

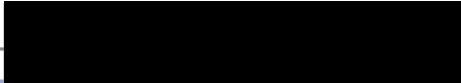
Submission No: \_\_\_\_\_

**Submission Form 13 to the Otago Regional Council on consent application RM19.051**

This is a Submission on a publicly notified resource consent application pursuant to the Resource Management Act 1991.

Submitter Details:  
(please print clearly)

Full Name/s MARGARET PRESCOTT + STEVEN PRESCOTT

Full Postal Address: 

Post Code: 

Please provide your preferred contact phone number: 

Email address: 

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

Applicant's Name: **Queenstown Lakes District Council**

Application Number: **RM19.051.01**

Location: **Various locations throughout the Queenstown Lakes district**

Purpose: **To discharge untreated wastewater to various freshwater receiving environments, and onto land in circumstances where it may enter freshwater due to blockages, breakages, system failures, extreme storm events, and capacity exceedance in the network that cause overflows to the wastewater infrastructure throughout the Queenstown Lakes district**

The specific parts of the application/e that <sup>we</sup> my submission relates to are: (Give details)

DISCHARGING UNTREATED WASTEWATER  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

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).

WE OPPOSE THE WASTEWATER BEING DISCHARGED INTO ANY FRESHWATER ENVIRONMENTS OR ONTO LAND AS WE WISH THESE PLACES TO BE AS CLEAN AS POSSIBLE ESPECIALLY WHEN WE HAVE JUST RECEIVED EXTRA FUNDING TO KEEP LAKE HUNNELL CLEAN.

Submission No: \_\_\_\_\_

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

TO NOT ALLOW UNTREATED WATER  
TO BE DISCHARGED INTO FRESHWATER  
RECEIVING ENVIRONMENTS OR ONTO LAND  
ESPECIALLY LAKE WANAKA

*We:*

- Wish to be heard in support of our/my submission  
 Not wish to be heard in support of our/my submission

If others make a similar submission, *we* will consider presenting a joint case with them at a hearing.

- Yes  
 No

I, ~~am~~ am not (choose one) 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~~ am not (choose one) 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~~ do not (choose one) wish to be involved in any pre-hearing meeting that may be held for this application.

I do ~~do not~~ request\* that the local authority delegates its functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

~~We have~~ we have not served a copy of my submission on the applicant.

[Redacted Signature]

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

7/7/19  
(Date)

Submission No:

**Submission Form 13 to the Otago Regional Council on  
Consent Application RM19.051**

This is a Submission on a publicly notified resource consent application pursuant to the Resource Management Act 1991.

**Submitter Details:**

Full Name/s Marie-Claire Henderson

Full Postal Address: [REDACTED]

Post Code: [REDACTED]

Please provide your preferred contact phone number: [REDACTED]

Email address: [REDACTED]

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

Applicant's Name: **Queenstown Lakes District Council**

Application Number: **RM19.051.01**

Location: **Various locations throughout the Queenstown Lakes district**

Purpose: **To discharge untreated wastewater to various freshwater receiving environments, and onto land in circumstances where it may enter freshwater due to blockages, breakages, system failures, extreme storm events, and capacity exceedance in the network that cause overflows to the wastewater infrastructure throughout the Queenstown Lakes district**

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

'untreated wastewater to various freshwater receiving environments, and onto land in circumstances where it may enter freshwater due to blockages, breakages, system failures, extreme storm events, and capacity exceedance in the network'...

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).*

I am concerned about the impact the proposal will have on the environment and ecosystems, the public health and the recreational value of our freshwater environments. We should expect, at a minimum, a well managed wastewater system of sufficient capacity and robust enough design to cope with all but the most extreme natural events without having a negative impact upon our environment, and this proposal does not seem to supply this.

**Submission No:**

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

To refuse the application.

I/we:

- Wish to be heard in support of our/my submission  
 Do not wish to be heard in support of our/my submission

If others make a similar submission, I/we will consider presenting a joint case with them at a hearing.

- Yes  
 No

I, Am Not (choose one) 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 (choose one) 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 Not (choose one) wish to be involved in any pre-hearing meeting that may be held for this application.

I Do request\* that the local authority delegates its functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

I Have Not served a copy of my submission on the applicant.

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

10/07/2019  
(Date)

## Submission No:

### ***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 the 20th working day after the date on which public or limited notification is given. If the application is subject to limited notification, the consent authority may adopt an earlier closing date for submissions once the consent authority receives responses from all affected persons.

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.

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](mailto:submissions@orc.govt.nz)

The address for service for the Applicant is:

**Queenstown Lakes District Council, Private Bag 50072, Queenstown 9300**

Or by email to [alisha.robinson@beca.com](mailto:alisha.robinson@beca.com)



Submission No: RM 19.051.01.

**Submission Form 13 to the Otago Regional Council on  
Consent Application RM19.051**

This is a Submission on a publicly notified resource consent application pursuant to the Resource Management Act 1991.

**Submitter Details:**  
(please print clearly)

Full Name/s MARINA SILVA

Full Postal Address: [REDACTED]

Post Code: [REDACTED]

Please provide your preferred contact phone number: [REDACTED]

Email address: [REDACTED]

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

Applicant's Name: **Queenstown Lakes District Council**

Application Number: **RM19.051.01**

Location: **Various locations throughout the Queenstown Lakes district**

Purpose: **To discharge untreated wastewater to various freshwater receiving environments, and onto land in circumstances where it may enter freshwater due to blockages, breakages, system failures, extreme storm events, and capacity exceedance in the network that cause overflows to the wastewater infrastructure throughout the Queenstown Lakes district**

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

Discharge untreated water to freshwater or land is absolutely unsustainable and does not pay respect to our environment & future generations. It is against 100% Pure NZ, principles of manaakitanga, toki

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).

I completely oppose this application.

Submission No: RM 19.051

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

That only treated water can be discharged  
back at environment. Until our infrastructure can  
cope with demand, we should not be giving  
consent for more hotels & accommodation providers.

I/we:

- Wish to be heard in support of our/my submission  
 Not wish to be heard in support of our/my submission

If others make a similar submission, I/we will consider presenting a joint case with them at a hearing.

- Yes  
 No

I, am/am not (choose one) 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/am not (choose one) 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/do not (choose one) wish to be involved in any pre-hearing meeting that may be held for this application.

I do/do not request\* that the local authority delegates its functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

I have/have not served a copy of my submission on the applicant.

[Redacted Signature]  
Signature/s of submitter/s (or person authorised to sign on behalf of submitter/s)

11/07/19.  
(Date)



Submission No: RM 19.051.01

**Notes to the submitter**

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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.

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- 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](mailto:submissions@orc.govt.nz)

The address for service for the Applicant is:

**Queenstown Lakes District Council, Private Bag 50072, Queenstown 9300**

Or by email to [alisha.robinson@beca.com](mailto:alisha.robinson@beca.com)

**Submission close at 5 pm on Friday 12 July 2019**



**From:** [REDACTED]  
**To:** [Submissions: alisha.robinson@beca.com](mailto:submissions@orca.govt.nz)  
**Subject:** Submission in respect of application no. RM19.051  
**Date:** Thursday, 11 July 2019 2:44:34 p.m.

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The following is my submission relation to application no. RM19.051 - full details are below. This application is being emailed to [submissions@orca.govt.nz](mailto:submissions@orca.govt.nz) and copied to the applicant at [alisha.robinson@beca.com](mailto:alisha.robinson@beca.com). Please contact me by return email if there is anything further you need from me in order for the application to be valid.

#### 1. My details

Name: [REDACTED]

Postal address: [REDACTED]

Mobile: [REDACTED]

Email: [REDACTED]

#### 2. Details of the application in respect of which I am making this submission Queenstown Lakes District Council – Various locations throughout the Queenstown Lakes district. Application No. RM19.051

To discharge untreated wastewater to various freshwater receiving environments including lakes and rivers, and to land in a circumstances where it may enter water as a result of blockages, breakages, system failures, extreme storm events, and capacity exceedance in the network that cause overflows to the wastewater infrastructure throughout the Queenstown Lakes district. The proposal is a discretionary activity in accordance with Rules 12.A.2.1, 12.B.4.2 and 12.C.3.2 of the Regional Plan: Water for Otago.

Purpose: Managing reticulated wastewater throughout the Queenstown Lakes district

Location: Various locations throughout the Queenstown Lakes district

Legal Description of Property: Various locations throughout the Queenstown Lakes district

#### 3. Whether it is in support or opposition.

I am making this submission to register my opposition to the application in the strongest possible terms.

#### 4. Submissions and reasons

Our waterways, rivers and lakes are already under threat from multiple sources, and we should not be allowing discharge of untreated wastewater into these systems under any circumstances. Such discharge threatens to cause both short and long term damage which can and should be avoided.

It should be part of QLDC's responsibility to assess potential points of weakness, failure or blockage, and to put sufficient safeguards in place to ensure that discharge of untreated wastewater is not required. Potential solutions could include holding tanks, secondary overflow systems, holding ponds, water treatment systems and more. These systems should all be monitored and maintained to a high standard.

The Queenstown Lakes District area is an area of outstanding natural beauty which has become sort after because of its pristine natural characteristics, including our lakes, rivers and waterways. These are natural treasures which we should do everything possible to protect and preserve. The QLD has a duty to ensure that these natural resources are preserved and maintained, not endangered and polluted. The QLDC should be held to the highest possible standards.

From an economic perspective, this application seeks permission to conduct activities which could threaten the very reason tourists flock to Central Otago. It simply makes no sense to allow QLDC to pollute our natural resources - resources which are the reason tourists want to come to Central Otago.

The recent resolution by the QLDC to declare a climate emergency in our area is directly at odds with this application. How can our council declare a climate emergency, and then merely a few weeks later seek permission to pollute the environment? In my view, this is indefensible.

Above all, the QLDC has a moral obligation to leave a positive legacy for future generations living in the region, and for New Zealanders as a whole. Likewise, the ORC has a moral obligation not to allow applicants to do anything which will likely cause significant damage to the environment.

5. Decision I wish Council to make.

I ask that the ORC declines QLDC's application for consent, in its entirety, and (if within its powers) directs the applicant to come back with a more sustainable, environmentally friendly plan to deal with waste water.

6. Wish to be heard.

I do not wish to be heard during the hearing, and I have copied this submission to the applicant, cc'd above.

[Ends]

---

Mark Sinclair, Founder, yBC.tv

*Game changing digital platforms and compelling content*

**London - Bristol - Edinburgh - Hamburg - Budapest - Hong Kong - Singapore - Auckland - Wanaka**

Websites: [yBC.tv](http://yBC.tv) (global) / [nz.yBC.tv](http://nz.yBC.tv) (NZ) / [finpix.tv](http://finpix.tv) (Asset Management) / [Brilliant Minds](#) (briefings)

Email: [REDACTED] (best way to message)

UK mob & WhatsApp: [REDACTED] (I don't have voicemail)

NZ mob: [REDACTED]

If you haven't already discovered Brilliant Minds, you should take a few moments to browse our back-catalogue

of sports stars, business leaders and academics. They are getting rave reviews - more [here](#).

**From:** [REDACTED]  
**To:** [Karen Bagnall](#)  
**Subject:** Re: Submission in respect of application no. RM19.051  
**Date:** Friday, 12 July 2019 10:38:12 a.m.  
**Attachments:** [image001.png](#)

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Hi Karen

I AM NOT a trade competitor.  
I DO NOT wish to be involved in any pre hearing meeting  
I DO NOT request that the local authority delegates its functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

I have already confirmed that I have served a copy of my submission on the applicant (see my original email).

Thanks  
Mark

---

Mark Sinclair, Founder, yBC.tv  
*Game changing digital platforms and compelling content*  
**London - Bristol - Edinburgh - Hamburg - Budapest - Hong Kong - Singapore - Auckland - Wanaka**  
Websites: [yBC.tv](#) (global) / [nz.yBC.tv](#) (NZ) / [finpix.tv](#) (Asset Management) / [Brilliant Minds](#) (briefings)

Email: [REDACTED] (best way to message)  
UK mob & WhatsApp: [REDACTED] (I don't have voicemail)  
NZ mob: [REDACTED]

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On Fri, 12 Jul 2019 at 10:19, Karen Bagnall <[karen.bagnall@orc.govt.nz](mailto:karen.bagnall@orc.govt.nz)> wrote:

Good morning – thank you for your submission – unfortunately there were a few things omitted – can you confirm the following;

I, **am/am not** (choose one) 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/am not** (choose one) 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/do not** (choose one) wish to be involved in any pre-hearing meeting that may be held for this application.

I **do/do not** request\* that the local authority delegates its functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

I **have/have not** served a copy of my submission on the applicant.

Could please reply to the submission e-mail address as per your original submission.

Please do not hesitate to contact me should you have any questions.



## Karen Bagnall

SENIOR CONSENTS SUPPORT OFFICER

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Otago Regional Council

70 Stafford St  
Private Bag 1954 Dunedin 9054

P (03) 474 0827 or 0800 474 082

[karen.bagnall@orc.govt.nz](mailto:karen.bagnall@orc.govt.nz)  
[www.orc.govt.nz](http://www.orc.govt.nz)

### Important Notice

This email contains information which is confidential and may be subject to legal privilege. If you are not the intended recipient, you must not peruse, use, disseminate, distribute or copy this email or attachments. If you have received this in error, please notify us immediately by return email, facsimile (03 479-0015) or telephone (03 474-0827) and delete this email. The Otago Regional Council accepts no responsibility for changes made to this email or to any attachments following the original transmission from its offices. Thank you

**From:** Mark Sinclair [REDACTED]  
**Sent:** Thursday, 11 July 2019 2:44 p.m.

**To:** Submissions <[Submissions@orc.govt.nz](mailto:Submissions@orc.govt.nz)>; [alisha.robinson@beca.com](mailto:alisha.robinson@beca.com)  
**Subject:** Submission in respect of application no. RM19.051

The following is my submission relation to application no. RM19.051 - full details are below. This application is being emailed to [submissions@orc.govt.nz](mailto:submissions@orc.govt.nz) and copied to the applicant at [alisha.robinson@beca.com](mailto:alisha.robinson@beca.com). Please contact me by return email if there is anything further you need from me in order for the application to be valid.

#### 1. My details

Name: Mark Sinclair

Postal address: [REDACTED]

Mobile: [REDACTED]

Email: [REDACTED]

#### 2. Details of the application in respect of which I am making this submission

Queenstown Lakes District Council – Various locations throughout the Queenstown Lakes district. Application No. RM19.051

To discharge untreated wastewater to various freshwater receiving environments including lakes and rivers, and to land in a circumstances where it may enter water as a result of blockages, breakages, system failures, extreme storm events, and capacity exceedance in the network that cause overflows to the wastewater infrastructure throughout the Queenstown Lakes district. The proposal is a discretionary activity in accordance with Rules 12.A.2.1, 12.B.4.2 and 12.C.3.2 of the Regional Plan: Water for Otago.

Purpose: Managing reticulated wastewater throughout the Queenstown Lakes district

Location: Various locations throughout the Queenstown Lakes district

Legal Description of Property: Various locations throughout the Queenstown Lakes district

#### 3. Whether it is in support or opposition.

I am making this submission to register my opposition to the application in the strongest possible terms.

#### 4. Submissions and reasons

Our waterways, rivers and lakes are already under threat from multiple sources, and we should not be allowing discharge of untreated wastewater into these systems under any circumstances. Such discharge threatens to cause both short and long term damage which can and should be avoided.

It should be part of QLDC's responsibility to assess potential points of weakness, failure or blockage, and to put sufficient safeguards in place to ensure that discharge of untreated wastewater is not required. Potential solutions could include holding tanks, secondary overflow systems, holding ponds, water treatment systems and more. These systems should all be monitored and maintained to a high standard.

The Queenstown Lakes District area is an area of outstanding natural beauty which has become sort after because of its pristine natural characteristics, including our lakes, rivers and waterways. These are natural treasures which we should do everything possible to protect and preserve. The QLD has a duty to ensure that these natural resources are preserved and maintained, not endangered and polluted. The QLDC should be held to the highest possible standards.

From an economic perspective, this application seeks permission to conduct activities which could threaten the very reason tourists flock to Central Otago. It simply makes no sense to allow QLDC to pollute our natural resources - resources which are the reason tourists want to come to Central Otago.

The recent resolution by the QLDC to declare a climate emergency in our area is directly at odds with this application. How can our council declare a climate emergency, and then merely a few weeks later seek permission to pollute the environment? In my view, this is indefensible.

Above all, the QLDC has a moral obligation to leave a positive legacy for future generations living in the region, and for New Zealanders as a whole. Likewise, the ORC has a moral obligation not to allow applicants to do anything which will likely cause significant damage to the environment.

5. Decision I wish Council to make.

I ask that the ORC declines QLDC's application for consent, in its entirety, and (if within its powers) directs the applicant to come back with a more sustainable, environmentally friendly plan to deal with waste water.

6. Wish to be heard.

I do not wish to be heard during the hearing, and I have copied this submission to the applicant, cc'd above.

[Ends]



**London - Bristol - Edinburgh - Hamburg - Budapest - Hong Kong - Singapore - Auckland - Wanaka**

Websites: [yBC.tv](#) (global) / [nz.yBC.tv](#) (NZ) / [finpix.tv](#) (Asset Management) / [Brilliant Minds](#) (briefings)

Email: [REDACTED] (best way to message)

UK mob & WhatsApp: [REDACTED] don't have voicemail)

NZ mob: [REDACTED]

[REDACTED]

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Submission No: \_\_\_\_\_

**Submission Form 13 to the Otago Regional Council on  
Consent Application RM19.051**

This is a Submission on a publicly notified resource consent application pursuant to the Resource Management Act 1991.

**Submitter Details:**

*(please print clearly)*

Full Name/s Laureys Marlene

Full Postal Address: \_\_\_\_\_

Post Code: \_\_\_\_\_

Please provide your preferred contact phone number: \_\_\_\_\_

Email address: \_\_\_\_\_

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

Applicant's Name: **Queenstown Lakes District Council**

Application Number: **RM19.051.01**

Location: **Various locations throughout the Queenstown Lakes district**

Purpose: **To discharge untreated wastewater to various freshwater receiving environments, and onto land in circumstances where it may enter freshwater due to blockages, breakages, system failures, extreme storm events, and capacity exceedance in the network that cause overflows to the wastewater infrastructure throughout the Queenstown Lakes district**

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

       **To discharge untreated wastewater to various freshwater receiving environments, and onto land in circumstances where it may enter freshwater due to blockages, breakages, system failures, extreme storm events, and capacity exceedance in the network that cause overflows to the wastewater infrastructure throughout the Queenstown Lakes district**

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)*.

Submission No: \_\_\_\_\_

Oppose the application

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

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

no consent

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

I/we:

- Wish to be heard in support of our/my submission
- Not wish to be heard in support of our/my submission

If others make a similar submission, I/we will consider presenting a joint case with them at a hearing.

- Yes
- No

I, **am not** (choose one) 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/** (choose one) 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 not** (choose one) wish to be involved in any pre-hearing meeting that may be held for this application.

I **do not** request\* that the local authority delegates its functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

I **have not** served a copy of my submission on the applicant.

Marlene Laureys

\_\_\_\_\_

11.07.2019

\_\_\_\_\_

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

(Date)

**Submission No:** \_\_\_\_\_

**Submission No:** \_\_\_\_\_

***Notes to the submitter***

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- 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](mailto:submissions@orc.govt.nz)

The address for service for the Applicant is:

**Queenstown Lakes District Council, Private Bag 50072, Queenstown 9300**

Or by email to [alisha.robinson@beca.com](mailto:alisha.robinson@beca.com)

**Submission close at 5 pm on Friday 12 July 2019**

## Alisha Robinson

---

**From:** Mel Müller <[REDACTED]>  
**Sent:** Friday, 12 July 2019 1:30 p.m.  
**To:** Alisha Robinson  
**Subject:** Re: Submission

Hi Alisha,

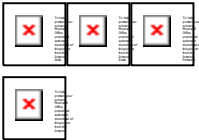
Please see in below email amended application.

Regards,

**Mel Mueller**  
Project Manager

[REDACTED]  
[REDACTED]

Member of PMI <https://www.pmi.org/>



---

Sustainable and high performance homes

On 12/07/2019, at 6:10 AM, Karen Bagnall <[karen.bagnall@orc.govt.nz](mailto:karen.bagnall@orc.govt.nz)> wrote:

Good morning – thank you for your submission – unfortunately there were a few things omitted – can you confirm the following;

I, **am not** (choose one) 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/am not** (choose one) 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** wish to be involved in any pre-hearing meeting that may be held for this application.

I **do** request\* that the local authority delegates its functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

I **have not** served a copy of my submission on the applicant.

Could please reply to the submission e-mail address as per your original submission.

**Please note that submissions close at 5 pm on Friday 12 July 2019**

Please do not hesitate to contact me should you have any questions.

<image001.png>

## **Karen Bagnall**

SENIOR CONSENTS SUPPORT OFFICER

---

Otago Regional Council  
70 Stafford St  
Private Bag 1954 Dunedin 9054  
P (03) 474 0827 or 0800 474 082

[karen.bagnall@orc.govt.nz](mailto:karen.bagnall@orc.govt.nz)  
[www.orc.govt.nz](http://www.orc.govt.nz)

### **Important Notice**

This email contains information which is confidential and may be subject to legal privilege. If you are not the intended recipient, you must not peruse, use, disseminate, distribute or copy this email or attachments. If you have received this in error, please notify us immediately by return email, facsimile (03 479-0015) or telephone (03 474-0827) and delete this email. The Otago Regional Council accepts no responsibility for changes made to this email or to any attachments following the original transmission from its offices. Thank you

---

**From:** Mel Müller <[REDACTED]>  
**Sent:** Thursday, 11 July 2019 2:16 p.m.  
**To:** Alisha Robinson <[Alisha.Robinson@beca.com](mailto:Alisha.Robinson@beca.com)>  
**Subject:** Submission

[Alisha.Robinson@beca.com](mailto:Alisha.Robinson@beca.com)

This is a Submission on a publicly notified resource consent application pursuant to the Resource Management Act 1991.

Applicant Details: Melanie Mueller

Applicant: Queenstown Lakes District Council

Application No: RM19.051.01

Consent Type: Discharge Permit

Purpose: To discharge untreated wastewater to various freshwater receiving environments, and onto land in circumstances where it may enter freshwater due to blockages, breakages, system failures, extreme storm events, and capacity exceedance in the network that cause overflows to the wastewater infrastructure throughout the Queenstown Lakes district

Location: Various locations throughout the Queenstown Lakes district

Map reference: Various locations throughout the Queenstown Lakes district

Legal description: Various locations throughout the Queenstown Lakes district

Submitter Details:

Full Name/s: Melanie Mueller

Primary contact: [REDACTED]

Full Postal Address: [REDACTED]

Post Code: [REDACTED]

Mobile Ph: [REDACTED]

Email address: [REDACTED]

Signature/s of submitter: m mueller

Submission No:

Please tick one of the following submission types regarding the application:

Do you: Oppose Yes

Do you: Wish to be heard Yes

The specific parts of the application/s that this submission relates to are: that the consent not be allowed in its entirety due the fact it does not meet the requirements under the National Policy Statement for Freshwater Management (NPSFM) specifically in regard to:

Safeguarding fresh water's life-supporting capacity, ecosystem processes, and indigenous species.

Safe guarding the health of people who come into contact with the water.

National Policy Statement for Freshwater Management A. Water quality Objective A1 To safeguard: a) the life-supporting capacity, ecosystem processes and indigenous species including their associated ecosystems, of fresh water; and b) the health of people and communities, as affected by contact with fresh water; in sustainably managing the use and development of land, and of discharges of contaminants.

Maintaining or improving the overall quality of fresh water within a freshwater management unit.

National Policy Statement for Freshwater Management Objective A2 The overall quality of fresh water within a freshwater management unit is maintained or improved while: a) protecting the significant values of outstanding freshwater bodies; b) protecting the significant values of wetlands; and c) improving the quality of fresh water in water bodies that have been degraded by human activities to the point of being over-allocated.

Improving water quality so that it is suitable for primary contact more often .

National Policy Statement for Freshwater Management Objective A3 The quality of fresh water within a freshwater management unit is improved so it is suitable for primary contact more often, unless: a) regional targets established under Policy A6(b) have been achieved; or b) naturally occurring processes mean further improvement is not possible.



In the event that a consent is granted then it must contain clear and strict requirements for infrastructure upgrades to occur within defined time period of no longer than 10 years so that these discharges are reduced and eliminated. Any such consent granted must be short-term so that the effectiveness of these upgrades, and also the performance of ORC's compliance team in undertaking the necessary monitoring and enforcement, is reviewed once again in the public arena. Transparency and an accountable promise that both organisations QLDC AND ORC work together to work towards reducing spills to zero over a set and agreed time frame.

The reasons for this submission are:

ORC is responsible for safeguarding fresh water's life-supporting capacity, ecosystem processes, and indigenous species, as per the National Policy Statement for Freshwater Management (NPSFM).

ORC is responsible for safe guarding the health of people who come into contact with the water (NPSFM).

ORC is responsible for maintaining or improving the overall quality of fresh water within a freshwater management unit (NPSFM).

"The applicant, QLDC, has failed to demonstrate how ORC can possibly grant the consent sought whilst ensuring that ORC's statutory obligations under the NPSFM are satisfied at all times"

Both ORC and QLDC, under section 6 (e), 7 (a) and 8 RMA, are responsible for recognising and providing for, having particular regard to, and taking into account both the principles of the Treaty of Waitangi and matters of importance to iwi. These values include but are not limited to:

Protecting the mauri of our waterways. Mauri is the life energy which binds and animates all things in the physical world. It is the force behind that which is manifested, the force that sparkles alive the waterways, the force of beat in the human pulse, the force that shines out through the native greenery. Discharging untreated water into waterways will diminish and degrade mauri.

To aid further understanding, a breakdown of the word mauri may help:

Ma = To be connected to, bound to, linked to, joined

Uri = Descendants. All things, seen and unseen

Protecting whakapapa. Whakapapa is the word for connections and relating. If the Enlightenment view is epitomised in 'I think therefore I am', the Māori understanding is 'I relate therefore I am'. In this cultural context, whakapapa refers to the need to treasure relationships, including the human relationship with water.

Upholding our responsibility as Kaitiakitanga of the whenua. In a cultural context our role is guardian or protectors of the land, and our function is to understand the significant values of outstanding freshwater bodies and to improve the quality of fresh water in water bodies that have been degraded by human activities to the point of being over-allocated. Kaitiakitanga refers to our need to lead the conversation about conservation - as people, organisations and businesses, and collaborate on how we protect and enhance the mauri of this water.

Wahi taonga refers to places in the landscapes that are treasured and in need of acknowledgement and protection. This includes our Central Lakes waterways and lakes which are precious and unique to us.

It is understood that the drains in the Queenstown region have unique issues with high fat content (and blocking), and discharge from industry in to drains. This is a related concern to me, and I am requesting that:

More emphasis be placed on educating the public on what is NOT flushable or drainable. Our biological system, which is excellent, can only accept the 3 P's- poo, pee, paper. Nothing else!

More stringent conditions are put in place in regards to households and industry discharge, including investment in more stringent monitoring of household and trade waste bylaw.

That no consent is granted unless it is for a very limited term, with stringent monitoring, and review provisions, and clear timelines within which QLDC must upgrade infrastructure so that these discharges are reduced and eliminated within a very clear timeframe.

I am concerned that ORC will not provide adequate monitoring and enforcement of these discharges and the required upgrades unless it is clearly defined on the aforementioned short-term consent, so that it may be given priority in ORC's compliance monitoring programme. It is a fact that ORC embarked on an Urban Water Strategy in 2017. It was agreed by ORC (worked on it partnership with QLDC) but has not progressed into an actual plan. So as a result has no teeth. Unfortunately there have been additional delays in doing this with the new NPSFM being proposed and now the complete review of the Water Plan: Otago. However there are key points in here about needing to upgrade infrastructure, partnership etc etc. THIS MUST BE PRIORITISED if we seek outcomes of the overall quality of fresh water within a freshwater management units are to be maintained or improved.

Submission No:

I seek the following decision from the consent authority: that the consent not be allowed in its entirety due to the reasons above

Regards,

**Mel Mueller**  
Project Manager

[Redacted]  
[Redacted]

Member of PMI <https://www.pmi.org/>



---

Sustainable and high performance homes

NOTICE: This email, if it relates to a specific contract, is sent on behalf of the Beca company which entered into the contract. Please contact the sender if you are unsure of the contracting Beca company or visit our web page <http://www.beca.com> for further information on the Beca Group. If this email relates to a specific contract, by responding you agree that, regardless of its terms, this email and the response by you will be a valid communication for the purposes of that contract, and may bind the parties accordingly. This e-mail together with any attachments is confidential, may be subject to legal privilege and may contain proprietary information, including information protected by copyright. If you are not the intended recipient, please do not copy, use or disclose this e-mail; please notify us immediately by return e-mail and then delete this e-mail.

Submission No:

**Submission Form 13 to the Otago Regional Council on  
Consent Application RM19.051**

This is a Submission on a publicly notified resource consent application pursuant to the Resource Management Act 1991.

**Submitter Details:**

Full Name/s Michael & Susie Ross

Full Postal Address: [REDACTED]

[REDACTED] Post Code: [REDACTED]

Please provide your preferred contact phone number: [REDACTED]

Email address: [REDACTED]

I/ we wish to submit a \_\_\_\_\_ (choose one) submission on the application of:

Applicant's Name: **Queenstown Lakes District Council**

Application Number: **RM19.051.01**

Location: **Various locations throughout the Queenstown Lakes district**

Purpose: **To discharge untreated wastewater to various freshwater receiving environments, and onto land in circumstances where it may enter freshwater due to blockages, breakages, system failures, extreme storm events, and capacity exceedance in the network that cause overflows to the wastewater infrastructure throughout the Queenstown Lakes district**

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

Discharges into freshwater.  
Discharges onto land

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)*.

We support emergency discharges onto land

We oppose discharges to freshwater bodies.  
Capacity exceedance has been chased by unfettered residential and tourism growth. This growth should be curtailed until capacity can be built to cope.

**Submission No:**

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

That the application be declined until such time as the on cil can demonstrate that it has contingency planning in place to cope with these events.

I/we:

- Wish to be heard in support of our/my submission  
 Do not wish to be heard in support of our/my submission

If others make a similar submission, I/we will consider presenting a joint case with them at a hearing.

- Yes  
 No

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

I \_\_\_\_\_ request\* that the local authority delegates its functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

I \_\_\_\_\_ served a copy of my submission on the applicant.



\_\_\_\_\_  
**Signature/s of submitter/s** (or person authorised to sign on behalf of submitter/s)

100th July 2019

\_\_\_\_\_  
(Date)

## Submission No:

### ***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 the 20th working day after the date on which public or limited notification is given. If the application is subject to limited notification, the consent authority may adopt an earlier closing date for submissions once the consent authority receives responses from all affected persons.

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.

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](mailto:submissions@orc.govt.nz)

The address for service for the Applicant is:

**Queenstown Lakes District Council, Private Bag 50072, Queenstown 9300**

Or by email to [alisha.robinson@beca.com](mailto:alisha.robinson@beca.com)

## Karen Bagnall

---

**From:** Michael Ross [REDACTED]  
**Sent:** Friday, 12 July 2019 10:13 a.m.  
**To:** Karen Bagnall; snuan52@gmail.com  
**Subject:** Re: FW: submission-form-for-publicly-notified-application-rm19051-editable-version.pdf

Good Morning Karen,  
Further to your phone call, here are our answer to the questions which did not arrive on your system. See alterations below to your original email below. Could you please confirm that this is suitable for your purposes.  
Many thanks,  
Susie and Michael Ross

On Thu, Jul 11, 2019 at 12:48 PM Karen Bagnall <[karen.bagnall@orc.govt.nz](mailto:karen.bagnall@orc.govt.nz)> wrote:

Good afternoon – thank you for your submission – unfortunately there were a few things omitted – can you confirm the following;

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

**We are not a Trade Competitor**

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

I, am (choose one) 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 not** (choose one) wish to be involved in any pre-hearing meeting that may be held for this application.

I **do request\*** that the local authority delegates its functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

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

Could please reply to the submission e-mail address as per your original submission.

**Please note that submissions close at 5 pm on Friday 12 July 2019**

Please do not hesitate to contact me should you have any question

Regards



**Karen Bagnall**

SENIOR CONSENTS SUPPORT OFFICER

---

Otago Regional Council

70 Stafford St  
Private Bag 1954 Dunedin 9054

P (03) 474 0827 or 0800 474 082

[karen.bagnall@orc.govt.nz](mailto:karen.bagnall@orc.govt.nz)  
[www.orc.govt.nz](http://www.orc.govt.nz)

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This email contains information which is confidential and may be subject to legal privilege. If you are not the intended recipient, you must not peruse, use, disseminate, distribute or copy this email or attachments. If you have received this in error, please notify us immediately by return email, facsimile (03 479-0015) or telephone (03 474-0827) and delete this email. The Otago Regional Council accepts no responsibility for changes made to this email or to any attachments following the original transmission from its offices. Thank you

Sent: Wednesday, 10 July 2019 9:00 p.m.

Submission No: \_\_\_\_\_

### Submission Form 13

File No: RM19.051

This is a Submission on a publicly notified resource consent application pursuant to the Resource Management Act 1991.

#### Applicant Details:

Applicant: Queenstown Lakes District Council

Application No: RM19.051.01

Consent Type: Discharge Permit

Purpose: To discharge untreated wastewater to various freshwater receiving environments, and onto land in circumstances where it may enter freshwater due to blockages, breakages, system failures, extreme storm events, and capacity exceedance in the network that cause overflows to the wastewater infrastructure throughout the Queenstown Lakes district

Location: Various locations throughout the Queenstown Lakes district

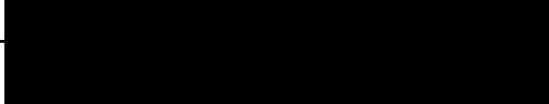
Map reference: Various locations throughout the Queenstown Lakes district

Legal description: Various locations throughout the Queenstown Lakes district

#### Submitter Details:

*(please print clearly)*

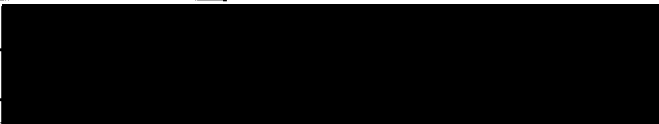
Full Name/s Michael John Bruce Arthur

Full Postal Address: 

Post Code: \_\_\_\_\_

Work Ph: \_\_\_\_\_

Home Ph: \_\_\_\_\_

Mobile Ph: 

Email address: \_\_\_\_\_

*(please tick your preferred daytime contact number)*

  
Signature/s of submitter/s

18 June 19  
(Date)



Submission No: \_\_\_\_\_

Please tick one of the following submission types regarding the application,

Do you:

- Support
- Neutral
- Oppose

Do you:

- Wish to be heard
- Not wish to be heard

in support of my/our submission.

If others make a similar submission, I/we will consider presenting a joint case with them at a hearing.

- Yes
- No

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

The discharge of untreated waste water  
into various freshwater receiving  
environments

My/Our submission is *(the reasons for your views, use a separate sheet if necessary)*

Under no circumstances should  
untreated waste water be discharged  
either directly or indirectly into  
Lake Wairaka or Lake Waikarepa.

Submission No: \_\_\_\_\_

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

Refusal of the resource consent  
applications

Date submissions close: 5 pm Friday 12<sup>th</sup> July 2019

A copy of your submission must be served on the applicant as soon as reasonably practicable after the service of your submission on the Otago Regional Council

**Address for Otago Regional Council:**

Otago Regional Council, Private Bag 1954, Dunedin, 9054  
or by email to [submissions@orc.govt.nz](mailto:submissions@orc.govt.nz)

**Address for Applicant:**

Queenstown Lakes District Council, Private Bag 50072, Queenstown 9300  
Or by email to [alisha.robinson@beca.com](mailto:alisha.robinson@beca.com)



Michael Arthur &lt;[REDACTED]&gt;

## Notified Application by Queenstown Lakes District Council RM19.051

1 message

Karen Bagnall &lt;karen.bagnall@orc.govt.nz&gt;

21 June 2019 at 07:18

Good morning – thank you for your submission on the above notified application. Unfortunately the original submission form supplied by Council omitted the following details;

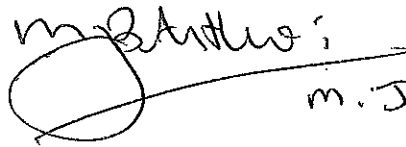
I am a trade competitor to the proposal

- ~~• Yes~~
- No

Pursuant to section 100A of the Resource Management Act 1991:

I request that you delegate your functions, powers, and duties required to hear and decide the application to 1 or more hearings commissioners who are not elected members of the Council Yes  No  (tick one)

Notes to Submitter:

*m. J. B. Arthur*  
  
 m. J. B. Arthur

**Electronic Submissions:** A signature is not required if you make your submission by electronic means. Submissions can be made to [submissions@orc.govt.nz](mailto:submissions@orc.govt.nz)

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

**Independent Commissioner** If you make a request under section 100A of the Resource Management Act 1991, for independent commissioner/s you must do so in writing no later than 5 working days after the close of submissions and you will be liable to meet or contribute to the costs of the hearings commissioner/s.

To constitute a full submission the above information should be provided to Council by close of submissions 5pm Friday 12 July 2019.

Please forward this information to [submissions@orc.govt.nz](mailto:submissions@orc.govt.nz)

Please do not hesitate to contact me should you have any questions regarding these matters.

regards

Submission No: \_\_\_\_\_

### Submission Form 13 to the Otago Regional Council on consent application RM19.051

This is a Submission on a publicly notified resource consent application pursuant to the Resource Management Act 1991.



Submitter Details:  
(please print clearly)

Full Name/s MICHAEL CLARK

Full Postal Address: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Please provide your preferred contact phone number: \_\_\_\_\_

Email address: \_\_\_\_\_

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

Applicant's Name: **Queenstown Lakes District Council**  
Application Number: **RM19.051.01**  
Location: **Various locations throughout the Queenstown Lakes district**  
Purpose: **To discharge untreated wastewater to various freshwater receiving environments, and onto land in circumstances where it may enter freshwater due to blockages, breakages, system failures, extreme storm events, and capacity exceedance in the network that cause overflows to the wastewater infrastructure throughout the Queenstown Lakes district**

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

THE WHOLE application.  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

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).

