for inclusion in the Otago Proposed RPS as the maintenance of their values depends on the integrated management of activities both in the coastal marine area (CMA) and on the adjacent land. Activities in the CMA, such as dredging, can affect the processes which result in surfable waves forming, while water quality and discharges can affect the quality and safety of the surfing experience. Activities on land, such as development and vegetation clearance, can affect the nature of the surfing experience and the access to surfing locations. Land based sources of contamination (sediment, nutrients, pathogens) can also affect the use of a surf break.

Maintenance of the coastal environment is a significant issue for the Otago region because of the high levels of use of the coastal areas, and the importance the community place on the coast. Surf breaks are an important element of the region's coastal environment for many people and warrant specific consideration in the resource management of the region.

Recognition of surf breaks in planning processes

There is considerable evidence internationally that surf breaks can be altered or destroyed by coastal development. Surf breaks can be destroyed by large scale works, such as an LPG terminal in Mexico. The quality of a break can be affected by smaller works such as construction of seawalls (e.g. St Clair, Dunedin), Dredging of moana anu anu channel at Whangamata, jetties (e.g. Mission Bay, San Diego, California), boat ramps (e.g. Manu Bay, Raglan) , piers (e.g. Oil Piers, Ventura, California) and beach nourishment (e.g. The Cove, Sandy Hook, New Jersey).

In the case of Mundaka, a Spanish venue for World Tour Championship competitions, the 2005 event was cancelled due to a lack of wave quality blamed on increased dredging and dumping of sand in the adjacent harbour. Any modifications to surfing break's needs to be strategic and not by chance to avoid accidentally destroying or degrading the surf break

resource. In New Zealand, concerns about potential effects on surf breaks have been advanced including recent concerns on sand mining at Pakiri and Mangawhai area.

Surfers' concerns regarding the quality of the surfing experience have contributed to community pressure for upgrades to wastewater discharges in Whangamata, Raglan, Gisborne, Dunedin and Wellington. Such issues have demonstrated the depth of community concern about surf breaks and potential adverse effects from activities in the CMA or on nearby land. Decisions made at the Otago Proposed RPS planning level could facilitate more expedient outcomes when such conflicts arise.

It is expected that the number of people participating in surfing will grow as the regional population grows. At the same time, there will be pressure for increased development and works along the coast in response to demands for other activities or in response to the effects of climate change.

The Otago Proposed RPS is an important means of requiring such consideration as it can influence planning for the land and the coastal marine area, and guide decision making in resource consents and other processes.

A variety of factors need to be addressed in a policy on surf breaks. These include:

- access to the surf break
- water quality of the surf breaks
- integrated consideration of potential effects on the physical processes that form a surf break

Consequently, the policy needs to cover the wider swell corridor and seabed, adjacent land and facilities, as well as the area of the surf break itself.

It is important to retain the existing variety of surf break types in the region to encompass a range of surfing skill levels and provide variety in the spectrum of surfing opportunities.

There is a gradient in skill level that needs to be provided for so that beginner to advanced surfers can be accommodated.

It would be inappropriate to only protect surf breaks of the highest quality or skill level, or only those in highly natural settings or those closest to the urban area. Such attributes should be considered in any assessment of effects but it is preferable at the more strategic

(RPS) level to identify a variety of surf break types and to provide information on the particular values of the different venues or sites.

Explicit inclusion of surf breaks in the Otago RPS will provide regional direction on the need to consider the breaks in RMA decision making. The policy will be implemented through the regional coastal plan, district plans and resource consents. It is not intended that the policy will stop all future development in the proximity of surf breaks but to ensure that adequate regard is given to potential effects.

Recognition of the breaks as an important part of the region's coastal environment will reinforce the need to consider whether new developments will enhance or adversely affect the values of the surf breaks and coastal spaces.

SPS Submissions, Reasons, Decisions Sought

While SPS fully support the inclusion of all nationally significant surfbreaks in the Otago RPS, SPS notes that the proposed RPS has erred with its interpretation of the NZCPS by not including *regional* surfbreaks in the Plan.

Regional councils must give effect to the NZCPS with regard to protecting regional surfbreaks, this is recognised in policy 13 Preservation of natural character;

1: To preserve the natural character of the coastal environment and to protect it from inappropriate subdivision, use, and development:

- (a) avoid adverse effects of activities on natural character in areas of the coastal environment with outstanding natural character; and
- (b) avoid significant adverse effects and avoid, remedy or mitigate other adverse effects of activities on natural character in all other areas of the coastal environment;
- (c) assessing the natural character of the coastal environment of the region or district, by mapping or otherwise identifying at least areas of high natural character; and
- (d) ensuring that regional policy statements, and plans, identify areas where preserving natural character requires objectives, policies and rules, and include those provisions.

2: Recognise that natural character is not the same as natural features and landscapes or amenity values and may include matters such as:

- (a) natural elements, processes and patterns;
- (b) biophysical, ecological, geological and geomorphological aspects;
- (c) natural landforms such as headlands, peninsulas, cliffs, dunes, wetlands, reefs, freshwater springs and **surf breaks**;
- (d) the natural movement of water and sediment;
- (e) the natural darkness of the night sky;
- (f) places or areas that are wild or scenic;
- (g) a range of natural character from pristine to modified; and
- (h) experiential attributes, including the sounds and smell of the sea; and their context or setting.

