

29 November 2022

Via Email: [rps@orc.govt.nz](mailto:rps@orc.govt.nz)

Dear Sir / Madam,

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

Thank you for providing the Queenstown Lakes District Council (QLDC) with the opportunity to submit on the abovementioned document.

Queenstown Lakes District Council broadly supports the intent of the ORC regarding the development of the Freshwater Planning Instrument (FWP) component of the Regional Policy Statement (RPS) notified on 30 September 2022.

This submission outlines key details and recommendations of QLDC for the proposed FWP. In summary, QLDC supports some provisions of the proposed FWP, and seeks amendments to other provisions.

QLDC would welcome the opportunity to be heard on its submission. It should be noted that this submission represents the view of officers and has not yet been ratified by full council.

Yours faithfully,



Glyn Lewers  
**Mayor**



Mike Theelen  
**Chief Executive**

**1.0 Background**

- 1.1 The Queenstown Lakes District Council is a high growth area and a high-profile tourist destination. The district includes both rural and urban areas, large and small population centres and townships that are geographically remote.
- 1.2 A significant percentage of the district is either an outstanding natural landscape or national park. Additionally, the district is characterized by freshwater bodies and headwaters catchments, all of which need to be protected to ensure the ongoing social, economic, and environmental health of the district and beyond. Water is also a valued recreational space in the district.
- 1.3 In June 2019, the Council declared a climate and ecological emergency and has since established a Climate Action Plan, focusing on emissions reduction mitigation activities as well as adaptation considerations. Residents of the district have significant climate change aspirations, in terms of both mitigation and adaptation activity, and the role of water in future energy resilience should be considered in this document

## 2.0 Introduction

- 2.1 Queenstown Lakes District Council supports the development of the proposed Freshwater Planning Instrument and its overall intent to manage the freshwater resources of Otago.
- 2.2 Queenstown Lakes District Council is generally supportive of the proposed Freshwater Planning Instrument, however, provide advice on amendments and refinement relevant to this district.

## 3.0 Specific Provision Responses to Proposed Freshwater Plan

Column 1	Column 2	Column 3	Column 4
The specific provisions of the proposal that my submission relates to are	I support or oppose the specific provisions or wish to have them amended	The reasons for my views are	I seek the following decision from the local authority  Additions indicated as <u>underlines</u> and deletions indicated as <del>strikethroughs</del>
<b>PROVISION IN FWP</b>	<b>POSITION</b>	<b>REASON</b>	<b>RELIEF SOUGHT</b>
<b>Significant Resource Management Issues section</b>			
<b>SMRM-15</b>	Amend	The context statement should acknowledge that different uses of water have different effects on the environment (including people and communities) and that s30 RMA enables the Council to allocate water amongst	That the second paragraph of the context statement be amended as follows:  Population growth and land-use intensification in urban and rural environments can create increased demand

		competing uses based on those effects (s30(fa)(1) and s30(4)(e))	for freshwater for human consumption, irrigation and other economic uses. <u>Some of these uses are more efficient and have greater beneficial effects on the environment and communities than others.</u> Freshwater resources in some places are reaching, or are beyond, their sustainable abstraction limits. <u>The RMA enables the allocation of water amongst competing activities.</u> However, there continues to be debate in the community about how historical freshwater allocations can be adjusted to achieve a balance of economic, environmental, social and cultural needs.
<b>SMRM-15</b>	Amend	The economic benefit of access to water is important for the district, and this section could better acknowledge this important value. Additionally, recreational use of water (inclusive of snow) should be highlighted as a benefit.	That the economic section be updated as follows: The economic benefits of urban development, tourism, <u>recreation</u> agriculture, energy production and water supply <del>can be</del> are positive for the Otago-Lakes' communities and visitors.
<b>SRMR-19</b>	Amend	Growth is a challenge in the QLD, but tourism has been changeable over the last few years and as such specifics may be better left out of the RPS.  The lakes and water are fundamental to the vitality of the region socially, culturally, environmentally, and economically. Recreational access to rivers, lakes and snow is also valued, and policy direction should not ignore or create settings that hinder or stop the access of humans to enjoy water. It is also important to consider potential future water use for energy resilience.	That the context statement be amended to read as follows: SRMR-19 – Otago lakes are subject to pressures from tourism and population growth  Healthy lakes are one of Otago's most valued natural resources and for the most part water quality is good. The values assigned to lakes include the natural features and landscapes, the quality and quantity of water accessible to the Otago communities, the accessibility of these resources for recreation, the health of native flora and fauna associated with Otago's rivers and lakes, and renewable energy production. People come to the region to enjoy and use water in many forms, and water is fundamental to the vitality of the region socially, culturally, environmentally, and economically. Urban growth is adversely affecting the natural features and landscapes around the lakes. The amount of growth is demonstrated in the Queenstown Lakes District, including Queenstown and Wanaka, where the population tripled in the last 20 years from 16,750 in 1999 to 47,400 in 2020. Continued growth is projected over the 30 years from 2020 to 2050 (by 63%) . This desire