Is against a consent being granted for a continuous length of time. I request that any consent granted is only for a limited time period long enough for the Q.L.D.C. to correct the system at present.

Submission No: \_\_\_\_\_

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

THE QLDC, if granted a consent  
is only granted a consent for 10 years only  
THIS IS LONG ENOUGH FOR THEM TO  
GET THE WASTE SYSTEM UP TO 100%  
Spill proof.

I/we:

- Wish to be heard in support of our/my submission  
 Not wish to be heard in support of our/my submission

If others make a similar submission, I/we will consider presenting a joint case with them at a hearing.

- Yes  
 No

I, am/am not (choose one) 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/am not (choose one) 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/do not (choose one) wish to be involved in any pre-hearing meeting that may be held for this application.

I do/do not request\* that the local authority delegates its functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

I have/have not served a copy of my submission on the applicant.

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

20/6/19  
(Date)

Submission No: \_\_\_\_\_

**Submission Form 13 to the Otago Regional Council on consent application  
RM19.051**

**This is a Submission on a publicly notified resource consent application pursuant  
to the Resource Management Act 1991.**

**Submitter Details:**

(please print clearly)

**Full Name/s (Philip) Michael Farrier**

**Full Postal Address:** \_\_\_\_\_

**Post Code:** \_\_\_\_\_

**Please provide your preferred contact phone number:** \_\_\_\_\_

**Email address:** \_\_\_\_\_

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

**Applicant's Name: Application Number: Location:**

**Purpose:**

**Queenstown Lakes District Council RM19.051.01**

**Various locations throughout the Queenstown Lakes district**

**To discharge untreated wastewater to various freshwater receiving environments,  
and onto land in circumstances where it may enter freshwater due to blockages,  
breakages, system failures, extreme storm events, and capacity exceedance in the  
network that cause overflows to the wastewater infrastructure throughout the  
Queenstown Lakes district**

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

My submission relates to the basis of the applicants proposal regarding the discharge of untreated waste water to land and natural waters from unknown and none specific locations.

The proposal goes on to say that waste water networks are critical to safeguard communities. I can agree with this, however, potable drinking water supplies are more critical for the the health of a community.

The applicant makes an attempt to model the effect of a discharge on the health of people as it may effect drinking water supplies extracted from the vicinity of a possible discharge.

The applicant concludes that the effects on the receiving waters is "less than minor" or "no more than minor"

A consent is sought for a period of 35 years.

**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).**

I oppose the application in its present format on the basis that no attempt has been made to describe the engineered sewerage network as might be expected when conducting a assessment of environment effects from any manmade structure, whether a motor vehicle, oil refinery or food processing plant. The fact that it is necessary to apply for a very general emergency discharge consent implies that the engineered works is not fit for purpose.

All engineered works have a risk associated with them and the starting point of an environmental impact report should be a description and a risk assessment of the engineered system to determine the likely places where it may fail. These places need to be minimised by engineering design and management practices, including preventative maintenance practices. It is not good enough to say that the system may fail at any point. This suggests that the sewerage system is not "engineered" and cannot be managed.

The applicant makes no attempt to define the strength of the sewage in the system and what contaminants may be present. Tee QLDC must have some figures on this (from Sewage Treatment Plant records) that could be used in the assessment of environmental effects on the receiving environment, whether it is a Lake a River or someones garden. If there is a spill of raw sewage the effects will be more than minor.

The Otago Regional Council has a specific duty to protect drinking water sources and to protect receiving waters the applicant has largely ignored this since the spill will be diluted. Photographs of the Lake Taupo sewage spill this week indicates the effects of a spill can be more than minor. The QLDC also have a responsibility to protect drinking water sources from contaminants. It is not sufficient to suggest that if they are chlorinated they are protected.

The addition of phosphate to Lake waters from a sewage spill is detrimental for many years to come since it can be recycled from the bottom sediments to feed algae growth. Lake Rotorua and Lake Hayes are two good examples of this.

The applicant needs to conduct specific dispersion testing in the most likely receiving waters to measure the rate of dilution and the direction of flow. This could possible be done by injecting a safe dye or other chemical tracer into the Lake.

A 35 year resource consent for emergency discharge is unrealistic. If a consent is granted it should be for a maximum of period of 5 years before a full review

**Page 1 of 3**

**Submission No:** \_\_\_\_\_

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

The applicant should be requested to describe the sewerage system and its management so that everyone is fully informed that it has been designed appropriately and that there are sufficient management control systems to prevent spills and if one becomes likely an alarm system to

provide early warning to the sewerage system operator. Perhaps a SCADA system need to be used to monitor flows, levels and pressures at specific locations in the system. The public needs to be ensured that the sewerage system is fit for purpose. If system risk assessment identifies that a failure of specific part of the system is more likely than at other locations contingency arrangements should be designed into the sewerage system to avert spills.

The applicant should be requested to submit a practical application that fully explains the environmental effects of a sewage spill and how the effects of a spill will be mitigated. Actual dispersion testing in the Lake water need to be conducted to properly demonstrate that potable water supplies can be protected.

A 35 year term for an emergency discharge permit is completely unrealistic when the objective should be to work towards the prevention of uncontrolled discharges by good engineering design of a system that is fit for purpose. Good management and maintenance practices should be adopted.

The maximum term of any emergency consent should be 5 years to ensure that all factors are fully reviewed and that progress is being made to improve the quality of all natural waters in the Wakatipu and Clutha basins.

The Otago Regional Council needs to consider whether it is proper use of the Resource Management Act (RMA) to grant an emergency discharge consent at unknown locations from a sewerage network. I would suggest that this is an abuse of the RMA and would its integrity. For example, is the next step to ask roading network operators to apply for an emergency consent for motor vehicle fuel spills that may occur at any point on a road network.

**I/we:**

- **xx Wish to be heard in support of our/my submission**

**If others make a similar submission, I/we will consider presenting a joint case with them at a hearing.**

- **No**

**I, am not (choose one) 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 (choose one) 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 do/do not request\* that the local authority delegates its functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.**

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

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

**P M Farrier**

**Originally submitted with an electronic signature on 4 July 2019**

**Page 2 of 3**

**Submission No:\_\_\_\_\_**

**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 the 20th working day after the date on which public or limited notification is given. If the application is subject to limited notification, the consent authority may adopt an earlier closing date for submissions once the consent authority receives responses from all affected persons.**

**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.**

**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](mailto:submissions@orc.govt.nz)**

**The address for service for the Applicant is:**

**Queenstown Lakes District Council, Private Bag 50072, Queenstown 9300 Or by email to [alisha.robinson@beca.com](mailto:alisha.robinson@beca.com)**

Submission No: \_\_\_\_\_

### Submission Form 13 to the Otago Regional Council on consent application RM19.051

This is a Submission on a publicly notified resource consent application pursuant to the Resource Management Act 1991.

Submitter Details:  
(please print clearly)

Full Name/s: MICHAEL LAWS (ORC Councillor - Dunstan Ward)

Full Postal Address: \_\_\_\_\_  
\_\_\_\_\_ Post Code: \_\_\_\_\_

Please provide your preferred contact phone number: \_\_\_\_\_

Email address: \_\_\_\_\_

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

Applicant's Name: **Queenstown Lakes District Council**

Application Number: **RM19.051.01**

Location: **Various locations throughout the Queenstown Lakes district**

Purpose: **To discharge untreated wastewater to various freshwater receiving environments, and onto land in circumstances where it may enter freshwater due to blockages, breakages, system failures, extreme storm events, and capacity exceedance in the network that cause overflows to the wastewater infrastructure throughout the Queenstown Lakes district**

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

Giving any consent to the QLDC to pollute the region's waterways. (I am a Dunstan Ward councillor.)

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).

No permission to pollute should be granted to any agency or council: economic, environmental and leadership values would be severely compromised.

Submission No: \_\_\_\_\_

**Submission Form 13 to the Otago Regional Council on consent application RM19.051**

This is a Submission on a publicly notified resource consent application pursuant to the Resource Management Act 1991.

**Submitter Details:**  
(please print clearly)

Full Name/s: MICHAEL LAWS (ORC Councillor - Dunstan Ward)

Full Postal Address: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
Post Code: \_\_\_\_\_

Please provide your preferred contact phone number: \_\_\_\_\_

Email address: \_\_\_\_\_

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

Applicant's Name: **Queenstown Lakes District Council**

Application Number: **RM19.051.01**

Location: **Various locations throughout the Queenstown Lakes district**

Purpose: **To discharge untreated wastewater to various freshwater receiving environments, and onto land in circumstances where it may enter freshwater due to blockages, breakages, system failures, extreme storm events, and capacity exceedance in the network that cause overflows to the wastewater infrastructure throughout the Queenstown Lakes district**

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

Giving any consent to the QLDC to pollute the region's waterways. (I am a Dunstan Ward councillor.)

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).

No permission to pollute should be granted to any agency or council: economic, environmental and leadership values would be severely compromised.

Submission No: \_\_\_\_\_

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

Decline any consent

I/we:

- Wish to be heard in support of our/my submission  
 Not wish to be heard in support of our/my submission

If others make a similar submission, I/we will consider presenting a joint case with them at a hearing.

- Yes  
 No

I, am/am not (choose one) 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/am not (choose one) 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/do not (choose one) wish to be involved in any pre-hearing meeting that may be held for this application.

I do/do not request\* that the local authority delegates its functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

I have/have not served a copy of my submission on the applicant.

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

10 July 2019  
(Date)

**From:** [REDACTED]  
**To:** [alisha.robinson@beca.com](mailto:alisha.robinson@beca.com)  
**Cc:** [Submissions](#)  
**Subject:** The following is my submission relation to application no. RM19.051  
**Date:** Friday, 12 July 2019 9:14:25 a.m.  
**Attachments:** [image001.png](#)  
[image002.png](#)  
**Importance:** High

---

Hi,

The following is my submission relation to application no. RM19.051 - full details are below.

This application is being emailed to [submissions@orc.govt.nz] (<mailto:submissions@orc.govt.nz>) and copied to the applicant at [alisha.robinson@beca.com] (<mailto:alisha.robinson@beca.com>). Please contact me by return email if there is anything further you need from me in order for the application to be valid.

#### 1. My details

Name: Michael Robertson

Postal address: [REDACTED]

Mobile: [REDACTED]

Email: [REDACTED]

#### 2. Details of the application in respect of which I am making this submission

Queenstown Lakes District Council – Various locations throughout the Queenstown Lakes district. Application No. RM19.051

To discharge untreated wastewater to various freshwater receiving environments including lakes and rivers, and to land in a circumstances where it may enter water as a result of blockages, breakages, system failures, extreme storm events, and capacity exceedance in the network that cause overflows to the wastewater infrastructure throughout the Queenstown Lakes district. The proposal is a discretionary activity in accordance with Rules 12.A.2.1, 12.B.4.2 and 12.C.3.2 of the Regional Plan: Water for Otago.

Purpose: Managing reticulated wastewater throughout the Queenstown Lakes district

Location: Various locations throughout the Queenstown Lakes district

Legal Description of Property: Various locations throughout the Queenstown Lakes district

#### 3. Whether it is in support or opposition.

I am making this submission to register my opposition to the application in the strongest possible terms.

#### 4. Submissions and reasons

Our waterways, rivers and lakes are already under threat from multiple sources, and we should not be allowing discharge of untreated wastewater into these systems under any circumstances. Such discharge threatens to cause both short and long term damage which can and should be avoided.

It should be part of QLDC's responsibility to assess potential points of weakness, failure or blockage, and to put sufficient safeguards in place to ensure that discharge of untreated wastewater is not required. Potential solutions could include holding tanks, secondary overflow systems, holding ponds, water treatment systems and more. These systems should all be monitored and maintained to a high standard.

The Queenstown Lakes District area is an area of outstanding natural beauty which has become sort after because of its pristine natural characteristics, including our lakes, rivers and waterways. These are natural treasures which we should do everything possible to protect and preserve. The QLD has a duty to ensure that these natural resources are preserved and maintained, not endangered and polluted. The QLDC should be held to the highest possible standards.

From an economic perspective, this application seeks permission to conduct activities which could threaten the very reason tourists flock to Central Otago. It simply makes no sense to allow QLDC to pollute our natural resources - resources which are the reason tourists want to come to Central Otago.

The recent resolution by the QLDC to declare a climate emergency in our area is directly at odds with this application. How can our council declare a climate emergency, and then merely a few weeks later seek permission to pollute the environment? In my view, this is indefensible.

Above all, the QLDC has a moral obligation to leave a positive legacy for future generations living in the region, and for New Zealanders as a whole. Likewise, the ORC has a moral obligation not to allow applicants to do anything which will likely cause significant damage to the environment.

#### 5. Decision I wish Council to make.

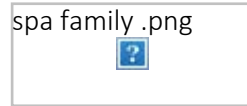
I ask that the ORC declines QLDC's application for consent, in its entirety, and (if within its powers) directs the applicant to come back with a more sustainable, environmentally friendly plan to deal with waste water.

#### 6. Wish to be heard.

I do not wish to be heard during the hearing, and I have copied this submission to the applicant, cc'd above.

Regards,

**Mike Robertson**  
**Business Development Manager**



PH: + [REDACTED]

Address: [REDACTED]

New Zealand

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## Karen Bagnall

---

**From:** Mike Hartley <[REDACTED]>  
**Sent:** Friday, 12 July 2019 4:05 p.m.  
**To:** Submissions  
**Cc:** alisha.robinson@beca.com  
**Subject:** Submission in opposition to application no. RM19.051

The following is my submission relation to application no. RM19.051 - full details are below. This application is being emailed to [submissions@orc.govt.nz](mailto:submissions@orc.govt.nz) and copied to the applicant at [alisha.robinson@beca.com](mailto:alisha.robinson@beca.com). Please contact me by return email if there is anything further you need from me in order for the application to be valid.

### 1. My details

Name: Mike Hartley

Postal address: [REDACTED]

Mobile: [REDACTED]

Email: [REDACTED]

### 2. Details of the application in respect of which I am making this submission

Queenstown Lakes District Council – Various locations throughout the Queenstown Lakes district. Application No. RM19.051

To discharge untreated wastewater to various freshwater receiving environments including lakes and rivers, and to land in a circumstances where it may enter water as a result of blockages, breakages, system failures, extreme storm events, and capacity exceedance in the network that cause overflows to the wastewater infrastructure throughout the Queenstown Lakes district. The proposal is a discretionary activity in accordance with Rules 12.A.2.1, 12.B.4.2 and 12.C.3.2 of the Regional Plan: Water for Otago.

Purpose: Managing reticulated wastewater throughout the Queenstown Lakes district

Location: Various locations throughout the Queenstown Lakes district

Legal Description of Property: Various locations throughout the Queenstown Lakes district

3. I am making this submission to register my opposition to the application in the strongest possible terms.

4. It doesn't make any sense to grant a legal mandate saying it is acceptable to pollute the water ways in this area. I accept that there are problems with the infrastructure and agree that there should be fines for pollution of them. These also act as incentives to ensure the unplanned spills are kept to a minimum.

It should be part of QLDC's responsibility to assess potential points of weakness, failure or blockage, and to put sufficient safeguards in place to ensure that discharge of untreated wastewater is not required. Potential solutions could include holding tanks, secondary overflow systems, holding ponds, water treatment systems and more. These systems should all be monitored and maintained to a high standard.

I am particularly opposed to the timescale being requested and the carte blanche it allows discharge to be released. Recently Northlake was fined for polluting the river with stormwater and with good cause. Any organisation or individual who does so should be fined appropriately as a message that it is not acceptable. If release of waste is acceptable is sends developers and councils a message that they do not need to be so vigilant in the planning of new infrastructure either. Unacceptable.

Above all, the QLDC has a moral obligation to leave a positive legacy for future generations living in the region, and for New Zealanders as a whole. Likewise, the ORC has a moral obligation not to allow applicants to do anything which will likely cause significant damage to the environment.

5. I ask that the ORC declines QLDC's application for consent, in its entirety, and (if within its powers) directs the applicant to come back with a more sustainable, environmentally friendly plan to deal with waste water.

6. I do not wish to be heard during the hearing, and I have copied this submission to the applicant, cc'd above.

Other declarations:

I AM NOT a trade competitor.

I DO NOT wish to be involved in any pre hearing meeting

I DO NOT request that the local authority delegates its functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

I HAVE served a copy of my submission on the applicant (see the cc line of my email).

Kind regards,

Mike Hartley

Tel : 0

Mob :



Submission No: \_\_\_\_\_

F42

### Submission Form 13 to the Otago Regional Council on consent application RM19.051

This is a Submission on a publicly notified resource consent application pursuant to the Resource Management Act 1991.



Submitter Details:  
(please print clearly)

Full Name/s MIRANDA SUSAN SPARKY

Full Postal Address: [Redacted]

Please provide your preferred contact phone number: [Redacted]

Email address: [Redacted]

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

Applicant's Name: **Queenstown Lakes District Council**  
Application Number: **RM19.051.01**  
Location: **Various locations throughout the Queenstown Lakes district**  
Purpose: **To discharge untreated wastewater to various freshwater receiving environments, and onto land in circumstances where it may enter freshwater due to blockages, breakages, system failures, extreme storm events, and capacity exceedance in the network that cause overflows to the wastewater infrastructure throughout the Queenstown Lakes district**

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

VARIOUS FRESHWATER RECEIVING ENVIRONMENTS  
SOUNDS LIKE ALL THE LOWEST POINTS EG.  
LAKE HAYES

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).

I don't think a blanket consent to allow ANY  
and ALL such discharges to be ~~disposed~~ permitted  
is at all wise. They need to be far more  
strictly defined and with very definite  
time allowances. It certainly cannot be an  
excuse to dump huge quantities of untreated  
wastewater.

Submission No: \_\_\_\_\_

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

The exact nature and scope of such discharges needs to be defined and if there needs to be a limit on the number of such events. Sounds mostly like bad planning and maintenance is the cause of this application.

I/we:

- Wish to be heard in support of our/my submission
- Not wish to be heard in support of our/my submission

If others make a similar submission, I/we will consider presenting a joint case with them at a hearing.

- Yes
- No

I, am/am not (choose one) 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/am not (choose one) 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/do not (choose one) wish to be involved in any pre-hearing meeting that may be held for this application.

I do/do not request\* that the local authority delegates its functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

I have/have not served a copy of my submission on the applicant.

\_\_\_\_\_  
**Signature/s of submitter/s** (or person authorised to sign on behalf of submitter/s)

1-7-19  
\_\_\_\_\_  
(Date)

Submission No: \_\_\_\_\_

**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 the 20th working day after the date on which public or limited notification is given. If the application is subject to limited notification, the consent authority may adopt an earlier closing date for submissions once the consent authority receives responses from all affected persons.

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.

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](mailto:submissions@orc.govt.nz)

The address for service for the Applicant is:

**Queenstown Lakes District Council, Private Bag 50072, Queenstown 9300**

Or by email to [alisha.robinson@beca.com](mailto:alisha.robinson@beca.com)

## Karen Bagnall

---

**From:** Miriam Houliston [REDACTED]  
**Sent:** Thursday, 11 July 2019 12:18 p.m.  
**To:** alisha.robinson@beca.com; Submissions  
**Subject:** This is a Submission on a publicly notified resource consent application pursuant to the Resource Management Act 1991.

This is a Submission on a publicly notified resource consent application pursuant to the Resource Management Act 1991.

Applicant Details: "Your Name"

Applicant: Queenstown Lakes District Council

Application No: RM19.051.01

Consent Type: Discharge Permit

Purpose: To discharge untreated wastewater to various freshwater receiving environments, and onto land in circumstances where it may enter freshwater due to blockages, breakages, system failures, extreme storm events, and capacity exceedance in the network that cause overflows to the wastewater infrastructure throughout the Queenstown Lakes district

Location: Various locations throughout the Queenstown Lakes district

Map reference: Various locations throughout the Queenstown Lakes district

Legal description: Various locations throughout the Queenstown Lakes district

Submitter Details:

Full Name/s: Primary contact: Miriam Houliston

Full Postal Address: Post Code: [REDACTED]

Mobile Ph: [REDACTED]

Email address: [REDACTED]

Signature/s of submitter:

Submission No:

Please tick one of the following submission types regarding the application:

Do you: Oppose Yes

Do you: Wish to be heard Yes

The specific parts of the application/s that this submission relates to are: that the consent not be allowed in its entirety due the fact it does not meet the requirements under the National Policy Statement for Freshwater Management (NPSFM) specifically in regard to:

Safeguarding fresh water's life-supporting capacity, ecosystem processes, and indigenous species.

Safe guarding the health of people who come into contact with the water.

National Policy Statement for Freshwater Management A. Water quality Objective A1 To safeguard: a) the life-supporting capacity, ecosystem processes and indigenous species including their associated ecosystems, of fresh water; and b) the health of people and communities, as affected by contact with fresh water; in sustainably managing the use and development of land, and of discharges of contaminants.

Maintaining or improving the overall quality of fresh water within a freshwater management unit.

National Policy Statement for Freshwater Management Objective A2 The overall quality of fresh water within a freshwater management unit is maintained or improved while: a) protecting the significant values of outstanding freshwater bodies; b) protecting the significant values of wetlands; and c) improving the quality of fresh water in water bodies that have been degraded by human activities to the point of being over-allocated.

Improving water quality so that it is suitable for primary contact more often .

National Policy Statement for Freshwater Management Objective A3 The quality of fresh water within a freshwater management unit is improved so it is suitable for primary contact more often, unless: a) regional

targets established under Policy A6(b) have been achieved; or b) naturally occurring processes mean further improvement is not possible.

In the event that a consent is granted then it must contain clear and strict requirements for infrastructure upgrades to occur within defined time period of no longer than 10 years so that these discharges are reduced and eliminated. Any such consent granted must be short-term so that the effectiveness of these upgrades, and also the performance of ORC's compliance team in undertaking the necessary monitoring and enforcement, is reviewed once again in the public arena. Transparency and an accountable promise that both organisations QLDC AND ORC work together to work towards reducing spills to zero over a set and agreed time frame.

The reasons for this submission are:

ORC is responsible for safeguarding fresh water's life-supporting capacity, ecosystem processes, and indigenous species, as per the National Policy Statement for Freshwater Management (NPSFM).

ORC is responsible for safe guarding the health of people who come into contact with the water (NPSFM).

ORC is responsible for maintaining or improving the overall quality of fresh water within a freshwater management unit (NPSFM).

"The applicant, QLDC, has failed to demonstrate how ORC can possibly grant the consent sought whilst ensuring that ORC's statutory obligations under the NPSFM are satisfied at all times"

Both ORC and QLDC, under section 6 (e), 7 (a) and 8 RMA, are responsible for recognising and providing for, having particular regard to, and taking into account both the principles of the Treaty of Waitangi and matters of importance to iwi. These values include but are not limited to:

Protecting the mauri of our waterways. Mauri is the life energy which binds and animates all things in the physical world. It is the force behind that which is manifested, the force that sparkles alive the waterways, the force of beat in the human pulse, the force that shines out through the native greenery. Discharging untreated water into waterways will diminish and degrade mauri.

To aid further understanding, a breakdown of the word mauri may help:

Ma = To be connected to, bound to, linked to, joined

Uri = Descendants. All things, seen and unseen

Protecting whakapapa. Whakapapa is the word for connections and relating. If the Enlightenment view is epitomised in 'I think therefore I am', the Māori understanding is 'I relate therefore I am'. In this cultural context, whakapapa refers to the need to treasure relationships, including the human relationship with water.

Upholding our responsibility as Kaitiakitanga of the whenua. In a cultural context our role is guardian or protectors of the land, and our function is to understand the significant values of outstanding freshwater bodies and to improve the quality of fresh water in water bodies that have been degraded by human activities to the point of being over-allocated. Kaitiakitanga refers to our need to lead the conversation about conservation - as people, organisations and businesses, and collaborate on how we protect and enhance the mauri of this water.

Wahi taonga refers to places in the landscapes that are treasured and in need of acknowledgement and protection. This includes our Central Lakes waterways and lakes which are precious and unique to us.

It is understood that the drains in the Queenstown region have unique issues with high fat content (and blocking), and discharge from industry in to drains. This is a related concern to me, and I am requesting that:

More emphasis be placed on educating the public on what is NOT flushable or drainable. Our biological system, which is excellent, can only accept the 3 P's- poo, pee, paper. Nothing else!

More stringent conditions are put in place in regards to households and industry discharge, including investment in more stringent monitoring of household and trade waste bylaw.

That no consent is granted unless it is for a very limited term, with stringent monitoring, and review provisions, and clear timelines within which QLDC must upgrade infrastructure so that these discharges and reduced and eliminated within a very clear timeframe.

I am concerned that ORC will not provide adequate monitoring and enforcement of these discharges and the required upgrades unless it is clearly defined on the aforementioned short-term consent, so that it may be given priority in ORC's compliance monitoring programme. It is a fact that ORC embarked on an Urban Water Strategy in 2017. It was agreed by ORC (worked on it partnership with QLDC) but has not progressed into an actual plan. So as a result has no teeth. Unfortunately there have been additional delays in doing this with the new NPSFM being proposed and now the complete review of the Water Plan: Otago. However there are key points in here about needing to upgrade infrastructure, partnership etc etc. THIS MUST BE PRIORITISED if we seek outcomes of the overall quality of fresh water within a freshwater management units are to be maintained or improved.

Submission No:

I seek the following decision from the consent authority: that the consent not be allowed in its entirety due to the reasons above

Date submissions close: 5 pm Friday 12th July 2019. A copy of your submission must be served on the applicant as soon as reasonably practicable after the service of your submission on the Otago Regional Council Address for Otago Regional Council: Otago Regional Council, Private Bag 1954, Dunedin, 9054 or by email to [submissions@orc.govt.nz](mailto:submissions@orc.govt.nz) Address for Applicant: Queenstown Lakes District Council, Private Bag 50072, Queenstown 9300 Or by email to [alisha.robinson@beca.com](mailto:alisha.robinson@beca.com)



## Karen Bagnall

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**From:** Miriam Houliston [REDACTED]  
**Sent:** Tuesday, 16 July 2019 4:06 p.m.  
**To:** alisha.robinson@beca.com; Submissions  
**Cc:** Karen Bagnall  
**Subject:** Re: Submission on a publicly notified resource consent application pursuant to the Resource Management Act 1991.

Please see below.

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/am not** (choose one) 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 not** wish to be involved in any pre-hearing meeting that may be held for this application.

I **do not** request\* that the local authority delegates its functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

I **have not** served a copy of my submission on the applicant.

Cheers,

Miriam Houliston

Could please reply to the submission e-mail address as per your original submission.

## Karen Bagnall

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**From:** Mylrea Bell [REDACTED]  
**Sent:** Friday, 12 July 2019 3:37 p.m.  
**To:** Submissions  
**Cc:** alisha.robinson@beca.com; services@qldc.govt.nz  
**Subject:** Submission in relation to application no. RM19.051

To Whom it may Concern

The following is my submission relation to application no. RM19.051 - full details are below. This application is being emailed to [submissions@orc.govt.nz](mailto:submissions@orc.govt.nz) and copied to the applicant at [alisha.robinson@beca.com](mailto:alisha.robinson@beca.com), also to [services@qldc.govt.nz](mailto:services@qldc.govt.nz). Please contact me by return email if there is anything further you need from me in order for the application to be valid.

### 1. My details

**Name:** Mylrea Elizabeth Bell

**Postal address:** [REDACTED]

**Mobile:** [REDACTED]

**Email:** [REDACTED]

### 2. Details of the application in respect of which I am making this submission

Queenstown Lakes District Council – Various locations throughout the Queenstown Lakes district.

Application No. RM19.051

To discharge untreated wastewater to various freshwater receiving environments including lakes and rivers, and to land in a circumstances where it may enter water as a result of blockages, breakages, system failures, extreme storm events, and capacity exceedance in the network that cause overflows to the wastewater infrastructure throughout the Queenstown Lakes district. The proposal is a discretionary activity in accordance with Rules 12.A.2.1, 12.B.4.2 and 12.C.3.2 of the Regional Plan: Water for Otago.

**Purpose:** Managing reticulated wastewater throughout the Queenstown Lakes district

**Location:** Various locations throughout the Queenstown Lakes district

**Legal Description of Property:** Various locations throughout the Queenstown Lakes district

### 3. Whether it is in support or opposition.

I am making this submission to register my opposition to the application in the strongest possible terms.

### 4. Submissions and reasons

Our waterways, rivers and lakes are already under threat from multiple sources, and we should not be allowing discharge of untreated wastewater into these systems under any circumstances. Such discharge threatens to cause both short and long term damage which can and should be avoided.

It should be part of QLDC's responsibility to assess potential points of weakness, failure or blockage, and to put sufficient safeguards in place to ensure that discharge of untreated wastewater is not required.

Potential solutions could include holding tanks, secondary overflow systems, holding ponds, water treatment systems and more. These systems should all be monitored and maintained to a high standard.

The Queenstown Lakes District area is an area of outstanding natural beauty which has become sought after because of its pristine natural characteristics, including our lakes, rivers and waterways. These are natural treasures which we should do everything possible to protect and preserve. The QLD has a duty to ensure that these natural resources are preserved and maintained, not endangered and polluted. The QLDC should be held to the highest possible standards.

From an economic perspective, this application seeks permission to conduct activities which could threaten the very reason people choose to live here, and why tourists visit the Lakes/Central Otago region. It simply makes no sense to allow QLDC to pollute our natural resources – the pristine environment is our largest treasure, and also is our largest responsibility to protect into perpetuity.

The recent resolution by the QLDC to declare a climate emergency in our area is directly at odds with this application. How can our council declare a climate emergency, and then merely a few weeks later seek permission to pollute the environment? This is indefensible.

Above all, the QLDC has a moral obligation to leave a positive legacy for future generations living in the region, and for New Zealanders as a whole. Likewise, the ORC has a moral obligation not to allow applicants to do anything which will likely cause significant damage to the environment.

**5. Decision I wish Council to make.**

I ask that the ORC declines QLDC's application for consent, in its entirety, and (if within its powers) directs the applicant to come back with a more sustainable, environmentally friendly plan to deal with waste water.

**6. Wish to be heard.**

I do not wish to be heard during the hearing, and I have copied this submission to the applicant, cc'd above.

**Other declarations:**

**I AM NOT a trade competitor.**

**I DO NOT wish to be involved in any pre hearing meeting**

**I DO NOT request that the local authority delegates its functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.**

**I HAVE served a copy of my submission on the applicant (see the cc line of my email), and to QLDC.**

## **Karen Bagnall**

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**From:** Nancy Latham [REDACTED]  
**Sent:** Friday, 12 July 2019 4:44 p.m.  
**To:** Submissions  
**Subject:** submissions to the QLDC/ORC

This is a Submission on a publicly notified resource consent application pursuant to the Resource Management Act 1991.

**Applicant Details:** Nancy Latham

**Applicant:** Queenstown Lakes District Council

**Application No:** RM19.051.01

**Consent Type:** Discharge Permit

**Purpose:** To discharge untreated wastewater to various freshwater receiving environments, and onto land in circumstances where it may enter freshwater due to blockages, breakages, system failures, extreme storm events, and capacity exceedance in the network that cause overflows to the wastewater infrastructure throughout the Queenstown Lakes district

**Location:** Various locations throughout the Queenstown Lakes district

**Map reference:** Various locations throughout the Queenstown Lakes district

**Legal description:** Various locations throughout the Queenstown Lakes district

**Submitter Details:**

**Full Name/s:** Primary contact: Nancy Latham

**Full Postal Address:** [REDACTED]

**Mobile Ph:** [REDACTED]

**Email address:** [REDACTED]

**Signature/s of submitter:**

**Submission No:**

Please tick one of the following submission types regarding the application:

Do you: Oppose Yes

Do you: Wish to be heard Yes

The specific parts of the application/s that this submission relates to are: that the consent not be allowed in its entirety due the fact it does not meet the requirements under the National Policy Statement for Freshwater Management (NPSFM) specifically in regard to:

Safeguarding fresh water's life-supporting capacity, ecosystem processes, and indigenous species.

Safe guarding the health of people who come into contact with the water.

National Policy Statement for Freshwater Management A. Water quality Objective A1 To safeguard: a) the life-supporting capacity, ecosystem processes and indigenous species including their associated ecosystems, of fresh water; and b) the health of people and communities, as affected by contact with fresh water; in sustainably managing the use and development of land, and of discharges of contaminants.

Maintaining or improving the overall quality of fresh water within a freshwater management unit.

National Policy Statement for Freshwater Management Objective A2 The overall quality of fresh water within a freshwater management unit is maintained or improved while: a) protecting the significant values of outstanding freshwater bodies; b) protecting the significant values of wetlands; and c) improving the quality of fresh water in water bodies that have been degraded by human activities to the point of being over-allocated.

Improving water quality so that it is suitable for primary contact more often .

National Policy Statement for Freshwater Management Objective A3 The quality of fresh water within a freshwater management unit is improved so it is suitable for primary contact more often, unless: a) regional targets established under Policy A6(b) have been achieved; or b) naturally occurring processes mean further improvement is not possible.

In the event that a consent is granted then it must contain clear and strict requirements for infrastructure upgrades to occur within defined time period of no longer than 10 years so that these discharges are reduced and eliminated. Any such consent granted must be short-term so that the effectiveness of these upgrades, and also the performance of ORC's compliance team in undertaking the necessary monitoring and enforcement, is reviewed once again in the public arena. Transparency and an accountable promise that both organisations QLDC AND ORC work together to work towards reducing spills to zero over a set and agreed time frame.

The reasons for this submission are:

ORC is responsible for safeguarding fresh water's life-supporting capacity, ecosystem processes, and indigenous species, as per the National Policy Statement for Freshwater Management (NPSFM).

ORC is responsible for safe guarding the health of people who come into contact with the water (NPSFM).

ORC is responsible for maintaining or improving the overall quality of fresh water within a freshwater management unit (NPSFM).

"The applicant, QLDC, has failed to demonstrate how ORC can possibly grant the consent sought whilst ensuring that ORC's statutory obligations under the NPSFM are satisfied at all times"

Both ORC and QLDC, under section 6 (e), 7 (a) and 8 RMA, are responsible for recognising and providing for, having particular regard to, and taking into account both the principles of the Treaty of Waitangi and matters of importance to iwi. These values include but are not limited to:

Protecting the mauri of our waterways. Mauri is the life energy which binds and animates all things in the physical world. It is the force behind that which is manifested, the force that sparkles alive the waterways, the force of beat in the human pulse, the force that shines out through the native greenery. Discharging untreated water into waterways will diminish and degrade mauri.

To aid further understanding, a breakdown of the word mauri may help:

Ma = To be connected to, bound to, linked to, joined

Uri = Descendants. All things, seen and unseen

Protecting whakapapa. Whakapapa is the word for connections and relating. If the Enlightenment view is epitomised in 'I think therefore I am', the Māori understanding is 'I relate therefore I am'. In this cultural context, whakapapa refers to the need to treasure relationships, including the human relationship with water.

Upholding our responsibility as Kaitiakitanga of the whenua. In a cultural context our role is guardian or protectors of the land, and our function is to understand the significant values of outstanding freshwater bodies and to improve the quality of fresh water in water bodies that have been degraded by human activities to the point of being over-allocated. Kaitiakitanga refers to our need to lead the conversation about conservation - as people, organisations and businesses, and collaborate on how we protect and enhance the mauri of this water.

Wahi taonga refers to places in the landscapes that are treasured and in need of acknowledgement and protection. This includes our Central Lakes waterways and lakes which are precious and unique to us.

It is understood that the drains in the Queenstown region have unique issues with high fat content (and blocking), and discharge from industry in to drains. This is a related concern to me, and I am requesting that:

More emphasis be placed on educating the public on what is NOT flushable or drainable. Our biological system, which is excellent, can only accept the 3 P's- poo, pee, paper. Nothing else!

More stringent conditions are put in place in regards to households and industry discharge, including investment in more stringent monitoring of household and trade waste bylaw.

That no consent is granted unless it is for a very limited term, with stringent monitoring, and review provisions, and clear timelines within which QLDC must upgrade infrastructure so that these discharges and reduced and eliminated within a very clear timeframe.

I am concerned that ORC will not provide adequate monitoring and enforcement of these discharges and the required upgrades unless it is clearly defined on the aforementioned short-term consent, so that it may be given priority in ORC's compliance monitoring programme. It is a fact that ORC embarked on an Urban Water Strategy in 2017. It was agreed by ORC (worked on it partnership with QLDC) but has not progressed into an actual plan. So as a result has no teeth. Unfortunately there have been additional delays in doing this with the new NPSFM being proposed and now the complete review of the Water Plan: Otago. However there are key points in here about needing to upgrade infrastructure, partnership etc etc. THIS MUST BE PRIORITISED if we seek outcomes of the overall quality of fresh water within a freshwater management units are to be maintained or improved.

Submission No:

I seek the following decision from the consent authority: that the consent not be allowed in its entirety due to the reasons above

## Karen Bagnall

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**From:** Nancy Latham [REDACTED]  
**Sent:** Tuesday, 23 July 2019 5:55 a.m.  
**To:** Karen Bagnall; Submissions  
**Subject:** Re: Queenstown Lakes District Council - Publicly Notified Application RM19.051

Dear Karen,

Thank you for your email and apologize for not getting back to you sooner.

1. I wish to be heard in support of my submission
2. yes I would consider presenting a joint case
3. I am not a trade competitor
- 4.
5. I am directly affected by adverse environmental effects
6. I do wish to be involved in a pre-hearing meeting
7. I do wish delegation to independent commissioners
8. I have not served a copy on the applicant

Please let me know if you require further information.

Kind regards,

Nancy Latham  
[REDACTED]

On Wed, Jul 17, 2019 at 12:24 PM Karen Bagnall <[karen.bagnall@orc.govt.nz](mailto:karen.bagnall@orc.govt.nz)> wrote:

Good afternoon – thank you for your submission – unfortunately there were a few things omitted – can you confirm the following;

I/we:

- Wish to be heard in support of our/my submission
- Not wish to be heard in support of our/my submission

If others make a similar submission, I/we will consider presenting a joint case with them at a hearing.