While 1.c of policy 13 states that areas of natural character be assessed by mapping or identifying, 2.c states that natural character may include matters such as **surf breaks** (emphasis added).

Policy 15 also gives direction to protect and avoid adverse effects on the natural features and natural landscapes (including seascapes) of the coastal environment from inappropriate subdivision, use, and development

The Wavetrack New Zealand Surfing Guide was recognized and accepted as a legitimate identification proxy by the NZCPS Board of Inquiry for identifying breaks of national significance. It follows on from this that the Wavetrack guide be accepted as a legitimate proxy for regionally significant surfbreaks.

To date a number of regional councils have recognised regional surfbreaks (not just nationally recognised surfbreaks as listed in the NZCPS) in their regional plans or proposed plans by way of policy, method and schedules that map and identify these regional surfbreaks.

Taranaki Regional Council (TRC) was the first local authority to provide for surf break protection under the RMA. The Taranaki Regional Policy Statement 2009 recognises 81 surf breaks that are important to the region. The list of breaks was based on TRC's Inventory of Coastal Areas of Local or Regional Significance in the Taranaki Region⁴⁵ (Taranaki Regional Council, 2004), the Wavetrack New Zealand Surfing Guide (Morse & Brunskill, 2004) and on consultation with local board-riding clubs (Taranaki Regional Council, 2009).

The Auckland Regional Council was in the process of including all regional surfbreaks in its Draft Auckland Regional Policy Statement - Background Report – Surf Breaks in 2011 - an in house report prepared by Kath Coombes and Brad Scarfe which listed and identified the regions surfbreaks which has now been translated into policies within the draft Auckland Unitary Plan :

Part 1 Introduction – Policies – 4.3.1 High natural character of the coastal environment-

11. Avoid significant adverse effects and avoid, remedy and mitigate other adverse effects on HNC areas by:
 - e: maintaining the integrity of landforms, geological features and associated natural processes including sensitive landforms such as ridgelines, headlands, peninsulas, cliffs, dunes, wetlands, reefs, fresh water springs, streams or rivers, and surf breaks

Part 2 - 5.1.3 Dredging - policies –

5. Control dredging activities so that they do not:
 - (d) result in adverse effects on significant surf breaks identified in Appendix 6.3 ⁶

Part 2 - 5.1.4 Disturbance of the foreshore and seabed

6. Avoid disturbance of the foreshore and seabed that will result in significant changes to natural coastal processes that will have adverse effects on significant surf breaks identified in Appendix 6.3 or cause or exacerbate coastal erosion.

Part 2 - 5.1.15 Structures - Ensuring structures are appropriately located and designed

6. Require that structures be located to avoid adverse effects on the values of:
 - b. significant surfbreaks identified in Appendix 6.3, including the recreation, amenity and economic values, and taking into account any effects on coastal processes, currents, water levels, seabed morphology and swell corridors that contribute to significant surfbreaks.

Part 3 - Regional and District Rules Chapter G: General provisions

5. Assessment - Restricted discretionary activities and development control infringements

5.2 Assessment criteria

11. Rivermouth dredging; dredging to maintain or gain access to an existing lawful structure; dredging to clear the exit of any stormwater outfall or pipe (maximum of 500m³, maximum 500m length) and maintenance dredging in specified zones

- iv. result in adverse effects on significant surf breaks identified in Appendix 6.3

⁶ A list of 33 regional surfbreaks (identified in the Wavetrack new Zealand surfing Guide) listed in the Draft Auckland Unitary plan can be viewed at:

<http://unitaryplan.aucklandcouncil.govt.nz/Common/Output/HTMLtoPDF.aspx?hid=40949>

The Wellington Regional Plan Review conducted last year also included surfbreak policy that recognises regional surfbreaks(it should also be noted that the Wellington region contains no nationally recognised surfbreaks as listed in the NZCPS) :

Objective RP.O29

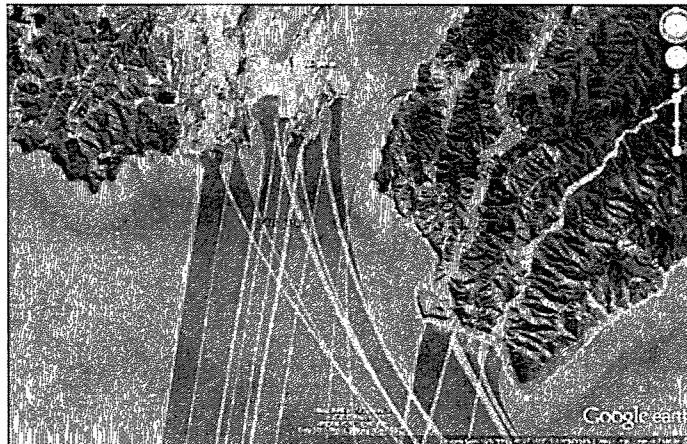
Significant surf breaks are protected from inappropriate use and development

Policy CM.P35: Significant surf breaks

Significant surf breaks identified in Schedule K (surf breaks) shall be protected by avoiding:

- (a) significant adverse effects on the surf breaks, and more than minor adverse effects on **natural processes**, currents, seabed morphology and swell corridors that contribute to regionally significant surf breaks, and
- (b) adverse effects on access to surf breaks within the coastal marine area, on a permanent or on-going basis.

