

Form 16 – Submission to the Otago Regional Council on Consent Applications

This is a Submission on (a) limited notified/publicly notified resource consent application/s pursuant to the Resource Management Act 1991.

Submitter Details:

(please print clearly)

Full Name/s: Dr Shayne Galloway

Postal Address:

[REDACTED]

Code: 9304

Phone number:

[REDACTED]

[REDACTED]

[REDACTED]

I/ we wish to **SUPPORT** / **OPPOSE** / submit a **NEUTRAL** submission on (circle one) the application of:

Applicant's Name: Queenstown Lakes District Council

Location: Shotover River/Kimiākau delta

Application Number: RM25.177

Purpose: To construct and operate a diversion channel within the bed of the Shotover River/Kimiākau to ensure the discharge of treated wastewater sought to be authorised under RM25.206 is always to flowing water.

Application Number: RM25.206

Purpose: Disposal of treated wastewater to water from a wastewater treatment plant and to construct a riprap outfall structure in the bed of the Shotover River/Kimiākau

Select one of the following options that applies:

☐ I am submitting on consent application RM25.177 **only**.

☐ I am submitting on consent application RM25.206 **only**.

☒ I am submitting on **both** consent applications.

The specific parts of the application/s that my submission relates to are: *(Give details)*

See attached PDF: Submission Opposing QLDC Resource Consents for Shotover WTP

My/Our submission is *(include: whether you support or oppose the application or specific parts of it, whether you are neutral regarding the application or specific parts of it and the reasons for your views)*.

See attached PDF: Submission Opposing QLDC Resource Consents for Shotover WTP

I/We seek the following decision from the consent authority *(give precise details, including the general nature of any conditions sought)*

See attached PDF: Submission Opposing QLDC Resource Consents for Shotover WTP

I Wish to be heard in support of our/my submission

I **am not** a trade competitor* of the applicant (for the purposes of Section 308B of the Resource Management Act 1991).

****If trade competitor chosen, please complete the next statement, otherwise leave blank.***

I **am** directly affected by an effect as a result of the proposed activity in the application that:

- a) adversely affects the environment; and
- b) does not relate to trade competition or the effects of trade competition.

I, **do** (choose one) wish to be involved in any pre-hearing meeting that may be held for this application.

I **have** served a copy of my submission on the applicant.

Please be advised that this application will be directly referred to the Environment Court for a decision.

03/11/2025

Signature/s of submitter/s

(or person authorised to sign on behalf of submitter/s)

(Date)

Notes to the submitter

If you are making a submission to the Environmental Protection Authority, you should use [form 16B](#).

The closing date for serving submissions on the consent authority is 3 November 2025.

You must serve a copy of your submission on the applicant as soon as is reasonably practicable after you have served your submission on the consent authority.

Privacy: Please note that submissions are public. Your name and submission will be included in papers that are available to the media and the public, including publication on the Council website. Your submission will only be used for the purpose of the notified resource consent process.

If you are a trade competitor, your right to make a submission may be limited by the trade competition provisions in [Part 11A](#) of the Resource Management Act 1991.

If you make a request under [section 100A](#) of the Resource Management Act 1991, you must do so in writing no later than 5 working days after the close of submissions and you may be liable to meet or contribute to the costs of the hearings commissioner or commissioners.

You may not make a request under section 100A of the Resource Management Act 1991 in relation to an application for a coastal permit to carry out an activity that a regional coastal plan describes as a restricted coastal activity.

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious:
- it discloses no reasonable or relevant case:
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
- it contains offensive language:
- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

The address for service for the Consent Authority is:

Otago Regional Council, Private Bag 1954, Dunedin, 9054

or by email to submissions@orc.govt.nz

Submission Opposing QLDC Resource Consents RM25.177 & RM25.206 (Shotover River Discharge and Diversion)

Submission of Dr Shayne Galloway, AffordanceMapping,NZ

Introduction and Submitter Details

Queenstown Lakes District Council (QLDC) has applied for two resource consents relating to the Shotover River/Kimi-ākau wastewater treatment plant: RM25.206 (to discharge treated wastewater into the Shotover River) and RM25.177 (to construct and operate a diversion channel in the Shotover Riverbed).