- Yes
- No

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

Submission No: \_\_\_\_\_

### Submission Form 13

File No: RM19.051

This is a Submission on a publicly notified resource consent application pursuant to the Resource Management Act 1991.

#### Applicant Details:

Applicant: Queenstown Lakes District Council

Application No: RM19.051.01

Consent Type: Discharge Permit

Purpose: To discharge untreated wastewater to various freshwater receiving environments, and onto land in circumstances where it may enter freshwater due to blockages, breakages, system failures, extreme storm events, and capacity exceedance in the network that cause overflows to the wastewater infrastructure throughout the Queenstown Lakes district


Location: Various locations throughout the Queenstown Lakes district

Map reference: Various locations throughout the Queenstown Lakes district


Legal description: Various locations throughout the Queenstown Lakes district

#### Submitter Details: (please print clearly)

Full Name/s Natalie Astin

Full Postal Address: 

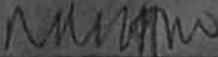
Work Ph:

Home Ph: 

Mobile Ph:

Email address: 

(please tick your preferred Daytime contact number)

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

12/7/19  
(Date)

Submission No: \_\_\_\_\_

Please tick one of the following submission types regarding the application,

Do you:

- Support  
 Neutral  
 Oppose

Do you:

- Wish to be heard  
 Not wish to be heard

in support of my/our submission.

If others make a similar submission, I/we will consider presenting a joint case with them at a hearing.

- Yes  
 No

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

35yr consent period  
Risk to water quality  
Environmental impact no more than minor  
Cultural Values  
Human health

My/Our submission is (the reasons for your views; use a separate sheet if necessary)

Consent period is far too long, under 10yrs  
We do not have sufficient data on the lakes  
water quality for the claim of impact - no more  
than minor.

Cultural perspective of Kai Tahu has not been  
considered

The proposal is not consistent with the  
purpose of the Lake Wairarapa Preservation  
Act 1973 - "maintain + improve water  
quality in the lake"



Submission No: \_\_\_\_\_

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

- Consent period reduced to less than 10 yrs
- Monitoring of lake quality
- Consider Kai Tahu cultural perspective
- Monitor quality of water near pumping stations
- Aim to reduce spills to zero, be accountable to ORC

Date submissions close: 5 pm Friday 12<sup>th</sup> July 2019

A copy of your submission must be served on the applicant as soon as reasonably practicable after the service of your submission on the Otago Regional Council

Address for Otago Regional Council:

Otago Regional Council, Private Bag 1954, Dunedin, 9054  
or by email to [submissions@orc.govt.nz](mailto:submissions@orc.govt.nz)

Address for Applicant:

Queenstown Lakes District Council, Private Bag 50072, Queenstown 9300  
Or by email to [alisha.robinson@beca.com](mailto:alisha.robinson@beca.com)

## Karen Bagnall

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**From:** natalie Astin [REDACTED]  
**Sent:** Monday, 15 July 2019 9:00 a.m.  
**To:** Submissions  
**Subject:** Re: Submission on application RM19.051.01

Hi there,  
Relating to my submission, these are completed as requested,  
Thanks,Natalie Astin

I, **am not** (choose one) 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** (choose one) directly affected by an effect as a result of the proposed activity in the application that: adversely affects the environment; and does not relate to trade competition or the effects of trade competition.

I, **/do not** (choose one) wish to be involved in any pre-hearing meeting that may be held for this application.

I **do/** request\* that the local authority delegates its functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

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

Get [Outlook for Android](#)

**From:** Karen Bagnall  
**Sent:** Friday, 12 July, 2:03 PM  
**Subject:** RE: Submission on application RM19.051.01  
**To:** natalie Astin

Good afternoon – thank you for your submission – unfortunately there were a few things omitted – can you confirm the following;

I, **am/am not** (choose one) 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/am not** (choose one) directly affected by an effect as a result of the proposed activity in the application that: adversely affects the environment; and does not relate to trade competition or the effects of trade competition.

I, **do/do not** (choose one) wish to be involved in any pre-hearing meeting that may be held for this application.

I **do/do not** request\* that the local authority delegates its functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

**I have/have not served a copy of my submission on the applicant.**

Could please reply to the submission e-mail address as per your original submission.

Please do not hesitate to contact me should you have any questions.



**Karen Bagnall**

**SENIOR CONSENTS SUPPORT OFFICER**

Otago Regional Council

70 Stafford St

Private Bag 1954 Dunedin 9054

**P**

**(03) 474 0827 or 0800 474 082**

**[karen.bagnall@orc.govt.nz](mailto:karen.bagnall@orc.govt.nz)**

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**[www.orc.govt.nz](http://www.orc.govt.nz)**

#### **Important Notice**

This email contains information which is confidential and may be subject to legal privilege. If you are not the intended recipient, you must not peruse, use, disseminate, distribute or copy this email or attachments. If you have received this in error, please notify us immediately by return email, facsimile (03 479-0015) or telephone (03 474-0827) and delete this email. The Otago Regional Council accepts no responsibility for changes made to this email or to any attachments following the original transmission from its offices. Thank you

**From:** natalie Astin <[REDACTED]>  
**Sent:** Friday, 12 July 2019 10:36 a.m.  
**To:** Submissions <[Submissions@orc.govt.nz](mailto:Submissions@orc.govt.nz)>; [alisha.robinson@beca.com](mailto:alisha.robinson@beca.com)  
**Subject:** Submission on application RM19.051.01

Please find attached my submission,  
Best wishes,  
Natalie Astin

Submission No: \_\_\_\_\_ 9

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

no consent under any circumstances

I/we:

Wish to be heard in support of our/my submission

Not wish to be heard in support of our/my submission

If others make a similar submission, I/we will consider presenting a joint case with them at a hearing.

Yes

No

I, Myam not (choose one) 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/am not (choose one) 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/do not (choose one) wish to be involved in any pre-hearing meeting that may be held for this application.

I do/do not request\* that the local authority delegates its functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

I have/have not served a copy of my submission on the applicant.

\_\_\_\_\_ 10 7 2014 (Date)

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

Submission No: \_\_\_\_\_ ?

Submission Form 13 to the Otago Regional Council on consent application RM19.051

This is a Submission on a publicly notified resource consent application pursuant to the Resource Management Act 1991.

Submitter Details:  
(please print clearly)

Full Name's: Neil Jordan

Full Postal Address: \_\_\_\_\_

Please provide your preferred contact phone number: \_\_\_\_\_

Email address: \_\_\_\_\_

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

Applicant's Name: Queenstown Lakes District Council

Application Number: RM19.051.01

Location: Various locations throughout the Queenstown Lakes district

Purpose: To discharge untreated wastewater to various freshwater receiving environments, and onto land in circumstances where it may enter freshwater due to blockages, breakages, system failures, extreme storm events, and capacity exceedance in the network that cause overflows to the wastewater infrastructure throughout the Queenstown Lakes district

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

no waste in our water

THANKS

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).

NO STAFF

Submission No:

## Submission Form 13 to the Otago Regional Council on Consent Application RM19.051

This is a Submission on a publicly notified resource consent application pursuant to the Resource Management Act 1991.

### Submitter Details:

Full Name/s Niamh Shaw

Full Postal Address: [REDACTED]  
[REDACTED]  
[REDACTED] Post Code: [REDACTED]

Please provide your preferred contact phone number: [REDACTED]

Email address: [REDACTED]

I/ we wish to submit a (choose one) submission on the application of:

Applicant's Name: **Queenstown Lakes District Council**

Application Number: **RM19.051.01**

Location: **Various locations throughout the Queenstown Lakes district**

Purpose: **To discharge untreated wastewater to various freshwater receiving environments, and onto land in circumstances where it may enter freshwater due to blockages, breakages, system failures, extreme storm events, and capacity exceedance in the network that cause overflows to the wastewater infrastructure throughout the Queenstown Lakes district**

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

Consent should NOT be granted to discharge untreated wastewater, since it removes incentive for the organisation to update legacy systems, address infrastructure issues, and recover damages from third parties.

I also support Michael Laws' submission on this resource consent application in its entirety. Thank you

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)*.

I oppose the application in its entirety. Legalising the discharge of wastewater into freshwater is entirely contrary to the values of the community, which strives to preserve and sustain the quality of its freshwater

**Submission No:**

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

Reject the application

I/we:

- Wish to be heard in support of our/my submission  
 Do not wish to be heard in support of our/my submission

If others make a similar submission, I/we will consider presenting a joint case with them at a hearing.

- Yes  
 No

I, Am Not (choose one) 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 (choose one) 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 Do Not request\* that the local authority delegates its functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

I Have Not served a copy of my submission on the applicant.



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

11/7/19

(Date)

## Submission No:

### **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 the 20th working day after the date on which public or limited notification is given. If the application is subject to limited notification, the consent authority may adopt an earlier closing date for submissions once the consent authority receives responses from all affected persons.

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.

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](mailto:submissions@orc.govt.nz)

The address for service for the Applicant is:  
**Queenstown Lakes District Council, Private Bag 50072, Queenstown 9300**

Or by email to [alisha.robinson@beca.com](mailto:alisha.robinson@beca.com)

Submission No:

**Submission Form 13 to the Otago Regional Council on  
Consent Application RM19.051**

This is a Submission on a publicly notified resource consent application pursuant to the Resource Management Act 1991.

**Submitter Details:**

Full Name/s Nicholas Andrew Loughnan

Full Postal Address: [REDACTED]

Post Code: [REDACTED]

Please provide your preferred contact phone number: [REDACTED]

Email address: [REDACTED]

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

Applicant's Name: **Queenstown Lakes District Council**

Application Number: **RM19.051.01**

Location: **Various locations throughout the Queenstown Lakes district**

Purpose: **To discharge untreated wastewater to various freshwater receiving environments, and onto land in circumstances where it may enter freshwater due to blockages, breakages, system failures, extreme storm events, and capacity exceedance in the network that cause overflows to the wastewater infrastructure throughout the Queenstown Lakes district**

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

Discharging of untreated wastewater to various freshwater receiving environments

The term that this consent application is seeking

The number of locations that are being sought for untreated wastewater discharges

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).*

I oppose this application in its entirety.

The Queenstown Lakes District is world famous for the extent of its largely unspoilt surroundings. The raw beauty of these environs are the very reason that so many people are drawn to visit and live in these extraordinary alpine regions. Fresh water is an integral part of this area's beauty. In a world with increasing pressure on freshwater ecosystems, QLDC seems to have surrendered to the difficulties inherent in managing their wastewater networks.

Waste pipe constrictions caused by tree roots are avoidable, and should be a matter of inspection frequency. In much the same way that our electricity lines networks are kept clear of tree branches through regular inspections and maintenance trimming, so too should waste pipes be routinely inspected and cleared.

Industrial and trade wastes are also cited as causes of blockage, along with 'Wipes'. Does the network design allow for in-line macerators for pulverising these problem materials? It seems extraordinary that QLDC has not yet found the necessary technology to mitigate the problems caused by these materials being present in the wastewater pipes.

'Capacity exceedance' is also cited as a problem. If the network is struggling with issues of capacity, then why do we see QLDC continually granting consents for more hotel and housing developments? We have seen a new 250 room hotel granted consent only this month. If there is a problem with wastewater network capacity being exceeded, then surely the network is not fit for purpose. From the reports that accompany the QLDC application, it appears that extreme storm events are seldom problematic.

*see attached note 1.*



**I oppose this application RM 19.051 in its entirety.**

The Queenstown Lakes District is world famous for the extent of its largely unspoiled surroundings. The beauty of these environs is the very reason that so many people are drawn to visit and live in these extraordinary alpine regions.

Clean, unpolluted fresh water is an integral part of this area's beauty. In a world with increasing pressure on freshwater ecosystems, QLDC seems to have surrendered to the difficulties inherent in managing their wastewater networks.

Wastewater pipe constrictions caused by tree roots are avoidable, and should be a matter of inspection frequency. In much the same way that our electricity lines networks are kept clear of tree branches through regular inspections and maintenance trimming, so too should waste pipes be routinely inspected and cleared.

Industrial and trade wastes are also cited as causes of blockages, along with 'wipes'. Does the network design allow for in-line macerators for pulverising these problem materials? It seems extraordinary that QLDC has not yet found the necessary technology to mitigate the problems caused by these materials being present in the wastewater pipes. These are after all very common worldwide wastewater problems.

'Capacity exceedance' is also cited as a problem. If the network is struggling with issues of capacity, then why do we see QLDC continually granting consents for more hotel and housing developments, and adding to the problem? A new \$200 million Brecon Street hotel with 390 guest rooms has been granted consent since this QLDC application was filed. If there is a problem with wastewater network capacity being exceeded, then surely the network is not fit for purpose. From the reports that accompany the QLDC application, it appears that extreme storm events are seldom problematic.

**Submission No:**

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

I request that the ORC decline this application to discharge untreated wastewater into freshwater streams, rivers and lakes.

To do otherwise is to legitimise what is presently illegal activity.

The QLDC has received widespread national criticism, both for this application, the high number of locations that it seeks to have permitted wastewater discharges, and the extraordinary term sought. It is an abhorrent request to make of the ORC, and deserves to be unconditionally refused.

I/we:

- Wish to be heard in support of our/my submission  
 Do not wish to be heard in support of our/my submission

If others make a similar submission, I/we will consider presenting a joint case with them at a hearing.

- Yes  
 No

I, Am Not (choose one) 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 Not (choose one) 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 Not (choose one) wish to be involved in any pre-hearing meeting that may be held for this application.

I Do Not request\* that the local authority delegates its functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

I Have served a copy of my submission on the applicant.



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

08-Jul-19

(Date)

Submission No: \_\_\_\_\_

**Submission Form 13 to the Otago Regional Council on  
Consent Application RM19.051**

This is a Submission on a publicly notified resource consent application pursuant to the Resource Management Act 1991.

**Submitter Details:**

*(please print clearly)*

Full Name/s Nicola Jane Barnard

Full Postal Address: \_\_\_\_\_  
Post Code: \_\_\_\_\_

Please provide your preferred contact phone number: \_\_\_\_\_

Email address: \_\_\_\_\_

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

Applicant's Name: **Queenstown Lakes District Council**

Application Number: **RM19.051.01**

Location: **Various locations throughout the Queenstown Lakes district**

Purpose: **To discharge untreated wastewater to various freshwater receiving environments, and onto land in circumstances where it may enter freshwater due to blockages, breakages, system failures, extreme storm events, and capacity exceedance in the network that cause overflows to the wastewater infrastructure throughout the Queenstown Lakes district**

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

I object to the application for the dumping of untreated sewerage into any of our freshwater lakes and rivers.

It does not sound like a well thought out solution, but short sighted and a non-sustainable solution. NZ is a young country and has the huge advantage of learning from other countries mistakes. NZ is a relatively unspoilt country; we need to protect our waterways and look after what nature has provided us with.

There are many aspects to consider with dumping effluent into our waterways - Health risks, impact on our tourism, impact on ecosystem in our waterways, impact on water sports, leisure and lifestyle and finally the lack of respect to ORC and QLDC. **WATER IS LIFE.**

None of us like freedom campers taking their ablutions in our lakes and rivers, but it's ok to allow sewerage to be legally dumped into our waterways?!

I believe a lot more consideration needs to be taken over such matters and not a hasty decision made. This has been kept too low profile and needs more input from ratepayers and residents before a conclusion is reached.

Submission No: \_\_\_\_\_

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).

I oppose – its unsafe practice and potentially damaging to our ecosystems, health, tourism, life and leisure,

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

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

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

I/we:

- Wish to be heard in support of our/my submission
- Not wish to be heard in support of our/my submission

If others make a similar submission, I/we will consider presenting a joint case with them at a hearing.

- Yes
- No

I, **am/am not** (choose one) 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/am not** (choose one) 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/do not** (choose one) wish to be involved in any pre-hearing meeting that may be held for this application.

I **do/do not** request\* that the local authority delegates its functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

I **have/have not** served a copy of my submission on the applicant.

**Nicola Barnard**

**11/7/19**

\_\_\_\_\_  
**Signature/s of submitter/s** (or person authorised to sign on behalf of submitter/s)

\_\_\_\_\_  
(Date) 11/7/2019

***I'm unable to sign online but I'm happy to sign this in your Wanaka office***

**Submission No:** \_\_\_\_\_

***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 the 20th working day after the date on which public or limited notification is given. If the application is subject to limited notification, the consent authority may adopt an earlier closing date for submissions once the consent authority receives responses from all affected persons.

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.

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](mailto:submissions@orc.govt.nz)

The address for service for the Applicant is:  
**Queenstown Lakes District Council, Private Bag 50072, Queenstown 9300**

Or by email to [alisha.robinson@beca.com](mailto:alisha.robinson@beca.com)

**Submission close at 5 pm on Friday 12 July 2019**

Submission No: \_\_\_\_\_

**Submission Form 13 to the Otago Regional Council on  
Consent Application RM19.051**

This is a Submission on a publicly notified resource consent application pursuant to the Resource Management Act 1991.

**Submitter Details:**  
(please print clearly)

**Full Name/s** Nigel Cowburn

**Full Postal Address:** [REDACTED]

**Post Code:** [REDACTED]

**Please provide your preferred contact phone number:** [REDACTED]

**Email address:** [REDACTED]

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

Applicant's Name: **Queenstown Lakes District Council**

Application Number: **RM19.051.01**

Location: **Various locations throughout the Queenstown Lakes district**

Purpose: **To discharge untreated wastewater to various freshwater receiving environments, and onto land in circumstances where it may enter freshwater due to blockages, breakages, system failures, extreme storm events, and capacity exceedance in the network that cause overflows to the wastewater infrastructure throughout the Queenstown Lakes district**

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

ALL of the Application

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).

I oppose QLDC's application to allow the accidental discharge of wastewater so that it could enter the lakes and other natural or artificial drainage networks that lead to the lakes and freshwater bodies of the region.

My reasons are:

A: to allow 'accidents' as a norm would mean reviews of incidents and near-incidents would not need to occur and that no one would be able to learn from and improve the wastewater network.

B: If this application is allowed Council will find it increasingly necessary to lie and engage in greenwash \ propaganda to retain a perception that the freshwaters that underpin our total culture and economy are clean and pure.

C: QLDC needs to recognise that the planet we live in is not infinite, it is not a rubbish bin into which we can endlessly pour our wastes.

Submission No: \_\_\_\_\_

The declining of this application should lead QLDC to look at three-water issues (wastewater \ stormwater and freshwater) and how they should be dealt with in an holistic way than honours the land and the people.

D; Pollution is a cumulative process in which reversal is usually essentially impossible. Any allowed pollution of lakes is an irreversible process that will lead to their degradation and eventual failure as essential parts of our planet.

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

That this application be DECLINED

I/we:

- YES - Wish to be heard in support of our/my submission

If others make a similar submission, I/we will consider presenting a joint case with them at a hearing.

- Yes

I **am not** (choose one) 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 live on the same planet that you are proposing to pollute; there are no unaffected parties to your application.

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

I **do not** request\* that the local authority delegates its functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

I **have/have not** served a copy of my submission on the applicant.

[I am uncertain what this means, but this submission is my only correspondence re this issue.]



\_\_\_\_\_  
**Signature/s of submitter/s** (or person authorised to sign on behalf of submitter/s)

\_\_\_\_\_  
(Date) 20190712

**Submission No:** \_\_\_\_\_

***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 the 20th working day after the date on which public or limited notification is given. If the application is subject to limited notification, the consent authority may adopt an earlier closing date for submissions once the consent authority receives responses from all affected persons.

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.

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](mailto:submissions@orc.govt.nz)

The address for service for the Applicant is:

**Queenstown Lakes District Council, Private Bag 50072, Queenstown 9300**

Or by email to [alisha.robinson@beca.com](mailto:alisha.robinson@beca.com)

**Submission close at 5 pm on Friday 12 July 2019**



**Submission Form 13 to the Otago Regional Council on  
Consent Application RM19.051**

**This is a Submission on a publicly notified resource consent application pursuant to the Resource Management Act 1991.**

**Submitter Details:**

Submitter name: **Niki Gladding**

Postal address: [REDACTED]

Contact phone: [REDACTED]

Email: [REDACTED]

I am not a trade competitor for the purposes of [section 308B](#) of the Resource Management Act 1991.

**I wish to make a submission in opposition to the application of:**

Applicant's Name: **Queenstown Lakes District Council**

Application Number: **RM19.051.01**

Location: **Various locations throughout the Queenstown Lakes district**

Purpose: **To discharge untreated wastewater to various freshwater receiving environments, and onto land in circumstances where it may enter freshwater due to blockages, breakages, system failures, extreme storm events, and capacity exceedance in the network that cause overflows to the wastewater infrastructure throughout the Queenstown Lakes district**

**I am opposed to Application RM19.051 in its entirety and request that the Application be rejected for the following reasons:**

1. **The significant values of the receiving environments** - The water bodies that could be affected by the proposed discharges include important environments for aquatic species, sensitive receiving environments, and water bodies that supply millions of people with drinking water each year. They also have significant cultural recreational and economic value for local communities and for all New Zealanders.

2. **Unlimited discharge volumes** - The Application as notified would allow Queenstown Lakes District Council (QLDC) to discharge unlimited volumes of untreated wastewater overflow (including human sewerage and hazardous waste) from its reticulated network to groundwater, lakes, streams and rivers in the Lakes District.
3. **Unlimited discharge frequency and duration** - The frequency and duration of wastewater overflow discharges is not limited by draft consent conditions.
4. **Consent term** - The term applied for is the maximum allowable under the RMA and does not force improvements in wastewater and stormwater management that might lead to better environmental and human health outcomes.
5. **Unacceptable reasons for overflow discharges (capacity exceedance)** - The consent would allow for overflow discharges relating to capacity exceedance in the wastewater reticulation network (notably, not limited to storm events). Our position is that this removes the requirement to manage growth and development in line with the capacity of stormwater and wastewater networks.
6. **Insufficient information on which to base an AEE** - It is impossible to say that granting this consent will not put the environment and human health at risk. Individual discharges are not limited in terms of volume, frequency, duration or the nature and concentration of contaminants. There is also no limit on cumulative volumes within specified time periods. For these reasons, and because all water bodies have different physical characteristics, it is impossible to adequately assess the potential long and short-term effects of the activity including effects on ecosystems, human health and recreation effects, visual effects, odour effects and economic effects. Given the lack of information the Precautionary Principle should be applied. In addition, effects of low probability which will have a high potential impact must be considered including the effects of contaminating water supplies.
7. **Loss of an important enforcement tool** - AWA accepts that overflows from wastewater networks, and in particular from Gravity sewer systems, are unavoidable. However, the potential for enforcement and financial penalty remains a useful tool for ensuring these events are minimised in terms of scale, frequency and adverse effects. Granting this Application would render that enforcement tool ineffective.

8. **Consent for future waste water systems** - The Application seeks to include areas where it is anticipated QLDC will either develop a wastewater network or take over the ownership and / or management of existing private wastewater networks including: Kingston, Glenorchy, Cardrona, Hāwea Flat, Glendhu Bay, Luggate, Jacks Point and Village, Hanley Farms, Coneburn (industrial zoned area) and the Millbrook Resort area. New wastewater reticulation networks, particularly those that could affect sensitive receiving environments or drinking water supplies, should as far as possible have the potential for overflows designed out (in line with the requirement to avoid adverse effects where possible). Granting this consent would likely remove any need to ensure future wastewater system designs avoid or minimise overflow discharges.
9. **Lack of benefit** - The draft consent conditions do not require QLDC to improve upon existing network management. For example, there are no requirements to build capacity - into either the wastewater or stormwater networks - in line with growth and the reasonably predictable effects of Climate Change; there is no requirement to reduce the frequency of overflow discharges; nor is there a requirement to construct new engineered overflows that do not discharge directly to water. The positive effects stated in s 5.2 of the Application can be achieved by QLDC meeting its obligations under legislation.
10. **Loss of stewardship and kaitiaki rights (in terms of the ability to take legal action)** - Granting this consent will likely remove the ability of communities and individuals to take legal action against QLDC for overflow discharges.
11. **Potential to avoid new legislation and rules** – We are concerned that this Application might allow QLDC to avoid potentially tighter rules around urban discharges under both the proposed new NPSFM and the ORC’s proposed new strategy for urban discharges. Given the physical scope of the Application and the term applied for, granting this application could significantly hinder efforts to protect and improve water quality in the Lakes District.
12. **Potential for perverse outcomes** - If discharge rules *are* strengthened as growth in the District continues, this consent could see QLDC preferring occasional capacity-related overflows from the network (to water) over significant upgrades to the capacity of treatment stations and associated discharges to land.

**13. Given the above, the Application is likely to be inconsistent with:**

- a. The Resource Management Act** sections 5, 6(a)(c)(e) and (h), 7(a)(aa)(b)(c)(d)(f)(g)(h) and (i)
- b. The National Policy Statement for Freshwater Management** including objectives and policies relating to Section A Water Quality; Section C Integrated Management; and Section CC Accounting for Freshwater Takes and Contaminants N.B. As the NPS has not been given specific effect to in the Otago Region's water plan, the NPS is directly relevant to this application
- c. Water Conservation (Kawarau) Order 1997**

I do wish to be heard in support of my submission.

I request pursuant to [section 100A](#) of the Act, that you delegate your functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

I also request that at least one commissioner be a Maori Commissioner.

Dated 12 July 2019

Signed: (submitted electronically)

**From:** [REDACTED]  
**To:** [Submissions: alisha.robinson@beca.com](mailto:Submissions:alisha.robinson@beca.com)  
**Subject:** Public Feedback to QLDC Application No. RM19.051  
**Date:** Friday, 12 July 2019 8:47:58 a.m.

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This application is being emailed to [submissions@orc.govt.nz](mailto:submissions@orc.govt.nz) and copied to the applicant at [alisha.robinson@beca.com](mailto:alisha.robinson@beca.com). Please contact me by return email if there is anything further you need from me in order for the application to be valid.

#### 1. My details

Name: Nina Klemm

Postal address: [REDACTED]

Mobile: [REDACTED]

Email: [REDACTED]

#### 2. Details of the application in respect of which I am making this submission

Queenstown Lakes District Council – Various locations throughout the Queenstown Lakes district. Application No. RM19.051

To discharge untreated wastewater to various freshwater receiving environments including lakes and rivers, and to land in a circumstances where it may enter water as a result of blockages, breakages, system failures, extreme storm events, and capacity exceeds the network that cause overflows to the wastewater infrastructure throughout the Queenstown Lakes district. The proposal is a discretionary activity in accordance with Rules 12.A.2.1, 12.B.4.2 and 12.C.3.2 of the Regional Plan: Water for Otago.

Purpose: Managing reticulated wastewater throughout the Queenstown Lakes district

Location: Various locations throughout the Queenstown Lakes district

Legal Description of Property: Various locations throughout the Queenstown Lakes district

#### 3. Whether it is in support or opposition.

I am making this submission to register my opposition to the application in the strongest possible terms.

#### 4. Submissions and reasons

Our waterways, rivers and lakes are already under threat from multiple sources, and we should not be allowing discharge of untreated wastewater into these systems under any circumstances. Such discharge threatens to cause both short and long term damage which can and should be avoided.

It should be part of QLDC's responsibility to invest in infrastructure and assess potential points of weakness, failure or blockage, and to put sufficient safeguards in place to ensure that discharge of untreated wastewater is not required. Potential solutions could include holding tanks, secondary overflow systems, holding ponds, water treatment systems and more. These systems should all be monitored and maintained to a high standard.

The Queenstown Lakes District area is an area of outstanding natural beauty which has become sort after because of its pristine natural characteristics, including our lakes, rivers and waterways. These are natural treasures which we should do everything possible to protect and preserve. The QLD has a duty to ensure that these natural resources are preserved and maintained, not endangered and polluted due to political inability. The QLDC should be held to the highest possible standards.

From an economic perspective, this application seeks permission to conduct activities which

could threaten the very reason tourists flock to Central Otago. It simply makes no sense to allow QLDC to pollute our natural resources - resources which are the reason tourists want to come to Central Otago.

The recent resolution by the QLDC to declare a climate emergency in our area is directly at odds with this application. How can our council declare a climate emergency, and then merely a few weeks later seek permission to pollute the environment? In my view, this is indefensible.

Above all, the QLDC has a moral obligation to leave a positive legacy for future generations living in the region, and for New Zealanders as a whole. Likewise, the ORC has a moral obligation not to allow applicants to do anything which will likely cause significant damage to the environment.

5. Decision I wish Council to make.

I ask that the ORC declines QLDC's application for consent, in its entirety, and (if within its powers) directs the applicant to come back with a more sustainable, environmentally friendly plan to deal with waste water.

6. Wish to be heard.

I do not wish to be heard during the hearing, and I have copied this submission to the applicant, cc'd above.

## Karen Bagnall

---

**From:** N Klemm <[REDACTED]>  
**Sent:** Friday, 12 July 2019 2:04 p.m.  
**To:** Submissions; alisha.robinson@beca.com  
**Subject:** Re: Public Feedback to QLDC Application No. RM19.051

Hi Karen

Responses below

I, **am not** (choose one) 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/am not** (choose one) 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 not** (choose one) wish to be involved in any pre-hearing meeting that may be held for this application.

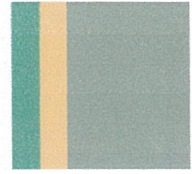
I **do/do not** request\* that the local authority delegates its functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

I **have not** served a copy of my submission on the applicant.

On Fri, Jul 12, 2019 at 1:45 PM Karen Bagnall <[karen.bagnall@orc.govt.nz](mailto:karen.bagnall@orc.govt.nz)> wrote:

Good afternoon – thank you for your submission – unfortunately there were a few things omitted – can you confirm the following;

NEW ZEALAND DEERSTALKERS ASSOCIATION INC  
Upper Clutha Branch  
28 Kingston Street, Albert Town, Wanaka 9305  
Telephone 021 0235 6147



17 JUL 2019  
QUEENSTOWN

16 July 2019

Queenstown District Council  
Private Bag 50072  
Queenstown 9300

Dear Queenstown Lakes District Council,

Attached please find a copy of this Branch's submission to your Resource Consent allocation RM19.051.01 lodged with the Otago Regional Council.

Yours faithfully

Murray Burns (Secretary)





Submission No:

**Submission Form 13 to the Otago Regional Council on  
Consent Application RM19.051**

This is a Submission on a publicly notified resource consent application pursuant to the Resource Management Act 1991.

**Submitter Details:**

**Full Name/s** NZ Deerstalkers Association (Upper Clutha Branch) Inc

**Full Postal Address:** c/o 28 Kingston Street  
Albert Town  
Wanaka **Post Code:** 9305

**Please provide your preferred contact phone number:** [REDACTED]

**Email address:** uppercluthadeerstalkers@gmail.com

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

**Applicant's Name:** **Queenstown Lakes District Council**

**Application Number:** **RM19.051.01**

**Location:** **Various locations throughout the Queenstown Lakes district**

**Purpose:** **To discharge untreated wastewater to various freshwater receiving environments, and onto land in circumstances where it may enter freshwater due to blockages, breakages, system failures, extreme storm events, and capacity exceedance in the network that cause overflows to the wastewater infrastructure throughout the Queenstown Lakes district**

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

The proposal to discharge untreated wastewater to various freshwater receiving environments and to land in circumstances where it may enter freshwater

*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).*

We have some sympathy for the applicant's position but to allow the application as submitted, will effectively grant the applicant QLDC, full licence to pollute outside and beyond public expectations and the enforceable regulatory and punishment regimes imposed by the Otago Regional Council.

There does not appear to be any economic solution that will guarantee an avoidance of wastewater discharges and it seems inevitable that these will not only continue to occur, but must increase in the light of ongoing urban growth and development.

It does not seem reasonable that QLDC should be held responsible for blockages caused by public ignorance or abuse or from discharges caused by extreme storm or wet weather events - they should only be held liable where discharges arising from Council negligence are evident. ORC needs to take a more moderate approach with enforcement given that sound education and response mechanisms and performance standards are either in place or proposed.

Discharges must be avoided in the first instance and either the relocation of all at risk wastewater network structures away from potential receiving waters or their modification to provide adequate containment facilities, including management of stormwater reticulation, must be a priority despite being at significant cost to the ratepayer. It is their interests after all.

**Submission No:**

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

Until wastewater infrastructure is upgraded, modified or relocated, the application should be refused and the status quo provisions of the Regional Plan: Water for Otago continue to be applied.

I/we:

- Wish to be heard in support of our/my submission  
 Do not wish to be heard in support of our/my submission

If others make a similar submission, I/we will consider presenting a joint case with them at a hearing.

- Yes  
 No

I, Am Not (choose one) 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, (choose one) 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 Not (choose one) wish to be involved in any pre-hearing meeting that may be held for this application.

I Do request\* that the local authority delegates its functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

I Have served a copy of my submission on the applicant.



\_\_\_\_\_  
**Signature/s of submitter/s** (or person authorised to sign on behalf of submitter/s)

16-Jul-19

\_\_\_\_\_  
(Date)

**12 July 2019**

To: Otago Regional Council

**Name of submitters:** One New Zealand.

**Applicant's Name:** Queenstown Lakes District Council.

**Application Number:** RM19.051.01

**Location:** Various locations throughout the Queenstown Lakes district

**Purpose:** To discharge untreated wastewater to various freshwater receiving environments, and onto land in circumstances where it may enter freshwater due to blockages, breakages, system failures, extreme storm events, and capacity exceedance in the network that cause overflows to the wastewater infrastructure throughout the Queenstown Lakes district.

Our Submission relates to all of the application.

**Background:**

One New Zealand is a Trust set up to accelerate community transition to a sustainable, carbon neutral future. Our framework for work is the United Nations Sustainable Development Goals. These include two which relate to water which are essential to look at with respect to the QLDC application..

**SDG 6 CLEAN WATER AND SANITATION** – Ensure availability and sustainable management of water and sanitation for all.

Goal 6.3

*By 2030, improve water quality by reducing pollution, eliminating dumping and minimizing release of hazardous chemicals and materials, halving the proportion of untreated wastewater and substantially increasing recycling and safe reuse globally*

**SDG 14 LIFE BELOW WATER** – Conserve and sustainably use oceans, seas, marine resources and waterways.

Target 14.1

*By 2025, prevent and significantly reduce...pollution of all kinds, in particular from land-based activities.*

**Submission:**

Our submission is in opposition to the application. In addition to our national obligations to protect our waterways, the above international targets are clearly not

being respected by the QLDC in their application to let waste water spill into our waterways.

We fully support the submission of the Guardians of Lake Wanaka, Guardians of Lake Hawea, Upper Clutha Lakes Trust Board, which is in opposition to the QLDC application and their reasons for the opposition which have been set out in full below.

Signature on behalf of submitters



**Date: 12 July 2019**

Electronic address for service of submitter: [monique@onenewzeland.co.nz](mailto:monique@onenewzeland.co.nz)  
Telephone: 027 949 2076

**Postal address:** 239B Beacon Point Road  
Wanaka 9343

Contact person:  
Monique KELLY

Reasons for opposition to the QLDC application RM19.051.01 as stated by the Guardians of Lake Wanaka, Guardians of Lake Hawea, Upper Clutha Lakes Trust Board

1. We believe that the QLDC application RM19.051.01 will, if approved as submitted, carry significant risks for water quality with consequent human health risks as well as potential for environmental/ecosystem impacts which could be more than minor. The suggestions we make here will be relevant for the main lakes of the Queenstown Lakes District: Lakes Wakatipu, Wanaka, Hawea and Hayes. Recent events around a major sewage spill into Lake Taupo are a timely reminder of the damage that can occur. Time constraints prevent us from considering the impacts of untreated sewage spillage on streams, rivers or aquifers although impacts are likely to be similar and at times potentially more significant in terms of impact than for spillages into lakes.