Surfbreak Protection Society member Michael Gunson collaborated with eCoast Ltd to identify and map some 70 surfbreaks for the Wellington Plan Review, the mapping included the swell corridors⁷



Swell corridor mapping of some of the Wellington Regions surfbreak swell corridors by eCoast Ltd, Raglan.

The Bay Of Plenty Regional Council is also in draft – proposed stage of their Regional Coastal Plan and have listed surfbreaks in Map Series b – Ecology, Culture and Heritage, - Regionally Significant Surf Breaks.⁸

⁷ Contact Caroline Ammundsen Policy Advisor, Environmental Policy, Greater Wellington regional Council for further detail.

⁸ Bay of Plenty regional Council have accepted advice from Surfbreak Protection Society on methods for mapping swell Corridors (see Wgtn Plan Review) and are taking on board changes to their plan <http://www.boprc.govt.nz/knowledge-centre/plans/regional-coastal-environment-plan/proposed-regional-coastal-environment-plan/>

Bay of Plenty Regional Council listed their regional surfbreaks in schedule 5 of the proposed coastal policy statement and referenced the Wavetrack New Zealand Surfing Guide as recognised by the Board of Inquiry to the New Zealand Coastal Policy Statement 2010.

As previously mentioned the regionally significant surfbreaks as listed in the Wavetrack New Zealand Surfing Guide has been recognised as a legitimate proxy for the identification of NZ surfbreaks.

The book itself only gives a rough guide to the surfbreaks location, once a surfer turns up at the location the surfbreak would be obvious to him/ her. But for the purpose of accurate mapping and identification as a natural landscape feature or character under the NZCPS greater detail is required, to that end the South Coast Board Riders Club and the Surfbreak Protection Society Inc. can assist with the accurate location of all the regional surfbreaks as listed in the Wavetrack Guide.

Decisions sought:

<u>Existing Policy</u>	<u>Change To:</u>
<p>Policy 2.1.8</p> <p>Recognising the values of natural character in the coastal environment Recognise the values of natural character in the coastal environment are derived from the following attributes:</p> <ul style="list-style-type: none"> a) Natural elements, processes and patterns; b) Biophysical, ecological, geological and geomorphological aspects; c) Natural landforms such as headlands, peninsulas, cliffs, dunes, wetlands, estuaries, reefs, freshwater springs and surf breaks; d) The natural movement of water and sediment; e) The natural darkness of the night sky; f) Places or areas that are wild or scenic; g) A range of natural character from pristine to modified; h) Experiential attributes, including the sounds and smell of the sea; and their context or setting 	<p>Policy 2.1.8</p> <p>Recognising the values of natural character in the coastal environment Recognise, <u>map and identify</u> the values of natural character in the coastal environment are derived from the following attributes:</p> <ul style="list-style-type: none"> a) Natural elements, processes and patterns; b) Biophysical, ecological, geological and geomorphological aspects; c) Natural landforms such as headlands, peninsulas, cliffs, dunes, wetlands, estuaries, reefs, freshwater springs and surf breaks; d) The natural movement of water and sediment; e) The natural darkness of the night sky; f) Places or areas that are wild or scenic; g) A range of natural character from pristine to modified; h) Experiential attributes, including the sounds and smell of the sea; and their context or setting
<p><u>Reason</u></p> <p>Policy 13 of the NZCPS gives direction to identify and map Natural Character, changing policy 2.1.8 to our recommendation will keep the intent of the proposed RPS consistent with the NZCPS</p>	

<u>Existing policy</u>	<u>Change to:</u>
<p>Policy 2.2.10</p> <p>Identifying surf breaks of national importance Recognise the surf breaks of national importance at:</p> <p>a) Karitane; b) Papatowai; c) The Spit; d) Whareakeake.</p>	<p>Policy 2.2.10</p> <p>Identifying surf breaks of national regional importance Recognise <u>Identify and map</u> the regionally significant surf breaks <u>as listed in schedule xx</u> of national importance at:</p> <p>a) Karitane; b) Papatowai; c) The Spit; d) Whareakeake.</p>
<p style="text-align: center;"><u>Reason</u></p> <p>The NZCPS already gives protection to the listed nationally significant surfbreaks as listed, The four nationally listed surfbreaks in policy 2.2.10 surfbreaks, as well as the other 30 listed in the Wavetrack guide require an equal level of protection as recognised by the Board of Inquiry to the NZCPS, where adverse effects must be avoided, and regional plans must reflect this.</p> <p>The section 32 report to the Board of Inquiry for the proposed NZCPS that became effective Dec 3rd 2010 noted several points regarding surfbreaks in general:</p> <p><i>'natural surf breaks are a finite resource and naturally occurring breaks help constitute the natural character of the coastal environment under s6(a); the preservation of the natural character of the coastal environment implies that sufficiently representative breaks in their natural context should be protected; those breaks that are rare should be given a greater level of importance than those that are common;</i></p> <p><i>natural surf breaks are outstanding natural features in their own right, and can be an element of outstanding natural landscapes (including seascapes), under s6(b); the protection of outstanding natural features requires the identification of outstanding natural surf breaks;</i></p> <p><i>natural surf breaks are of social, cultural and economic value to coastal communities;</i></p> <p><i>activities in the coastal marine area and landward can have adverse effects on surf breaks; activities like placement of artificial nourishment (sand) on a beach, building a seawall, development of coastal property, nearshore sand mining, breakwater ports and marines, changes to land catchment around a break have potential to adversely affect a surf break;</i></p> <p><i>increasing pressures will lead to damage and destruction of surf breaks and there is a need for protection; surf breaks are scarce and vulnerable to development and the technology does not exist at present to restore a natural break disturbed or damaged by human intervention;</i>⁹</p> <p>It follows on that as surfbreaks are outstanding natural features and a finite resource, they are entitled to a level of protection offered by a regional policy statement, and consistent with that of Taranaki, and proposed by Wellington and Auckland policies.</p>	