As a resident, father and expert in recreation affordance, I oppose both applications in their entirety and I wish to be heard. This submission outlines the reasons for opposition, focusing on the proposals' inconsistency with legal protections, planning policies, and the high value of the well-being affordance of the Shotover/Kawarau River system.

Background: These consents seek to **legitimise an emergency measure** QLDC undertook in March 2025 when a failure of its land disposal field forced direct discharge of treated effluent to the Shotover River. While intended as a short-term fix, QLDC now proposes to continue discharging up to **12,000 cubic metres per day** of treated wastewater into the river, and to cut/maintain a channel in the braided riverbed to ensure that effluent enters flowing water. In practice, this amounts to a **physical and operational extension of the wastewater treatment plant into the active braided riverbed**, fundamentally altering the river's natural state. The submitter acknowledges the urgent circumstances that led to the interim discharge, but **strongly opposes any ongoing consent** on legal, recreational, and environmental grounds. The following sections detail these concerns.

Water Conservation Order and Legal/Planning Context

The Shotover and Kawarau Rivers are protected by the Water Conservation (Kawarau) Order 1997 (WCO), a national-level instrument under the RMA that recognizes their outstanding wild, scenic, natural, scientific, recreational, and historical values. The WCO specifically lists the Shotover River's **"wild and scenic characteristics," "high natural sediment load and active delta," and its "recreational purposes (rafting, kayaking, jetboating)"** as outstanding characteristics to be preserved. Likewise, the Kawarau River (into which the Shotover feeds) is protected for its **wild, scenic and recreational values**.

Under the WCO, **water quality in both rivers must be maintained at Class CR (contact recreation) standard, and no damming of the rivers is allowed.** In short, the WCO's purpose is to **safeguard the rivers' natural state and amenity values in perpetuity.**

Importantly, **no resource consent should be granted that is contrary to a water conservation order.** There are two levels at which WCOs operate. It is prohibited to grant consent that would breach the restrictions and prohibitions in the Order - which for the Shotover, is the prohibition on damming, and causing water quality to drop below Contact Recreation standard. Beyond that the WCO does not operate as an absolute bar should be given weight if a proposal is likely to adversely affect outstanding affordances.

This is reinforced by Section 217 of the Resource Management Act 1991 (RMA), which prohibits consent authorities from authorising activities that would breach the WCO conditions. The **applicant's proposal is inconsistent with the WCO** on multiple fronts:

- *Wild and Scenic Values:* The Shotover's wild and scenic character would be marred by installing an outfall structure and artificially training the river's flow. **Cutting a new channel or permanently diverting flows is effectively a form of river control engineering,** which undermines the river's natural morphology and untamed appearance. The WCO does allow an exemption (added in 2011) for minor flood protection works in the lower Shotover, but **extending a wastewater system into the river goes well beyond flood control.** It introduces industrial infrastructure into a landscape meant to remain wild. This **constitutes "inappropriate ... development" in the riverbed,** inconsistent with RMA Section 6(a) (which requires preservation of the natural character of rivers and their margins).
- *Natural Braided Character:* The **braided nature of the Shotover,** with its shifting channels and active gravel delta, is explicitly cited as an outstanding natural characteristic in the WCO. The proposal to fix a single diversion channel and continuously direct flows through it will **simplify and constrain the river's braids,** impeding the natural processes of braiding, gravel deposition, and delta formation. Research on New Zealand's braided rivers warns that *"local fixes like flood protection barriers... simplify the ecosystem, reducing habitat diversity and weakening resilience"*. By the same token, forcing the Shotover into a controlled channel for operational convenience **erodes its dynamic character and resilience,** counter to the WCO mandate to maintain an "active delta" and the **RMA's call to protect natural river morphology.**
- *Recreational and Amenity Values:* The WCO protects the Shotover/Kawarau for **contact recreation and amenity.** Any degradation of water quality, navigability, or public perception of the river will undermine these values. The applicant's own communications acknowledge the Shotover is *"a significant natural resource with considerable cultural and community values"*. **Permitting a treated sewage discharge into a protected river sets a dangerous precedent** – it risks normalising intrusion on a waterway **venerated for its cleanliness and recreational use.** The proposal cannot guarantee that **water quality will always meet Class CR standards in all flow conditions,** especially given the uncertainties in effluent