2. Application RM19.051.01 states that QLDC is “applying for resource consent from Otago Regional Council (ORC) to discharge untreated wastewater overflows from its network to freshwater receiving environments, or onto land, in circumstances where it may enter freshwater, as a result of blockages, breakages, system failures, extreme storm events, and capacity exceedance in the network”. We note that seismic activity and wild fires are omitted from the application.
3. While we accept that there is inevitability for each of these causes of wastewater overflows, we would prefer to see an aspirational goal of zero wastewater overflows for subsets of the District networks. Over the last 4 years such events have resulted in a total of around 206 sewage spills from the 421 km QLDC drain network of which ~17 spills are reported to have flowed into water. For some of the more serious of these spills, QLDC has been fined by ORC because QLDC does not have a consent to spill sewage into water. Risks of spills are real. Of 47 pumping stations, ~17 are located in a position to allow sewage to flow into a lake, and of these, 11 are considered to have a “high” or “moderate to high” probability of causing wastewater to enter a lake. We consider this somewhat qualitative level of risk as unacceptable and urge ORC to require QLDC to develop robust solutions to reduce it significantly.
4. The application refers to this district wide consent application to authorise these wastewater overflows as the “Network Consent”. Whether or not this Network Consent is granted there will be spillage over time of untreated sewage / wastewater into freshwater environments across the district.
5. The application seeks a consent to spill for a term of 35 years. We oppose this length of consent and strongly suggest it should be for no more than 10 years and subject to review before being renewed. Ten years provides sufficient time to ensure that QLDC undertakes the proposed upgrades to infrastructure outlined in its 10 year plan. At the end of the 10 year period ORC should review the steps taken by QLDC to reduce the impact of spills, e.g. by improving processes that prevent/capture overflows.
6. In the ORC consent application form, Part B, Assessments of effects on the environment, two items (v) and (vi) are left blank when they should each have ticked the “yes” boxes.
7. We feel that the Beca report glosses over many aspects of risks to water quality in the event of lakes or rivers receiving spillage or overflow of sewage. For example, on page 20 Version 4, the Beca report states: *“In the case of the large lakes, Wakatipu, Wanaka and Hāwea, the low levels of nutrients mean they are anticipated to be sensitive to wastewater discharges. However, these effects are not expected to adversely affect the overall health of the lakes and will be largely restricted to localised effects in the vicinity of the discharge. Following the notification of an overflow, the response process kicks in to remediate the breakage in the network, stop flow of discharge to the receiving environment, and to contain the area. The 2017/2018 median response times were 22 minutes with a key performance indicator of 60 mins and a median*

*resolution time of 151 minutes with a key performance indicator of 240 minutes. Thus reducing the areas of the lakes subject to the overflow discharge and adverse effects.”*

8. It is incorrect of Beca to assert that “...*these effects are not expected to adversely affect the overall health of the lakes and will be largely restricted to localised effects in the vicinity of the discharge.*” To act on this statement is likely to lead to bad decisions with potential for local environmental impact. The impact on a lake shore and nearby water quality and ecosystems will depend on the speed and direction of flow of water and mixing in the vicinity, on the weather conditions and the time taken by QLDC to respond. The quoted QLDC response times are unqualified and we can't tell whether they include responses to more distant district localities such as Lake Hawea township or Kingston. Realistic target response times should be set for each of the areas likely to be impacted. The risk of contamination during flood events would probably be more significant than that from a breakage, especially if latter occurs well above lake/river level. If a leak site is covered with flood water, then response times are likely to be very protracted which would also put the quoted response times in some doubt for such extreme events.
9. Furthermore, considering “*the overall health of the lakes*” makes no sense in this context because the localised impacts from sewage spillage will coincide with the areas close to townships, which are the most likely to be accessed by people. The characteristics of the entire water bodies, while important in a regional sense, are not the matter at issue in this discussion. Rather, it is the localised impacts at locations where people are likely to have contact with the water and where we may experience localised ecosystem impacts.
10. Regarding the Lake Wanaka Preservation Act 1973, the Beca report claims (pages 28 and 30) that the QLDC consent application “*Through public engagement and proposed conditions, it is considered that the proposal is consistent with the purpose of the Act,*” and further states “*the proposal is consistent with the Lake Wanaka Preservation Act in that it will maintain and as far as possible, improve the water quality in the lake through management of overflows.*” We disagree with these assertions in the Beca Report. Clearly the dumping of raw sewage into Lake Wanaka is **not** consistent with the requirements of the Lake Wanaka Preservation Act in that dumping raw sewage will certainly not “*maintain and..., improve the water quality in the lake*” as claimed in the Beca report. (The Guardians of Lake Wanaka are appointed by the Minister of Conservation to serve the Lake Wanaka Preservation Act).
11. Another weak but significant assertion by the Beca report relates to the Water Conservation (Kawarau) Order 1997 which includes protection of the water of Lake Wakatipu and the Kawarau river and tributaries. The Beca report states: “*Overall, the way in which wastewater overflows are responded to, as proposed in the suite of consent conditions will provide for both the preservation and protection of the identified water bodies. For this reason it is considered that the application will not be contrary to the purpose of this*

*Order.* We disagree with this unsubstantiated assertion and expect if granted, sewage spillage or deliberate release into the waters covered by the Water Conservation (Kawarau) Order would be in breach of the Order.

12. Concerning the National Policy Statement for Freshwater Management (NPSFM) the Beca report asserts that: *“the proposal will be consistent with the NPSFM through management of effects to the receiving environment. This is accomplished through the proposed suite of consent conditions and through involvement and engagement with iwi and hapu”*. We disagree with this assertion and do not regard it as credible. A revised version of the NPSFM is due out next year. Any consent conditions relating to NPSFM will need to take into account the new version.
13. The Ryder report (Table 8, page 33) includes a risk assessment associated with potential discharge points from QLDC wastewater infrastructure. In order to help ensure that any response to a spillage or release of sewage into lake water is managed with minimal impact we request that QLDC measure basic water properties in the vicinity of areas where the probability of waste water entering water is High and Moderately High. These measurements should include direction and speed of lake water flow, some index of mixing and background nutrient and E.coli levels under dry conditions and heavy rainfall. Another complexity in assessing hydrodynamics at potential spill localities is the response of local lake water flow to wind speed and direction. We also expect that QLDC would be required in high risk areas to make baseline measures of biodiversity indices (e.g. Macroinvertebrate Community Index, Submerged Plant Index). All such factors would need to be taken into account in minimising localised lake water contamination and determining how long it may take for conditions to return to safe levels for human or stock use and back to physical and biological baseline values. These issues should all be addressed by way of the conditions around any consent to spill.
14. Further, on the topic of public health (Beca report page 21 Version 4), the application states, based on the NIWA report (“Wastewater overflow discharge consent - Queenstown Lakes District Council Microbial risk assessment” April 2019): *“Currently no data or modelling of dilution, dispersion or advection of discharges exist for freshwater lakes and rivers in the Queenstown Lakes District.”* This is a very important statement. It is the reason why the author was unable to complete any Quantitative Microbial Risk Assessments. It reinforces our concerns above. It emphasises the need for substantial baseline measurement to address this shortfall in the vicinity of all potential lake and some river/stream spillage sites.
15. On the subject of Public Health, the Beca report concludes that *“With the implementation of the proposed consent conditions including physical response processes, the public health assessment finds the risk to human health from occasional discharge of wastewater to be low to very low. Consequently, the adverse public health effects are considered to be no more than minor”*.

16. The Beca report under-estimates and glosses over the public health advice provided by the NIWA report. We refer for example to the following statements from the NIWA report:

- *“For lakes, use of a calibrated hydrodynamic model, able to represent the mixing, dilution and advection of contaminants within the lake will be required.”*
- *“These results indicate a potential for significant health risk arising from the discharge of untreated sewage in the conditions assumed in each scenario.”*
- *“We have reviewed the incident response plan of QLDC, and we consider that: 1. It is suitable as a high-level strategy document, but that considerable additional detail should be provided before it can be considered sufficiently robust” (our underlining).*
- *“If QLDC implements the recommended response processes identified in Section 6 above then I consider the risk to human health arising from occasional discharge of wastewater from the sewer network to surface waters to be low to very low.”*

17. There are several significant points listed in section 6 of the NIWA report that are recommended for inclusion in the QLDC incident response plan. It is not clear from the Beca report that these points will or should be included in an amended incident response plan. Clearly the points in section 6 must be included in the QLDC incident response plan.

18. A further point of concern is that of cumulative environmental effects. One small incident of spillage may be “no more than minor” but the application seeks to legitimise numerous incidents. The receiving environment could conceivably suffer major impact from a series of minor spillage events. The Regional Council should consider the effects of possible discharges in their entirety, not individually. Therefore we submit that the usual procedure of assessing individual events as minor should not have any place here.

### **Proposed Draft Conditions**

19. Throughout the Beca report there are multiple statements to the effect that if a *“suite of proposed consent conditions are implemented then a range environmental and public health risks will be “less than minor” or “no more than minor”*. We have considered QLDC’s suite of proposed draft conditions (pages 30-36 in the Beca report version 4) and make the following comments:

**QLDC Condition Number 1:** We agree in principle but it’s not clear if or how the key recommendations from reports listed in a – d will be operationalised by QLDC or revised over time as the infrastructure network expands. This condition requires some explanation to address this.



**QLDC Condition Number 2:** We agree – and we are pleased to see that this condition excludes wastewater discharges from wastewater treatment plants

**QLDC Condition Number 3:** We agree.

**QLDC Condition Number 4:** We agree.

**QLDC Condition Number 5:** We agree.

**QLDC Condition Number 6:** We disagree. The consent should be granted for no more than 10 years and should be reviewed before considering a continuation. There would be significant risks in proceeding without review due for example to the considerable uncertainty in QLDC's response capability across a range of spillage scenarios and uncertainty due to the absence of baseline measurement of key environmental attributes.

**QLDC Condition Number 7:** We agree. This would be stronger if the proposed review is to be conducted by an independent engineering service familiar with global best practice in wastewater networks and in particular with managing risk in wastewater networks.

**QLDC Condition Number 8:** We agree. However the response should explicitly include the additions to the QLDC incident response plan proposed in section 6 of the NIWA report.

**QLDC Condition Number 9:** We agree and will support QLDC's education and awareness initiatives.

**QLDC Condition Number 10:** We agree.

**Submitters proposed additional new Conditions:**

20. The submitters, Guardians of Lake Wanaka, Guardians of Lake Hawea and the Upper Clutha Lakes Trust Board request that the following conditions are added to conditions 1-10 above.

(a) For each site identified as having a High or Moderately High probability of wastewater entering water we request that QLDC measure baseline water properties in the vicinity. These measurements should include direction, speed and path or trajectory of lake water flow, some index of mixing and background nutrient and *E.coli* levels under dry conditions and heavy rainfall. An assessment of hydrodynamics at potential spill localities is important and should include response of local lake water flow to wind speed and direction. Baseline measures of invertebrate and submerged plant diversity / species mix should be measured. All such factors would need to be taken into account in minimising localised lake water contamination and determining how long it may take for conditions to return to safe levels for human and stock use. These issues should all be addressed by way of the conditions around any consent to spill to help ensure that any response to a spillage or release of sewage into lake water is managed with minimal impact.

(b) The Beca letter to ORC dated 5 June 2019 advises that a further condition of consent is proposed to require QLDC to prepare one combined procedural

document that includes both QLDC's current incident response processes and Dr Hudson's recommendations within 6 months of consent being granted. We agree with this condition and recommend that QLDC's procedural documentation include specific remediation plans for each site identified as having a High or Moderately High probability of wastewater entering water.

- (c) We note that earthquake and wildfire risks are not mentioned in the reports accompanying the consent application and request that these be considered in the preparation of QLDC's combined procedural document.
- (d) QLDC plans to spend \$105M between 2018 and 2028 on the wastewater network including pump stations, pipes and treatment plants. We do not wish to see any relaxation of progress due to consent being granted and request that QLDC be required to publicly report on actual vs planned expenditure over the 10 year period of the consent.
- (e) QLDC should formulate a control/mitigation strategy for each site with appropriate infrastructure being available should an overflow event occur.

### **Kai Tahu Cultural Values Missing?**

21. We note that the Beca report states Māori "cultural traditions have been recognised and provided for". This is not explicitly addressed in the Beca report or in the draft proposed conditions. However, on page 25 of the Beca report the following statement is included: *"it is acknowledged that throughout engagement mana whenua indicated their appreciation of the work undertaken thus far and were generally supportive of the management of overflows given they already occur and cannot be fully avoided in the future"*. We believe that Kai Tahu authors of the Cultural Impact Statement should be given an opportunity to endorse our submission.

### **Decisions sought from the consent authority:**

22. The submitters seek the following from the consent authority:
- (a) Decline consent or
  - (b) Grant with a much reduced term from 35 years to 10 years to ensure the necessary upgrades to infrastructure are undertaken in a timely manner to ensure there is capacity to prevent/capture overflows.
  - (c) Grant with a condition to proceed only when a full engineering review has been completed with recommendations for any network changes to achieve global best practice, and those recommendations are scheduled to be implemented.
  - (d) Grant with a set of conditions accepting our amendments as indicated to conditions 1 - 10 and our additional submitters conditions a-e above.
  - (e) Grant with a set of conditions requiring upgrading and reporting to ORC on set milestones for progressing necessary upgrades and other measures to prevent/capture overflows.
  - (f) We wish to be heard in support of our submission.
  - (g) We wish to be kept in the loop with any reviewing/reporting/recommendations resulting from the above.

If others make a similar submission, we will consider presenting a joint case with them at the hearing.

We request pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to one or more hearings commissioners who are not members of the local authority.



12 July 2019  
Otago Regional Council  
Private Bag 1954  
Dunedin, 9054  
[submissions@orc.govt.nz](mailto:submissions@orc.govt.nz)

cc: Queenstown Lakes District Council  
[alisha.robinson@beca.com](mailto:alisha.robinson@beca.com)

### Submission on Application No. RM19.051

This feedback is provided on behalf of the Otago Fish and Game Council (**Fish and Game**). For additional information please contact Nigel Paragreen using the details below.

#### Submitter Details

Contact person: Nigel Paragreen, Environmental Officer  
Email: [nparagreen@fishandgame.org.nz](mailto:nparagreen@fishandgame.org.nz)  
Office phone: 03 477 9076  
Postal address: PO Box 76, Dunedin 9016

A handwritten signature in black ink that reads 'N. Paragreen'.

12 July 2019

#### General

- [1]** Fish and Game is the statutory manager of sports fish and game bird resources within Otago. It holds functions and responsibilities set out in the Conservation Act (1987). Part of the organisation's function is to represent the interests and aspirations of anglers and hunters in the statutory planning process and to advocate the interests of the Council, including its interests in habitats. This submission is provided in accordance with this function.
- [2]** As required by the Conservation Act (1987), Fish and Game has prepared a sports Fish and Game Bird Management Plan for Otago<sup>1</sup> (**SFGMP**), which has guided the development of this submission. This document describes the sports fish and game bird resources in the region and outlines issues, objectives and policies for management over the period. The document may be useful for decision makers to have regard to when considering this application.
- [3]** Fish and Game submits in respect to the whole application, which it opposes and requests that the consent not be granted in for form specified in the application. Fish and Game could be supportive of the consent provided conditions were imposed which:

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<sup>1</sup> Otago Fish and Game Council, *Sports fish and game bird management plan for Otago 2015-2025*. Dunedin, 2015. A copy has been attached to this submission.

[Statutory managers of freshwater sports fish, game birds and their habitat](#)

- a. created performance standards equivalent to the current pattern of discharge and improved incrementally over time; and
- b. shortened the duration of the consent.

[4] Fish and Game does wish to be heard in support of its submission.

*The activity in the context of the Queenstown Lakes District*

[5] Fish and Game considers that the activity described in the application has serious potential for environmental harm via adverse effects on freshwater ecosystems and the people who use them. To summarise the application, a description of key characteristics of the activity sought might be:

- a. a discharge of wastewater to water, or to land in circumstances where it may enter water;
- b. a wide current geographic extent covering the major urban centres in the district, with the future inclusion of additional urban centres; and
- c. an unspecified scale of discharge, in terms of the volume discharged, the duration of discharge and the number of discharges that may occur in a given period;
- d. a duration of 35 years.

[6] Fish and Game staff, and many professionals in Otago, often refer to consents which have a wide geographic scale and long duration as global consents. District councils seem to be more likely to apply for or hold historic global consents due to the nature of their work, in which homogenous tasks requiring resource consent may need to be undertaken frequently. Fish and Game's experience with global consents is that they can be misused and abused if they are overly permissive as the managers, direction and culture of institutions change over the long time frame of the consent. As a result, it is important to Fish and Game that global consents have strict consent conditions which are not open to interpretation.

[7] The receiving waters of the Queenstown Lakes District (**the District**) that may be affected by the global consent covers an immense variety of waterbodies, ecosystems and human uses. This is problematic, as the scale of the activity described in the application is also immense. Because it would be nearly impossible to independently assess each stream, the AEE Ryder Environmental Ltd. (**Ryder**) has categorised and described the affected waterbodies into very large rivers; medium – large rivers; small – medium rivers; streams; large lakes; and medium lakes<sup>2</sup>. This is an understandable action to take, albeit one which will undoubtedly cause detail to be lost. Nonetheless, the broad description does enable a discussion about the impacts on ecosystems.

[8] Fish and Game holds additional information on some of the rivers within the geographic scope of the application. A classification system to assign grades of significance to habitat across Otago<sup>3</sup> and surveys of angler effort, measured in angler days have been carried out<sup>4</sup>. These figures help Fish and Game staff to identify the importance of a fishery to licence holders.

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<sup>2</sup> Appendix C of the application

<sup>3</sup> Fish and Game. *SFGMP*. Dunedin, 2015, p 76-90.

<sup>4</sup> M J Unwin, *Angler usage of New Zealand lake and River fisheries: results from the 2014/2015 National Angling Survey*. The National Institute of Water & Atmospheric Research Ltd, Christchurch, 2016.

[9] Streams named in the application for which there is good information are shown below.

| Application category                                     | River Name             | Significance | National Angler Survey Result (angler days) |                        |                        |                        |
|--|------------------------|--------------|---|------------------------|------------------------|------------------------|
|  |                        |              | 2014/2015                                   | 2015/2016              | 2016/2017              | 2017/2018              |
| Very large rivers  | upper Clutha / Mata-Au | National     | 6,670 ± 1,330                               | 20,900 ± 3,220         | 20,160 ± 2,760         | 11,440 ± 2,130         |
|  | Kawarau                | -            | 1,630 ± 600                                 | 1,930 ± 750            | 1,700 ± 770            | 3,500 ± 1,000          |
| Medium-large rivers                                      | Hawea                  | Regional     | 480 ± 170                                   | 710 ± 310              | 4,970 ± 1,310          | 1,920 ± 470            |
|  | Shotover               | -            | 150 ± 80                                    | 70 ± 50                | 1,120 ± 500            | 130 ± 60               |
| Small-medium rivers                                      | Arrow                  | Local        | 160 ± 100                                   | 350 ± 160              | -                      | 210 ± 120              |
|  | Cardrona               | -            | 200 ± 180                                   | 30 ± 30                | -                      | 30 ± 30                |
| Large lakes  | Lake Hawea             | National     | 13,640 ± 2,490                              | 21,920 ± 2,750         | 28,160 ± 3,670         | 18,820 ± 2,260         |
|  | Lake Wakatipu          | National     | 21,860 ± 3,170                              | 20,970 ± 2,230         | 17,720 ± 1,910         | 21,410 ± 2,180         |
|  | Lake Wanaka            | National     | 22,410 ± 3,180                              | 39,070 ± 5,710         | 25,270 ± 2,310         | 25,530 ± 2,370         |
| Medium lakes   | Lake Hayes             | Regional     | 180 ± 90                                    | 500 ± 160              | 1,540 ± 830            | 1,430 ± 480            |
| <i>Total angler days in Otago</i>                        |                        |              | <i>180,860 ± 8,330</i>                      | <i>215,430 ± 9,370</i> | <i>218,710 ± 8,660</i> | <i>182,870 ± 6,470</i> |
| <i>Total, as a percent of total angler days in Otago</i> |                        |              | <i>37.26%</i>                               | <i>49.41%</i>          | <i>46.02%</i>          | <i>46.16%</i>          |

- [10] There are a number of small rivers and streams which Fish and Game does not hold this type of information on but are incredibly important to licence holders nonetheless. Luggate, Mill, Bullock and Horne Creeks are named in the application and each of these streams supports spawning critical to local fisheries in the Upper Clutha, Lakes Hayes, Lake Wakatipu and Lake Wanaka. Three of these four fisheries are listed as having national significance, with significant angler effort.
- [11] It should also be noted that there will be many small streams which are not identified by the application yet may be impacted by the proposed discharge. These may provide low density spawning services; habitat for juvenile or adult fish; or production for invertebrates that float downstream and will be preyed upon. Ecological production is cumulative and works best when there are a wide range of interconnected, healthy habitats. As a result, we should be concerned not only by the ecosystems which have huge measurable productive capacity but also those which support them to a lesser extent.
- [12] To put it simply, the receiving waters for this application are extremely valuable. Ranging from large lakes and rivers with exceptional angling waters for anglers in Otago to critically significant spawning streams to small streams with typical small stream values. To discharge wastewater into any of them is a meaningful event that should not be taken lightly.

### *The existing and future environment*

- [13] The Queenstown Lakes District Council (QLDC) has inferred numerous times in statutory and non-statutory assessment<sup>5</sup> that the activity is existing, and that this should bear some weight in policy interpretation. Fish and Game submits that this is not the case. The activity has clearly occurred in the past; however, it has done so illegally. Previous discharges were likely a breach of s15 of the Resource Management Act (RMA) and would not have been permitted by a National Environmental Standard, other regulation, a resource consent or a rule in the Regional Plan Water (RPW). As such, they should not be considered part of the existing environment from a planning perspective.
- [14] Looking to the future, the intense development pressure on the district should also be considered. The district has experienced phenomenal growth in the past and is expected to continue growing over the life of this consent, as shown below<sup>6</sup>.

| Variable                     | 2018   | 2028   | 2038    | 2048    |
|------------------------------|--------|--------|---------|---------|
| <b>District</b>              |        |        |         |         |
| Residents                    | 39,500 | 56,400 | 65,900  | 74,400  |
| Total Houses                 | 20,840 | 28,500 | 33,290  | 37,770  |
| Total Visitors (Average Day) | 24,860 | 31,490 | 35,550  | 39,040  |
| Total Visitors (Peak Day)    | 79,300 | 99,750 | 113,810 | 126,370 |
| Average day population*      | 64,360 | 87,890 | 101,450 | 113,440 |
| Total Rating Units           | 26,020 | 35,300 | 39,830  | 45,280  |

- [15] While the information from this source is intended for general use only, the trend is very clear. The projected near doubling of the average day population, which equates to the residents plus total visitors (average day), will place significant additional pressure on the wastewater system. With it will likely come an increased risk of discharge events.
- [16] However, the cumulative effects of additional people will likely be more than simply increased risk of discharges. People demand goods and services, housing, transport and jobs to pay for it all. This economic activity will place additional burdens on the district's ecosystems and natural resources, including the ability of its waterbodies to absorb contaminants without serious consequence.
- [17] Much of the analysis in the AEE by Ryder relies upon the ability of pristine environments to absorb and/or dilute wastewater from discharges, therefore significantly reducing the adverse effects of a discharge event. Can we be confident this assumption will hold for the life of the 35 year duration of the consent?

### *Scale of the discharge*

- [18] Table 2 of the AEE outlines the potential level of effects, assessed by Ryder, of a discharge of wastewater to a freshwater ecosystem. This table demonstrates that the effects exist on a continuum, from low to high. This basis is then used in the context of each category of waterbody to assess the risks of adverse effects. A useful summary of results can be found in Table 7 of the AEE.

<sup>5</sup> Appendix F of the application

<sup>6</sup> Utility Ltd. *Queenstown Lakes District population projections (December 2018)*. Queenstown Lakes District Council, 2018. Retrieved from: <https://www.qldc.govt.nz/assets/Uploads/Our-Community/Population-Projections/QLDC-Growth-Projections-2018-to-2048-summary-table.pdf>

- [19] It is reasonable to assume that as the scale of the discharge, in terms of frequency and volume, increases, the situation would move up the scale outlined in Table 2. A one off, small discharge into a pristine environment may have a short term impact but it would be expected be absorbed quickly because the ecosystem would likely be resilient. However, more frequent and/or larger discharges will have larger effects and the level of effect will likely be larger.
- [20] This is particularly the case with the frequency of discharge, as an ecosystem still recovering from the previous discharge now have additional contaminants to deal with and could be pushed over ecological thresholds. Both degradation from previous wastewater discharges and cumulative effects from other activities could act in this way. Examples of current cumulative effects might include high levels of siltation from inappropriate subdivision in Bullock Creek or prolonged low flows caused by abstraction in Luggate Creek. In future, such pressures on the district's ecosystems may be more common.
- [21] The underlying assumption in the AEE is that the discharges will continue as they are currently – short term and very occasionally<sup>7</sup>. However, there is nothing in the volunteered consent conditions which ensures this will be the case. If a consent is issued as applied for, it would permit an unlimited number of discharges, each of an unlimited volume and duration.
- [22] This means the potential future discharge regime would permit discharges that are greater than is currently experienced. In this situation, the AEE is unhelpful except to say that the risks will be higher than stated. To what degree is unknown. When this is the case it is impossible to assess the actual and potential effects of allowing the activity, as required in s104 of the RMA.
- [23] What is clear from Table 7 that the risk of the current discharge regime is already moderate to high for many waterbodies, particularly streams. As discussed previously, this category includes spawning streams and provide for nationally significant fisheries. Additional risk for these streams may have significant effects.

*Policy Assessment, performance standards and responsibility for discharges*

- [24] Given the above, it is difficult to assess the full effects of the proposed activity in the context of the relevant policy documents. Because there is no limit for the volume, duration of frequency of discharges the QLDC would legally be able to discharge at a scale of the recent Taupō accident<sup>8</sup> every other week. It would be absurd to imagine that such an effect would be consistent with the relevant provisions of Iwi management plans, the SFGMP, the RPW, the Regional Policy Statement or the National Policy Statement for Freshwater Management; let alone be consistent with the Kawarau Water Conservation Order, the Lake Wanaka Preservation Act or Part 2 of the RMA.
- [25] Fish and Game raised this issue multiple times during consultation with the QLDC. It has also raised a solution in the form of volunteered conditions outlining performance standards for wastewater discharges, which the QLDC would be obliged to stay within. For example, a limit on the average number of discharges to water, average volume of discharge to water and average duration of discharges to water over a rolling time period.
- [26] So far, the QLDC has not be willing to take this on as a solution. In response, it has claimed that it should not be held responsible to specific performance standards as it has no control over when and where the discharges occur. This question of responsibility is critical.

<sup>7</sup> For example, in the 1<sup>st</sup> paragraph of section 6.2.1 of the AEE

<sup>8</sup> <https://www.rnz.co.nz/news/national/393516/taupo-cleanup-begins-after-190-000-litre-sewage-spill>



- [27] It is true that it is the general population of the district, not specifically QLDC staff, that are causing the network blockages. However, the QLDC is a democratically run institution who represents and is funded by the general population of the district. Collectively, they are responsible for the discharges and Fish and Game submits that it is not unreasonable for them to be collectively held responsible for ensuring those discharges do not cause undue harm.
- [28] Discharges can be controlled loosely through investment in improving and maintaining network infrastructure and education for the populace. For this, the QLDC has volunteered related consent conditions in the application. Fish and Game is pleased that the QLDC plans to undertake work in these areas.
- [29] Unfortunately, there is nothing in the volunteered consent conditions that binds the QLDC to levels of investment of education which can be expected to achieve results. In subsequent long-term planning rounds, the QLDC of the day could simply change their plans and use the money earmarked for infrastructure investment on another cause. In that case, the scale of mitigation claimed by the application would be diminished. Similarly, the volunteered education consent condition could be satisfied by a leaflet in a waiting room just as effectively as a million-dollar advertising campaign. Just as there's no way of assessing the adverse effects of the proposed activity, there is no way of assessing how investment and education conditions may mitigate those unknown adverse effects.
- [30] If performance standards were considered, both issues could be resolved. An assessment of effects against the policy framework could be undertaken as the (average) scale of effects would be known. If they were pegged to a discharge pattern similar to or less than what is experienced currently, the AEE information will be useful. Similarly, the scale of conditions to mitigate the adverse effects would be less important to decision makers, as the QLDC would have incentive to do what is required to stay within their performance standard conditions. In this instance, reporting conditions like those volunteered would be adequate.
- [31] In addition, a performance standard condition could be used to ensure the QLDC improved over time. This could take the form of a staged, periodic decrease in identified limits over the life of the consent. Fish and Game would strongly support such an outcome.
- [32] Without performance standards, or some similar solution, Fish and Game considers that the application is unacceptably permissive and has a high risk of abuse by future iterations of the QLDC.

#### *Consent Term*

- [33] Fish and Game's position is that the consent should not be granted without performance standards. However, if they were to be adopted in a sensible manner, then consent term must be considered. Given the fast pace of development in the region, it would be unreasonable for a consent of this nature to be issued for 35 years. As a result, Fish and Game has a preference for a consent duration that is shorter than 35 years.

#### *Conclusion*

- [34] In summary, Fish and Game opposes this application. Accidents will happen and seems that the QLDC genuinely wants to resolve this issue. However, good intentions cannot be relied upon and should not be a substitute for clear and enforceable consent conditions. This is the only way that decision makers, stakeholders and the public will have certainty that anticipated results will be achieved.

- [35] In its current state, the application is not consistent with relevant policy documents and legislation as it would enable an unlimited frequency, duration and volume of wastewater discharges to occur into ecosystems of incredible value. In assuming the discharge pattern will remain the same as historic discharges, despite the permissive nature of the volunteered conditions, the AEE is fundamentally flawed in its analysis and is ultimately unhelpful in a policy assessment. It is unclear what the effect of education and investment mitigation conditions proposed will be and whether they will be successful in avoiding future discharges.
- [36] Performance standards as conditions of consent may be a way to resolve these issues. If this were the case, the consent term would need to be considered. Fish and Game feels it is appropriate that the consent term be less than 35 years.



SPORTS FISH AND GAME MANAGEMENT PLAN FOR  
OTAGO FISH AND GAME REGION 2015-2025

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“in the interests of anglers and hunters”

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## **PART I BACKGROUND AND RESOURCE SUMMARY**

### **1. How To Use This Plan**

The Sports Fish and Game Management Plan for Otago Fish and Game Region ('the plan') provides a framework for the management of Otago's sports fish and game bird resources. The plan has a ten year horizon and is both strategic, in outlining issues and providing long term organisational outcomes, and operational in outlining management objectives and policies..

Part I provides background information on the plan and explains the role and responsibilities of Otago Fish and Game Council ('the Council'). The Council is one of twelve Fish & Game Councils (FGCs) established under the Conservation Act 1987 for the management of sports fish and game resources within defined regions. A thirteenth council, the New Zealand Fish and Game Council (NZFGC), coordinates the twelve FGCs and provides national advocacy.

Part II of the plan is divided into sections based largely on the functional areas currently used for FGC annual planning and reporting. This part of the plan lists the issues identified through the plan development process and the policy responses to them.

#### **1.1 Operation of Plan**

This plan was made operative on 18/05/2015 and will remain in effect until such time as it is reviewed, which should be not later than 10 years from the date of its approval.

#### **1.2 Plan Review**

The plan will be reviewed in ten years from the date of its approval by the Minister of Conservation unless it requires amendment sooner. Plan reviews are provided for under Section 17M of the Conservation Act 1987.

### **2. Introduction**

This plan is prepared in accordance with section 17L of the Conservation Act 1987 (the Act) which requires the Council in its plan preparation:

- To have regard to the sustainability of sports fish and game birds in the area to which the plan relates; and
- To have regard to the impact that the management proposed in the plan is likely to have on other natural resources and other users of the habitat concerned; and
- To include such provisions as may be necessary to maximise the recreational opportunities for anglers and hunters.

In attaining these objectives, to be cognisant of the wider social and economic space in which outdoor recreation sits.

The procedure for the preparation of the plan is set out in Section 17M of the Act. The legal status of the Council and the context within which it operates is described below:

## **2.1 Conservation Act 1987**

The Council is established under section 26P of the Conservation Act 1987 as a body corporate. Its functions are detailed in Section 26Q of the Act.

The general function of the Council is to... 'manage, maintain and enhance the sports fish and game resource in the recreational interests of anglers and hunters. Particular functions include :

- assess and monitor sports fish and game populations.
- assess and monitor angler and hunter success and satisfaction.
- assess and monitor the condition and trend of ecosystems as habitats for sports fish and game.
- maintain and improve access to sports fish and game resources.
- maintain and improve hatchery breeding programmes for restocking fish and game habitats where necessary
- provide information on sports fish and game and promote angling and hunting.
- ensure compliance with angling and hunting conditions and promote ethical standards
- represent the interests and aspirations of anglers and hunters in statutory planning processes, including advocating for their interests in habitats.
- implement Fish and Game national policies

The Council's responsibilities for management of fish and game resources cover the whole of the Otago Fish and Game Region (refer Appendix 2, Map of Otago Region), and are not limited to public conservation lands and waters.

Regulations can be made under sections 48 and 48A of the Conservation Act which relate to fish and game management. Current regulations include the Fish and Game Council Elections Regulations 1990.

The Freshwater Fisheries Regulations 1983 are made under the Fisheries Act 1983, but apply mainly to the Conservation Act 1987. Broadly they cover sports fish and licencing, protecting of marked fish, canning, storage and smoking of fish, ensuring that fish passage is maintained, the use of electric fishing machines, and the management and authorisation of fishing competitions. Schedule 1 of the Regulations lists the species of fish in New Zealand waters legally declared to be sports fish, and thus governed by Fish and Game Councils (Appendix 1.).

In addition, section 26ZL of the Act enables the Director General of Conservation, at the request of the Council, to declare restrictions on fishing including conditions controlling entry to specified waters and prohibiting fishing by notice in newspapers circulating in the area concerned.

The Council is composed of twelve councillors elected from whole season fishing and hunting licenceholders in triennial elections conducted by postal ballot. The Council appoints one of its members to the NZFGC.

The NZFGC's primary role is to represent nationally the interests of anglers and hunters and co-ordinate the activities of the regional FGCs. Supporting functions are to:



- develop national policies for the carrying out of its functions for sports fish and game in consultation with regional Fish and Game Councils
- advise the Minister of Conservation on issues relating to sports fish and game.
- participate in the development of research programmes for the management of sports fish and game.
- advocate in the interests of sports fish and game management.
- report to Fish and Game Councils on issues affecting sports fish and game management.
- co-ordinate the production of the annual Angler's Notice and Game Gazette
- advise the Minister of Conservation on sports fish and game licences and their fees having regard to the recommendations of with Fish and Game Councils.

There are 12 defined Fish and Game Regions in New Zealand. Their boundaries are described in the New Zealand Gazette (NZ Government, 1990). The 12 regional Fish and Game Councils and the New Zealand Council operate collectively under the brand name Fish & Game New Zealand. The 13 Councils are independent public entities and funds are redistributed between Councils to meet national and regional needs by way of a levy and grant system. Fish and Game funding is derived almost exclusively from licence sales, and the use of that funding and the role carried out by Councils across the country has a substantial benefit to the wider public beyond anglers and hunters.

The relationship of the plan to other Conservation Act policies and plans is defined in Section 17L of the Act. These provisions require that nothing in any sports fish and game management plan 'shall derogate' from any provisions of the Act or any other Act, any policy approved under the Act or any other Act, any Department of Conservation (DOC) conservation management strategy, conservation management plan, or freshwater fisheries management plan. DOC plans must 'have regard' to existing sports fish and game management plans.

Section 4 of the Conservation Act 1987 governs the Council's relationship with Ngai Tahu. It is discussed below in 4.1 'Relationship with Ngai Tahu.'

The Act also defines "freshwater" in section 2 as extending 500 metres offshore from the low tide mouth of any stream or river, which effectively means that Council's jurisdiction for sports fish extends 500 metres offshore in those locations.

## **2.2 Wildlife Act 1953**

The Wildlife Act 1953 includes provisions relating to game bird management which:

- enable the Minister of Conservation to declare open seasons for game and the conditions controlling the taking of game.
- allow the Director-General of the Department of Conservation to authorise the Council to take game for certain purposes.
- describe the powers of rangers.
- define wildlife species declared to be 'game' in the First Schedule to the Act and thus governed by Fish and Game Councils (Appendix 1)

In addition, the Act allows for the making of regulations including the Wildlife Regulations 1955.

### **3. Wider Legal Context**

Management of sports fish and game bird resources occurs within a legal context defined by a number of key statutes described below:

#### **3.1 Resource Management Act 1991**

The Resource Management Act 1991 (the RMA) is the primary statute in New Zealand for resource management and planning. It places a strong emphasis on matters relevant to the habitat protection and access functions of Fish and Game Councils. It also provides linkages between statutory plans and opportunities for FGCs to have input into resource planning across regional and territorial local authorities.

Section 5 of the RMA describes the purpose of the RMA as being to promote the sustainable management of natural and physical resources. It defines sustainable management in a qualified way that requires the safeguarding of the life supporting capacity of ecosystems and the management of adverse effects on the environment where resource use occurs.

Section 6 outlines 'Matters of National Importance', requiring persons exercising powers and functions under the RMA to recognise and provide for priority matters. Those relevant to fish and game management are as follows:

- a) The preservation 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:
- c) The protection of areas of significant vegetation and significant habitats of indigenous fauna:
- d) The maintenance and enhancement of public access to and along the coastal marine areas, lakes, and rivers.

Section 7, 'Other Matters' list other priority matters. Those of relevance to sports fish and game management objectives are:

- (c) The maintenance and enhancement of amenity values:
- (d) Intrinsic values of ecosystems:
- (f) Maintenance and enhancement of the quality of the environment:
- (h) The protection of the habitat of trout and salmon.

Other elements of Part II of the RMA relate to the priority placed by the Act on Maori cultural matters in sections 6(e), 7(a) and 8.

Sports Fish and Game Management Plans are linked to regional and district council policy and plan development through sections 61, 66, and 74 of the RMA. These sections require regional and

district councils to 'have regard' to management plans and strategies prepared under other Acts in the preparation of policy statements and plans.

Other RMA provisions include Part 9 water conservation order application procedures which may be used where outstanding amenity or intrinsic values are present in waterways.

### **3.2 Biosecurity Act 1993**

The Biosecurity Act includes provisions on the humanitarian treatment of animals and the control of pests which can impact on Council's management activities. It also controls the introduction of new species into New Zealand.

### **3.3 Local Government Act 1974**

Navigational Safety Bylaws are developed by territorial local authorities under the provisions of the Local Government Act 1974. These regulations control recreational boating and allow the setting of speed limits on inland waterways.

Part 21 of the Local Government Act 1974 described local authority responsibilities for the maintenance and accessibility of local roads along waterways, including unformed legal road. Section 342 and Schedule 10 cover the temporary closure of public roads and the procedure for the legal stopping of a road.

### **3.4 Crown Pastoral Land Act 1998**

The Crown Pastoral Land Act establishes procedures for changing the tenure of Crown pastoral lease lands in the South Island high country.

### **3.5 National Parks Act 1980**

National Parks are managed in accordance with the National Parks Act 1980. Mt Aspiring National Park is an important park in Otago for conservation and recreation and contains a number of important trout fisheries.

### **3.6 Reserves Act 1977**

The Reserves Act is the statute under which much of the Crown's wetland reserve land is managed. The Council is able to be appointed to carry out day to day control and management of reserves, particularly Government Purpose Reserves for Wildlife Management.

The Council has been declared to be a local authority under section 2 of the Act to enable it to exercise the powers and functions of a local authority under this Act (NZ Government, 2001). Also, the Council is recognised as a covenanting body under this Act.

### **3.7 Local Government Official Information and Meetings Act 1987**

The Council is subject to the Local Government Official Information and Meetings Act 1987. Council meetings are open to the public and must be advertised. All business must be transacted in open meeting unless it meets criteria defined in the Act.

### **3.8 Ngai Tahu Claims Settlement Act 1998**

The Act appoints Te Runanga o Ngai Tahu (TRONT) as a statutory advisor to the Council. TRONT may provide advice on the harvest of native game birds and the preparation of those parts of sports fish and game management plans which relate to native game birds. The Council must have particular regard to that advice.