⁹ <http://www.doc.govt.nz/Documents/getting-involved/consultations/closed-consultations/nzcps/NZCPS-2008-board-of-inquiry-vol-2.pdf>

<u>Existing policy</u>	<u>Change to:</u>
<p>Policy 2.2.11</p> <p>Managing surf breaks of national importance Protect surf breaks of national importance, by:</p> <p>a) Avoiding adverse effects on the natural and physical processes contributing to their existence; and</p> <p>b) Avoiding adverse effects of other activities on access to, and use and enjoyment of, those surf breaks.</p>	<p>Policy 2.2.11</p> <p>Managing surf breaks of national regional importance Protect surf breaks of national <u>regional</u> importance, by:</p> <p>a) Avoiding adverse effects on the natural and physical processes contributing to their existence; and</p> <p>b) Avoiding adverse effects of other activities on access to, and use and enjoyment of, those surf breaks.</p>
<u>Reason</u>	
For those same reasons as given for our recommended changes to policies 2.2.8 and 2.2.10	

Decision Sought:

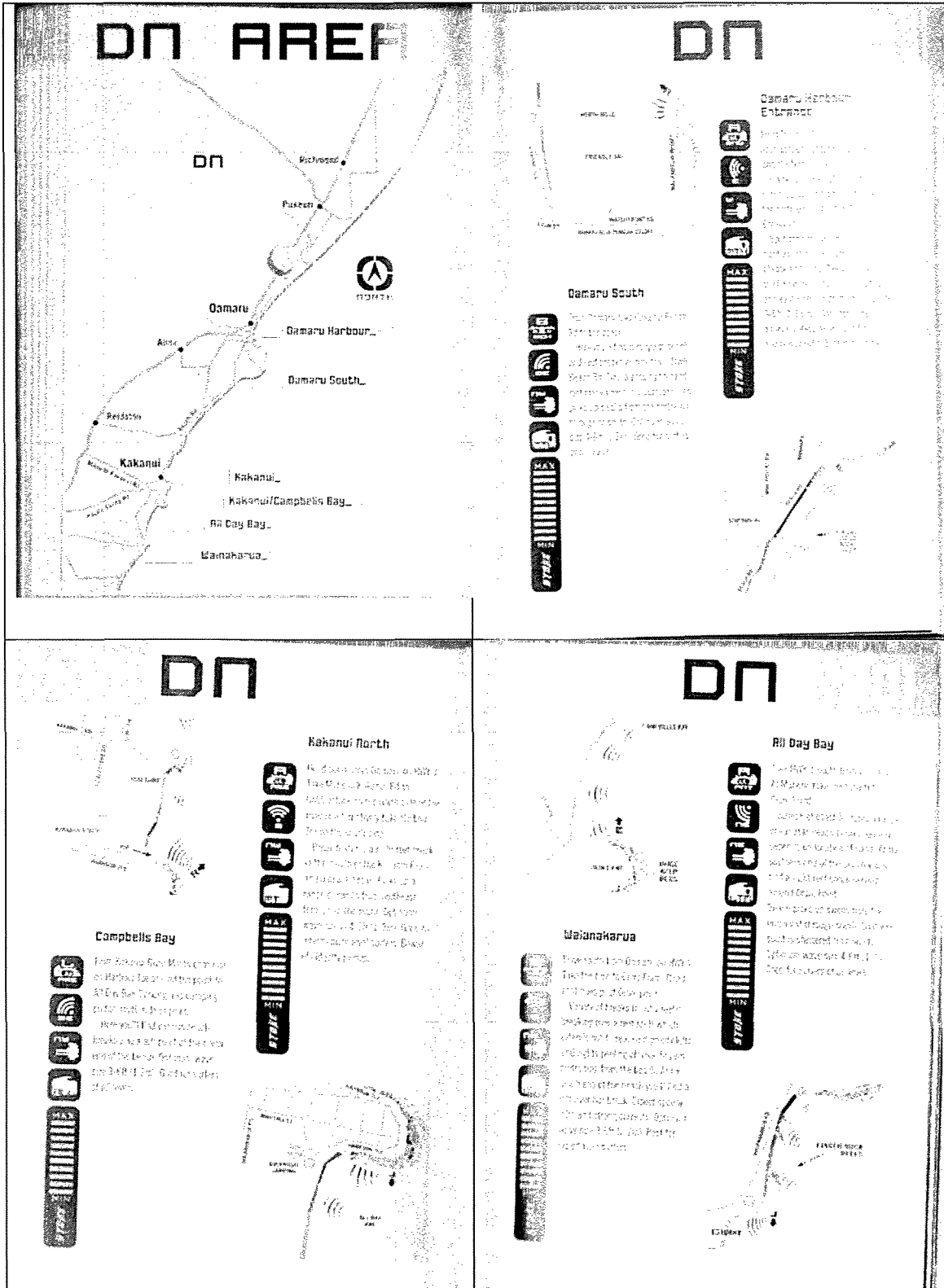
Create a schedule of regionally significant surfbreaks in the Otago region by means of consultation with local surfers and surfing organisations, as well as SPS that are mapped and identified, along with their swell corridors. It is envisaged that the schedule would be much in line with that already given in the Wavetrack New Zealand Surfing Guide:

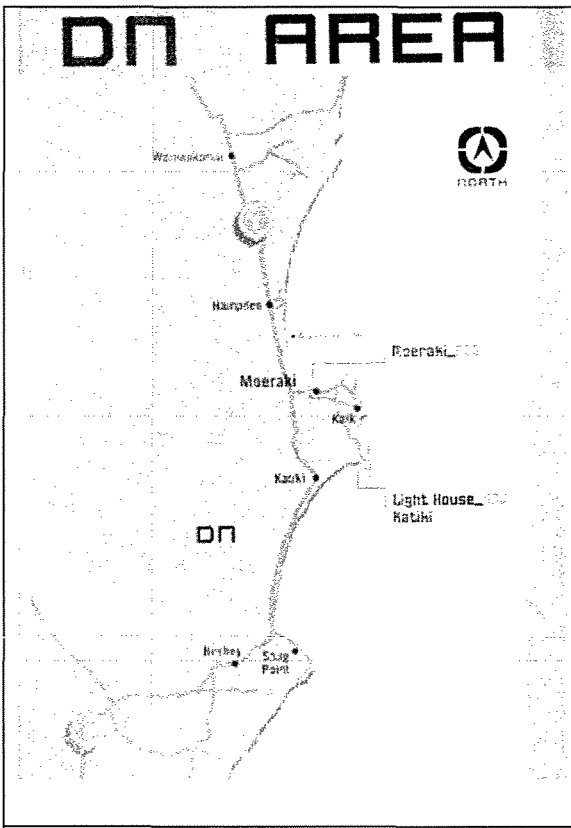
List of surfbreaks and surfbreak areas as listed in the Wavetrack New Zealand Surfing Guide

(North to South = left to right top to bottom)

Oamaru Harbour	Oamaru South	Kakanui
Kakanui /Campbells Bay	All Day Bay	Wainakarua
Moeraki	Light house Katiki	Matakana
Karitane	Karatane Beach	Warrington
Potato Point	Murdering Bay	Aramoana Spit
Pipikaretu	Victory – Wickliffe Bay	Allans Beach
Sandfly Bay	Smails Beach	Tomahawk beach
Lawyers Head	St Kilda	St Clair
Black Head	Ocean View	Brighton
Taieri Mouth	Kaka Point	Nugget Point
Cannibal Bay	Long Point	Papatowai
Tatupu		

Maps of Surfbreaks in the Otago Region – Wavetrack Guide.

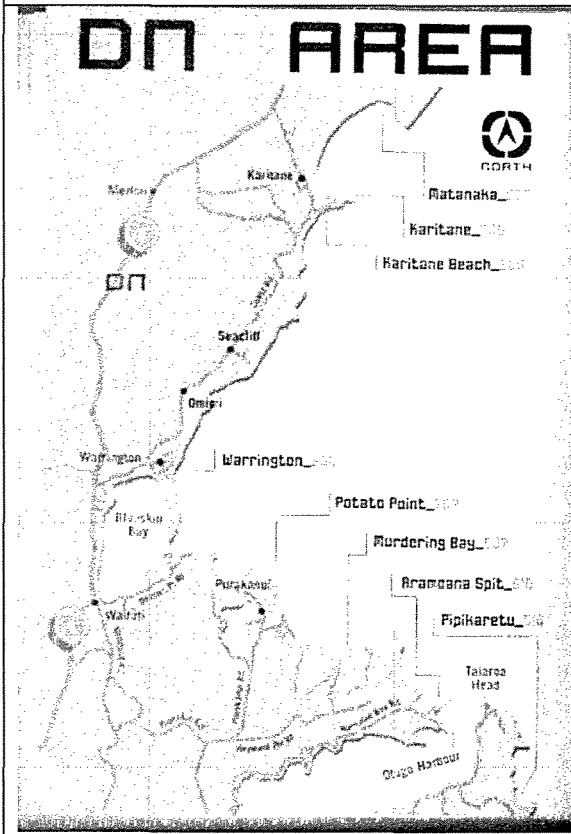




DN

Light House

The Moeraki Boulders are a unique natural phenomenon consisting of three large boulders that appear to be arranged in a line. The boulders are made of gneiss and are thought to be the remains of a volcanic vent. The boulders are located on a beach near the Light House. The Light House is a small building that was built in 1862. It was used as a lighthouse until 1908. The Light House is now a museum and is open to the public. The Light House is located on the coast of the South Island of New Zealand. The Light House is a small building that was built in 1862. It was used as a lighthouse until 1908. The Light House is now a museum and is open to the public. The Light House is located on the coast of the South Island of New Zealand.