mixing during low flows (discussed below). If water quality or the **public's confidence** in water quality is diminished, **contact recreation (swimming, kayaking, rafting) and general enjoyment of the river will suffer – an outcome directly at odds with the WCO and RMA's intent.**

In summary, the **proposed discharge and diversion are prima facie contrary to the Kawarau WCO's purpose**, which is to **preserve the Shotover and Kawarau in their natural state, protecting wild, scenic, ecological, and recreational values for future generations**. Approving these consents would violate the letter and spirit of that Order. The consent authority is therefore legally obligated to **decline the applications** unless it can be proven that the activities will not compromise any of the protected characteristics – a burden the applicant has not met.

Physical and Operational Extension into the Braided Riverbed

The submitter is concerned that the proposal effectively **expands the footprint and operations of the wastewater treatment plant into the active river environment**. This is more than a simple discharge pipe – it includes earthworks and ongoing intervention in the river's flow pattern:

- **Diversion Channel Construction:** The second application (RM25.177) seeks to **construct and maintain a diversion channel within the Shotover River bed**[\[3\]](#). This implies digging through gravel banks, re-routing water, and periodic maintenance dredging to keep the channel clear. In essence, QLDC would be managing a section of the river as an extension of its treatment system. Such work is akin to **river training infrastructure**, effectively making part of the public river into a private utility zone for wastewater disposal. This blurs the line between land-based treatment facilities and the river's natural domain, setting a concerning precedent that critical infrastructure can be thrust into a braided river when convenient.
- **Operational Uncertainties:** There is significant uncertainty around how this artificial channel will behave over time. **Braided rivers are inherently dynamic** – channels move, new braids form and old ones dry up, especially under the influence of floods or droughts. The applicant assumes it can “ensure discharge is always to flowing water” by engineering one channel, but **in low-flow years or during sediment buildup events, even the diverted channel could become sluggish or isolated**. If that occurs, **effluent could end up pooling or infiltrating into gravel** rather than mixing promptly with river flow, defeating the purpose of the diversion. The application documents (as far as reviewed) do not convincingly address how the channel will perform in extreme low-flow conditions – an oversight given the **increasing variability of flows with climate change**. In short, the council is proposing to micro-manage a river system that **may not cooperate with fixed infrastructure**, making the scheme **operationally risky**.

- **Need for Ongoing Intervention:** To maintain the channel, QLDC or its contractors would likely need to **periodically remove sediment, clear debris, or even re-dig sections** after floods. This means repeated disturbance of the riverbed and further alteration of natural processes. Continuous intervention contradicts the notion of a river conservation area. It also raises questions about **failure modes** – e.g., if a major flood obliterates the artificial channel or creates new flow paths, will QLDC chase the river with diggers to re-establish the channel in perpetuity? The lack of a clear exit strategy or contingency (beyond the promise of a new disposal system by 2030) is a planning flaw. Essentially, the river itself will bear the brunt of QLDC's stop-gap measure for the next 5+ years. This **amounts to an unplanned** extension of wastewater operations into a highly valued natural corridor, which is unacceptable.

Recommendation: The consents should be declined on the grounds that the proposal extends infrastructure into the river in a manner that **compromises natural character and requires perpetual interference with river dynamics**. At minimum, if any consent were contemplated, it should be strictly time-limited and require removal of all works and full restoration of the riverbed to its natural state by a near-term date. However, the submitter's position remains that **the risk and principle of the matter warrant outright refusal**.