Native game birds are defined in the Act as:

- Maunu/Parera or Grey Duck
- Pakura/Pukeko or Pukeko
- Putakitaki or Paradise Shelduck
- Tete or Shoveller.

The Act also details waters within Otago Fish and Game Region with which Ngai Tahu has cultural associations. These associations are formalised in the Act by “Statutory Acknowledgements” or “Deeds of Recognition” when they relate to public conservation land. The waters concerned are:

- Kuramea or Catlins Lake
- Lake Hawea
- Lake Wanaka
- Mata-au or Clutha River
- Pomahaka River
- TeTauraka Poti or Merton Tidal Arm
- Te Wairere or Lake Dunstan
- Whakatipu-wai-Maori or Lake Wakatipu

### **3.9 Public Finance Act 1989**

The Council is subject to the provisions of the Public Finance Act 1989. It is audited annually by the auditors appointed by the Office of the Auditor General and must produce an annual report including a statement of objectives and a comparative statement of service performance. The report must be presented to a publicly advertised annual general meeting and to Parliament. The Council is a Public Entity in terms of the Act.

### **3.10 Walking Access Act 2008**

The Walking Access Act 2008 established the New Zealand Walking Access Commission, which has the objectives of providing the New Zealand public with “free, certain, enduring, and practical walking access to the outdoors”. Specific responsibilities of the Commission include placing a priority on negotiating access over private land to parts of rivers and lakes where there is not already walking access, and to sports fish and game resources (s11, Walking Access Act, 2008). These responsibilities align closely with the responsibilities and roles of Fish and Game Councils for access under the Conservation Act 1987. As such, the Otago Fish and Game Council will work closely with the

Commission and its regional field advisors in identifying mutual priority areas for access that require focus and resourcing.

### **3.11 Public Works Act 1981**

Section 45 of the Public Works Act 1981 allows local authorities to lease or license any land held for a road, including adjacent unformed legal road, to adjacent landowners for activities such as grazing.

### 3.10 Relationship with Ngai Tahu

Ngai Tahu is the iwi with manawhenua for the Otago rohe (region). Ngai Tahu has established a tribal structure -Te Runanga O Ngai Tahu (TRONT) which is made up of eighteen Papatipu Rununga. Each runanga has a defined takiwa (area). The runanga and whanau with influence in the Otago Fish and game region are:

- Te Runanga o Otakou
- Te Runaka o Hukanui
- South Otago Runanga
- Kati Huirapa Runanga Ki Puketeraki
- Te Whanau o Otokia
- Moturata Taieri Whanau
- Te Runanga o Moeraki.

Collectively, the papatipu runanga for Otago are referred to as Kai Tahu ki Otago. Kāi Tahu ki Otago has established a natural resource management consultancy; Kāi Tahu ki Otago Ltd. Kāi Tahu ki Otago Ltd facilitates consultation with Kāi Tahu ki Otago on environmental matters within Otago.

Section 4 of the Conservation Act 1987 states that: ‘this Act shall be so interpreted and administered as to give effect to the principles of the Treaty of Waitangi’. This is the strongest Treaty clause within New Zealand law, and contrasts to that of the Resource Management Act which requires decision-makers to “take into account the principles of the Treaty of Waitangi” (s8, RMA 1991) This places an obligation on FGCs to act, where appropriate, in accordance with Treaty principles and to decide how they are to be weighed in any particular management situation. Any decision, however, must always be consistent with the Council’s other statutory requirements.

In addition the 1997 Deed of Settlement between the Crown and Ngai Tahu and the subsequent Ngai Tahu Claims Settlement Act 1998 places further obligations on the Council, particularly in respect of native game birds.

The principles of the Treaty of Waitangi are evolving concepts arising from court decisions, most notably found in *NZ Maori Council v Attorney General* (1987).

These principles are listed in the Kai Tahu ki Otago Natural Resource Management Plan 2005 (NRMP) as:

- The principle of the Government’s right to govern
- The principle of tribal rangatiratanga/self regulation
- The principle of partnership
- The principle of active participation in decision-making
- The principle of active protection
- The principle of redress for past grievances.

Those of particular importance for the Council in its dealings with Ngai Tahu are:

*To act in good faith (principle of partnership)*

This is based on the present legal interpretation of the Treaty of Waitangi that suggests the Crown

and its agents and Maori are obliged to act towards each other 'reasonably and with the utmost good faith'. This includes an interest in each others' well-being and welfare.

*To consult (principle of active participation in decision-making)*

Consultation between the Council and Ngai Tahu, represented in Otago by Kai Tahu ki Otago should occur on matters of potential common interest. These may include matters arising from the Ngai Tahu Deed of Settlement. Consultation is itself legally defined through precedents set through decisions of the Court. The procedure for the preparation of sports fish and game management plans requires the Council to give notice of any draft plan to Ngai Tahu. Issues and objectives for the Council's relationship with Ngai Tahu are included in this plan.

Otago Fish and Game will seek comment from the relevant rūnanga or whānau rōpū, preferably through Kai Tahu Ki Otago, when any action or policy may have a potential impact on native biodiversity, including habitat, distribution of populations, and spawning areas.

The NRMP expresses Kāi Tahu ki Otago values, knowledge and perspectives on natural resource and environmental management issues. The NRMP provides a framework for consultation with Kāi Tahu ki Otago" on resource management but is not considered a substitute for direct consultation. The NRMP is a 'relevant planning document recognised by an iwi authority' affected by a district or regional plans in terms of sections 66 and 74 of the RMA. The Council will use the NRMP as a reference source prior to undertaking consultation with local runanga and whanau where required.

The Council recognises the priority placed on Maori cultural values in Part II of the RMA:

- Section 6 - Matters of National Importance  
(e) The relationship of Maori and their culture and traditions with their ancestral lands, water, sites, waahi tapu and other taonga
- Section 7 - Other Matters  
(a) Kaitiakitanga
- Section 8 - Treaty of Waitangi

### **3.11 Relationship with the Department of Conservation (DOC)**

The Council's relationship with DOC is one of liaison between two agencies with responsibilities under the Conservation Act 1987. There is some overlap in functions due to section 6 (ab) of the Conservation Act which gives DOC the task of preserving so far as is practical "all indigenous freshwater fisheries and protect[ing] recreational freshwater fisheries and freshwater fish habitats". This includes freshwater sports fisheries and habitats. While DOC is active in the fisheries/freshwater habitat conservation area, the relationship is complementary where water resource allocation, planning, and aquatic habitat issues are concerned. Otago Fish and Game's responsibilities under s26 of the Act fit well with the Department of Conservation's powers to advocate for the conservation of natural and historic resources under s6(b) of the Act.

The Director General of the Department of Conservation or his nominee is entitled to attend and speak at Council meetings.

A Memorandum of Understanding (MoU) has been developed and adopted at a national level by DOC and the NZFGC to guide the working relationship of the two organisations and an MoU is being developed between DOC and the Otago Fish and Game Council.

### **3.12 Relationship with the Otago Regional Council**

The Council's relationship with the Otago Regional Council (ORC) is multi-faceted. The Otago Fish and Game Council is a statutory agency, landowner, ratepayer, and often an affected party on resource consents and planning processes under the Resource Management Act 1991. The ORC have significant influence over sports fish and gamebird habitat through their river management functions, the establishment of regional policies and plans for water resources, and their decision-making role on resource consent applications. ORC functions and activities are of critical importance to the Council and so engagement with them is frequent and at all levels.

Freshwater ecosystems and fish and game resources only really have 'security of tenure' through RMA legislation, policy and plans. The Otago Fish and Game Council, manages sports fish and gamebird species, whilst the Otago Regional Council (for the most part) is the primary manager and regulator of their habitat.

### **3.13 Relationship with territorial local authorities**

There are five territorial local authorities (TLAs) in the Otago Fish and Game Region. These are:

- The Dunedin City Council
- The Waitaki District Council (part of District)
- The Central Otago District Council
- The Clutha District Council
- The Queenstown Lakes District Council.

Council's primary relationship with the TLAs is through official processes under the Resource Management Act 1991 and the Local Government Acts 1974 and 2002.

### **3.14 Relationship with the New Zealand Walking Access Commission**

The relationship between the Otago Fish and Game Council and the New Zealand Walking Access Commission and its field advisors is important as both organisations have a statutory responsibility for maintaining and improving access for outdoor recreation.



## 4 Resource Summary

The sports fish and game bird resources of Otago provide a spectrum of recreational opportunity for anglers and hunters from within the region, from elsewhere in New Zealand and from overseas. Sports fisheries and game bird populations represent a significant natural, self-sustaining resource of benefit to the regional community both in providing recreational amenity and from the economic activity arising from angling and hunting.

### 4.1 Otago Fish and Game Region

The Otago Fish and Game Region is some 32,000 square kilometres in area. It extends from Shag Point, on the east coast of the South Island, south to The Brothers Point in the Catlins area. The region runs inland to include the whole of both the Taieri and Clutha River catchments as well as a number of smaller coastal river catchments such as the Catlins, Tokomariro, Waikouaiti and Shag (Appendix 2.)

The Southern Lakes area is mountainous and dominated by three large glacial lakes: Wakatipu, Wanaka and Hawea. Their tributary rivers, draining relatively unmodified mountain catchments, support important backcountry fisheries.

Central Otago is both rugged and relatively arid. Many rivers in the area are adversely affected by abstraction for irrigation due to the historical deemed permit system of allocation and there are numerous reservoirs constructed for both irrigation storage and hydro electricity generation. As the original permitting system of mining rights or “deemed permits” for abstraction from these rivers is set to expire in 2021, most users in these Central Otago catchments will require resource consents if they are to continue to irrigate. The process for obtaining resource consents thus offers the best opportunity in over one hundred years to improve the instream environment of these rivers through better allocation. Water storage at times of high flow also offers an opportunity to reduce the pressure on rivers during times of low flow, however the natural character of rivers is heavily influenced by high flow events and it is most sustainable to only allocate a portion of flood or fresh flows for irrigation.

Coastal Otago is relatively wet and is dominated by the lower reaches of major rivers (the Clutha and the Taieri) and large lowland wetlands such as Lakes Waihola, Waipori and Tuakitoto and estuaries such as Kaikorai, Waikouaiti and Catlins. This part of the region supports the main habitat for mallard ducks.

South and West Otago are dominated by the catchments of the Pomahaka and Waipahi rivers, and their tributaries. These have traditionally been high valued for their brown trout fishery, with the Pomahaka River in recent times becoming known for its salmon run. Whilst the lowland country in these areas is intensively farmed, the hill country is either extensively farmed or in exotic forestry. Upland wetlands are a major feature of the Waipahi and Catlins catchments in particular. The wet soils and mole and tile drains that predominate in this part of Otago are problematic for nutrient leaching into rivers.

Many lowland rivers in Otago have suffered a marked deterioration in water quality resulting primarily from the effects of more intensive use of agricultural land, and as a result, the sports fisheries in these catchments are in decline. The primary contaminants are sediment, E-coli, phosphorus and nitrogen. Particular rivers of concern include the Shag, Taieri, Tokomairiro, Lower Clutha valley tributaries, the Waiwera, the Pomahaka catchment below Glenken, the Catlins River,

and the Manuherikia. Steps that should be taken to remedy this ongoing problem include the fencing off of waterways from intensive farmland, meeting on property nitrogen load limits and nutrient concentration limits as specified in the Otago Regional Water Plan, as well as the sensible design of agricultural systems based on the carrying capacity of the land and the catchment's receiving environment.

There are many opportunities available for profitable farming systems that reduce leaching, but these require sensible design and in some cases, capital investment. Scientific understanding of the issue will advance as well. The significance of the problem of deteriorating water quality is that good work in reducing leaching can be undone by others, which requires that system improvements must occur across all properties and in all catchments.

## **4.2 Sports Fish Populations**

Sports fisheries in Otago are based on brown and rainbow trout, chinook salmon, brook char and perch.

### *Brown Trout (Salmo trutta)*

Brown trout are the most widely distributed sports fish species in Otago, occurring in most rivers, streams and lakes. They were first introduced in 1864 and rapidly established wild self sustaining populations through a vigorous programme of hatchery liberations. They are an important component in the mixed species river and lake fisheries in Central Otago and Southern Lakes.

As well as river and lake resident brown trout there are migratory or sea-run populations in coastal rivers, notably the Shag, Waikouaiti, Leith, Taieri, Clutha and Pomahaka. Sea-run trout move from the ocean into rivers and move upstream to spawn. The eggs, buried in riverbed gravels, develop and hatch and the juvenile trout migrate downstream to take up residence in the sea where they grow to maturity. There is a need to further understand the behaviour and lifecycle of sea-run trout and to look to how the resource could be enhanced. Internationally, sea-run fisheries are sought after and are of substantial value to anglers.

Brown trout populations have declined in abundance as waterways have been modified, particularly in coastal waterways, through the combined impacts of river channel modification, point source and non-point source pollution and water abstraction. Lowland lakes, such as Lake Waipori have also shown a marked deterioration in fishery quality over time, most probably caused by accelerated enrichment and infilling by silt. The Lower Taieri River has improved since most point source discharges from wastewater treatment plants have been removed but nitrogen and phosphorus discharges from agricultural land remain an issue.

Fisheries in the mid Clutha have been adversely impacted by fluctuations in flow due to the operation of the Roxburgh hydroelectric dam although the extent of fluctuating flows has been moderated with the renewal of the resource consents to operate the hydroelectric scheme. The Lower Clutha fishery and river remains in good health. In the Maniototo reach of the upper Taieri the trophy trout fishery has diminished as a consequence of river channel modification.

Irrigation and water storage projects support valued brown trout fisheries which have established in Fraser, Poolburn, Manorburn, Falls and Loganburn reservoirs and in Lakes Dunstan, Mahinerangi and Onslow.

### *Rainbow trout (Oncorhynchus mykiss)*

Rainbow trout have a more restricted distribution than brown trout with fisheries primarily centred on Lakes Wakatipu, Wanaka, Hawea and the recently constructed Lake Dunstan and their tributary rivers and in Falls Dam reservoir. There are discrete populations in Manorburn reservoir and a declining population in Lake Mahinerangi. They also occur in Tomahawk Lagoon, Dunedin City reservoirs and smaller reservoirs in the Maniototo and Manuherikia areas as a result of hatchery restocking.

The premier rainbow trout fisheries in Otago are the lake tributaries such as the Hunter, Greenstone, Caples, Lochy, and Young Rivers and Dingle Burn. These backcountry fisheries require a backcountry licence endorsement on a fishing license, and the Greenstone also has a controlled fishery operating in January and February of each year, to ensure that fishery quality is maintained and the high demand for its angling opportunities is allocated fairly amongst anglers.

### *Chinook Salmon (Oncorhynchus tshawytscha)*

Chinook salmon were successfully introduced into Otago shortly after the turn of the century and established a significant wild run in the Clutha catchment with mature adults making their way upstream from the sea to major lake tributaries such as the Hunter and Matukituki Rivers to spawn. The historic annual run was estimated at between 20-30,000 returning fish by Jellyman (1989). One estimate of the peak run is as high as 50,000 (James and Dungey 2000)

The completion of the Roxburgh Hydro Dam in 1956 effectively stopped upstream salmon migration and the run rapidly diminished to a small percentage of its former size. Fish ladders were considered by the New Zealand Electricity Department at the time of planning for the dam, but were ruled out due to cost and practicality. The 1951-1952 report of the Otago Acclimatisation Society reports "some dams are so high that no scheme is possible, and the cost would cost about £50,000 per dam for a possible solution: and, pretty bluntly, that no Government would spent such an amount of money"<sup>1</sup>

However, as a result of Contact Energy's new resource consents to operate their hydroelectric generation assets on the Clutha River, the company is required to undertake a programme of fishery impact mitigation in the Lower Clutha River (defined as the river below the Roxburgh Dam). This includes the objective of restoring a run of 5000 returning adult salmon to the lower river.

Salmon are caught over the full length of the Lower Clutha River from Roxburgh dam to the sea and in some tributaries. The residual run of salmon upriver from the sea has been recently estimated to be less than 500 fish per annum, many of which are caught by anglers immediately below the dam wall. Some salmon spawn in the river downstream of the dam but the significance of this spawning to the maintenance of the run is uncertain because of the damaging impacts of fluctuating flows from the power station and discharges of silt from the Roxburgh Dam reservoir.

Land-locked populations of salmon occur in Lakes Wanaka, Hawea and Wakatipu where they form an important component of the anglers catch. Although the size is relatively small these fish are readily caught. They spawn and rear in tributary streams such as Diamond Creek at the head of Lake Wakatipu but their spawning areas are not well defined.

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<sup>1</sup> Annual Report of the Otago Acclimatisation Society, 1951-1952, pg 19.

There is an annual seaward migration of salmon from these three lakes, particularly Lake Hawea. These fish move into the Clutha River and downstream through Lakes Dunstan and Roxburgh where they provide a seasonal angling opportunity. Some manage to pass both Clyde and Roxburgh Dams on their passage to the sea and are so contribute to the returning sea run. There is a strong need to further understand the behaviour of landlocked salmon, their lifecycle, and the contribution that they make to downstream populations.

Minor runs of salmon also occur in the Leith Stream and the Taieri River. Upstream migration of salmon and trout in the Leith is restricted by channelised reaches and concrete flumes above the University, but recent works have alleviated problems in most places.

There is an historical run of salmon in the Taieri dating back many years. This run was been the subject of an NZ Salmon Anglers Association enhancement project in the late 1990s . The Council contributed to the project with financial grants, technical advice and field support.

Commercial ocean ranching of salmon was undertaken at Careys Creek north of Dunedin, at Kaitangata, and at Newhaven, near Owaka during the 1980's and early 1990's. While none of these operations proved commercially viable, all three provided additional salmon angling opportunities through salmon runs enhanced by smolt releases

The NZ Salmon Anglers Association currently operates a put and take salmon fishery in Otago Harbour but this is independent of the Council's management activities because the harbour lies outside the Otago Fish and Game Region. The Council has permitted smolt releases into Leith Stream as part of the NZSAA harbour salmon fishery enhancement programme.

#### *Brook Char (Salvelinus fontinalis)*

Brook char were introduced into Otago in the late 19th and early 20th century. Wild populations have established themselves in headwater tributary streams, particularly the Manuherikia and Nevis rivers but they offer little angling opportunity because of their small size. Their restricted distribution is due to competition with brown trout.

One discrete fishable population occurs in Munro's Dam near Lake Mahinerangi, adding to the diversity of angling within the region. The species offers opportunities for put-and-take fisheries where there is no potential conflict with native species.

### *Perch (Perca fluviatilis)*

Perch commonly occur in lowland coastal waters such as Lakes Waipori, Waihola, Tuakitoto, and the Taieri and Clutha Rivers. Notable populations are found also in Lake Hayes and Lake Mahinerangi. Perch are underrated as a sports fish but have an enthusiastic following amongst some anglers. Little is known about perch population trends, and work may need to be undertaken to better understand population dynamics.

## **4.3 Game Bird Populations**

The game bird resource in Otago is comprised of five species of waterfowl, one rail, and three upland game species. All the upland game species and three waterfowl species have been introduced. Upland game species are essentially confined to the drier and semi arid scrub areas of Central Otago and to the east of the Southern Lakes area. This includes areas around Ettrick, Roxburgh, Alexandra, Clyde, Cromwell, Queenstown, St Bathans and Wanaka, Naseby and Patearoa. The best habitat is in the Alexandra, Cromwell and Tarras areas.

### *Mallard (Anas platyrhynchos)*

Mallards were first introduced in Otago in 1869 from England and were widely liberated well into the 1900s. The species slowly established and was put on the game licence in 1919. In the 1940s mallards of North American origin were also liberated in Otago. Over the next 20 years mallard abundance increased and they are now by far the most common waterfowl species.

Mallards have hybridised widely with grey duck so much so that the mallard/grey duck population is best described as a mallard-grey hybrid complex (sometimes referred to as a 'greylard').

Mallards are especially common in agricultural areas with large wetlands, particularly along the coast. They inhabit rivers, natural wetlands, farm ponds, ditches and reservoirs. The species is only occasionally seen in remote hill country areas.

Populations regularly fluctuate dependant on the success of annual reproduction. A major population regulator is duckling survival. This tends to be strongly influenced by the abundance and quality of habitat for females and brood rearing habitat which has been shown to be linked to winter and spring rainfall. Mallards comprise the majority (at about 75% of the waterfowl harvested).

### *Black Swan (Cygnus atratus)*

Black swan were introduced into Otago in the 1860s and were liberated at several locations in the district. The species established well and hunting commenced in 1932. There is some evidence that black swan also reached New Zealand from Australia by themselves in the 1860s (Williams,1981).

Birds from Otago and Southland may be a single population unit with annual movements between regions for moulting and breeding. The Otago/Southland population is relatively static but has declined slightly since 2000 to around 5000. Coastal wetlands and estuaries are the major habitats as well as the upper Taieri Wetlands. There is also a population of black swans on Lake Dunstan. The annual harvest is about 1% of the total waterfowl harvest.

### *Grey Duck (Anas s. superciliosa)*

Grey ducks in Otago have been steadily declining throughout the region due to habitat loss and hybridisation with mallards. Recent research increasingly supports the view that mallards and greys are part of a common hybrid population. The annual harvest reported by hunters is less than 2% of the total annual waterfowl harvest. Grey duck are defined as native game birds in the Ngai Tahu Claims Settlement Act 1998.

### *Paradise Shelduck (Tadorna variegata)*

Paradise shelduck are an endemic species that were common prior to European settlement but have also adapted well to an agricultural environment. Farm development has provided improved feeding opportunities with new pasture and increased brood rearing areas with construction of stock water ponds. Hunter harvest is also increasing with annual harvest estimated at about 20% of the total annual waterfowl harvest. Paradise shelduck are defined as native game birds in the Ngai Tahu Claims Settlement Act 1998.

Otago Fish and Game conduct annual paradise shelduck surveys to ascertain numbers and maintain knowledge of trends in their population. The population has ranged between 15,000 and 21,000 over the last 15 years.

### *Australasian Shoveler (Anas rhynchotis)*

This native spoonbilled species is common in fertile lowland wetlands however numbers may have declined from historical times due to wetland drainage. The annual harvest rate is variable with harvest representing between 2.0% and 5.0% of the total annual waterfowl harvest. Shoveler are defined as native game birds in the Ngai Tahu Claims Settlement Act 1998.

### *Pukeko (Porphyrio melanotis)*

Pukeko are a rail species which were once numerous in coastal areas and in some inland locations with wetland habitat. Their numbers are thought to have declined due to land development. Today Pukeko are still present through most of the coastal part of the region and in South and West Otago in lowland swamps and wetland areas and rough agricultural land that has suitable cover. The Otago hunting season for pukeko is presently closed because of concern about low numbers but the population has remained relatively low despite a lack of harvest. Pukeko are defined as native game birds in the Ngai Tahu Claims Settlement Act 1998

### *California quail (Lophortyx californicus)*

California quail were first introduced to Otago in 1868 and there were numerous releases throughout the region over the next few decades until the early 1940s. They peaked in abundance in Central Otago during the 1930s and 40s. Since that time numbers have declined. Today the species is still common throughout Central Otago and in the Strath Taieri and Shag Valleys.

The annual harvest of California quail varies widely depending on breeding success but is commonly about 1% of game harvested.

### *Chukar (Alectoris chukar)*

Chukar partridge were first released in Central Otago in 1920 and the species spread widely throughout the Central Otago and Lakes districts hill country where they were liberated. The population peaked in the 1940s and began to decline noticeably after that. This is perceived to be associated with the commencement of widespread aerial rabbit poisoning, oversowing and topdressing in their high country habitat. Chukar are now scarce with only small coveys remaining at higher altitude. The reported annual harvest of chukar has been negligible for a number of years, but it is expected that a small unreported harvest still occurs.

### *Pheasant (Phasianus colchicus)*

The first pheasants were liberated in Otago in 1865. Liberations continued on a small but widespread scale until the mid 1940s. The birds initially established but soon declined and in spite of continued attempts wild pheasant populations did not establish successfully. In 1947 a change in emphasis saw large numbers of pheasants reared and released specifically for the gun. While popular, the releases ceased in the mid 1970s as the activity was not considered cost-effective. Today there are still a few residual wild pheasants in Otago but no hunting of any significance. Some landholders rear and release pheasants as a hobby activity and several commercial game bird hunting preserves have operated on private land in Otago using artificially reared pheasants released for the gun. At present only two preserves are operational.

### *Other Species of Interest to Hunters*

Whilst the Canada goose (*Branta canadensis*) is no longer listed as a gamebird on Schedule 1 of the Wildlife Act 1953, it is still valued as a game bird by many hunters and recreational hunting can assist in population control.

Grey teal (*Anas gracilis*) are presently listed as absolutely protected wildlife but they are common in Otago and there is interest in the prospect of re-designating them as 'game' on Schedule 1 of the Wildlife Act 1953.

## **4.4 Resource Use**

At present Otago issues approximately 20,000 fishing licences and 4500 game licences annually. Trends in fishing licence sales for Otago show the following:

- (a) An increase in license sales
- (b) Rapid population growth in the Queenstown Lakes District
- (c) An increase in tourist and visitor fishing in the Queenstown Lakes District

Otago's population is currently 193,803 people, of whom 75% live in Dunedin and Mosgiel.

Angler effort has been estimated from the 2007 national angler survey (Unwin and Brown 2007). A new survey will be conducted in the 2014-2015 season. Total annual angler effort has been determined at 224,942 angler visits per annum within Otago. This shows a continued increase from 1994 when the National Angler Survey began, with 182,869 angler days counted. The results show angler use is concentrated on the major lakes (Wakatipu, Wanaka, Hawea and Dunstan), Central Otago reservoirs and some reaches of major rivers such as the Taieri and the Clutha. The stocked Dunedin reservoir fisheries such as the Southern Reservoir are also increasing in use. Lowland rain-

fed rivers, such as the Shag, Waikouaiti, Tokomariro, Lower Taieri, Pomahaka, and Waipahi have all registered a decline in use, most likely due to declining water and habitat quality.

The trends in angler use also show increasing pressure on backcountry fisheries (including Greenstone, Hunter, Caples, Lochy, Nevis, , Hunter, Upper Manuherikia, Young and Wilkin Rivers, Dingle Burn and Dunstan Creek) to the extent that the sustainability of the recreational opportunity afforded by these backcountry waters as remote backcountry or 'wilderness' fisheries remains a significant management consideration.

Seasonal movement of anglers from centres of population both within and outside Otago to the Lakes/Central Otago area results in high levels of use over peak holiday periods. The deterioration in the habitat quality of coastal waters close to Dunedin, Mosgiel and Balclutha appears to have resulted in declines in fishery values and use.

As a response to the angling interest within urban areas, put-and-take fisheries have been established in close proximity to population centres, with the most recent fishery being established at Lake Tewa near Queenstown. These waters are restocked on an annual basis with hatchery raised fish as they have little or no natural spawning and recruitment.

It should be stated that all user groups put pressure on a fishery – both recreational and guided anglers.

Game license sales have shown a steady increase over the past 10 years from 3514 full season licenses sold in 2003 to 4636 licenses sold in all categories in 2013.

Waterfowl hunting effort has been estimated through the annual game harvest survey at approximately 17,000 hunter visits per annum. Survey methods do not presently allow an assessment of hunting pressure by habitat area but much of the region's waterfowl hunting occurs in coastal Otago on large wetlands such as Lakes Waihola, Waipori and Tuakitoto and the lower reaches of major rivers. There is considerable hunting pressure on farm ponds over opening weekend throughout the region. Upland game hunting has a small but enthusiastic following in Central Otago.

#### **4.5 Sports Fish and Game Resources in Otago**

Sports fish and game resources is the overall term used to describe the combination of populations of sports fish and game bird species and the habitats that they live in. The sports fish and game bird habitats of Otago are listed in Appendix 4. Assessments of the significance of fish and game resources need to cover habitat values, fish and game population characteristics, and fishing and hunting amenity and attributes (usually managed within a recreational opportunity spectrum). Significance may change over time in light of things like increasing user participation, changes in the distribution of Otago's human population, changes in attitudes towards angling, hunting, and wild harvest, and changes in recreational settings or fish/game habitat values. Habitat values and settings may improve or deteriorate due to external impacts from resource use activities, such as the intensification of agriculture, hydroelectric development and adjacent subdivision.

The following components have been incorporated into this significance assessment:

- Existing published reports or articles.
- Recognition of the fishery or game bird resource in law (such as water conservation orders), regional plans, or other statutory documents



- Angler use, as reported in the 7-yearly national angler survey, conducted by NIWA on behalf of the New Zealand Fish and Game Council.
- The recreational opportunity spectrum for the fishery or game bird resource
- Surveyed angler perceptions of the attributes of the fishery, such as the 1979 and 2013 angler attribute surveys.
- Geographical location.
- Underlying land status and recreational opportunity setting of the resource.

Appendix 5 contains further detail about the methodology used to assess significance.

#### 4.6 Angling and Hunting Recreational Opportunity Spectrum for Otago

To assist planning and management a recreational opportunity spectrum (ROS) has been developed for angling and hunting in Otago. This draws on ROS theory outlined in the Otago Conservation Management Strategy (2003) and recreation planning literature (e.g. Clark & Stankey, 1982, Taylor, P.C. DOC 1993, DOC 2003). The ROS recognises the diversity of recreational angling and hunting opportunities within the region and classifies them within a spectrum based on key characteristics, primarily recreational settings:

Key Characteristics:

a) **Settings** - the combination of social physical, biological and managerial conditions that give value to a place. Six setting attributes have been identified namely:

1. access into and within the area
2. other non-recreational resource uses and their compatibility
3. on-site management
4. social interaction (user density);
5. level of regimentation (regulations)
6. acceptable level of visitor impacts.

b) **Activities** – the specific things people do: fly fish, hunt upland game, troll from a boat etc. It is important to identify potential users, their expectations and the style of activity in which they participate.

c) **Experiences** - the combination of activities (chosen by users) and the settings (managed as far as possible) result in experiences including challenge, risk, solitude, and companionship.

A recreational opportunity is defined as... ‘a chance for a person to participate in a specific recreational activity in a specific setting in order to realise a predictable recreational experience’.

The Council’s long term aim is to maintain (or enhance) the range, quality and extent of angling and hunting opportunity in Otago to meet the preferences of individual users and provide the widest achievement of desired experiences. To achieve this aim the Council requires in some cases a better understanding of recreational user preferences and needs to actively manage settings for user experiences.

The following represents an opportunity spectrum based on five broad categories: Urban, Rural, Natural, Backcountry and Remote.

### Urban

Setting is within or adjacent to urban area

Duration of activity is relatively short

Access is easy by road and travel is short

User encounter rates are relatively high

Water is man-made or highly modified

Fishery may be stocked

Experience is characterised by open space but within a built or modified environment.

### Rural

Setting is rural and modified by farming activity

Duration of activity may be short or long

Access is relatively easy by road and duration of activity is commonly up to a day

User levels can be high and encounter rates are moderate

Fishable water area is extensive

Hunting opportunity for waterfowl is extensive.

Experience is characterised by feelings of being away from urban areas

Experience is associated with companionship or family recreation activities, such as swimming.

A variety of fishing methods are employed

Catch rates and size of fish are average.

### Natural

Setting is not greatly modified and unmodified remnants are common

Duration of activity is usually longer and commonly over 4 hours

Access is easy by road, track or boat and travel distance is relatively long

Location is usually distant from centres of population

Use is commonly associated with camping, swimming, and the use of huts or holiday houses

User encounter rates are moderate

Water is little modified and catch rates/size of fish are average or better

Fishable water area is extensive

Game-bird hunting opportunity is less extensive but more diverse (including upland game )

Experience is characterised by scenic beauty and is commonly associated with family activities such as boating, picnicking, and walking.

### Backcountry

Setting is largely unmodified natural landscape and human intrusion is limited

Duration of activity is usually longer and commonly over 4 hours

Access is by gravel road, walking track, boat or aircraft and travel distance is relatively long

Location is usually distant from centres of population

Use is commonly associated with camping, swimming, and the use of huts or holiday houses

User encounter rates are low

Water is little modified and catch rates/size of fish are average or better and can include trophy trout

Fishable water area is limited

Game-bird hunting opportunity is very limited

Experience is characterised by scenic beauty and feelings of solitude and is commonly associated with activities such as tramping and camping

Access methods can impact on the experience of others.

### Remote

Setting is natural landscape with very little human intrusion

Duration of activity is usually long and involves more than a day

Access is by foot, aircraft or jet boat and travel distance is long

Location is remote from centres of population

Use is commonly associated with camping, tramping and hunting

User encounter rates are low

Water is clear and size of fish is larger than average

Fishable water area is limited and pressure sensitive

Experience is characterised by scenic beauty and feelings of peace and solitude

Access methods can impact on the experience of others.

## **4.7 Significance Grading**

The following criteria have been considered in determining the significance of fish and game habitats, fisheries and hunting areas within Otago as outlined in Sections 5.6 and 5.7.

The significance of a fishery or game resource is not the same as the quality or value of that resource. For example a locally significant fishery can be high, medium or low quality or value depending on its condition, character or specific fishery characteristics or attributes.

A habitat, fishery or hunting population/area needs to meet one or more of the criteria to be graded as nationally regionally or locally significant.

### **4.7.1 Nationally significant**

- Habitat, fishery or hunting area is recognised as outstanding in a Water Conservation Order; or of high significance in a decision from a public process or in a published technical report or statutory plan.
- Backcountry fishery in an area designated as an outstanding natural landscape in a district plan or within public conservation land and recognised as outstanding in national terms.
- Fishery sustaining 5,000 or more angler visits/year
- Hunting area sustaining more than 500 hunter visits per year
- Habitat, fishery or hunting area with more than one exceptional attributes as determined by formal angler or hunter surveys.
- Wetland habitat of 400 hectares in area or more.
- High level of use by international anglers
- High level of use by resident anglers from outside Otago
- Fishery or hunting area has significant attributes identified by survey or community consultation.
- Habitat that provides spawning, breeding, rearing areas for a nationally significant fishery or game habitat.
- Habitat that provides a migratory pathway or corridor for a nationally significant fishery or game habitat.

### **4.7.2 Regionally significant**

- Habitat, fishery or hunting area is recognised as regionally important in a decision from a public process or in a published technical report or statutory plan.

- Backcountry fishery in an area designated as an outstanding natural landscape in a district plan or within public conservation land'
- Fishery sustaining between 2000-5000 angler visits per year
- Hunting area sustaining between 150 to 500 hunter visits per year
- Habitat, fishery or hunting area with at least one exceptional attribute as determined by formal angler or hunter surveys.
- Wetland habitat over 40 to 400 hectares in area
- Noticeable level of use by international anglers
- Noticeable level of use by resident anglers from outside Otago
- Degraded habitat with potential for restoration to meet one or more of the above criteria
- Fishery or hunting area has significant attributes identified by survey or community consultation.
- Habitats that provide spawning, breeding, rearing areas for a regionally significant fishery or game habitat
- Habitat that provides a migratory pathway or corridor for a regionally significant fishery or game habitat.

#### **4.7.3 Locally significant**

- Habitat, fishery or hunting area is recognised in surveys including NIWA National Anglers' Survey, in a decision from a public process or in a published technical report or statutory plan
- Fishery sustaining up to 2000 angler visits/year
- Hunting area sustaining up to 150 hunter visits per year
- Habitat fishery or hunting area that is close to a centre of population (within 45 minutes drive)
- Degraded habitat with potential for restoration to meet one or more of the above criteria
- Fishery or hunting area has significant attributes identified by survey or community consultation.
- Habitats that provide spawning, breeding, rearing areas for a locally significant fishery or game habitat
- Habitat that provides a migratory pathway or corridor for a locally significant fishery or game habitat.

#### **4.7.4 Review of significance**

Habitat significance may be reviewed or amended in the light of new information and any changes that results will be incorporated into the plan by way of section 17M (3) of the Conservation Act 1987.

## **PART II FISH AND GAME MANAGEMENT ISSUES AND POLICY RESPONSES**

Part II of the plan is divided into sections based on the functional areas currently used for Council annual planning and reporting. It details the issues identified through the plan development process and the policy responses to them.

'Outcomes' describe the future aim or goal, in a way that allows one to envisage future possibilities, both positive and negative. These outcomes are standard within second generation conservation planning documents written under the Conservation Act 1987 and the Conservation General Policy 2005.

'Issues' identified under each section describe the current situations which require active management - the "Where are we?" of the planning process.

'Objectives' give weight to the outcomes, describing more succinctly "Where we want to go" in terms of the future or the desired result.

'Policies' have been developed which describe in more specific terms the course of action intended to achieve the desired result or "How we are going to get there". Milestones for all functional areas are then specified jointly at the end of the plan.

The plan will be implemented progressively by assigning staff resources and funds to specific projects within each annual plan. A timetable for implementation of key action is included in section 12.

### **5 Species Management**

In almost all cases sports fish and game species within the region are based on wild self-sustaining populations.

The principle underlying harvest management is that a wild population will produce each year a surplus above that required to replace natural mortality. That surplus can be harvested on a sustainable basis where all other factors, such as water quality and quantity, are more or less stable. The difficulty lies in identifying the threshold between sustainable harvest and unsustainable harvest given both the elasticity and dynamics of any given population, and then reflecting this in angling and hunting regulations, given the difficulty in obtaining information about population trends. Regulations need to take a precautionary approach to avoid over harvest.

## 5.1 Outcome

Throughout Otago publicly owned and managed fish and game resources are thriving within natural habitats and areas. Wild fish and game resources maintain a population which produces sufficient numbers for a self-sustaining annual harvest in the long term. Brown and rainbow trout continue to provide the mainstay of fishing opportunity in Otago, but the salmon run on the Clutha and Pomahaka Rivers is now increasing towards 5000 returning adult fish due to Contact Energy's Lower Clutha River mitigation programme. Put and take fisheries continue to be stocked to the benefit of novice and urban anglers. Wild fish and game species are valued by the community for the recreational opportunity that they provide, for the potential to harvest them for food, and as part of Otago's natural heritage.