DN

Karitane

The Karitane Peninsula is a long, narrow peninsula that extends into the sea. It is known for its beautiful scenery and its rich history. The Karitane Peninsula is a long, narrow peninsula that extends into the sea. It is known for its beautiful scenery and its rich history. The Karitane Peninsula is a long, narrow peninsula that extends into the sea. It is known for its beautiful scenery and its rich history. The Karitane Peninsula is a long, narrow peninsula that extends into the sea. It is known for its beautiful scenery and its rich history.

DN

Karitane Beach

For those who want to enjoy the sun, sand and surf, Karitane Beach is a great spot. The beach is wide and sandy, with a gentle slope down to the water. There are several cafes and shops nearby, and a playground for children. The beach is also a popular spot for fishing and bird watching.



Warrington

Warrington is a beautiful coastal town with a long beach and a variety of shops and cafes. It's a great spot for a day out with the family or a romantic walk. The town is also a popular spot for fishing and bird watching.



DN

Potato Point

Potato Point is a beautiful coastal town with a long beach and a variety of shops and cafes. It's a great spot for a day out with the family or a romantic walk. The town is also a popular spot for fishing and bird watching.



Murdering Bay

Murdering Bay is a beautiful coastal town with a long beach and a variety of shops and cafes. It's a great spot for a day out with the family or a romantic walk. The town is also a popular spot for fishing and bird watching.



DN

Aracoona Spit

Aracoona Spit is a beautiful coastal town with a long beach and a variety of shops and cafes. It's a great spot for a day out with the family or a romantic walk. The town is also a popular spot for fishing and bird watching.

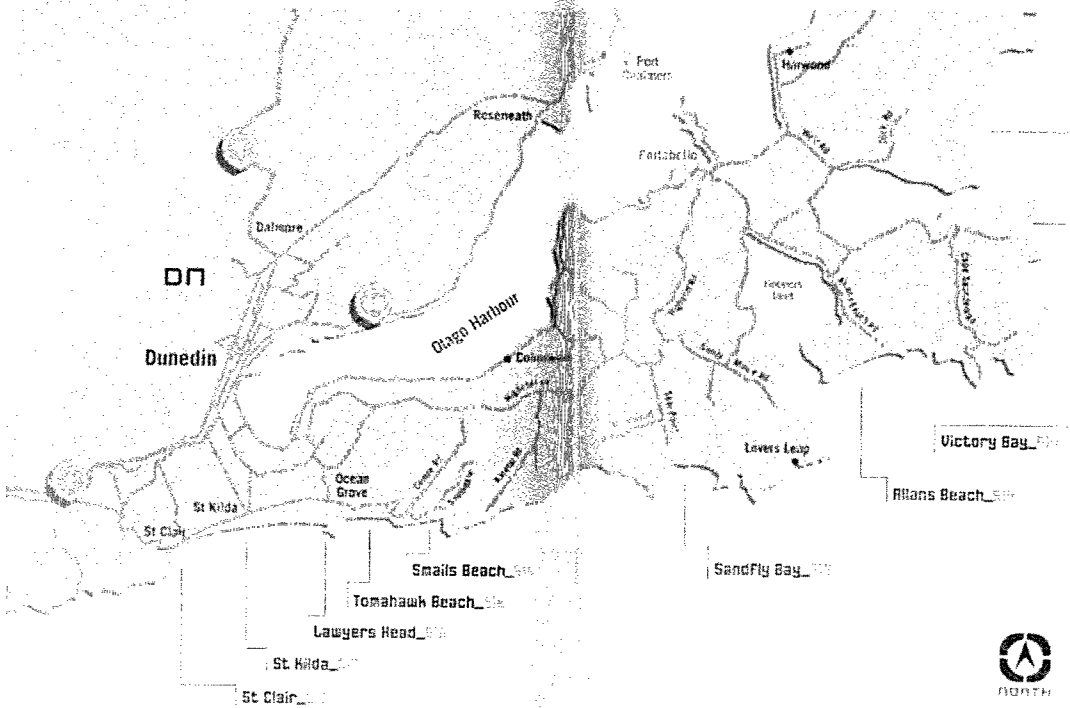


Piparetu

Piparetu is a beautiful coastal town with a long beach and a variety of shops and cafes. It's a great spot for a day out with the family or a romantic walk. The town is also a popular spot for fishing and bird watching.



DN AREA



DN



Allans Beach

From Port Chalmers, Allans Beach is a beautiful bay with a wide beach and a sheltered area for swimming and sunbathing. The water is clear and the sand is soft. There are many cafes and restaurants nearby, making it a great spot for a picnic or a meal. The beach is also a popular spot for surfing and fishing.

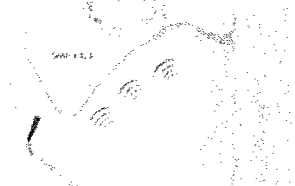


Victory-Wickliffe Bay

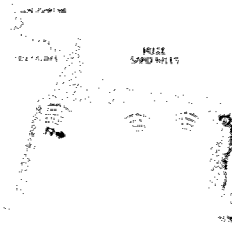
Victory-Wickliffe Bay is a beautiful bay with a wide beach and a sheltered area for swimming and sunbathing. The water is clear and the sand is soft. There are many cafes and restaurants nearby, making it a great spot for a picnic or a meal. The beach is also a popular spot for surfing and fishing.