Hydrological Risks and Downstream Effects (Low Flows, Water Clarity, Sediment)

Braided rivers like the Shotover are prone to dramatic fluctuations – from swift floods that carry heavy sediment loads to very low flows where braided channels shrink to a trickle. The submitter is concerned that the **application downplays risks under these edge conditions**:

- **Low-Flow Channel Capacity:** In drought or seasonal low flow periods, the Shotover's discharge can become quite low, and many of the gravel channels go dry. The proposal relies on one channel to always have sufficient flow for dilution. **If the river flow is minimal, the diversion channel might not carry enough water to disperse the effluent**, even if it technically still "flows." This raises the spectre of **concentrated wastewater zones** in the river, potentially causing **localized water quality exceedances** (e.g., elevated nutrients or pathogens) that breach contact recreation standards. It could also **foul the riverbed** in that area (e.g., promoting algal growth or odour) – an effect highly inconsistent with a river valued for its natural state. The application should have provided robust hydrological modelling for worst-case low flow scenarios and a plan to cease discharge if dilution falls below safe thresholds; if it did not, that is a glaring omission.
- **Flood and Sediment Mobilisation:** Conversely, during high flows or floods, the artificial channel and outfall structure may alter sediment transport. **Any structure or excavation in a braided river can cause scouring or silting in unexpected**

ways. If the diversion channel increases flow velocity in one braid, it might **accelerate erosion locally**, sending *extra pulses of sediment downstream into the Kawarau River*. While the Shotover naturally carries a high sediment load (up to ~2 million m³ of silt per year into Lake Dunstan according to studies) and is valued for its “high natural sediment load”, the key is that this sediment regime is *natural*. Human alterations could upset the equilibrium: for example, a cut that captures most low flows might cause finer sediment to settle in side channels (due to reduced flushing), and then later be scoured out in a lump during a flood, creating larger turbidity spikes downstream than would otherwise occur. **Lake Dunstan (the Clutha/Kawarau reservoir downstream) is already facing rapid sediment infilling** from the Shotover. Any additional loading or changes to sediment deposition patterns in the Kawarau arm of the lake could worsen **water clarity and navigability in the lake**. The application does not convincingly demonstrate that the diversion and discharge won’t exacerbate downstream sedimentation trends.

- **Water Quality and Clarity:** The **Kawarau River and Lake Dunstan are popular for recreation (boating, fishing, swimming)** and are part of Otago’s iconic landscapes. The WCO highlights the **Kawarau’s natural flow and scenic values**, and Lake Dunstan is renowned (and monitored) for its water clarity. Introducing a point-source discharge, even highly treated, raises concerns about **cumulative nutrient or contaminant build-up**. For instance, **increased nitrogen or phosphorus in the effluent could contribute to algal growth** in slower-moving waters of Kawarau or the lake, reducing clarity and quality. While one might argue the volume is small relative to river flow, during low flows the proportion of effluent in the river could be non-trivial. Without robust evidence to the contrary, **granting the discharge would run counter to the precautionary approach required under the RMA for safeguarding water quality**. The public perception is also key – if the Kawarau is known to receive wastewater discharges, **it may negatively affect the region’s reputation for clear, clean rivers and lakes**, which has intangible but real economic and social costs.

In summary, the **hydrological and water quality risks** – especially under low-flow conditions and in terms of downstream sediment/clarity impacts – are insufficiently addressed and could have **significant adverse effects on the Kawarau River and Lake Dunstan environment**. These uncertainties make the proposal inconsistent with **Policy 5 of the National Policy Statement for Freshwater Management (2020)**, which requires that water quality be maintained or improved, and with the **precautionary principle in managing freshwater resources**. Given the high ecological and community values at stake, **these consents should not proceed in the face of such uncertainty**.

Impacts on Recreation, Accessibility and Navigability

Recreation and public use of the Shotover/Kawarau waterways are central to their value, and this submission places particular emphasis on **protecting recreation-based**

well-being. The proposed activities would have a range of negative effects on recreation access, safety, and enjoyment:



Caption: View of the lower Shotover River/Kimi-ākau near the old Shotover bridge. The Shotover's dynamic braided channels and scenic natural character are central to its recreation and amenity value for jetboating, kayaking, swimming, and riverside enjoyment.