## 5.2 Issues

- 5.2.1 There is a statutory requirement to manage sports fish and game to ensure species and population sustainability. There is an ongoing need for information on sports fish and game populations dynamics and factors affecting their abundance, including harvest, as well as a precautionary approach to their management. Declines in water quality and quantity may also lead to declines in fish habitat value and fishery productivity. As such, there is a need to demonstrate a cautious management approach in light of any perceived decline in fisheries.
- 5.2.2 Sports fish and game management activities may impact on other resources or resource users and these external effects need to be carefully assessed. For example the extension of the range of sports fish into areas where unmodified populations of native fish occur may put native fish conservation values at risk. There are also opportunities for co-operation with other freshwater fisheries agencies over management initiatives. Also there are concerns amongst landholders that game birds can impact on crops and pasture in some circumstances.
- 5.2.3 There is a demand amongst anglers and hunters for a diverse range of recreational opportunities. There is also an interest in the extension of sports fish or game status to species currently occurring in Otago which have a high reproductive capacity (e.g. grey teal). Anglers are interested in the enhancement of existing seasonal salmon runs in Otago, particularly in the Lower Clutha and Taieri Rivers and in the Water of Leith.
- 5.2.4 There is increasing interest in commercial activities based on sports fish and game resources through the provision of services to anglers and hunters. For example there is continuing interest in angling and hunting guiding and in the establishment of hunting preserves. The construction of backcountry lodges and the provision of access services such as aircraft transportation have the potential to affect the quality of angling and hunting experience and may lead to capacity pressures or the partial capture of sports fishing and game hunting opportunity through restrictions on access. The exclusive capture of publicly owned and managed fish and game resources is an issue that Otago Fish and Game takes seriously and will strongly oppose, including using legal means if necessary.
- 5.2.5 There is a risk of cementing in place fishing competitions that have a commercial focus or which are unsustainable in terms of their harvest rate.
- 5.2.6 Otago Fish and Game continue to maintain a relationship with landholders over their management of Canada geese because they continue to offer hunting opportunities for

licenceholding waterfowl hunters despite the species no longer being defined as game under the Wildlife Act.

- 5.2.7 There are continuing concerns amongst hunters about the non-target primary and secondary impacts of 1080 pest control operations on upland game generally and a desire to see poisoning practices adjusted to minimise potential effects on bird life.
- 5.2.8 The introduction of new organisms into waters where they do not presently exist has the potential to adversely impact on sports fisheries and their habitats. Two examples are the accidental introduction of didymo has had significant adverse effects in some locations in Otago and the past proposed introduction of grass carp into Lake Dunstan for weed control.
- 5.2.9 There is a continued need for Fish and Game to adopt evidence based decision making for actions involving sports fish and gamebird resources. This includes sustaining and undertaking a systematic approach to scientific investigation of fisheries and habitats and the creation of mechanisms and processes to share and disseminate these findings.

### **5.3 Objectives**

#### Species management

- 5.3.1 To manage sports fisheries and game resources having regard to sustainability to meet the interests and recreational needs of present and future generations of anglers and hunters.
- 5.3.2 To primarily focus sports fisheries management on wild, self sustaining fish populations.
- 5.3.3 To optimise angling and hunting opportunity and maintain or improve the recreational fishing opportunity spectrum available in Otago.
- 5.3.4 To manage sports fisheries and game populations in Otago within their existing ranges except where a risk assessment shows there is no significant effect from extending the distribution on indigenous biodiversity and Kāi Tahu values. Consultation with interested parties, including Te Rūnanga o Ngāi Tahu, Kāi Tahu ki Otago and DOC, will be undertaken as part of the process for approval under the Freshwater Fisheries Regulations 1983 and similar laws.
- 5.3.5 To manage liberations of sports fish so that new sports fisheries will not be created where there are likely to be significant adverse effects on rare or threatened indigenous fish species, including non-migratory galaxiid.
- 5.3.6 To have regard to the effects of fish and game management activities on other natural resources and resource users.
- 5.3.7 To cooperate with other freshwater fisheries agencies over freshwater fisheries conservation and habitat protection.
- 5.3.8 To protect Otago's sports fisheries from the adverse effects of releases of other exotic freshwater fish or other unwanted organisms

5.3.9 To maximise salmon angling opportunity in Otago by supporting efforts to enhance the wild self-sustaining salmon fishery in the Taieri River and by seeking run restoration for in the Clutha in mitigation of adverse impacts on natural runs resulting from hydro development.

#### Commercial use

5.3.10 To manage commercial activity relating to sports fish and game ways that avoid or minimise adverse effects on angling and hunting and ensures a reasonable contribution to fish and game management costs.

5.3.11 To define clearly Council's jurisdiction over sports fish and game resources where commercial interests encroach on the interests of anglers and hunters.

#### Game bird conflict

5.3.12 To minimise conflict between game birds and agricultural production.

5.3.13 To control game bird populations primarily through hunter harvest during gazetted game seasons.

5.3.14 To maintain a residual liaison between farmers and Otago Fish and Game over Canada goose issues.

#### Hatchery and restocking

5.3.15 To restock fisheries only where:

- a) the benefits are measurable and bear a reasonable relationship to costs.
- b) there is a strategic benefit in doing so.
- c) there is no significant adverse effect on other natural resources or the users of those resources.
- d) to expand the range of harvest opportunities.
- e) to direct harvest pressure to where it can be sustained and managed.



## 5.4 Policies

### Species management

5.4.1 Achieve sustainability through the following approach:

- a) Ensure that the sustainability of the resource has precedence over utilisation (i.e., utilisation will be dependent on sustainability).
- b) In the absence of reliable information or in the face of uncertain information, a precautionary approach will be adopted in managing fish populations.
- c) Management decisions will be based on the best available information.
- d) The absence of information will not be used as a reason for failing to adopt management measures.

5.4.2 Establish and maintain an inventory of sports fish and game resources in Otago including:

- a) classification of individual sports fisheries and game habitats to allow management based on significance, key characteristics and the recreational opportunity provided within a spectrum.
- b) defined spawning grounds and characteristics
- c) links to water quality and quantity information
- d) links between fish and game data and place, space, and time (i.e. a geospatial database)

5.4.3 Prioritise sports fish and game species management activities through:

- a) population trend monitoring
- b) angler and hunter harvest and opinion surveys
- c) identification of species management threats and opportunities
- d) assessments of the effectiveness of species management activities.

5.4.4 Manage game bird populations in order to provide a level of abundance and distribution acceptable to hunters while taking account of the effects of game birds on other resource users.

5.4.5 Protect the significant sports fishing characteristics of Otago's remote and backcountry fisheries.

5.4.6 Actively manage the risks of fish or game projects which extend the range of sports fish or game species within the region.

5.4.7 Prohibit sports fish liberation in waters where the creation of new sports fisheries would significantly impact on rare or threatened indigenous fish species, including non-migratory galaxiid.

- 5.4.8 Respond appropriately to reports of adverse effects arising from fish and game management projects on other natural resources or resource users. This may include discussions with landholders and/or their representatives.
- 5.4.9 Actively liaise with the Ministry of Primary Industries, the Department of Conservation and Kai Tahu Ki Otago over freshwater fisheries management issues and protection of freshwater habitats.
- 5.4.10 Liaise with anglers and angling organisations over salmon fishery monitoring and management issues.
- 5.4.11 Support the enhancement of salmon fisheries in the Leith, Taieri, Clutha and Pomahaka Rivers by supporting enhancement projects.
- 5.4.12 Maintain a current and historical database of sports fish and game species and their population trends.
- 5.4.13 Undertake research on migratory sports fish.

#### Commercial use

- 5.4.14 Monitor and/or manage commercial uses of sports fish and game birds to maintain licence holder access and sporting opportunities. Commercial uses that require monitoring include:
  - a) angling and hunting guiding
  - b) angling and hunting competitions for direct or indirect commercial gain to ensure that they meet the aims of this plan and that the harvest is consistent with the long term management ambition for the specific fishery
  - c) sports fish displays
  - d) hunting and game preservesand, where possible, to recover costs of monitoring and management.

- 5.4.15 Oppose the establishment of fish farms licenced under the Fish Farming Regulations 1983 where fish-out ponds are proposed as a primary activity.

Game bird conflict

- 5.4.16 Assist landholders to manage situations where there is conflict between game birds and agricultural production.
- 5.4.17 Liaise with landowners where necessary over Canada geese issues
- 5.4.18 Improve the skills of hunters in hunting for individual game species with potential to cause nuisance.

Hatchery and restocking

- 5.4.19 Use hatchery restocking to extend the spectrum of angling opportunity in Otago to include accessible put-and-take sports fish fisheries close to urban populations.
- 5.4.20 Investigate alternative hatchery sites and the potential raising of other species, such as brown trout, in order to maintain hatchery capacity if needed.
- 5.4.21 Oppose any releases of exotic freshwater fish which pose a risk to sports fisheries or their habitats.
- 5.4.22 Support efforts to prevent accidental transmission of unwanted aquatic organisms under the Biosecurity Act 1993 into Otago or between waters in Otago
- 5.4.23 Support hatchery releases of salmon into the Clutha to restore sea run salmon stocks in the Lower Clutha with a first preference for use of smolts reared from Clutha salmon brood stock in Clutha catchment water.

## 6 Habitat Protection & Management

The distribution and abundance of fish and game species is largely related to the quality and extent of fish and game habitats. The Otago Fish and Game Council has a broad range of responsibilities under section 26Q of the Conservation Act 1987. These include:

- To manage, maintain, and enhance the sports fish and gamebird resource
- to monitor the condition and trend of ecosystems as habitats for sports fish and game
- to maintain and improve access
- to maintain hatchery and breeding programmes, where required for stocking or restocking the sports fisheries and game habitat
- to undertake such works as may be necessary to maintain and enhance the habitat of sports fish and game (subject to appropriate approvals)
- to promote recreation based on sports fish and game
- to advocate for the interests of the Council, including its interests in habitats.

As such, the protection, maintenance and enhancement of rivers, streams, lakes and wetlands as habitats and ecosystems is vitally important in the maintenance of fish and waterfowl resources. The maintenance and enhancement of water quality, water quantity, water flow and water level regimes, and natural habitat characteristics (for example channel variability and riparian cover) are essential requirements.

The same holds true for upland game habitats, but they are a more difficult proposition in terms of habitat management because habitat components can include weed pests. In addition intensification in land-use and animal pest control activities, appears to have adverse effects on quail and chukar habitat productivity.

Community use of land and other resources for productive purposes often has adverse impacts on fish and game habitats.

Major impacts may result from:

- intensification of land use including forestry, dairying, mining and urban development
- nutrient and sediment discharges to waterways and non-point source pollution
- flood control works in rivers and streams
- wetland drainage and modification of wetland vegetation through activities such as mob stocking, water storage reservoir construction and abstraction for irrigation
- the damming of rivers and lakes
- Introduction of unwanted organisms such as didymo (*Didymosphenia geminata*) and other aquatic pests.

The Council recognises that for the greater part habitat protection must be achieved through advocacy because the control and management of water and land resources lies with private interests or other statutory agencies. Under common law, water is assumed to be owned by no person. There are many ways to approach advocacy for habitat, and some of these are outlined below:

- the RMA resource consent application process
- district and regional policy and plan development and reviews under the RMA
- development of legislation affecting resource management

- the pastoral lease tenure review process under the Crown Pastoral Lands Act 1998
- policies, plans and strategies developed under other Acts
- raising public awareness
- participating in catchment committees and other strategic groups
- alternative ways of securing sufficient water to maintain and enhance fisheries.

The protection of habitat through direct purchase is liable to remain a relatively minor Council activity, restricted to the acquisition of smaller wetland areas for development as game habitats and hunting areas.

A key strategy in the Council's advocacy activities will be the development of co-operative relationships with agencies and stakeholders with an interest in habitat, particularly the Otago Regional Council, Department of Conservation, Ngai Tahu, Arai Te Uru Eel Management Committee, landcare groups, Federated Farmers, the University of Otago, Crown Research Institutes, and other scientific conservation, recreation and community groups.

## 6.1 Outcome

Water quality ranges between good and excellent in Otago rivers, lakes and wetlands. River flows and lake or wetland water levels combine with the natural characteristics of waterways to support natural ecosystems functioning at a level that supports productive and diverse fish and game populations. Rivers are swimmable, fishable, and safe for food gathering. Otago's wetlands are improving in terms of quality, diversity and species productivity and the overall area of wetlands is expanding, underpinned by the regional focus on protection of regionally significant and other smaller wetlands, as well as an active programme of wetland creation on private land. Degraded headwater wetlands have been restored and contribute to maintenance of summer low flows in catchments downstream. Overall, rivers and wetlands are highly valued by the public for their intrinsic qualities and amenity values.

## 6.2 Issues

Issues affecting fish and game habitats are significant and complex, and with limited resources available, Otago Fish and Game needs to prioritise catchments for research and monitoring.

Fish and game habitats in Otago are currently affected by a broad range of resource and land use activities causing incremental declines in habitat quality and extent. Trends of particular concern include the loss or degradation of river and wetlands ecosystems, and accelerated enrichment of rivers and lakes with non-point source pollutants including silt.

6.2.1 Non-point source pollution and sediment is a serious issue affecting water and habitat quality. Of particular concern are the more intensive agricultural land uses, particularly unconstrained and poorly managed dairying and intensive sheep and beef operations.

6.2.2 Wetlands in Otago have been lost or degraded through accelerated eutrophication, sedimentation, drainage, damage from stock, and vegetation modification. Sedimentation primarily comes from the human or animal disturbance of soil without adequate buffers to trap the sediment between the land use activity and the waterway.

- 6.2.3 River management activities have degraded fish and game habitats in the past and may degrade or enhance habitats and associated recreational amenity in the future depending upon the management regime employed. Management of riparian areas on waterways is of major strategic importance in the protection and enhancement of fish and game habitats and recreational amenity.
- 6.2.4 Development of rivers for the generation of hydro electricity or water storage for irrigation has the potential to seriously impact on rivers, river fisheries and angling opportunity in Otago, but well-designed water storage schemes have the potential to improve water storage, reduce run of river irrigation takes, and increase downstream flows in rivers. Existing hydro-electric dams at Hawea outlet, Roxburgh, Clyde, Mahinerangi, Teviot and Paerau have ongoing effects on fish and game resources and associated recreational use. Dams and weirs block fish passage both up and down stream and flows fluctuate unnaturally downstream from dams.
- 6.2.5 These multiple stressors on waterways are exacerbated by the many and often conflicting systems for resource administration that exist, such as different types of resource consent, subsequent minimum flow provisions, and differing interpretations on existing resource consents. There is an urgent need for a holistic consideration of catchments.
- 6.2.6 The spread of didymo and other aquatic pests (such as lagarosiphon) has also had a major impact on fisheries, and for didymo no effective eradication methods exist.
- 6.2.7 Some rivers in Otago are fully or over allocated in terms of water abstraction for out of stream uses, resulting in degradation of aquatic habitats. Examples include the Shag, Manuherikia, Cardrona and Lindis Rivers and the Sowburn, Pigburn and Kyeburn. Mining privileges in Central Otago give owners secure property rights over water, however these expire in 2021. In several cases their use for irrigation has serious adverse effects on aquatic ecosystems in some river reaches and their existence constrains sustainable water resource management.
- 6.2.8 The transition from mining privileges to RMA resource consents poses significant challenges to Otago Fish and Game and Otago Regional Council for some Central Otago catchments. A strategic and hands on approach to managing water allocation in these catchments if instream values are to be satisfactorily restored.
- 6.2.9 Climate change may alter the hydrological patterns across Otago and consideration for the effects of climate change needs to be built into decision making.
- 6.2.10 Some hydro generation and irrigation reservoirs in Otago provide important angling amenity. Examples include Lake Dunstan, Lake Onslow, Falls Dam, Poolburn Dam, Manorburn Dam, and Loganburn Dam. There are active proposals to increase the height of both Falls Dam and the Loganburn Dam.
- 6.2.11 There is a demand amongst anglers and hunters, and within the community, to restore degraded fish and game habitats and to create new habitats, especially close to centres of population.
- 6.2.12 Development and management of wetland reserves is undertaken to protect, restore or enhance habitat values by maintaining or increasing habitat diversity. Management of

hunting in reserves or on other wetlands is undertaken in ways which minimise effects on habitat quality.

- 6.2.13 Weed and pest species present in Otago may not always have adverse impacts on fish and game habitats. For example *Largarosiphon* in Lake Dunstan plays an important role in lake productivity and so underpins the trout fishery.
- 6.2.14 Tenure change in the South Island high country may have adverse or beneficial effects on fish and game habitats, populations and public access and use depending upon the outcomes of pastoral lease tenure reviews.
- 6.2.15 Mining and gravel extraction adjacent to or within waterways can have serious adverse impacts on fishery values if not managed closely and under appropriate consent conditions.
- 6.2.16 Access opportunities to waterways can be lost through incremental changes, such as subdivision, the loss of accessways such as unformed legal roads, and changes in landholder values.
- 6.2.17 The restoration of lowland fisheries offers an opportunity to better balance harvest pressure across the Otago Fish and Game Region.
- 6.2.18 The Upper Clutha fishery is experiencing increasing pressure as a result of increasing population and increasing angler pressure, in part from deterioration in lowland fisheries. The health of the fishery needs to be carefully monitored and recommendations made on future management regimes.

### **6.3 Objectives**

- 6.3.1 To protect, maintain and enhance the quality and extent of fish and game habitats in Otago as a priority, with advocacy as the primary tool.
- 6.3.2 To restore or create fish and game habitat where the opportunity arises and it is practical to do so.
- 6.3.3 To actively promote targets for habitat quality and quantity, and where necessary, actively defend these targets.
- 6.3.4 To develop and implement higher level policy on the management of South Island Sea Run Salmon.

### **6.4 Policies**

- 6.4.1 Priority is to be given to achieving outcomes through RMA planning processes and focussing in the first instance on habitat areas identified as nationally or regionally significant in section 5.6 and 5.7 of this plan or those at risk from a specific threat.
- 6.4.2 Promote the protection, maintenance and enhancement of habitats through either public processes and public advocacy including:
  - a) resource consent application processes
  - b) regional and district policy and plan development
  - c) pastoral lease tenure reviews

- d) legislation and policy development under other Acts.
- e) Department of Conservation conservation planning processes
- f) Department of Conservation concession application processes

6.4.3 Maintain co-operative working relationships with the Department of Conservation, Kai Tahu ki Otago, Otago Regional Council, District Councils, the Clutha Fisheries Trust, Universities, conservation and recreation NGOs, community groups and resource user groups including Federated Farmers via liaison, formal and informal meetings, and working groups for information sharing.

6.4.4 Undertake a coordination role with other like-minded groups when engaged in similar work and where requested.

6.4.5 Develop a complete inventory of fish and game habitats within Otago based on a systematic ongoing assessment of fish and game resources and use including information on amenity value, ecosystem trend, habitat quality, population trends and desired outcome for individual habitats.

6.4.6 Promote community awareness of habitat issues and encourage support for environmental management benefiting fish and game habitats through:

- a) liaison with agencies and community groups
- b) media releases and advocacy.

6.4.7 Protect fish and game habitats, particularly wetlands, by way of:

- a) purchase of discrete habitat areas
- b) promotion of public (Crown or local body) reserve establishment
- c) securing Council management authority for public reserve areas
- d) negotiation of covenants over freehold land by negotiation to maintain or improve ecosystems and/or sports fish and gamebird resources.
- e) inclusion of protective mechanisms in the regional water plan
- f) water conservation order applications

Priority will depend on the value of the habitat concerned, present or future risks to habitat values, the practicality of protection, and opportunity for protection.

6.4.8 Press for appropriate action by agencies directly responsible where non-compliance with resource management, conservation or other laws, and plans and policies written under these laws is detected.

6.4.9 Give priority to the monitoring and management of fish habitats within Otago which have the highest levels of angler participation and so underpin licence sales and revenue generation.

6.4.10 Actively encourage projects by community groups that protect, maintain or enhance fish and game habitats.

6.4.11 Develop the potential of Council owned or managed wetlands as habitats and as hunting areas and contribute generally to improved wetland management in Otago.



- 6.4.12 Advocate and support the restoration of headwater wetlands where they have been damaged or drained in the past.
- 6.4.13 Actively encourage landholders to create or enhance habitat and to understand the many benefits from such enhancement including the benefits to downstream water quality.
- 6.4.14 When advocating the Council's interest in habitats, undertake a holistic assessment of the catchments ecosystem values and needs.
- 6.4.15 Undertake specific advocacy with landholders for the identification of wetlands and water yield areas (tussock grasslands and herbfields) and assess the possibility and mechanisms for restoration where possible due to the downstream ecosystem services that these areas provide.
- 6.4.16 Seek restoration and enhancement of salmon spawning and rearing areas and runs in the Lower Clutha catchment and the Water of Leith.
- 6.4.17 Protect fish and game habitats and amenity values of rivers, streams and lakes in Otago by way of:
- a) involvement in consent and permission processes
  - b) involvement in the development of RMA policies and plan changes.
  - c) applications for water conservation orders
  - d) involvement in collaborative community based processes.
- 6.4.18 To ensure that water quality standards and flow regimes reflect the requirements of healthy and productive sports fish and game populations and the different stages in their life cycles.
- 6.4.19 Place a priority on resolving over allocation issues in Central Otago rivers relating to deemed permits in order to restore habitats for sports fish. The potential of on-farm water storage should be considered in resolving over-allocation issues.

## 7 Angler and Hunter Participation

This functional area has two important components:

- a) participation in the recreational activities of angling and hunting, and
- b) participation in fish and game management as key stakeholders in Otago's fish and game resources.

There is a need to assess user satisfaction in both respects.

### 7.1 Outcomes

**7.1.1 Access** - Free, certain, enduring, and practical public access is available to all fish and game resources in Otago and information on this access is readily available to anglers and hunters from a variety of sources. The value of public access to waterways, wetlands, and other fish and game resources is well understood and protected by local authorities and other agencies responsible for land, water and public recreation. The value of providing access for possible future recreational needs is also understood by all agencies with responsibilities for managing public access ways. Otago Fish and Game continues to advocate for public access where needed, recognising the interests of the rural community. Formed and unformed legal roads remain as the 'gold standard' for public access and the Council places a first preference on their retention or establishment in order to meet access requirements.

**7.1.2 Participation** – The Otago community and visitors to the region have ready access to a balanced range of fishing and hunting licences through convenient sales channels utilizing new technology. Fishing and hunting opportunities enjoyed by licence holders are diverse and high quality. Anglers and hunters are well informed on fish and game management issues and actively contribute by standing as candidates or voting in Council elections or supporting promotional or advocacy initiatives.

### 7.2 Issues

7.2.1 There is a demand for clear and simple angling and hunting regulations and anglers and hunters want liberalisation of method and season restrictions. Angling and hunting methods must cater for all including the young and the elderly. Regulations must also be backed up by scientific research of the fishery or game bird population, and the precautionary principle needs to be applied where the science is not clear.

7.2.2 There is a demand for more licence category flexibility to meet the needs of specific end users as well as support for nationally inter-available licences at equitable fees<sup>2</sup>. Anglers and hunters want value for their licence money.

7.2.3 Participation levels, user density and methods of angler access are impacting on the quality of recreational experience in some circumstances such as in 'backcountry' and 'remote'

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<sup>1</sup>Inter-available licenses mean regional licenses that are available in a nationwide system. The Conservation Act 1987 only makes fishing licenses available on a regional basis.

fisheries where wilderness values are important. Problems with fisheries at this end of the recreational opportunity spectrum require active management to avoid conflicts between users over user densities or modes of access (eg aircraft or jet boats).

7.2.4 There is a demand for more detailed information on the physical access available to fish and game resources in Otago and a demand for more detailed information on how to hunt and fish.

7.2.5 Public access to fish and game resources is becoming progressively more restricted due to changing attitudes within the community resulting from:

- a) closer settlement and intensification of land use
- b) concern over health and safety requirements
- c) a hardening of attitude towards private property rights and concerns about security
- d) A liberalisation of DOC policies governing commercial concessions, particularly aircraft landings in backcountry and remote fisheries.
- e) increased awareness of commercial opportunities.

7.2.6 Secure practical public access to fish and game resources via road reserves, marginal strips and esplanade reserves is important but sometimes it is difficult to identify on the ground. Secure public access to rivers, lakes and wetlands and hunting areas is lacking in many areas of Otago. Many landholders acknowledge the security that they gain from granting access to responsible anglers and hunters who can keep landholders informed about issues on their property.

There has been a hardening of attitudes towards property rights, which has affected access to public fish and game resources.

7.2.7 Non-resident anglers and hunters are perceived to be gaining access to angling and hunting without contributing equitably to management of the resource. A non-resident fishing license, at a fee 1.3 times greater than the regular full season adult fishing license has been introduced.

7.2.8 Fishing competitions require management because:

- a) they have the potential to focus angling pressure in specific locations, leading to potential impacts on fish stocks and normal patterns of angling; and
- b) they can be commercial in nature and can generate revenue for the organisers.

Those operating fishing competitions need to explain the overall rationale for the competition in order for its sustainability and contribution to Council objectives to be assessed prior to its approval.

## **7.3 Objectives**

### Participation and behaviour

- 7.3.1 To encourage angler and hunter ethics and have anglers and hunters recognised as responsible resource users and good neighbours.
- 7.3.2 To minimise and simplify regulations controlling angling and hunting so that they do not become an impediment to participation, but not at the expense of precautionary management.
- 7.3.3 To manage fishing competitions in order to maximise benefits, minimise adverse impacts and to ensure there is an equitable contribution to fish and game management from any revenue generated.
- 7.3.4 To foster greater awareness of and participation in conservation initiatives amongst anglers and hunters.
- 7.3.5 To utilise new technology, including mobile technology to promote understanding and participation amongst fish and game license holders.
- 7.3.6 To manage potential conflicts between recreational users over modes of access and methods.

### Access and recreation

- 7.3.7 To maintain and improve secure public access to rivers, lakes and wetlands and land areas supporting fish and game resources.
- 7.3.8 To recognise the impact that access, particularly informal access arrangements, can have on landowners and their farming operations, and to negotiate access arrangements as far as possible.
- 7.3.9 To maintain and improve public access opportunities across private land as far as practicable.
- 7.3.10 To set limits on angler or hunter use of fisheries and hunting areas where pressure of use threatens or adversely affects the quality of recreational experience and to actively manage those areas for their key characteristics.
- 7.3.11 To keep anglers and hunters informed over access to fish and game resources and angling and hunting techniques.

7.3.12 To protect those elements of the public estate with importance to angling and hunting, particularly:

- a) marginal strips,
- b) esplanade reserves, esplanade strips and access strips
- c) recreation and conservation reserve land
- d) formed and unformed roads
- e) any government or local body owned land with value for angling and hunting, access, or fish and game habitat.

#### Licencing

7.3.13 To provide a range of licence categories that meet the needs of specific end users in terms of both coverage and affordability.

7.3.14 To provide licence purchase options to meet the needs of all clients.

#### Democracy

7.3.15 To facilitate angler and hunter participation in fish and game management.

## **7.4 Policies**

#### Participation and behaviour

7.4.1 Promote angler and hunter codes of conduct for fish and game resource use and access.

7.4.2 Review annually angling and hunting conditions and assess them for their relevance, clarity and simplicity.

7.4.3 Liaise with other regions over the annual review of angling and hunting conditions and to seek consistency between regions.

7.4.4 Seek outcomes in RMA plans and other statutory plans that manage conflicts between recreational users over matters including modes of access, compatibility of activities and user densities.

#### *Fishing competitions*

7.4.5 Approve fishing competitions in Otago on waters other than those supporting pressure sensitive fisheries where.

- a) the sustainability of fish stocks is not threatened and/or
- b) there is no significant impact on angling opportunity

subject to the fees set out in clause 57F of the Freshwater Fisheries Regulations 1983.

7.4.6 Apply revenue gained from competitions to<sup>3</sup>:

- a) facilities which benefit anglers,
- b) activities which promote angling and/or enhance angling opportunities,
- c) activities which promote or assist fish habitat conservation

7.4.7 Approve competitions subject to conditions and fees in accordance with policies 8.4.4 where:

- a) The competition is held in conjunction with, or as part of, a 'take-a-kid-fishing' or family fishing day.
- b) The competition is a minor angling club competition without significant prizes or entry fee.
- c) The competition is community based, aims to promote an area rather than a commercial business, and benefits sports fisheries management.
- d) the event is consistent with the Council's fisheries management philosophy, competition conditions and rental are agreed to the Council's satisfaction and the Freshwater Fisheries Regulations 1983.

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<sup>3</sup> *Refer Conservation Act 1987, Sec. 26ZK, and Freshwater Fisheries Regulations 1983, Sec.57A to 57F]*

- 7.4.8 Encourage organisers of fishing events to place less emphasis on “heaviest bag” type competitions in order to promote sustainability.

Access and Recreation

- 7.4.9 Establish where necessary controlling mechanisms for access to, and use of, fisheries within defined carrying capacities.
- 7.4.10 Manage and advocate for appropriate social carrying capacities to protect pressure sensitive remote or backcountry fisheries and to manage within those capacities to preserve high quality recreational experiences and the spectrum of fishing and hunting opportunity in Otago.
- 7.4.11 Provide accurate information to anglers and hunters on access to fish and game resources and angling and hunting techniques. Access information should be prepared in consultation with landowners and their representatives.
- 7.4.12 Participate in public processes relating to public land acquisitions and disposals including tenure reviews, reserving of marginal strips, subdivisions and road stopping or taking to provide for public access, recreation and fish and game habitats.
- 7.4.13 Contribute to a register of secure public access ways to and along rivers, lakes and wetlands and to upland hunting areas, such as that operated by the NZ Walking Access Commission.
- 7.4.14 Establish access-ways across private land to fish and game resources through negotiation with landholders, and particularly when land use is changing or intensifying. A variety of options exist for negotiation, including legal easements and access covenants, through to informal marked accessways.
- 7.4.15 Advocate to maintain the existing unformed legal road network in Otago where this provides secure access to fish and game resources and agree to road stopping only where:
- a) There is no impact on present or future public access
  - b) An alternative ‘like for like’ road access alternative is offered

- 7.4.16 Undertake awareness programmes to educate anglers and hunters about access issues.
- 7.4.17 Investigate methods of reducing angler conflict across pressure sensitive fisheries, including modern management techniques such as rotational closure.
- 7.4.18 Actively engage with territorial local authorities on policy for formed and unformed legal roads and other accessways.
- 7.4.19 Coordinate recreational and access advocacy groups where necessary.
- 7.4.20 Work with the Walking Access Commission and its regional field advisors in establishing and maintaining public access to fish and game-bird resources.

#### Licencing

- 7.4.21 Regularly review the range of licences offered and where necessary or desirable develop and promote new options.
- 7.4.22 Maintain and improve licence purchase options.
- 7.4.23 Provide supporting information for licence sales.
- 7.4.24 Support the co-ordination of licensing arrangements nationally and actively seek improvements in line with the expectations of the regional users.

#### Democracy

- 7.4.25 Encourage licenceholder participation in Council elections as voters and candidates.
- 7.4.26 Ensure Council activities and processes are open and accessible to encourage maximum angler and hunter participation.



## **8. Public Interface**

### **8.1 Outcome**

Waterways are seen by the public as the arteries of the land, with a healthy rivers or streams being a sign of healthy land use. Similarly, wetlands are valued for both their recreational hunting opportunities and for their role in filtering water from land use and maintaining wildlife biodiversity. Anglers, hunters, and the general community value introduced sports fish and gamebird species for the recreation and harvest that they provide, as well as seeing them as barometers of ecological health. The user pays, user says democratically accountable fish and game system continues to be promoted and endorsed by New Zealanders as an effective model for the management of public fish and game resources.

### **8.2 Issues**

- 8.2.1 The Council will be most effective in its advocacy for fish and game resources and angler and hunter interests where it has community support. The public needs to be kept informed and have a high level of awareness of the Council's work and the wider benefits arising from it. The Council also faces risks where the wider community does not have a good understanding of recreational harvesting and its importance in community recreation. An example is the risk arising from anti-hunting groups arguing for restrictions or prohibitions on hunting.
- 8.2.2 The effectiveness of advocacy and public awareness within Otago also depends on the collective efforts of the other 12 regional Fish and Game Councils and particularly the national advocacy efforts of the New Zealand Fish and Game Council.
- 8.2.3 The achievement of fish and game management objectives will be assisted by developing and maintaining positive working relationships with all sectors of the community.
- 8.2.4 Due to its statutory requirement to as an advocate for freshwater habitat, the Council may from time to time find itself engaged in potentially unpopular advocacy. This is likely to be most contentious when the advocacy involves the setting or recognition of limits on economic growth. Currently, the most contested issue is in the setting of limits to protect water quality and appropriate natural flows, but other areas are likely to emerge as economic activity arrives at further physical and biological limits. One area likely to become controversial is the issue of mining on public conservation land, another is the further drainage of wetlands to create pasture.
- 8.2.5 The methods by which the Council communicates with licenceholders and the public is also changing. Online tools of communication, such as websites and email, are becoming more important as the readership rate of traditional tools, such as newspapers and physical mail is dropping. The same applies with the shift to cellular phones. The Council needs to maintain both physical and electronic forms of communication, but slowly shift as demographics shift to electronic communication where possible.

- 8.2.6 Licence sales agencies and rangers play an important role in the public perceptions of the organisation as do rangers. They are often the everyday face of Fish and Game.
- 8.2.7 A functional working relationship with resource users is necessary to achieve fish and game management objectives. Important sector groups include farmers, miners, foresters, tourism interests and power companies.

### **8.3 Objectives**

- 8.3.1 To project a positive public image as a regional organisation involved in environmental and natural resource management and to be perceived as professional, accessible, responsive, friendly, fair and community based.
- 8.3.2 To ensure the public has a good understanding of the wider benefits of the Council's work, the issues facing fish and game resources and the case for recreational harvesting.
- 8.3.3 To support the national advocacy efforts of the New Zealand Fish & Game Council and the collective advocacy and public awareness efforts of other Fish and Game Councils.
- 8.3.4 To develop and maintain positive working relationships with groups within the community, especially Te Runanga O Ngai Tahu and Kai Tahu ki Otago, local bodies, resource user groups, politicians, conservation and recreation groups and government departments.

### **8.4 Policies**

- 8.4.1 Educate and inform anglers and hunters so that they can in turn inform the community about fish and game management issues.
- 8.4.2 Promote and explain the Council's role and its activities to the public through the media.
- 8.4.3 Liaise with groups within the community involved in environmental protection or resource management, especially Ngai Tahu, local bodies, resource user groups, politicians, conservation and recreation groups and government departments.
- 8.4.4 Liaise with primary industry representatives, such as Federated Farmers.
- 8.4.5 Keep opinion leaders within the community informed of fish and game issues.
- 8.4.6 Liaise closely with the New Zealand Fish and Game Council and other regional Fish and Game Councils over the co-ordination of public awareness activities and advocacy.
- 8.4.7 Work co-operatively with other community groups where there is a mutual benefit in doing so.
- 8.4.8 Advocate the Council's position on legislation, policy and/or development proposals affecting fish and game resources, their use or public access.
- 8.4.9 Promote public appreciation of sports fish and game birds as a natural resource and their recreational use by anglers and hunters.
- 8.4.10 Complete and implement the Memorandum of Understanding between the Department of Conservation and the Council.

## 9 Administration and Statutory Servicing

The Fish and Game management system is based on twelve regional Fish and Game Councils and the New Zealand Fish & Game Council and is described in section 2.1 above. Funding of all Councils is linked through a national budget system which includes the setting of levies and payment of grants to redistribute revenue between all 13 Councils.

Fish and Game is effectively a co-management system involving a delegation of management responsibility for fish and game resources from Government to elected anglers and hunters within regional communities. As such communication, openness, accountability, accessibility to the decision-making process and the fostering of participatory democracy are important elements of the system. This system, with some changes, has effectively been in operation in New Zealand for 150 years, and has proven to be a sound, well supported and cost-effective model for the management of these resources.

The Council is elected from nominated adult whole season licence holders in triennial elections. Holders of Otago adult whole season licences can enrol to vote and take part in those elections as voters or as candidates for Council.

Otago Fish and Game Council is a Public Entity. It reports annually to Parliament and the Minister of Conservation and presents its annual report to a publicly advertised annual general meeting. The Council governs fish and game management in the Otago Fish and Game Region.

### 9.1 Outcome

Fish and Game continues to prudentially manage its finances and resources, mindful of the basis on which all of its income is derived. The categories, availability and affordability of licenses are reviewed in a timely manner, designed to both ensure that the fish and game system receives adequate funding and also to ensure that anglers and hunters pay a fair price for licenses, to further encourage the growth of the sport. Council staff and rangers continue to be grounded in the community and provide positive, helpful, and professional advice to all who seek it, consistent with Fish and Game's unique role.

### 9.2 Issues

- 9.2.1 Fish and game management must be transparent, accountable, accessible and responsive. The accessibility is important as the Council is seen as part of the community, rather than as a more remote centrally controlled agency. This aspect is vital to continued acceptance and success. Furthermore some anglers and hunters want to have the opportunity to actively participate in fish and game management and particularly to participate in the review of angling and hunting licence conditions.
- 9.2.2 Fish and Game Councils all derive the revenue they need to operate from licence sales. To a large extent the sale of licences in Otago is related to the quality and extent of fish and game resources within the region. Otago's fish and game resources are the natural capital the Council is charged with maintaining. The recreational use of the resources and the harvest of fish and game is the return provided on that natural capital.

- 9.2.3 As a levy paying region Otago needs to:
- a) optimise its licence sales to balance use pressure for lower fees and more flexibility within the license system with the need to generate income;
  - b) financially support the fish and game system, and ;
  - c) as a priority protect the region's fish and game resources and adequately service its client base on behalf of the 'owners', Otago licenceholders.
- 9.2.4 The Council is confronted with a substantial workload across a range of functional areas yet the fish and game system is resource short and is liable to remain so. It must manage its assets carefully.
- 9.2.5 In Otago, the Council has limited staff and financial resources to cover its workload in promoting angling and hunting, in managing fish and game resources and in responding to the very substantial resource management workload within the region. To an extent this resourcing issue can be addressed by internal co-operation particularly with neighbouring regions. Fish and game management cannot afford to be bureaucratic or unfocussed.
- 9.2.6 The Council operates in a regional community which supports it through the purchase of licences.