PORT CHALMERS



DN



Smalls Beach

Smalls Beach is a beautiful bay with a wide beach and a sheltered area for swimming and sunbathing. The water is clear and the sand is soft. There are many cafes and restaurants nearby, making it a great spot for a picnic or a meal. The beach is also a popular spot for surfing and fishing.

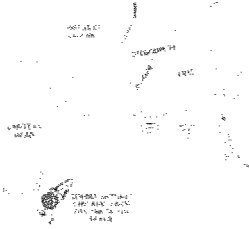


Sandfly Bay

Sandfly Bay is a beautiful bay with a wide beach and a sheltered area for swimming and sunbathing. The water is clear and the sand is soft. There are many cafes and restaurants nearby, making it a great spot for a picnic or a meal. The beach is also a popular spot for surfing and fishing.



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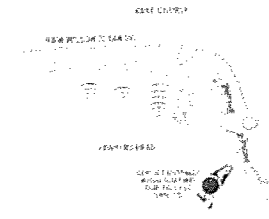
Tomshaw's Beach

From 1860 to 1900, Tomshaw's Beach was a popular resort. A number of grand mansions were built along the beachfront. The area is now a residential suburb.

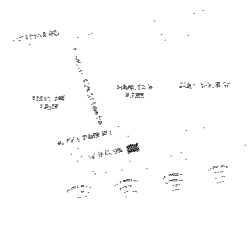


Lougers Head

One of the best views of the coastline can be seen from Lougers Head. The area is a residential suburb.



DN



St Kilda

St Kilda is a small island in the Phillipian Sea. It was a penal colony from 1838 to 1936. The island is now a national park.

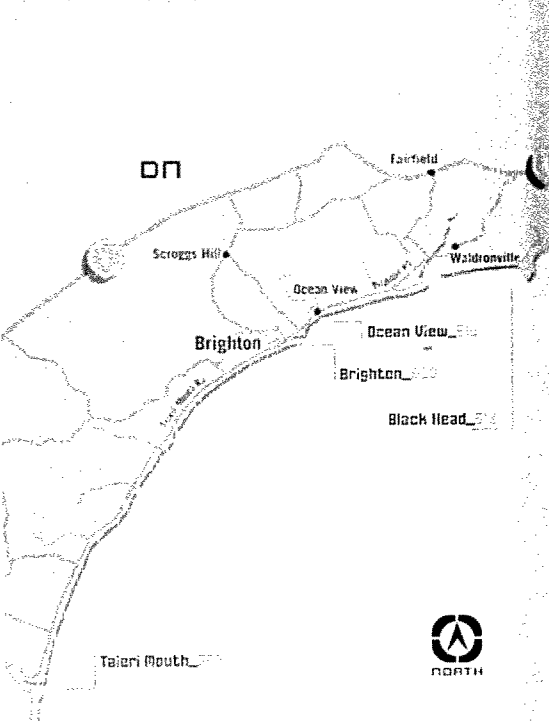


St Clair

St Clair is a residential suburb. It is known for its beautiful views of the coastline. The area is a residential suburb.



DN AREA



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Ocean View

Ocean View is a residential suburb. It is known for its beautiful views of the coastline. The area is a residential suburb.

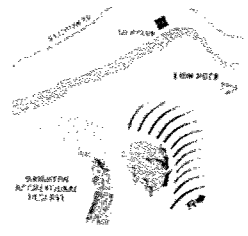


Black Head

Black Head is a residential suburb. It is known for its beautiful views of the coastline. The area is a residential suburb.



DN



Brighton
 Brighton is a beautiful coastal town with a rich history and a vibrant community. It is a great place to visit for a day or a weekend.

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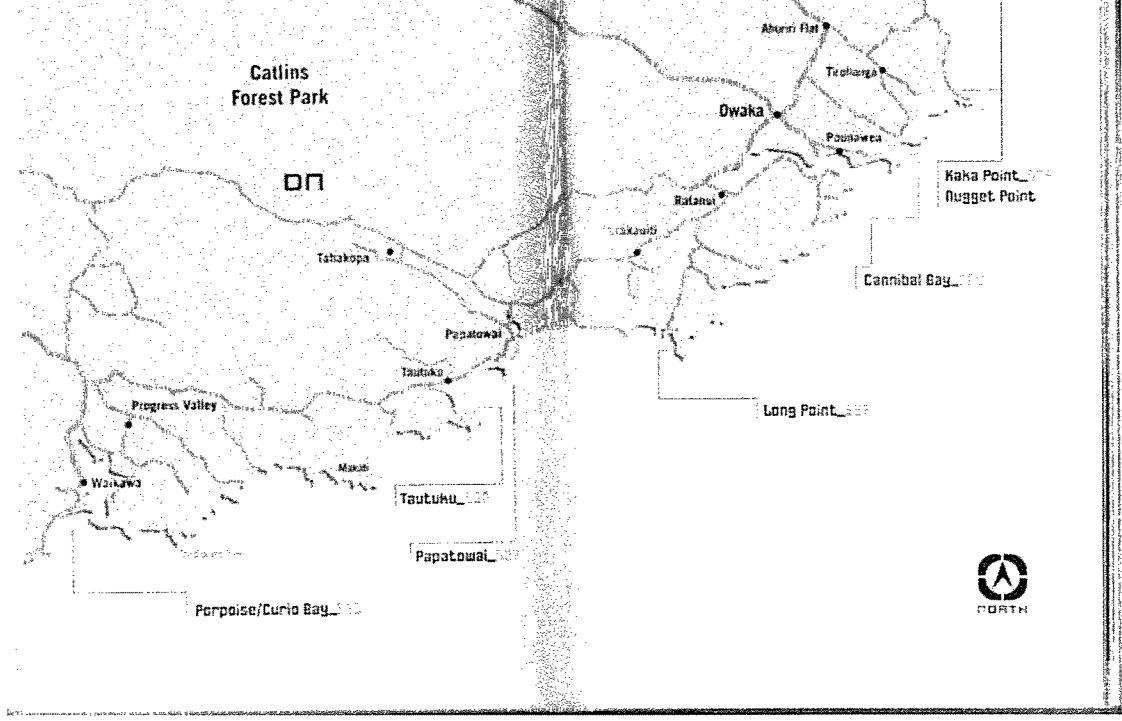
Tairāhiti