- **Reduced Accessibility:** The construction of a new channel and likely the presence of machinery during maintenance can **impede public access to parts of the riverbed**. The lower Shotover delta area is used informally by walkers, anglers, gold fossickers, and families. Diverting a channel may create **new deep or swift water where previously one could walk or wade**, effectively cutting off sections of the braidplain to foot access. This conflicts with **RMA Section 6(d), which treats maintaining public access to rivers as a matter of national importance**. It is unacceptable that a public river could have areas made off-limits or harder to reach because they are co-opted for a sewage disposal scheme.
- **Navigational Hazards:** The Shotover and Kawarau support commercial and private jetboating (e.g. KJet operates tours that may enter the lower Shotover, and the famed Shotover Jet operates upstream in the canyon) as well as kayaking and rafting tours that finish near the confluence. Introducing an outfall structure and a managed channel can create **physical hazards for boaters**. For example, if the outfall is a pipe or concrete structure in the channel, it could be struck by jetboats traveling at speed in shallow water. Even a buoy or sign marking the outfall is an obstacle in a braided river environment where craft may need to traverse braided channels unexpectedly. Kayakers and packrafters, who often float the Kawarau and lower Shotover channels, could be caught off guard by fast currents or eddies around the diversion channel. There is also a **risk of new “strainers” or turbulence**

where the engineered channel rejoins the main flow. None of these hazards exist today in the natural state. Thus, the proposal would **degrade navigational safety and contravene the expectation that rivers be managed to enable safe public use.**

- **Contact Recreation and Perceived Health Risk:** The Shotover at the delta is a known spot for locals to cool off in summer; the Kawarau below is also used for swimming (and is part of triathlon courses, etc.). Even if the treated effluent meets bacteriological standards on paper, **the presence of a wastewater discharge will create a perception of pollution** that could drive swimmers and families away. Public submissions and feedback (as evidenced in media coverage) already indicate community discomfort with the idea of **“semi-treated sewage” entering a protected river**. This **loss of amenity via public perception** is very real – people derive less enjoyment from a river they **know contains wastewater**, regardless of what consents say is “safe.” Moreover, in the event of any plant upset or a higher pathogen count than expected, there is potential for **actual health risks** (e.g. gastro-intestinal illness for swimmers, or skin infections). This undermines the **cultural ecosystem service** the river provides as a *swimmable, fishable resource*. Under the **IPBES framework of Nature’s Contributions to People (NCP)**, the **“physical and psychological experiences”** provided by natural settings like rivers are a key non-material benefit to human well-being. **Polluting the Shotover – whether in reality or perception – strips away some of those positive contributions**, harming community well-being.
- **Amenity and Enjoyment:** Beyond direct recreation, the **amenity value** of the river (scenic beauty, natural sounds, sense of wilderness so close to urban Queenstown) is a major part of its attraction. The **sight of construction works, or signage warning of treated effluent, or a visibly altered channel** will degrade the experience for walkers and sightseers. It also could impact the tourism image – the Shotover is one of the most photographed and famous rivers in Aotearoa (home of gold rush lore and adventure tourism). A water conservation order and national park-level protection are in place upstream; doing this in the lower river sends a mixed message. **Braided rivers are cherished landscapes for many Kiwis and visitors**, and the Shotover is no exception. The proposal’s effects on amenity and enjoyment are **more than minor and cannot be adequately mitigated**.
- **Commercial Recreation Interests:** Although not speaking for any commercial entity, the submitter notes that **companies like jet boat operators and rafting guides have an interest in a pristine river environment**. Any negative publicity or actual water quality issues could **impact their businesses and the broader Queenstown adventure tourism sector**. The consent applications did not include letters of support from these operators, and it is likely some have raised concerns. This again points to how the proposal runs counter to the **community’s recreational well-being and the district’s recreation economy**.