### **9.3 Objectives**

- 9.3.1 To establish and maintain governance and management arrangements which allow for efficient and effective use of Council resources including staff.
- 9.3.2 To ensure Council meetings and other Council processes are open and accessible to licenceholders and the public.
- 9.3.3 To ensure the Council is adequately resourced to protect the fish and game resources on which licence sales are based and to support existing clients.
- 9.3.4 To cooperate actively with other Fish and Game Councils and the New Zealand Fish and Game Council and to ensure the latter is fully informed on the views and aspirations of anglers and hunters in Otago.
- 9.3.5 To support local businesses in the purchase of goods and services.

### **9.4 Policies**

- 9.4.1 Assess the cost effectiveness of Council activities where possible.
- 9.4.2 Routinely supply the media with Council agendas, reports and media releases to keep them informed of Council activities.
- 9.4.3 Invite anglers and hunters, and Ngai Tahu to participate in Anglers Notice and Game Gazette reviews.
- 9.4.4 Seek a review of the fish and game financial allocation process.

- 9.4.5 Support local businesses in the purchase of goods and services unless there is a significant saving or benefit in not doing so.
- 9.4.6 Liaise closely with other Fish and Game Councils and the NZFGC over fish and game matters and resource sharing.
- 9.4.7 Actively co-operate with neighbouring Councils in the sharing of information and resources.
- 9.4.8 Manage the Council's assets prudently.

## **10 Compliance**

Compliance activities are more than law enforcement and prosecutions. The Council is committed to actively encouraging public and licenceholder understanding, acceptance and belief in a legal code of practice that will be self-reinforcing.

### **10.1 Outcome**

There is a high level of compliance with and acceptance of the need for fishing and game hunting regulations applying to Otago. Compliant anglers and hunters continue to support the Council and its rangers in ensuring that non-compliance is kept to a minimum. Anglers and hunters themselves, and license agents, are educated to provide information to their peers about fish and game regulations to further boost compliance. Regulations are reviewed to ensure that they remain accurate and appropriate.

### **10.2 Issues**

- 10.2.1 Management of sports fish and game bird populations requires ongoing compliance monitoring at levels which provide an effective deterrent. Compliance monitoring requires active co-ordination and support because concentrated compliance monitoring activities can cause irritation to law abiding anglers and hunters.
- 10.2.2 Non-compliance with resource management laws and plans can cause damage to fish and game habitats. Licenceholders expect that compliance with laws controlling angling and hunting will be strictly enforced. However prosecution of offences through the courts is costly and results are variable.

### **10.3 Objectives**

- 10.3.1 To be perceived as professional, consistent, fair and reasonable in carrying out compliance monitoring and enforcement activities relating to fish and game laws, regulations and conditions.
- 10.3.2 To maintain and manage an effective compliance monitoring and enforcement capability based on staff and voluntary Fish & Game rangers.
- 10.3.3 To secure action by the statutory agency directly responsible for offences under other legislation which adversely affect fish and game resources.
- 10.3.4 To have a minimum of 95% compliance with fish and game rules by anglers and hunters.
- 10.3.5 To have majority community support for Council compliance activities including legal action.

## **10.4 Policies**

- 10.4.1 Support staff and voluntary rangers involved in compliance monitoring by providing appropriate training, equipment, information, and support.
- 10.4.2 Liaise with other agencies involved in natural resource compliance monitoring and enforcement including Ngai Tahu.
- 10.4.3 Encourage appropriate action by Otago Regional Council over resource use offences affecting sports fish and game resources

## **11 Plan Implementation**

The Sports Fish and Gamebird Management Plan for Otago is implemented through the Council's annual planning process. The life of the plan is ten years from the date of approval, at which time it will become due for review. However, part or the entire plan may be reviewed and amended at any time should the Council consider it necessary to do so. Plan reviews must be conducted in accordance with Section 17M(5) of the Conservation Act 1987.

### **11.1 Target Dates for Key Actions**

The plan will be progressively implemented over its ten-year life and each year the Council will review priorities depending on the circumstances at the time. Successive annual work plans will detail the relative allocation of efforts and funds to the implementation of the plan in each financial year within the overall directions set by the Plan.

Many actions requiring implementation through annual plans are routine and will arise annually or at regular intervals. Others identified below with their target completion date have been identified as key actions or projects which will move fish and game management forward a significant step.

#### **11.1.1 Key actions to be completed by the end of the second year after plan approval include:**

- 11.1.1.1 Memorandum of Understanding signed off between the Otago Fish and Game Council and the Department of Conservation.
- 11.1.1.2 Memorandum of Understanding signed off between the Otago Fish and Game Council and the Otago Regional Council on RMA resource consent processing and affected party determinations.
- 11.1.1.3 All publishable fish and game resource information, survey results and reports to be available online.
- 11.1.1.4 The health of the Upper Clutha fishery reviewed and subject of a report.
- 11.1.1.5 Status of Otago's lowland fisheries reviewed and subject of a report.

#### **11.2.1 Key actions to be completed by the end of the fifth year after plan approval include:**

- 11.2.1.1 The health of the Upper Fraser river fishery and subject of a report.
- 11.2.1.2 The Otago Fish and Game Region habitat resource inventory is complete and updated regularly.
- 11.2.1.3 Ranger distribution is reviewed to take into account areas of greatest need and pressure.
- 11.2.1.4 Public awareness of matters affecting fish and game resources is high and results in good outcomes in regional and district public processes.



- 11.2.1.5 A rivercare group or similar structure is established to achieve a better understanding and management of the Pomahaka and Waipahi Rivers, with the aim to achieve an improvement in water quality and restore this regionally important fishery.
- 11.2.1.6 The riverine environment and riparian margins of the Benger Burn are restored and protected and supports salmon spawning and rearing in the lower Clutha as well as other aquatic life.
- 11.2.1.7 A report on the landlocked salmon fishery of the southern lakes and its contribution to the sea run salmon fishery is produced and disseminated.
- 11.2.1.8 The lower Clutha salmon run is significantly enhanced as a result of Contact Energy's lower Clutha mitigation programme with smolts being reared in a local hatchery from returning adult salmon.

**11.1.3 Key actions to be completed by the end of the seventh year after plan approval include:**

- 11.1.3.1 Catchment wide habitat projects are completed in the Manuherikia valley in conjunction with plans to increase irrigation and intensify land use thereby protecting aquatic habitats for sports fish and game and other aquatic life and securing and enhancing the recreational amenity of the river system.
- 11.1.3.2 A minimum of 40% turnout of enrolled licence-holders is achieved in Otago Fish and Game Council elections.
- 11.1.3.3 Poolburn Reservoir is retained as the largest stillwater brown trout fishery of Otago and its key characteristics are protected.
- 11.1.3.4 Minimum or residual flows are established for all Otago rivers that maintain or restore aquatic ecosystems to a healthy and productive state so that sports fish and game populations flourish.

## **APPENDIX 1.           LEGAL STATUS OF FISH & GAME SPECIES**

### **Freshwater Fisheries Regulations 1983, First Schedule:**

Brown trout  
Rainbow trout  
American brook trout or char  
Lake trout or char  
Atlantic salmon  
Quinnat or chinook salmon  
Sockeye salmon  
Perch  
Tench  
Rudd (found or taken in the Auckland Fish and Game Region)

and includes any hybrid and the young, fry, ova and spawn and any part of any such fish

### **Wildlife Act 1953, First Schedule :**

Black swan  
Chukar  
Duck –  
    Australasian shoveler  
    Grey duck and any cross of that species with any other species, variety, or kind of duck  
    Mallard duck and any cross of that species with any other species, variety, or kind of duck  
    Paradise shelduck  
  
Partridge –  
    Grey partridge  
    Red legged partridge  
  
Pheasant  
Pukeko  
Quail –  
    Bobwhite quail  
    Brown quail  
    California quail

**APPENDIX 2. MAP: OTAGO FISH & GAME REGION**

Otago Fish and Game Region



### APPENDIX 3. OTAGO’S FISH AND GAME RESOURCES

The Otago Fish and Game Region’s waterways contains many discrete and interconnected freshwater sports fisheries supporting angler use. Similarly Otago’s waterways and wetlands collectively support valued populations of waterfowl and upland game birds are found in terrestrial habitats in dryer areas of Central Otago.

126 named sports fisheries have been identified through the National Anglers Survey (NAS) conducted by NIWA once every five to seven years. The NAS provides a reliable and comparable long term reference point for the use of sports fishery resources by anglers, but the number of fisheries in Otago is larger again than the number of named fisheries because fishing waters with very low response rates are not included in the survey results. Also over time, new fisheries can be created through pond and reservoir development and stocking or flow restoration, for example Lake Tewa at Jacks Point.

Therefore when considering the relative significance of sports fisheries within Otago it is important to recognise that there is a spectrum of significance from national to regional to local. That significance rating is not equivalent to fishery quality (or value). A locally significant fishery, for example, may be a high or low quality fishery or somewhere in between.

Significance criteria are included in the plan in Section 4 but assessments of quality need to take account of all available information on fishery characteristics and attributes.

|  |   |
|--|---|
| <p><u>Major Lakes</u></p> <p>Lake Wakatipu<br/>         Lake Wanaka<br/>         Lake Hawea<br/>         Lake Dunstan<br/>         Lake Roxburgh</p> | <p><u>Backcountry Rivers</u></p> <p>Blue River<br/>         Caples River<br/>         Dart River<br/>         Diamond Creek<br/>         Dingle Burn<br/>         Dunstan Creek<br/>         Fraser River (upper reaches)<br/>         Greenstone River<br/>         Hunter River<br/>         Lochy River<br/>         Makarora River<br/>         Manuherikia River (upper reaches)<br/>         Matukituki River<br/>         Minaret Burn<br/>         Nevis River<br/>         Rees River<br/>         Routeburn<br/>         Timaru Creek<br/>         Pomahaka River (above Glenken)<br/>         Upper Taieri River<br/>         Von River<br/>         Wilkin River<br/>         Young River</p> |
|--|---|

| <u>Rain-fed Rivers and Streams</u>        | <u>Major Rivers</u>  |
|---|----------------------|
| Arrow River                               | Clutha River (upper) |
| Bannockburn                               | Clutha River (lower) |
| Boundary Creek                            | Taieri River         |
| Camp Creek                                | Kawarau River        |
| Cardrona River                            |                      |
| Catlins River                             |                      |
| Cluden Stream                             |                      |
| Deep Stream                               |                      |
| Dunstan Creek                             |                      |
| Fast Burn                                 |                      |
| Fraser River (lower reaches)              |                      |
| Hawea River                               |                      |
| Ida Burn                                  |                      |
| Kaihiku River                             |                      |
| Kaihiku Stream                            |                      |
| Kaitangata Channel                        |                      |
| Kaiwera Stream                            |                      |
| Kye Burn                                  |                      |
| Lee Stream                                |                      |
| Lindis River                              |                      |
| Logan Burn                                |                      |
| Maclennan River                           |                      |
| Manorburn                                 |                      |
| Manuherikia (middle and lower reaches),   |                      |
| Meggat Burn                               |                      |
| Owaka River                               |                      |
| Pleasant River                            |                      |
| Pomahaka River (middle and lower reaches) |                      |
| Poolburn                                  |                      |
| Puerua River                              |                      |
| Shag River                                |                      |
| Silver Stream                             |                      |
| Staircase Creek                           |                      |
| Steele Creek                              |                      |
| Sutton Stream                             |                      |
| Tahakopa River                            |                      |
| Temple Burn                               |                      |
| Teviot River                              |                      |
| Three O'Clock Stream                      |                      |
| Tokomairiro River                         |                      |
| Tuapeka River                             |                      |
| Twelve Mile Creek                         |                      |
| Waikerikeri Creek                         |                      |
| Waikoikoi Creek                           |                      |
| Waikouaiti River                          |                      |
| Waipahi River                             |                      |
| Waipori River                             |                      |
| Waitahuna River                           |                      |

|  |  |
|--|--|
| <p>Waitati River<br/>Waiwera River<br/>Wye Creek</p>   |  |
| <p><u>Smaller Lakes</u></p> <p>Diamond Lake<br/>Glenorchy Lagoons<br/>Lake Dispute<br/>Lake Hayes<br/>Lake Johnson<br/>Lake Kirkpatrick<br/>Lake Luna<br/>Lake Reid*<br/>Lake Rere<br/>Lake Sylvan<br/>Moke Lake</p> <p>*Lake Reid drains into Diamond Creek which has backcountry characteristics</p> | <p><u>Ponds, Reservoirs, Dams &amp; Urban Streams</u></p> <p>Blakleys Dam<br/>Butchers Dam<br/>Conroys Dam<br/>Coal Pit Dam<br/>Falls Dam<br/>Fraser Dam<br/>Hamiltons Dam<br/>Hoffmans Dam<br/>Hores Pond<br/>Kaikorai Stream<br/>Knights Dam<br/>Lake Mahinerangi<br/>Lake Onslow<br/>Lake Tewa<br/>Logan Burn Reservoir<br/>Lone Pine Dam<br/>MacAtamneys Head Pond<br/>Malones Dam<br/>Manorburn Reservoir<br/>Mathias Dam<br/>Phoenix Dam<br/>Poolburn Reservoir<br/>Rutherfords Dam<br/>Southern Reservoir<br/>Sullivans Dam<br/>Tomahawk Creek<br/>West Eweburn Dams<br/>Water of Leith</p> |
| <p><u>Coastal Wetlands and Estuaries</u></p> <p>Blueskin Bay<br/>Catlins Lake<br/>Kaikorai Lagoon<br/>Pleasant Estuary<br/>Waikouaiti Estuary<br/>Shag Estuary<br/>Tomahawk Lagoon<br/>Lake Tuakitoto<br/>Lake Waihola<br/>Lake Waipori</p>  |  |

## Major lakes

| <u>Surveyed fisheries</u>                                  | <u>Unsurveyed fisheries</u> |
|--|-----------------------------|
| Lake Wanaka<br>Lake Wakatipu<br>Lake Hawea<br>Lake Dunstan | None in this category       |

### *Description*

Large multi-species fisheries offering lake-shore and boat fishing, principally trolling. Lake Wakatipu is identified as nationally important under the Kawarau Water Conservation Order. The quality of and natural range of water levels in Lake Wanaka are protected by the Lake Wanaka Preservation Act 1973. Lake Hawea was raised in the 1950s for hydroelectricity storage, but Contact Energy is required to manage shoreline stability under the conditions of its resource consent. Lake Dunstan is a more recent addition to the landscape, being created progressively from 1990s onwards as a result of the filling of the Clyde Dam, but it has quickly been valued and used for recreational activities, in the same way that the hydro lakes of the Waitaki Valley have become well utilised for recreation. Lake Dunstan's formation was at the expense of a highly valued reach of the upper Clutha River

These southern lakes are responsible for up to 50% of the region's angling use, based on National Angler Survey figures. Therefore, the importance of these four lakes in sustaining angling and licence numbers is high. These lakes have shown increasing use as the quality of river fishing has declined in some locations, notably as a result of the occurrence of didymo in adjacent waters.

### *Participation*

| Fishery       | 2002 Angler Survey | 2007 Angler Survey | 2015 Angler Survey | Change |
|---------------|--------------------|--------------------|--------------------|--------|
| Lake Dunstan  | 19872              | 26138              |                    | 6,266  |
| Lake Hawea    | 28155              | 22214              |                    | -5,941 |
| Lake Wakatipu | 17702              | 21481              |                    | 3,779  |
| Lake Wanaka   | 25268              | 39402              |                    | 14,134 |

The only fishery to record a decline in angler usage during this period was Lake Hawea.

### *Availability*

These lakes are all readily accessible to holiday centres (Queenstown, Arrowtown, Glenorchy, Hawea and Wanaka) and rural towns in Central Otago (Cromwell and Alexandra) and are some distance from Otago's main urban population in Dunedin/Mosgiel. The development of Lake Dunstan has spawned a number of subdivisions and land developments on its western side extending north from Cromwell. This is in part due to the recreational activities, including fishing, that the lake offers.

### *Risk*

These lakes are all at low risk of over-harvest as long as spawning and rearing facilities are maintained and improved. Lake Dunstan is slightly vulnerable to habitat degradation such as

eutrophication but only with large scale land use intensification or poorly performing wastewater systems. With large scale irrigation schemes now proposed for the Hawea Flats and the Lindis/Tarras flats, there is more risk of nutrient overloading than previously. Important spawning tributaries to the Lake such as the Lindis are far more vulnerable however, with both low flows and decreasing water quality putting their contribution to the lake fishery at risk.

Lakes Hawea, Wanaka, and Wakatipu are at low risk of degradation, being large, deep and cold bodies of water surrounded by traditionally low intensity land use. However, flat land surrounding these lakes may increasingly be intensified as a result of tenure review and irrigation developments. The occurrence of 'lake snow' in Wanaka is a concern

*Knowledge*

Otago Fish and Game has access to good, up-to-date, and long term knowledge of fisheries use on these lakes through intermittent creel surveys. Different lakes appear to peak and trough at different times, although there appears to be more of a connection between Lakes Hawea and Wanaka than there is with Lake Wakatipu. The status of spawning areas within these lakes and trends in these spawning areas is not well known.

Access pamphlets have been prepared.

**Backcountry Rivers**

| <u>Surveyed fisheries</u> | <u>Unsurveyed fisheries</u>   |
|---------------------------|---|
| Caples                    | Fraser (above Fraser Dam, although the whole river is also surveyed)  |
| Dart                      |   |
| Dingle                    |   |
| Dunstan Creek             | Pomahaka (above Glenken, although the whole river is surveyed, and the Upper Pomahaka is likely to be a significant part of the total figures), |
| Greenstone                |   |
| Hunter                    |   |
| Lochy                     |   |
| Makarora                  | Manuherikia (above Falls Dam)   |
| Matukituki                |   |
| Nevis                     |   |
| Rees                      |   |
| Routeburn                 |   |
| Teviot                    |   |
| Timaru Ck                 |   |
| Taieri (above Kokonga)    |   |
| Von                       |   |
| Wilkin                    |   |
| Young                     |   |

*Description*

The Greenstone, Caples, Lochy, Nevis and Hunter Rivers are recognised as nationally significant trout fishing rivers. The Upper Pomahaka and Upper Taieri rivers are recognised as regionally significant trout fishing rivers. The Von, Dingle, Timaru Ck., Rees, Dart, Wilkin, Young and Makarora rivers are considered to be regionally significant. The upper Fraser, upper Manuherikia, Dunstan Creek and Routeburn rivers are considered to be locally significant .



Of these rivers, the Greenstone, Caples, Lochy, Young, Wilkin, Nevis, Dingle Burn and Hunter rivers are classified as backcountry fisheries and require a separate endorsement on licenses in order to fish them. A part of the Greenstone River (between the Slyburn confluence and the head) is further classified and regulated as a 'controlled fishery' from 1 February to 31 March each year, and fishing it during these times requires the booking of a section of river, known as a "beat". There are three beats on the river, with a section downstream open to fishing without a beat booking. Both of these measures were deemed necessary after substantial research in order to preserve the high quality/low user density of the fisheries. These regulations are contained within the annual Sports Fish Licenses, Fees, and Forms Notice.

### *Participation*

#### Surveyed fisheries

| Fishery          | 2002 Angler Survey | 2007 Angler Survey | 2015 Angler Survey | Change |
|------------------|--------------------|--------------------|--------------------|--------|
| Greenstone River | 372                | 710                |                    | 338    |
| Caples River     | 225                | 679                |                    | 454    |
| Lochy River      | 262                | 258                |                    | -4     |
| Von River        | 519                | 872                |                    | 353    |
| Matukituki River | 531                | 494                |                    | -37    |
| Hunter River     | 1629               | 1225               |                    | -404   |
| Dingleburn       | 105                | 91                 |                    | -14    |
| Teviot River     | 325                | 102                |                    | -223   |
| Dunstan Creek    | 40                 | 360                |                    | 320    |
| Nevis River      | 250                | 106                |                    | -144   |
| Dart River       | 39                 | 254                |                    | 215    |
| Rees River       | 79                 | 177                |                    | 98     |
| Routeburn        | 440                | 820                |                    | 380    |
| Timaru Creek     | 481                | 157                |                    | -324   |
| Wilkin River     | 145                | 412                |                    | 267    |
| Makarora River   |                    | 1865               |                    | 1865   |
| Young River      | 117                | 17                 |                    | -100   |

### *Availability*

Backcountry rivers are characterized by difficult physical access, which often involves either substantial walking or in some cases challenging 4WD access. In some especially remote fisheries, such as the Dingle or Hunter, some anglers opt for flying in, either by fixed wing or helicopter. The Greenstone River above the Slyburn is a controlled fishery during the months of February and March each year, in order to better manage the high demand for angling during this time. Three "beats", or sections of river, have been identified and marked, and can be booked for specific periods of time during the controlled fishery season.

### *Risk*

The sustainability of high quality angling experiences due to over-use is the main risk in these fisheries. A similar concern is maintaining public access to these fisheries, as capture by adjacent landholders for associated commercial uses remains a problem. The introduction of the backcountry fishery definition and backcountry license endorsement has given Otago Fish and Game the ability to gain specific insight into the angling use patterns within these backcountry fisheries. This information will allow for more informed management responses in the future if sustainability concerns arise.

Aside from the risks presented by development proposals, all have the potential to suffer from recreational angling capacity pressures characterised by encounter rates that detract from the angling experience. The following risks have been identified for each of the legally defined backcountry rivers, as well as those having backcountry characteristics but not legally classed as such:

Greenstone – limited threats currently, but some potential exists for recreational conflict between anglers and trampers, if the existing track was to be re-routed nearer the river and/or if numbers increase. The threats of roading development in the Greenstone appear to have receded as well, but a renewed Caples/Greenstone gondola proposal would seriously threaten the landscape values and fishery within this valley.

Caples – Similar to the Greenstone, but with the possibility of angler-tramper conflict occurring from current proposals to increase the concessionaire party size limit in the Caples Valley from 7 to 15 (Draft Otago Conservation Management Strategy, 2013) and also to allow more landings for angler and hunter access.

Lochy – The Lochy lacks public access in parts, but due to its remoteness is unlikely to suffer from capacity pressures. Access issues may be able to be resolved through the tenure review process of surrounding pastoral lease land.

Von – With the upgrade of the Mavora – Mt Nicholas Road to 2WD status this fishery is seeing more use, and further monitoring of spawning and harvest may be required to assess its current sustainability. A potential threat to the amenity values of the Von fishery is the increase in traffic volumes that will come from any further interest in a new transportation link along the lines of the the proposed Mavora-Snowdon monorail. Passengers were to have been transported to the monorail's terminus in ATV vehicle via the Von River road.

Matukituki – There are concerns that the Matukituki has been adversely affected by land use intensification within the catchment including wetland drainage and stream channelization and that the rivers fishery values are being affected. The ramifications of any decline in the habitat values of the river are that it will affect the fishery in Lake Wanaka, as one of the largest tributaries feeding the lake.

Hunter – the biggest issue facing the Hunter fishery is access and recreational conflict. There is increasing use of the fishery by fly-in anglers, including guided anglers. Recent relaxation of aircraft landing controls by DOC is of concern. The issue of road access across the pastoral lease into the station is ongoing. Access has been available for anglers at the discretion of the landholder except during lambing but the recent dispute between QLDC and the leaseholder over the underlying status of the road remains unresolved. Recreational conflict between anglers and jet boat usage on the river has caused issues in the past and may do so again. One way of resolving this is through the Queenstown Lakes District plan review process but boat speed limit rules also need compliance monitoring

Dingle – the Dingle fishery currently faces few issues, with any likely issues to emerge being around friction between anglers who have walked in and those who have flown in.

Upper Pomahaka – the Upper Pomahaka, faces a number of issues. The first is water quality, which has traditionally been good but in recent years has been declining as a result of land use intensification. The National Angler Survey does not include a category for the Upper Pomahaka, so it

is hard to determine whether the usage in this river has declined since the survey began in 1994/1995, but as the overall river usage has declined from 6783 angler days to 4142 over close to a 20 year period..

Another issue relates to public access, particularly in the headwaters of the river on Hukarere station. Whilst there are marginal strips and legal roads along both sides of the river (and the river itself is public land), access overland to these strips, and in some cases, along the strips themselves, is impractical, non-existent or interrupted in many cases.

The Leithen Burn, a tributary of the Upper Pomahaka, is one of two major salmon spawning sites within the Clutha catchment. This site deserves further protection from both surrounding land use and water quality degradation.

The Upper Fraser River, above the Fraser Dam behind Earnsclough Flats has had a reputation for being a good fishery, however, alluvial mining in the upper catchment prior to 2000 and siltation of Fraser Dam reservoir are thought to be the cause of a decline in fishery values. There is a lack of information on fishery values in the river.

The Nevis River supports a nationally outstanding trout fishery within a highly natural setting. It was threatened by proposals to dam the river in order to generate electricity but an amendment to the National Water Conservation (Kawarau) Order 1997 has prohibited dams on the river. Land development within the Nevis valley following tenure review of pastoral leases may pose some risk to the river and its setting

The Upper Taieri River has undergone a revival in fishing activity in recent years, with numbers of anglers increasing from 3659 in 2002/2003 to 4054 in 2007/2008. The Upper Taieri river also supports spawning in the main stem and tributary streams including the Kye Burn, Logan Burn and Sow Burn. The issues affecting this river include over-allocation in the side streams feeding it, affecting spawning and recruitment, pugging and damage to river banks, and the possibility of water quality degradation if land use intensification is not closely managed in the Upper Taieri catchment .

The Dart River has consistently turbid waters, and does not receive much angling use. Its long term threats are unknown.

The Rees River fishery has undergone a decline and recovery in angler use from 293 angler days in 1993/1994, to 129 in 2001/2002, and then rising to 177 in 2007/2008. As the usage is low, the reasons behind the decline and subsequent recovery are probably more related to angler use patterns than any underlying change in the fishery.

The fishable reaches of the lower Routeburn (below the gorge) have shown a marked increase in angler use, rising from 86 angler days in 2002 to 820 in 2008. This is a significant increase, and is probably related to the Sports Fish regulations that classify the fishery as a fly-only catch and release river because of its limited stocks of fish present and the beneficial effects of stock retention by comparison with harvest.

The Timaru River has seen a spike and decline in angler use numbers, rising from 169 in 1993/1994 to 481 in 2002/2003, and then falling to the 2008 level of 157. This is likely to be more reflective of small sample size and angler use patterns than any underlying change in the condition of the fishery.

The angling use patterns for the Upper Manuherikia are not known as this reach of the river is not surveyed as a discrete unit, but will be a portion of the 2064 angler days spent on the whole river.

The Upper Manuherikia is defined as the river above Falls Dam, which forms a discrete fishery as a result of the damming. The main threats within this fishery currently are the potential for lignite mining on the surrounding land (a threat which may be diminishing), which is Crown land but kept outside of the Oteake Conservation Park at the time of its creation, and also proposals to raise Falls Dam which could affect near-lake spawning sites and flood a section of the mainstem river.

Dunstan Creek has undergone a rise in use, recording 40 angler days in 2002/2003 and 320 angler days in 2007/2008. This indicates a productive fishery but also hints at displacement of anglers from lower down in the catchment. The main threats to this fishery is the over-allocation of water to irrigation, and the security of the fishery in the future depends on ensuring that deemed permits in the catchment are renegotiated with appropriate residual and minimum flows.

The Wilkin River has undergone a rise from 192 angler days in 1993/1994 to the current level of 412. The valley below the Mt Aspiring National Park boundary is currently grazed extensively, but this appears to have little impact on the fishery. Occasional conflict between jet boats and anglers is likely to be the main issue in this river. River bank instability has been an issue in the past

The Young River only recorded 17 angler days in 2007/2008, which is well down on the peak usage in 2002/2003 of 145 angler days. This may be related to a natural fluctuation in population or a flood event disturbing the fishery. Access to this fishery has improved with the construction of a track on the true right of the Makarora valley linking the bridge across the Makarora at the Blue Pools with the Young Valley, where previously access required fording the river, or a boat. It is still a long walk with fishing gear though, and few anglers probably undertake this. There has been a significant land slip in a branch of the the upper valley in recent years causing the formation of a small lake which seems to have become a stable feature

The Makarora River itself has undergone a steady increase in fishing use from 1457 in 1993/1994 to 1865 in 2007/2008. Threats to this river are few and the water quality within it is currently excellent.

### **Rainfed Rivers**

| <u>Surveyed fisheries</u> | <u>Unsurveyed fisheries</u> |
|---------------------------|-----------------------------|
| Arrow River               | Bannock Nurn                |
| Catlins River             | Boundary Creek              |
| Deep Stream               | Camp Creek                  |
| Diamond Creek             | Catlins River               |
| Fraser River              | Cluden Stream               |
| Hawea River               | Deep Creek                  |
| Kawarau River             | Dunstan Creek               |
| Lee Stream                | Fast Burn                   |
| Leith River               | Ida Burn                    |
| Lindis River              | Kaihiku River               |
| Logan Burn Reservoir      | Kaihiku Stream              |
| Manuherikia River         | Kaitangata Channel          |
| Owaka River               | Kaiwera Stream              |
| Pomahaka River            | Kye Burn                    |
| Shag River                | Lee Stream                  |
| Tahakopa River            | Leith River                 |
| Teviot River              | Maclennan River             |
| Tokomariro River          | Manorburn                   |
| Waikouaiti River          | Meggat Burn                 |

|               |                      |
|---------------|----------------------|
| Waipahi River | Pleasant River       |
| Waipori River | Poolburn             |
| Waitati River | Puerua River         |
| Waiwera River | Silver Stream        |
|               | Staircase Creek      |
|               | Steele Creek         |
|               | Sutton Stream        |
|               | Tahakopa River       |
|               | Temple Burn          |
|               | Three O'Clock Stream |
|               | Timaru River         |
|               | Tuapeka River        |
|               | Twelve Mile Creek    |
|               | Waikerikeri Creek    |
|               | Waikoikoi Creek      |
|               | Waitahuna River      |
|               | Waitati River        |
|               | Wye Creek            |

*Description*

Identified as Regionally Significant: Pomahaka, Waipahi, Shag, Manuherikia, Diamond Creek

Otherwise these rivers are considered as locally significant fisheries.

*Participation*

| <u>Fishery</u>       | <u>2002 Angler Survey</u> | <u>2007 Angler Survey</u> | <u>2015 Angler Survey</u> | <u>Change</u> |
|----------------------|---------------------------|---------------------------|---------------------------|---------------|
| Shag River           | 1698                      | 802                       |                           | -896          |
| Waikouaiti River     | 1357                      | 1236                      |                           | -121          |
| Waitati River        | 130                       | 1012                      |                           | 882           |
| Tokomariro River     | 4089                      | 519                       |                           | -3570         |
| Waipahi River        | 1815                      | 919                       |                           | -896          |
| Catlins River        | 913                       | 1492                      |                           | 579           |
| Owaka River          | 191                       | 1085                      |                           | 894           |
| Tahakopa River       | 720                       | 55                        |                           | -665          |
| Teviot River         | 325                       | 160                       |                           | -165          |
| Waiwera River        | 315                       | 119                       |                           | -196          |
| Logan Burn Reservoir | 4276                      | 2868                      |                           | -1408         |
| Lindis River         | 147                       | 332                       |                           | 185           |
| Manuherikia River    | 5269                      | 2074                      |                           | -3195         |
| Lee Stream           | 55                        | 154                       |                           | 99            |
| Deep Stream          | 344                       | 213                       |                           | -131          |
| Hawea River          | 4969                      | 834                       |                           | -4135         |
| Diamond Creek        | 380                       | 578                       |                           | 198           |
| Arrow River          | 207 (in 1994/95)          | 347                       |                           | 140           |
| Fraser River         | 529                       | 1380                      |                           | 851           |
| Pomahaka River       | 6004                      | 4142                      |                           | -1862         |
| Kawarau River        | 1698                      | 1930                      |                           | 232           |

### *Availability*

Good distribution, readily accessible, particularly with landholder co-operation

### *Risk*

Habitat degradation (non point source pollution, abstraction, channel modification, hydro development). Progressive restrictions on access, and the degradation of the angling experience and fishery values of some rivers, such as the Hawea River, due to the presence of didymo (*Didymosphenia geminata*)

### *Knowledge*

Lack of fishery trend information. Superficial use/catch data

## **Major Rivers**

### *Description*

Big river fishing for brown and rainbow trout and sea run salmon in lower rivers

Nationally Significant: Upper Clutha

Regionally Significant: Taieri, Lower Clutha

### *Participation*

| <u>Fishery</u> | <u>2002 Angler Survey</u> | <u>2007 Angler Survey</u> | <u>2015 Angler Survey</u> | <u>Change</u> |
|----------------|---------------------------|---------------------------|---------------------------|---------------|
| Taieri River   | 11532                     | 16358                     |                           | 4826          |
| Upper Clutha   | 20155                     | 22030                     |                           | 1,875         |
| Lower Clutha   | 14447                     | 12549                     |                           | -1,898        |

### *Availability*

Readily accessible in many reaches, but some serious access issues remain at the Clutha Mouth

### *Risk*

Upper Clutha - Habitat degradation through land use intensification, and hydroelectricity flow regimes. The threat of hydroelectric development on the upper river has now diminished. The presence of didymo has degraded angling values throughout much of the upper river.

Lower Clutha - Habitat degradation through land use intensification, point source discharges, hydroelectricity flow regimes, silt discharges, bank stability and channel works (including gravel extraction).

Taieri. Habitat degradation through point and non-point source pollution, irrigation abstraction, channel management, reservoir construction, gravel extraction, and hydro flow regimes (in the upper river). The Upper Taieri also has a number of opportunities for substantial improvement to habitat values, including adjacent wetlands on the Taieri scroll plain.

### *Knowledge*

Fair information base on angler use, some data on trends, superficial information base on habitat degradation, particularly lower river degradation and loss of fishery productivity.

## Coastal Wetlands and Estuaries

Lakes Waihola  
Lake Waipori  
Lake Tuakitoto

### *Description*

Identified as Nationally Significant for Wildlife/Hunting: Lake Waihola, Lake Waipori  
Identified as Regionally Significant for Wildlife/ Hunting: Lake Tuakitoto, Tomahawk Lagoon  
Identified as of local significance: Blueskin Bay, Catlins Lake, Kaikorai Lagoon, Shag Estuary, Waikouaiti Estuary

### *Availability*

Close to centres of population, large accessible area by boat, restricted shore access

### *Risk*

Habitat degradation: serious non-point source pollution and siltation

### *Knowledge*

Fair hunter use/wildlife information, limited habitat trend info

## Small Lakes

### Surveyed fisheries

Moke Lake  
Diamond Lake  
Lake Hayes  
Glenorchy Lagoons  
Lake Dispute  
Lake Johnson  
Lake Kirkpatrick  
Lake Luna  
Lake Reid  
Lake Rere  
Lake Sylvan

### Unsurveyed fisheries

None listed

### *Description*

Mostly attractive smaller still water fisheries without serious risks and often close to smaller centres of population. Some have backcountry characteristics, such as Diamond Lake.

### *Participation*

| <u>Fishery</u>    | <u>2002 Angler Survey</u> | <u>2007 Angler Survey</u> | <u>2015 Angler Survey</u> | <u>Change</u> |
|-------------------|---------------------------|---------------------------|---------------------------|---------------|
| Moke Lake         | 365                       | 1525                      |                           | 1160          |
| Lake Hayes        | 1434                      | 1544                      |                           | 110           |
| Glenorchy Lagoons | Unrecorded                | Unrecorded                |                           |               |

|                  |            |            |  |     |
|------------------|------------|------------|--|-----|
| Lake Dispute     | Unrecorded | Unrecorded |  |     |
| Lake Johnson     | 79         | 171        |  | 92  |
| Lake Kirkpatrick | 70         | 27         |  | -43 |
| Lake Luna        | Unrecorded | Unrecorded |  |     |
| Lake Reid        | Unrecorded | 54         |  |     |
| Lake Rere        | 6          | Unrecorded |  |     |
| Lake Sylvan      | Unrecorded | 182        |  |     |
| Diamond Lake     | 519        | 472        |  | -47 |

*Availability*

Readily accessible. Usable in bad weather conditions. Some restrictions on trolling.

*Risk*

No significant risks to lakes.

*Knowledge*

Tributary stream status unknown

**Ponds, Reservoirs, Dams, and Urban Streams**

Surveyed fisheries

Falls Dam  
Fraser Dam  
Manorburn Reservoir  
Poolburn Reservoir  
Lake Onslow  
Lake Mahinerangi  
Logan Burn Reservoir  
Blakleys Dam  
Butchers Dam  
Conroys Dam  
Coal Pit Dam  
Hamiltons Dam  
Hoffmans Dam  
Hores Pond  
Knights Dam  
Lake Tewa  
Leith Stream  
Lone Pine Dam  
MacAtamneys Head Pond  
Mathias Dam  
Phoenix Dam  
Rutherfords Dam  
Sullivans Dam  
Southern Reservoir  
Tomahawk Creek  
West Eweburn Dam



### Unsurveyed fisheries

Kaikorai Stream  
Lake Tewa  
Malones Dam

#### *Description*

These ponds, reservoirs, dams and urban streams cover a wide range of angling opportunities, from readily accessible urban environments through to remote locations. Reservoir fisheries can generally hold good stocks of fish without the effects of floods and flow variability (although the draining of reservoirs can be an issue) and they are often suitable for management as a put and take fishery.

#### *Availability*

Remote from centres of population and difficult to access in other than good weather conditions. Anglers huts at almost all fisheries.

#### *Risk*

Lake level fluctuations such as hydro operation regimes, irrigation demand regimes, some access issues). There have been serious declines in the quality of the fishery at Lake Mahinerangi, but the cause is unknown.

#### *Knowledge*

Most waters have some angler use/catch data but continuous records are lacking, assessment of habitat trends/impacts are lacking.