Tairāhiti is a beautiful coastal town with a rich history and a vibrant community. It is a great place to visit for a day or a weekend.

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DN AREA



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Cannibal Bay

Two miles (three km) to the south of Kaka Point. From here you can see the Bay of Islands. The right to fishery.

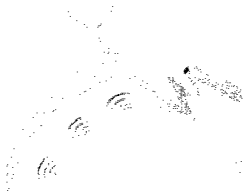
See page 10 for details of producing quality fish. Take the southern half of the bay to enjoy your catch and house to fish even up to the edge. Follow the water to the 11. The Bay of Islands is the best place to see it all.

Vertical sidebar with icons for mobile phone, Wi-Fi, and signal strength bars.

Kaka-Rugget Point

Two miles (three km) to the south of Kaka Point. From here you can see the Bay of Islands. The right to fishery.

Vertical sidebar with icons for mobile phone, Wi-Fi, and signal strength bars.



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Long Point

Two miles (three km) to the south of Kaka Point. From here you can see the Bay of Islands. The right to fishery.

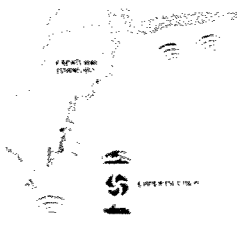
See page 10 for details of producing quality fish. Take the southern half of the bay to enjoy your catch and house to fish even up to the edge. Follow the water to the 11. The Bay of Islands is the best place to see it all.

Vertical sidebar with icons for mobile phone, Wi-Fi, and signal strength bars.

Papatowai

Two miles (three km) to the south of Kaka Point. From here you can see the Bay of Islands. The right to fishery.

Vertical sidebar with icons for mobile phone, Wi-Fi, and signal strength bars.



DN



Porpoise Bay

Two miles (three km) to the south of Kaka Point. From here you can see the Bay of Islands. The right to fishery.

See page 10 for details of producing quality fish. Take the southern half of the bay to enjoy your catch and house to fish even up to the edge. Follow the water to the 11. The Bay of Islands is the best place to see it all.

Vertical sidebar with icons for mobile phone, Wi-Fi, and signal strength bars.

Tautuku

Two miles (three km) to the south of Kaka Point. From here you can see the Bay of Islands. The right to fishery.

Vertical sidebar with icons for mobile phone, Wi-Fi, and signal strength bars.

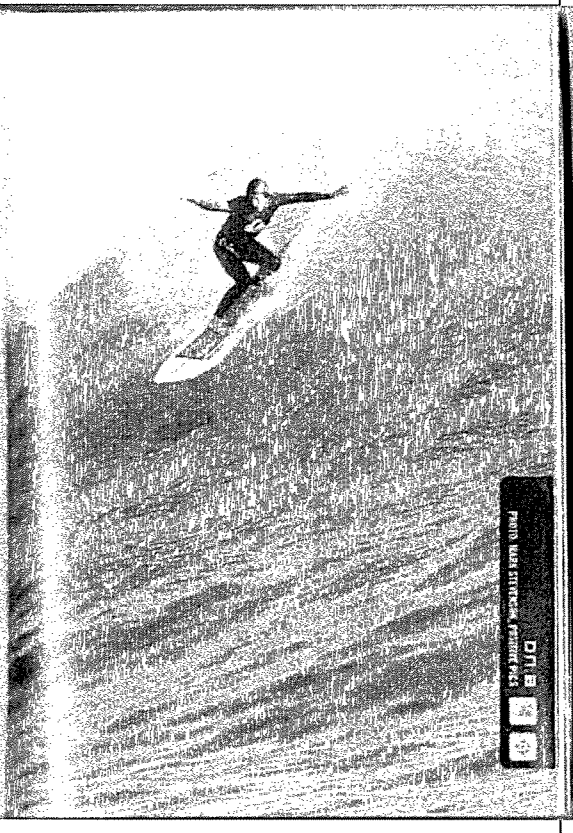
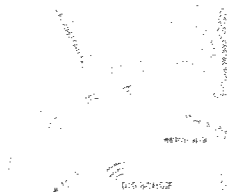


Photo: Alan Sutherland / PhotoQuest

As mentioned SPS wish to speak to our submission, and would be prepared to present with the South Coast Board Riders Association, or any other parties with similar submissions.

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President of the Surfbreak Protection Society

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