In light of the above, the submitter contends that the **adverse effects on recreation, navigation, and amenity are significant** and cannot be justified by the short-term convenience to QLDC. These rivers provide “**abundant recreational opportunities**” by **virtue of their natural state**, and it is our collective duty to **protect these opportunities for current and future generations, rather than trade them away** for an interim infrastructure fix. The applications should be declined on the basis of unacceptable recreation and amenity effects alone.

Recreation-Specific Well-Being and Ecosystem Service Perspective

This opposition is framed not just in terms of policy and effects, but also in terms of the **loss of well-being affordances** provided by the Shotover/Kawarau river system. Dr. Galloway’s work (AffordanceMapping.NZ) emphasizes how natural environments afford people various opportunities for physical activity, adventure, social bonding, and spiritual renewal. The **Shotover River, in its free-flowing braided state, affords a wide range of positive experiences** – from the thrill of a jetboat ride to the simple joy of skimming stones on a clear river braid.

Under the **IPBES and ecosystem services frameworks**, these experiences are recognised as valuable “**cultural ecosystem services**” or “**Nature’s Contributions to People**”. Specifically, IPBES includes **recreation, tourism, and inspiration** as key non-material contributions that nature provides to human quality of life. When we degrade a river’s natural qualities, we degrade those contributions. In this case, allowing wastewater infrastructure and discharges into the Shotover will **diminish the river’s capacity to support recreation-related well-being**. For example:

- **Psychological Benefits:** People gain mental health and stress-reduction benefits from knowing their rivers are clean and safe. Polluting the river erodes this benefit as people may feel disgust or anxiety about the water. This is a loss of what could be termed “*experiential value*”.
- **Identity and Sense of Place:** The Shotover/Kawarau rivers are part of the identity of Central Otago/Queenstown. They feature in legends, in local pride, and in how residents define their home. A decline in river health or status (due to a consented discharge) can harm community identity and pride. **In IPBES terms, this touches on “Supporting identities (NCP 18)”**, where nature underpins social cohesion and sense of belonging.
- **Physical Activity and Health:** As noted, if fewer people are willing to swim, kayak or otherwise interact with the river, there’s a knock-on effect on physical activity and health. This contradicts broader government goals to improve community well-being through outdoor recreation.

In Aotearoa-based literature, **braided rivers have been highlighted as rare, irreplaceable ecosystems that also hold cultural and recreational significance**. The **Canterbury Regional Council (Environment Canterbury)** succinctly states that “*Braided rivers also*

provide abundant recreational opportunities, as well as water for...hydroelectricity and irrigation". While the latter uses (power, irrigation) often conflict with natural values, **recreation is a use that is generally sustainable when the river is kept in its natural state. It is ironic and troubling that a Council – entrusted with guardianship of community well-being – is proposing an intervention that sacrifices those recreational values** in the short term.

The submitter urges decision-makers to adopt a **holistic, well-being-centric view**: The marginal convenience gained by QLDC through this discharge (avoiding trucking waste or fast-tracking a new land disposal scheme) is overwhelmingly outweighed by the **loss in ecosystem service value, cultural value, and community well-being** caused by degrading a *taonga* river. In today's planning context – guided by concepts like **Te Mana o te Wai (the integrated and holistic well-being of the water)** – the proposal fails to uphold the principle that **the health of waterbodies is vital to the social, cultural and economic well-being of people and communities**. A truly well-being-focused approach would reject these consents and demand solutions that enhance, rather than undermine, the river's condition.

Braided Rivers as High-Value, Threatened Geomorphologies

The Shotover River is one of relatively few braided rivers in Otago (most of New Zealand's ~150 braided rivers are in Canterbury). **Braided rivers are globally rare and endangered ecosystems**. New Zealand's braided rivers, including the Shotover, face increasing pressures – gravel extraction, land development on floodplains, invasive weeds, and pollution. The **University of Canterbury's Braided Rivers research** notes that many lowland braided rivers are being *"squeezed into narrower channels with far fewer braids. The loss of this natural variability strips away resilience...leav[ing] native plants, fish and birds increasingly vulnerable."* In other words, when we **confine or alter braided rivers, we degrade their ecological integrity**.