			<p>of New Zealanders and international visitors to enjoy the outstanding natural environments of the Otago lakes has placed significant pressures on the environment, transport, energy and other infrastructure, health services and social structures. At the same time the economy of the Otago lakes area is heavily dependent on tourism. For example, in 2020, tourism employment accounted for an estimated 56% (or 17,758) of the jobs in the Queenstown-Lakes district; tourism GDP accounted for 43.7% (or NZ \$1.7 billion) of the district's GDP and international tourism contributed 64% (or NZ \$1.89 billion). The Otago-Lakes area also supplies significant renewable energy for use in Otago and beyond.</p>
<b>LF-WAI – O1 – Te Mana o te Wai</b>	Support	The provision is generally supported.	That LF-WAI – O1 be retained as notified.
<b>LF-VM– O2 – Clutha Mata-au FMU vision</b>	Support	The provision is generally supported.	That LF-VM-O2 be retained as notified.
<b>LF-VM– P5 Freshwater Management Units (FMUs) and rohe</b>  <b>LF- VM-P6</b>	Support	The provisions are generally supported.	That LF-WAI-P5 and P6 be retained as notified.
<b>Fresh water LF-FW– O8 - LF-FW-O9; LF- FW-10</b>	Support	The provisions are generally supported.	That LF-FW-O8, LF-FW-O9, LF-FW-10 be retained as notified.
<b>LF-FW-P7</b>	Support	The provisions are generally supported.	That LF-FW-P7 be retained as notified.
<b>LF-FW-P9</b>	Amend	<p>The inclusion of 1(ii) 'restoration activities' as an acceptable reason for wetland decline is of concern and further clarification is sought through either defining the term or excluding the limb.</p> <p>It is unclear how restoration activities result in a loss of values.</p>	<p>That a definition of 'restoration' be included, and if not included, that restoration activities be struck from the provision. The following is from the draft National Policy Statement Indigenous Biodiversity</p> <p><u>Restoration means the active intervention and management of modified or degraded habitats, ecosystems, landforms, and landscapes in order to maintain or reinstate indigenous natural character, ecological and physical processes, and cultural and visual qualities, and may include enhancement activities</u></p>