Approving a consent to purposely **maintain a single thread of flow (the diversion cut) year-round** is essentially an action that "squeezes" the river's braids. It's a form of encroachment – albeit for wastewater rather than agriculture or stopbanks – but the effect is similar in principle. If every council or developer took liberty to carve channels or dump waste in braidplains, these ecosystems would indeed lose their unique character. Braided rivers have been called **"endangered ecosystems"** and there is a call among scientists for **"big-picture conservation"** to protect their full braidplain processes. The Shotover's **active delta at the Kawarau confluence is even identified in the WCO for scientific value** – it is a living example of a braidplain building landforms over time. **Interfering with that process by digging channels is contrary to the need to let braided rivers be dynamic**. As Dr. Holly Harris notes in her research, *"allow[ing] natural processes like braiding and flooding to occur more freely promotes habitat diversity, ecological resilience and capacity to adapt to climate change"*. By implication, doing the opposite – artificial channelisation – undermines those values.

From a planning perspective, the **Otago Regional Policy Statement and Regional Plan (Water)** undoubtedly recognize the importance of natural character and habitats of rivers. (For example, Policy 5.4.3 of the Regional Plan: Water for Otago requires maintaining or enhancing the natural character of water bodies, and their margins, and protecting them from inappropriate use and development.) **The proposal at hand is a textbook case of inappropriate use of a riverbed**, given the Shotover's status. It prioritises a human waste issue over the river's long-term geomorphic and ecological health.

In conclusion of this point, the **Commissioners (or Court) should give great weight to the broader context**: The Shotover River's braidplain is a **rare geomorphology under threat**, and any further pressure (especially one that provides no environmental benefit) must be avoided. **Protecting such rivers is aligned with New Zealand's international commitments to biodiversity and ecosystem conservation**, as well as our national identity.

Conclusion and Relief Sought

For the reasons detailed above – including conflict with the Kawarau Water Conservation Order, infringement of RMA Part 2 principles, significant risks to water quality and river morphology, and unacceptable impacts on recreation and amenity – **Dr. Shayne Galloway respectfully urges that resource consents RM25.177 and RM25.206 be DECLINED** in full. The current proposal amounts to an unsatisfactory and unlawful incursion into a protected river, and granting consent would set a poor precedent for freshwater management in Aotearoa.

The submitter recognizes the challenge QLDC faces with its wastewater infrastructure, but **the solution cannot be to sacrifice the values of a nationally treasured river**.

Alternative disposal options (even as interim measures) must be pursued that do not involve discharges to the Shotover or Kawarau. This might require greater investment or expedience by QLDC – but that is the cost of upholding environmental and community values, which must come first. Indeed, the **WCO and RMA demand that the rivers' well-being and the community's well-being (through recreation and natural heritage) take priority** over expedience.

The submitter wishes to be heard in support of this submission, to reinforce the recreation-focused perspective and to assist the decision-makers in understanding the full implications of the proposal on human and ecological well-being.

In summary, the applications are opposed in their entirety. Dr. Galloway seeks that they be refused consent, and that QLDC be encouraged to remove any works already undertaken in the river as soon as practicable. The Shotover and Kawarau Rivers deserve the highest degree of protection and respect – nothing less.

References (cited sources):

- Water Conservation (Kawarau) Order 1997, Schedule 2 (values and restrictions for Shotover and Kawarau Rivers)
- Otago Fish & Game statement on WCO protecting Shotover's water quality, fisheries, and contact recreation values
- Anderson Lloyd legal update re: WCO effect (no consent may contravene an order)
- QLDC press release (20 Sep 2025) – notification of applications (retrospective discharge, diversion channel)
- RNZ News report on Shotover wastewater emergency discharge and consent applications (context of plant failures and interim fix)
- Environment Canterbury – Importance of braided rivers (recreational opportunities, global rarity)
- University of Canterbury news – braided rivers research (endangered status, harm from channelization, need to allow braiding processes)