<p><b>LF-FW-P10 – Restoring natural wetlands</b></p>	<p>Amend</p>	<p>The provision is generally supported however it should be stronger in its controls.</p> <p>For the primary limb: where possible should be strengthened.</p> <p>For limb (1): The word <i>condition</i> is suggested as an alternative to <i>quality</i>, as it allows for more scope measurement and follows changes made in other parts of the Proposed RPS further along in the process.</p>	<p>That LF-FW-P10 (1) be amended as follows:</p> <p>Improve the ecosystem health, hydrological functioning, water quality and extent of natural wetlands that have been degraded or lost by requiring, <del>where possible</del></p> <p>(x) control of pest species and vegetation clearance, and</p> <p>(xx) the exclusion of stock.</p> <p><u>And where possible, requiring</u> (xxx) an increase in the extent and <del>quality</del> <u>condition</u> of habitat for indigenous species,</p> <p>(xxxx) the restoration of hydrological processes-</p>
<p><b>LF-FW-P15 – Stormwater and wastewater discharges</b></p>	<p>Amend</p>	<p>The policy should be stronger in the approach to urban reticulation of stormwater and wastewater, in general urban areas must be reticulated, with exclusions only relevant for special cases, for example outlying settlements where infrastructure funding constraints are a challenge.</p>	<p>That the policy be amended to require where practicable the reticulation of stormwater and wastewater in urban areas.</p> <p>3) <del>promoting</del> <u>requiring, where practicable</u>, the reticulation of stormwater and wastewater in urban areas</p>
<p><b>LF-FW-M8 Action plans</b></p>	<p>Support</p>	<p>The provisions are generally supported.</p>	<p>That LF-FW-M8 be retained as notified.</p>
<p><b>LF-FW Anticipated environmental results section</b></p>	<p>Amend</p>	<p>Overall allocation and competition for water is a significant and unresolved issue for the region. The PRPS also acknowledges the debate about how historical freshwater allocations can be adjusted to achieve a balance of economic, environmental, social, and cultural needs (page 74). Despite this there is no anticipated environmental outcome that the allocation of water will deliver good social, economic, and environmental outcomes for Otago’s communities. For example, access to water resource for power generation or the ability to use the water resource for recreational commercial purposes even if there is no direct loss of water as a result of these should be assured.</p>	<p>That an additional LF-FW-AER be added in line with desired outcomes as follows: <u>Fresh water is allocated in a way that will deliver a balance of social, cultural, economic, and environmental outcomes that ensure the wellbeing of local communities.</u></p>
<p><b>LF-FW-AER4 – AER10</b></p>	<p>Support</p>	<p>The provisions are generally supported.</p>	<p>That the provisions be retained as notified.</p>
<p><b>LF-FW-AER11</b></p>	<p>Amend</p>	<p>The concept is supported; however, the wording could be amended. The word <i>condition</i> is suggested as an alternative to</p>	<p>That LF FW AER11 be amended to:</p>

		<i>quality</i> , as it allows for more scope measurement and follows changes made in other parts of the Proposed RPS further along in the process.	There is no reduction in the extent or <del>quality</del> <u>condition</u> of Otago's natural wetlands.
<b>LF-LS-P18 Soil erosion</b>	Amend	The intent of the provision is supported, however, in instances where vegetation is not sufficient it should be improved – amending the provision to add enhancement will assist.	That LF-LS-P18 be amended as shown below, and that it otherwise remain as notified.  Minimise soil erosion, and the associated risk of sedimentation in water bodies, resulting from land use activities by:  (1) implementing effective management practices to retain topsoil in-situ and minimise the potential for soil to be discharged to water bodies, including by controlling the timing, duration, scale and location of soil exposure,  (2) maintaining, <u>or enhancing</u> , vegetative cover on erosion-prone land, and  (3) promoting activities that enhance soil retention.
<b>LF- LS – P21 Land use and fresh water</b>	Amend	The overall concept of the policy is supported however it could be redrafted to better capture the freshwater conditions sought.	That the policy is amended to:  Achieve the <b>improvement</b> or <b>maintenance</b> of <i>freshwater</i> quantity <del>or</del> <u>and</u> quality to meet <i>environmental outcomes</i> set for <i>Freshwater Management Units</i> and/or rohe by:  (1) reducing direct and indirect <i>discharges of contaminants</i> to <i>water</i> from the use and development of <i>land</i> and  (2) managing <i>land</i> uses that may have adverse <i>effects</i> on the flow of <i>water</i> in surface <i>water bodies</i> or the recharge of <i>groundwater</i>
<b>LF-LS-M11 Regional plans</b>	Support	The provisions are generally supported.	That LF-LS-M11 be retained as notified.
<b>LF-LS-AER 14 Anticipated environmental results</b>	Support	The provision is generally supported.	That LF-LS-AER 14 be retained as notified.

## 4.0 Summary

4.1 In summary, QLDC supports the development of the Freshwater Instrument but with advice relevant to this district, but seeks some amendments clarifying wording, and intent of provisions along with management of particular resources.