#### *Participation*

| <u>Fishery</u>        | <u>2002 Angler Survey</u> | <u>2007 Angler Survey</u> | <u>2013 Angler Survey</u> | <u>Change</u> |
|-----------------------|---------------------------|---------------------------|---------------------------|---------------|
| Falls Dam             | 132                       | 193                       |                           | 61            |
| Fraser Dam            | 529                       | 1380                      |                           | 851           |
| Manorburn Reservoir   | 529                       | 3407                      |                           | 2878          |
| Poolburn Reservoir    | 2810                      | 3843                      |                           | 1033          |
| Lake Onslow           | 3449                      | 3423                      |                           | -26           |
| Lake Mahinerangi      | 4746                      | 2163                      |                           | -2583         |
| Logan Burn Reservoir  | 4281                      | 2868                      |                           | -1413         |
| Blakleys Dam          | 282                       | 209                       |                           | -73           |
| Butchers Dam          | 204                       | 618                       |                           | 414           |
| Conroys Dam           | 83                        | 401                       |                           | 318           |
| Coal Pit Dam          | 763                       | 98                        |                           | -665          |
| Hamiltons Dam         | Unrecorded                | Unrecorded                |                           |               |
| Hoffmans Dam          | 280                       | Unrecorded                |                           |               |
| Hores Pond            | 39                        | 332                       |                           | 293           |
| Knights Dam           | 70                        | Unrecorded                |                           |               |
| Leith Stream          | 63                        | 199                       |                           | 136           |
| Lone Pine Dam         | Unrecorded                | Unrecorded                |                           |               |
| MacAtamneys Head Pond | Unrecorded                | 281                       |                           |               |
| Mathias Dam           | 195                       | 51                        |                           | -144          |
| Phoenix Dam           | Unrecorded                | Unrecorded                |                           |               |
| Rutherfords Dam       | 125                       | 26                        |                           | -99           |
| Sullivans Dam         | 2027                      | 1233                      |                           | -794          |
| Southern Reservoir    | 1095                      | 1034                      |                           | -61           |

|                  |            |            |  |  |
|------------------|------------|------------|--|--|
| Tomahawk Lagoon  | Unrecorded | 317        |  |  |
| Tomahawk Creek   | 671        | Unrecorded |  |  |
| West Eweburn Dam | Unrecorded | 638        |  |  |

*Availability*

Readily accessible without excessive travel.  
 Urban streams have potential to increase participation.

*Risk*

Ability to restock and dependence on hatchery operations  
 Continued degradation in lower rivers and urban streams.  
 Access across private land to ponds and reservoirs

*Knowledge*

Some creel survey results

**Gamebird Resources**

Waterfowl, upland game

*Description*

Large populations of mallard and paradise ducks form the mainstay of the hunting resource. Black swans, shoveler duck and upland game make up a relatively small contribution of the harvest.

*Participation*

~5000 including landholders (landholders hunting without purchasing licences under the landholders' privilege are estimated to number 1000)

*Availability*

Waterfowl hunting opportunity is not limiting participation but upland game hunting which is heavily dependant on hunter landholder relationships may be limited by hunting opportunity

*Risk*

Lack of hunter recruitment, skill development

*Knowledge*

Good knowledge of bird distribution and harvest

## APPENDIX 4. RECREATIONAL OPPORTUNITY SPECTRUM

### Classification of Angling and Hunting Opportunities in Otago within a Recreational Opportunity Spectrum

| Categories                | Waters:<br>upper (U) middle (M) lower (L) | Setting:<br>Urban<br>Rural<br>Natural<br>Backcountry<br>Remote                        | Activity:<br>Fly (F),<br>Spin (S),<br>Troll (T)<br>Hunt<br>waterfowl(H) | Users:<br>Local (L)<br>Regional (R)<br>National (N)<br>International (I)<br>Commercial (C)<br>Juniors (J) |
|---------------------------|---|---|---|---|
| <b>Major Lakes</b>        | Dunstan                                   | Rural   | F,S,B,T, H  | L,R,N,I,C, J  |
|                           | Hawea                                     | Natural   | F,S,B,T   | L,R,N,I,C, J  |
|                           | Wakatipu                                  | Natural   | F,S,B,T   | L,R,N,I,C,J   |
|                           | Wanaka                                    | Natural   | F,S,B,T   | L,R,N,I,C, J  |
| <b>Backcountry Rivers</b> |   | Remote<br><i>Backcountry endorsement required</i>                                     | F   | L,R,N,I,C,  |
|                           | Caples                                    | Backcountry   | F,S,  | L,R,N,I,C,  |
|                           | Dart                                      | Backcountry   | F,S,B   | L,R,N,I,C   |
|                           | Diamond Creek                             | Remote<br><i>Backcountry endorsement required</i>                                     | F,S   | L,R,N,I,C,  |
|                           | Dingle Burn                               | Backcountry   | F,S,B   | L,R,N,C,J   |
|                           | Dunstan Creek                             | Backcountry   | F,S,B   | L,R,N,I,C   |
|                           | Fraser (above Fraser Dam)                 | Remote<br><i>Backcountry endorsement required, controlled fishery during Feb-Mar.</i> | F   | L,R,N,I,C,  |
|                           | Greenstone                                | Remote,<br><i>Backcountry endorsement required</i>                                    | F,S,B,  | L,R,N,I,C,  |
|                           | Hunter                                    | Remote<br><i>Backcountry endorsement required for upper river.</i>                    | F (Catch & Release [C&R] -Upper)  | L,R,N,I,C,  |
|                           | Lochy                                     | Backcountry   | F,S   | L,R,N,I,C,  |
|                           | Makarora                                  | Backcountry   | F,S,B,  | L,R,N,I,C   |
|                           | Manuherikia (above Falls Dam)             | Backcountry<br><i>Backcountry endorsement required</i>                                | F,S   | L,R,N,I,C,  |
|                           | Nevis                                     | Backcountry/Remote  | F,S,  | L,R,N,I,C, J  |
|                           | Rees                                      | Backcountry   | F (C&R)   | L,R,N,I,C   |
| Routeburn                 |   |   |   |   |

|                                |                          |   |             |              |
|--------------------------------|--------------------------|---|-------------|--------------|
|                                | Timaru Ck                | Backcountry   | F,S         | L,R,N,I,C, J |
|                                | Upper Pomahaka           | Backcountry   | F,S,B       | L,R,N,I,C,   |
|                                | Upper Taieri             | Backcountry<br>Natural                                | F,S,B,H     | L,R,N,I,C,   |
|                                | Von                      | <i>Backcountry<br/>endorsement required</i>           | F,S         | L,R,N,I,C,   |
|                                | Wilkin                   | <i>Backcountry<br/>endorsement required</i><br>Remote | F,S         | L,R,N,I,C,   |
|                                | Young                    | <i>Backcountry<br/>endorsement required</i>           | F,S         | L,R,N,I,C,   |
| <b>Rain-fed<br/>Rivers</b>     | Arrow                    | Rural   | F,S,B       | L,R,J        |
|                                | Catlins River            | Rural/Natural   | F,S,B, H    | L,R,J        |
|                                | Deep Creek               | Rural   | F,S,B, H    | L,J          |
|                                | Hawea                    | Rural   | F,S,B       | L,R,J,C      |
|                                | Kaihiku                  | Rural   | F,S,B, H    | L,R,J        |
|                                | Lee Stream               | Rural   | F,S,B, H    | L,J          |
|                                | Lindis River             | Rural   | F,S,B       | L,J          |
|                                | Logan Burn               | Rural   | F,S,B,      | L,J          |
|                                | Maclennan River          | Natural   | F,S,B       | L,J          |
|                                | Manuherikia              | Rural   | F,S,B, H    | L,R,J,C      |
|                                | Owaka River              | Rural   | F,S,B, H    | L,J          |
|                                | Pomahaka (below Glenken) | Rural   | F,S,B, H    | L,R,J,C      |
|                                | Shag                     | Rural   | F,S,B,H     | L,R,J        |
|                                | Tahakopa River           | Rural/Natural   | F,S,B, H    | L,J          |
|                                | Tokomariro River         | Rural   | F,S,B, H    | L,J          |
|                                | Waikouaiti River         | Rural   | F,S,B, H    | L,J          |
|                                | Waipahi River            | Rural   | F,S,B, H    | L,R,N,J      |
|                                | Waitati River            | Rural   | F,S,B, H    | L,J          |
|                                | Waiwera River            | Rural   | F,S,B, H    | L,J          |
| <b>Major Rivers</b>            | Clutha (Above Clyde Dam) | Rural/Natural   | F,S,B, H    | L,R,N,J,C    |
|                                | Clutha (below Clyde Dam) | Rural   | F,S,B, H    | L,R,N,J,C    |
|                                | Taieri                   | Rural   | F,S,B, H    | L,R,N,J,C    |
| <b>Reservoir<br/>Fisheries</b> | Falls                    | Natural   | F,S,B, T,H  | L,R,N,J      |
|                                | Fraser                   | Natural   | F,S,B,T     | L,R,N,J,C    |
|                                | Logan Burn               | Natural   | F,S,B, T, H | L,R,C        |
|                                | Mahinerangi              | Rural   | F,S,B, T,H  | L,R,         |
|                                | Manorburn                | Natural   | F,S,B,T     | L,R,N,J,C    |
|                                | Onslow                   | Natural   | F,S,B,T     | L,R,J,C      |
|                                | Poolburn                 | Natural   | F,S,B,T     | L,R,N,J,C    |

**Coastal  
Wetlands  
and  
Estuaries**

|                 |         |            |         |
|-----------------|---------|------------|---------|
| Blueskin Bay    | Rural   | F,S,B,T,H  | L,J     |
| Catlins Lake    | Natural | F,S,B,T,H  | L,R,J   |
| Kaikorai Lagoon | Urban   | Hw         | L,J     |
| Shag Estuary    | Rural   | F,S,B,H    | L,R,J   |
| Tuakitoto       | Natural | F,S,B,T, H | L,R,N,J |
| Waihola         | Natural | F,S,B,T, H | L,R,N,J |
| Waipori         | Natural | F,S,B,T, H | L,R,N,J |

**Other  
Wetlands**

|                           |         |         |       |
|---------------------------|---------|---------|-------|
| Glenorchy Lagoons         | Natural | H       | L,R,J |
| Takitakitoa               | Natural | H       | L,R,J |
| Tomahawk Lagoon           | Urban   | H       | L,J   |
| Upper Taieri Scroll Plain | Rural   | F,S,B,H | L,R,C |

**Small Lakes**

|             |         |            |           |
|-------------|---------|------------|-----------|
| Butchers    | Rural   | F,S,B      | L,R,N,J   |
| Conroys     | Rural   | F,S,B      | L,R,N,J   |
| Diamond     | Natural | F,S,T, H   | L,R,N,J,C |
| Hayes       | Rural   | F,S,B      | L,R,N,J   |
| Johnson     | Rural   | F,S,B,T, H | L,R,N,J   |
| Kirkpatrick | Rural   | F,S,B      | L,R,N,J,C |
| Moke        | Natural | F,S,B,     | L,R,N,J,C |
| Sylvan      | Remote  | F,S        | L,R,N,J   |

**Ponds, Dams  
& Urban  
Streams**

|                 |         |       |         |
|-----------------|---------|-------|---------|
| Blakleys        | Rural   | F,S,B | L,R,J,C |
| Coal Pit        | Rural   | F,S,B | L,R,J   |
| Hoffmans        | Rural   | F,S,B | L,R,J   |
| Kaikorai Stream | Urban   | F,S,B | L,J     |
| Mathias         | Rural   | F,S,B | L,R,J,C |
| McAtamneys      | Rural   | F,S,B | L,R,J   |
| Rutherfords     | Rural   | F,S,B | L,R,J,C |
| Southern        | Urban   | F,S   | L,J     |
| Sullivan        | Natural | F,S   | L,J     |
| Tomahawk        | Urban   | F,S,B | L,J     |
| Water of Leith  | Urban   | F,S,B | L,J     |

## APPENDIX 5. SPORTS FISH AND GAMEBIRD RESOURCE SIGNIFICANCE

Multiple information sources are used to determine the significance of sports fish or gamebird resources. The highest significance rating determined in one source of information is the significance that applies to the fishery. These include:

### Existing published reports or articles.

The primary source of published reports and articles on the significance of fisheries was published reports by Acclimatisation Societies or the Ministry of Fisheries Research Division in the 1980s. These reports contained detailed assessments of the significance of rivers, lakes and wetlands and their catchments.

### Recognition of the fishery or gamebird resource in law

Law includes statutory instruments (formerly referred to as “regulations” such as national water conservation orders, former local water conservation notices (which have been since amalgamated with regional water plans), references to fishery and gamebird values within subordinate legislation such as regional policy and plans (in Otago, the regional policy statement and the regional water plan are the most important source of information), district plans, and also other documents such as Department of Conservation conservation management strategies and plans. Resource consents, particularly ‘global’ consents that deal with whole catchments or sub-catchments, may also contain reference to fishery and gamebird values.

### Angler and hunter use

Angler use, as reported in the 7-yearly national angler survey, conducted by NIWA on behalf of the New Zealand Fish and Game Council. This survey has a dataset dating back to the mid 1990s.

Hunter use is reported primarily through the hunter diary scheme.

### Angling and hunting recreational opportunity spectrum

The Otago Fish and Game region has an operative recreational opportunity spectrum which classifies fisheries and gamebird resources based on setting, type of activity, and type of user. Recreational opportunity spectra are used as a conservation management tool when there is a diverse range of recreational experiences within a region.

### Angler perceptions

Anger perception surveys have been undertaken in New Zealand in 1978 and 2013 Unwin (2009, 2013; New Zealand Acclimatisation Societies, 1978). These are large-scale exercises which require participants to rank their experiences, perceptions and values of fishing in different rivers. The following criteria have been used:

- *Close to home* – (‘close to where you normally live’) This relates to travel distance to a fishery
- *Close to holiday location* – (‘close to where you live while on holiday’) This also relates to travel distance
- *Ease of access*
- *Large areas of fishable water*

- *Scenic beauty*
- *Wilderness character*
- *Anticipation of a good catch rate*
- *Anticipation of landing large fish*

Anglers are also asked to identify the “overall” value of a fishery on a 1-5 scale, based on the following criteria:

1. *This fishery can provide enjoyable angling, but is not exceptional;*
2. *This fishery often provides enjoyable angling, but is not exceptional;*
3. *This fishery consistently provides enjoyable angling;*
4. *This fishery provides a very enjoyable angling experience, and is one of my personal favourites;*
5. *This fishery provides an exceptional angling experience, and has few peers.*

#### Degraded Habitats and Populations

Where a fishery or hunting area or population has been degraded or has deteriorated over time because of identified or unidentified external factors its former significance status and potential for restoration deserve recognition. No fishery or game hunting area/population should be removed from a former status of nationally or regionally importance due to a human-induced decline in water quality or physical habitat. Instead, the appropriate response is to note the change and the reasons for the change in status and suggest remediation.

#### Habitat components of significance

Significance of fish or game habitats will include the following habitat considerations:

- the size or value of the fish or game population supported including for game, the proportion of a national population
- the importance to the life cycle requirements of a fishery or game population including spawning or breeding areas, areas for juvenile rearing
- role as migratory pathways or habitat corridors
- special characteristics of the habitats.

## 5.1 Nationally Significant Habitats

Please note that this list of rivers and lakes include their tributary streams in the catchment above the named river, lake, stream, or wetland because of the part they play in providing habitat areas for particular life stages of fish and game species.

### *Lakes Waihola and Waipori.*

Nationally important wetland for both game habitat and as a recreational hunting area.

[Internal assessment by OFGC, Teirney et al 1984, p106]

Also considered national and internationally important for wildlife and fisheries

[DOC, 1993, DOC 1996, Davis 1997]

Recreational Opportunity Spectrum

Setting: natural,

Activities: fly, spin, bait, troll, hunt.

Users: local, regional, national user groups.

### *Lake Wanaka*

A nationally important sports fishery

[Internal assessment by OFGC; Teirney et al 1984, p106, Hutchinson 1980]

Recreational Opportunity Spectrum

Setting: natural

Activities: fly, spin, bait, troll

Users: Local, regional, national, international, commercial, junior

### *Lake Wakatipu*

A nationally important sports fishery

[Water Conservation (Kawarau) Order 1997, Internal assessment by OFGC; Teirney et al 1984, p106]

Recreational Opportunity Spectrum

Setting: natural

Activities: fly, spin, bait, troll

Users: Local, regional, national, international, commercial, junior.

### *Lake Hawea*

A nationally important sports fishery

[Internal assessment by OFGC, Teirney et al 1984, p 106]

Recreational Opportunity Spectrum

Setting: natural

Activities: fly, spin, bait, troll

Users: Local, regional, national, international, commercial, junior

### *Lake Dunstan*

A nationally important sports fishery

[Internal assessment by OFGC]



Recreational Opportunity Spectrum

Setting: rural

Activities: fly, spin, bait, troll, hunt

Users: Local, regional, national, international, commercial, junior

*Greenstone River*

A nationally important backcountry trout fishery

[Teirney et al 1984; Water Conservation (Kawarau) Order 1997, Jellyman and Graynoth 1994]

Also considered of national and international significance for outdoor recreation and conservation values [DOC 1996]

Recreational Opportunity Spectrum

Setting: remote

Activities: fly

Users: Local, regional, national, international, commercial

*Hunter River*

A nationally important backcountry trout fishery

[Teirney et al 1984, Jellyman and Graynoth 1994]

Recreational Opportunity Spectrum

Setting: remote

Users: fly, spin, bait

Local, regional, national, international, commercial

*Caples River*

A nationally important backcountry trout fishery

[Teirney et al 1984; Water Conservation (Kawarau) Order 1997, Jellyman and Graynoth 1994]

Also considered of national and international significance for outdoor recreation and conservation values [DOC 1996]

Recreational Opportunity Spectrum

Setting: remote

Activities: fly

Users: Local, regional, national, international, commercial

*Lochy River*

A nationally important backcountry trout fishery

[Teirney et al 1984; Water Conservation (Kawarau) Order 1997, Jellyman and Graynoth 1994]

#### Recreational Opportunity Spectrum

Setting: remote

Activities: fly, catch and release (upper Lochy)

Users: Local, regional, national, international, commercial

#### *Nevis River*

A nationally important backcountry trout fishery

[Water Conservation (Kawarau) Amendment Order 2013, Jellyman and Graynoth 1994]

#### Recreational Opportunity Spectrum

Setting: backcountry

Activities: fly, spin

Users: Local, regional, national, international, commercial

#### *Diamond Lake, Reid Lake and Diamond Creek*

(Reid Lake is sometimes known as Reids Lake)

A nationally important wildlife habitat, trout and salmon fishery and game hunting area. Diamond Lake is a wildlife management reserve and Diamond Creek is a significant salmon spawning ground. .

[Water Conservation (Kawarau) Order 1997, Wildlife Management Reserve, Schedule 9 of the Otago Regional Plan Water (WP)].

#### Recreational Opportunity Spectrum

Setting: backcountry

Activities: fly, spin, bait

Users: Local, regional, national, international, junior

#### *Upper Clutha River*

A nationally important recreational sports fishery, with particularly high angling values between the Lake Wanaka outlet and Cardrona River confluence.

[Teirney et al 1984, Teirney and Jowett 1990]

#### Recreational Opportunity Spectrum

Setting: rural

Activities: fly, spin, bait

Users: Local, regional, junior

## **5.2 Regionally Significant Habitats**

#### *Lake Tuakitoto*

A regionally important wetland both as game habitat and as a recreational waterfowl hunting area.

[Local Water Conservation (Lake Tuakitoto) Notice 1991, NZ Gazette 1991, no. 126, p2745, Water Plan regionally significant wetland]

Also considered nationally important for wildlife and fisheries.

[DOC 1987, Davis 1987]

Recreational Opportunity Spectrum:

Setting: natural

Activities: fly, spin, bait, troll, hunt

Users: Local, regional, national, junior

#### *Lower Clutha River*

A regionally important area for sports fish, game and for angling and hunting

[Local Water Conservation (Pomahaka River and Tributaries and Lower Clutha River) Notice 1989, NZ Gazette 1989, No. 212, p6032, Hughey et al 1986]

Recreational Opportunity Spectrum

Setting: rural

Activities: fly, spin, bait, hunt

Users: Local, regional, national, junior, commercial

#### *Taieri River*

A regionally important area for sports fish, game and for angling and hunting

[Richardson 1984, Internal assessment by OFGC, Jellyman and Graynoth 1994]

Recreational Opportunity Spectrum

Setting: rural

Activities: fly, spin, bait, hunt

Users: Local, regional, national, junior, commercial

#### *Pomahaka River*

A regionally important brown trout fishery for both sea run and resident trout and as a game habitat and hunting area. The Upper Pomahaka River has backcountry characteristics.

[Local Water Conservation (Pomahaka River and Tributaries and Lower Clutha River) Notice 1989, NZ Gazette 1989, No. 212, p6032, Teirney et al 1984, Jellyman and Graynoth 1994, Teirney and Jowett 1990, WP Schedule 1A]

Recreational Opportunity Spectrum (middle and lower reaches, below Glenken)

Setting: rural

Activities: fly, spin, bait, hunt.

Uses: Local, regional, junior, commercial

Recreational Opportunity Spectrum (upper reaches, above Glenken)

Setting: backcountry

Activities: fly, spin, bait

Users: Local, regional, national, international, commercial

### *Upper Taieri Scroll Plain Wetlands*

A regionally important wetland both for game and as a hunting area  
[Internal assessment by OFGC; WP Schedule 9]

#### Recreational Opportunity Spectrum

Setting: rural

Activities: fly, spin, bait, hunt

Users: Local, regional, commercial

### *Waipahi River*

A regionally important brown trout fishery

[Local Water Conservation (Pomahaka River and Tributaries and Lower Clutha River) Notice 1989, NZ Gazette 1989, No. 212, p6032, WP Schedule 1A]

#### Recreational Opportunity Spectrum

Setting: rural

Activities: fly, spin, bait, hunt

Users: Local, regional, national, junior

### *Kaikorai Estuary*

A regionally important wetland both for game and as a hunting area  
[Internal assessment by OFGC]

#### Recreational Opportunity Spectrum

Setting: urban

Activities: hunting

Users: Local, junior

### *Lake Mahinerangi.*

A regionally important sports fishery

[Teirney et al 1984, p 106]

#### Recreational Opportunity Spectrum

Setting: rural

Activities: fly, spin, bait, troll, hunt

Users: Local, regional

### *Manorburn Reservoir*

A regionally important sports fishery

[Teirney et al 1984, p 106]

#### Recreational Opportunity Spectrum

Setting: natural

Activities: fly, spin, bait, troll

Users: Local, regional, national, junior, commercial

*Poolburn Reservoir*

A regionally important sports fishery  
[Teirney et al 1984, p 106]

Recreational Opportunity Spectrum  
Setting: natural  
Activities: fly, spin, bait, troll  
Users: Local, regional, national, junior, commercial

*Lake Onslow*

A regionally important sports fishery  
[Teirney et al 1984, p 106]

Recreational Opportunity Spectrum  
Setting: natural  
Activities: fly, spin, bait, troll  
Users: Local, regional, junior, commercial

*Lake Sylvan*

Situated within Mt Aspiring National Park, and recognised by the National Water Conservation (Kawarau River) Order

Recreational Opportunity Spectrum  
Setting: remote  
Activities: fly, spin  
Users: local, regional, national, junior

*Loganburn Reservoir and Logan Burn*

A regionally important sports fishery  
[Teirney et al 1984, p 106]

Recreational Opportunity Spectrum  
Setting: natural  
Activities: fly, spin, bait, troll, hunt  
Users: Local, regional, commercial

*Dingle Burn*

A regionally important backcountry trout fishery  
[Jellyman and Graynoth 1994]

Recreational Opportunity Spectrum  
Setting: remote  
Activities: fly, spin  
Users: Local, regional, national, international, commercial

### *Route Burn*

A regionally important backcountry trout fishery  
[Water Conservation (Kawarau) Order 1997, Jellyman and Graynoth 1994].

Recreational Opportunity Spectrum  
Setting: natural  
Activities: fly (catch and release)  
Users: Local, regional, national, international, commercial

### *Lake Hayes*

A regionally important trout fishery and wildlife habitat.  
[Water Conservation (Kawarau) Order 1997, Teirney et al 1984, p 106, Wildlife Sanctuary]

Recreational Opportunity Spectrum  
Setting: rural  
Activities: fly, spin, bait  
Users: Local, regional, national, junior

### *Hawea River*

A regionally important trout fishery  
[Internal assessment by OFGC, Unwin and Brown 1998]

Recreational Opportunity Spectrum  
Setting: rural  
Activities: fly, spin, bait  
Users: Local, regional, junior, commercial

### *Manuherikia River*

A regionally important trout fishery.  
The upper reaches of this river have backcountry characteristics.  
[Internal assessment by OFGC]

Recreational Opportunity Spectrum  
Setting: rural, backcountry (for the upper river)  
Activities: fly, spin, bait, hunt  
Users: Local, regional, junior, commercial

### *Dunstan Creek*

A regionally important trout fishery  
[Internal assessment by OFGC]

Recreational Opportunity Spectrum  
Setting: backcountry  
Activities: fly, spin, bait, hunt  
Users: Local, regional, national, junior, commercial

### *Shag River*

A regionally important trout fishery

[Internal assessment by OFGC, Davis 1987, Teirney and Jowett 1990]

Recreational Opportunity Spectrum

Setting: rural

Activities: fly, spin, bait, hunt

Users: Local, regional, junior

### *Von River*

A regionally important backcountry trout fishery

[ Water Conservation (Kawarau) Order 1997, Jellyman and Graynoth 1994].

Recreational Opportunity Spectrum

Setting: backcountry

Activities: fly, spin

Users: local, regional, national, international, commercial

### *Lower Tokomariro River and adjacent wetlands*

A regionally important wildlife habitat for game birds and protected species, also supports a brown trout fishery. This river has suffered from marked water quality deterioration in recent years.

[Internal assessment by OFGC, Otago Regional Council water quality report 2012]

Recreational Opportunity Spectrum

Setting: rural

Activities: fly, spin, bait, hunt

Users: local, junior

### *Glenorchy Lagoon*

A regionally important wildlife habitat for game birds and protected species. .

[Internal assessment by OFGC, Wildlife Management Reserve Status, WP Schedule 9]

Recreational Opportunity Spectrum

Setting: natural

Activities: hunt

Users: local, regional, junior

### *Tomahawk Lagoon*

A regionally important wildlife habitat for game birds and protected species, also supports a trout and perch fishery

[Internal assessment by OFGC]

Recreational Opportunity Spectrum

Setting: rural

Activities: hunt

Users: local, junior

#### *Takitakitoa Wetland*

A regionally important wildlife habitat for gamebirds and protected species.

[Otago Regional Water Plan: Schedule 9]

Recreational Opportunity Spectrum

Setting: natural

Activities: hunt

Users: local, regional, junior

### **5.3 Locally Significant Habitats**

All sports fish and gamebird habitats that are not listed as nationally or regionally significant above should be considered as locally significant in the first instance in the absence of further information about the habitat.

#### *Waikouaiti River*

This river sits on the border between a locally and regionally significant fishery on the basis of angler use. Its key attributes include: a fishery composed of both sea run and river resident trout; the ability to catch trophy fish; its proximity to a large centre of population (Dunedin) and a growing local population. It is one of a few sizeable and fishable East Coast rivers between Dunedin and Oamaru is also a consideration (the other three are the Waianakarua, Kakanui and the Shag River).

Recreational Opportunity Spectrum

Setting: rural

Activities: fly, spin, bait, hunt

Users: local, junior

#### *Waitati*

Recreational Opportunity Spectrum

Setting: rural

Activities: fly, spin, bait, hunt

Users: local, junior

#### *Catlins*

Recreational Opportunity Spectrum

Setting: rural/natural

Activities: fly, spin, bait, hunt

Users: local, regional, junior

#### *Owaka*

Recreational Opportunity Spectrum

Setting: rural

Activities: fly, spin, bait, hunt

Users: local, junior



*Tahakopa*

Recreational Opportunity Spectrum  
Setting: rural/natural  
Activities: fly, spin, bait, hunt  
Users: local, junior

*Maclennan*

Recreational Opportunity Spectrum  
Setting: natural  
Activities: fly, spin, bait  
Users: local, junior

*Waiwera*

Recreational Opportunity Spectrum  
Setting: rural  
Activities: fly, spin, bait, hunt  
Users: local, junior

*Lee Stream*

Recreational Opportunity Spectrum  
Setting: rural  
Activities: fly, spin, bait, hunt  
Users: local, junior

*Deep Stream*

Recreational Opportunity Spectrum  
Setting: rural  
Activities: fly, spin, bait, hunt  
Users: local, junior

*Kaihiku Stream*

Recreational Opportunity Spectrum  
Setting: rural  
Activities: fly, spin, bait, hunt  
Users: local, regional, junior

*Arrow River*

Recreational Opportunity Spectrum  
Setting: rural  
Activities: fly, spin, bait  
Users: local, regional, junior

*Lake Johnson*

Recreational Opportunity Spectrum

Setting: rural

Activities: fly, spin, bait, troll, hunt

Users: local, regional, national, junior

*Moke Lake*

Recreational Opportunity Spectrum

Setting: natural

Activities: fly, spin, bait

Users: local, regional, national, junior, commercial

*Conroys Dam*

Recreational Opportunity Spectrum

Setting: natural

Activities: fly, spin, bait

Users: local, regional, national, junior

*Butchers Dam*

Recreational Opportunity Spectrum

Setting: natural

Activities: fly, spin, bait

Users: local, regional, national, junior

*Lake Kirkpatrick*

Recreational Opportunity Spectrum

Setting: natural

Activities: fly, spin, bait

Users: local, regional, junior

*Sullivans Dam*

Recreational Opportunity Spectrum

Setting: natural

Activities: fly, spin

Users: local, junior

*Southern Reservoir*

Recreational Opportunity Spectrum

Setting: urban

Activities: fly, spin

Users: local, junior

*Coal Pit Dam*

Recreational Opportunity Spectrum

Setting: rural

Activities: fly, spin, bait

Users: local, regional, junior

*Hoffmans Dam*

Recreational Opportunity Spectrum

Setting: rural

Activities: fly, spin, bait

Users: local, regional, junior

*Blakelys Dam*

Recreational Opportunity Spectrum

Setting: rural

Activities: fly, spin, bait

Users: local, regional, junior, commercial

*Rutherfords Dam*

Recreational Opportunity Spectrum

Setting: rural

Activities: fly, spin, bait

Users: local, regional, junior, commercial

*McAtamneys Head Pond/Dam*

Recreational Opportunity Spectrum

Setting: rural

Activities: fly, spin, bait

Users: local, regional, junior

*Mathias Dam*

Recreational Opportunity Spectrum

Setting: rural

Activities: fly, spin, bait

Users: local, regional, junior, commercial

*Kaikorai Lagoon*

Recreational Opportunity Spectrum

Setting: urban

Activities: fly, spin, bait

Users: local, junior

*Kaikorai Stream*

Recreational Opportunity Spectrum

Setting: urban

Activities: fly, spin, bait

Users: local, junior

*Water of Leith*

Recreational Opportunity Spectrum

Setting: urban

Activities: fly, spin, bait

Users: local, junior

*Blueskin Bay*

Recreational Opportunity Spectrum

Setting: rural

Activities: fly, spin, bait, hunt

Users: local, junior

*Catlins Lake*

Recreational Opportunity Spectrum

Setting: natural

Activities: fly, spin, bait, hunt

Users: local, regional, junior

*Shag Estuary*

Recreational Opportunity Spectrum

Setting: rural

Activities: fly, spin, bait, hunt

Users: local, regional, junior

## APPENDIX 6. WETLAND RESERVES OWNED OR MANAGED BY THE COUNCIL

| Name                           | Location   | Status                                | Owner            | Area Ha. | Gazette Reference or Title Reference   |
|--------------------------------|--|---------------------------------------|------------------|----------|--|
| Takitakitoa Wetland            | Near Lower Taieri River below Waipori River confluence       | Freehold title                        | F&G              | 40       | Fee Simple, 1/1, Lot 1 Deposited Plan 300569 and Lot 1 Deposited Plan 301419<br><br>Fee Simple, 1/1, Allotment 23 Block A Taieri Maori Reserve<br><br>Part Taieri Sec 24 Blk A Block |
| Toko Wetland: Davis            | Lower Tokomariro Catchment                                   | QE II Covenant,<br><br>Freehold title | F&G              | 5        | Fee Simple, 1/1, Lot 1 Deposited Plan 21009  |
| Toko Wetland: Nobleburn        | Lower Tokomariro Catchment                                   | Freehold title                        | F&G              | 46       | Fee Simple, 1/1, Part Lot 1 Deposited Plan 21008   |
| Toko Wetland: City Forests Ltd | Lower Tokomariro Catchment                                   | QE II Covenant,                       | City Forests Ltd | 22.5     |  |
| Waitepeka Wetland              | Adjacent to SH 82, Finegand, South Otago                     | Freehold title                        | F&G              | 35       | Fee Simple, 1/1, Lot 3-4 Deposited Plan 22588  |
| Finegand Lagoon                | On lower Waitapeka Stream, near SH 82, Finegand, South Otago | Wildlife Refuge<br>F&G<br>Covenant    | Private          | 15       | 17 Dec. 1959. No.78, p.1919  |
| Waihola Wetland                | Western margin, Lake Waihola                                 | Wildlife Reserve                      | Crown            | 8.5      |  |
| Otokia Wetland                 | Adjacent to SH1 north  |                                       | Otago Region     | 9        |  |

|                      |   |  |               |     |                                |
|----------------------|---|--|---------------|-----|--------------------------------|
|                      | of Otokia<br>Bridge on<br>Lower Taieri                          |  | al<br>Council |     |                                |
| Bendigo Wetland      | Clutha Arm<br>of Lake<br>Dunstan,<br>Central<br>Otago           | Pending<br>Wildlife<br>M'gement<br>Reserve | Crown         | 153 |                                |
| Little Hoopers Inlet | Northern<br>margin of<br>Hoopers<br>Inlet, Otago<br>Peninsula   | Wildlife<br>M'gement<br>Reserve            | Crown         |     |                                |
| Inch Clutha Wetland  | Adjacent<br>Chickory<br>Road, Inch<br>Clutha,<br>South<br>Otago | Wildlife<br>Mgement<br>Reserve             | Crown         | 17  | 15 April 1999, No.45,<br>p1055 |

## APPENDIX 7. PUT & TAKE STOCKING SCHEDULE

The following is the put-and-take fishery stocking schedule for Otago as at August 2013. All fish are sourced from the Otago Fish and Game Council hatchery at Macraes Flat.

| Species | Age | Number PA | Release Date | Fishery              |
|---------|-----|-----------|--------------|----------------------|
| Rainbow | 2   | 300       | December     | Sullivans Dam        |
| Rainbow | 2   | 800       | December     | Southern Reservoir   |
| Rainbow | 2   | 100       | March        | Tomahawk Lagoon      |
| Rainbow | 1   | 500       | Oct          | Rutherfords Dam      |
| Rainbow | 1   | 200       | Oct          | McAtamneys Head Pond |
| Rainbow | 1   | 500       | Oct          | Blakleys Dam         |
| Rainbow | 1   | 100       | Oct          | Hamiltons Dam        |
| Rainbow | 1   | 300       | Oct          | Mathais Dam          |
| Rainbow | 1   | 1000      | Oct          | Butchers Dam         |
| Rainbow | 1   | 500       | Oct          | Lake Johnson         |
| Rainbow | 1   | 150       | Oct          | Coal Pit Dam         |
| Rainbow | 1   | 200       | Oct          | Nenthorn Dam         |
| Rainbow | 1   | 100       | Oct          | Perkins Pond         |
| Rainbow | 2   | 100       | December     | Earnsclough Pond     |
| Rainbow | 1   | 100       | Oct          | Island Block Ponds   |
| Rainbow | 2   | 100       | Oct          | Lake Tewa            |
| Rainbow | 1   | 300       | Oct          | Moke Lake            |

## APPENDIX 8. APPROVAL



### Office of Honourable Maggie Barry ONZM

MP for North Shore  
Minister for Arts, Culture and Heritage  
Minister of Conservation  
Minister for Senior Citizens

12 APR 2015

6 MAY 2015

Monty Wright  
Chairperson  
Otago Fish and Game Council  
PO Box 78  
Dunedin 9054

Dear Monty

Thank you for your letter of 14 February 2015 enclosing the draft Sports Fish and Game Management Plan for Otago – 2015-2025.

I think it clearly sets out the council's management intentions for Otago, and gives due regard to the sustainability of sports fish and game in the region, the impact of the proposed management regime on the resources, and allows recreational anglers and hunters to maximise their opportunities.

Clearly, a great deal of work has gone into the development of the management plan and I congratulate all those who have contributed. In particular, please convey my appreciation to the Otago Fish and Game Council.

I have no comments of substance that I wish the council to consider. In accordance with section 17M(g) of the Conservation Act 1987, I hereby approve the Sports Fish and Game Management Plan for Otago.

Yours sincerely

Honourable Maggie Barry ONZM  
Minister of Conservation



## **APPENDIX 9. REFERENCES**

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## Karen Bagnall

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**From:** Nigel Paragreen <nparagreen@fishandgame.org.nz>  
**Sent:** Friday, 12 July 2019 7:51 p.m.  
**To:** Karen Bagnall; Submissions  
**Subject:** Re: Fish and Game Submission on Application No. RM19.051

Hi Karen,

I'm very sorry about that. Please see Fish and Game's responses below, with the applicable answer in **red** and the incorrect answer in ~~strike through~~.

Unfortunately, I have been out of the office today and I only just received your email. Given these circumstances, could you please confirm if the submission will be accepted?

Cheers

**Nigel Paragreen | Environmental Officer**

**Otago Fish and Game Council**

PO Box 76, Dunedin 9054

Cnr Hanover and Harrow Street, Dunedin

P 0272 050 395 | E [nparagreen@fishandgame.org.nz](mailto:nparagreen@fishandgame.org.nz) | W [www.fishandgame.org.nz](http://www.fishandgame.org.nz)



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**From:** Karen Bagnall <karen.bagnall@orc.govt.nz>  
**Sent:** 12 July 2019 13:49  
**To:** Nigel Paragreen  
**Subject:** FW: Fish and Game Submission on Application No. RM19.051

Good afternoon – thank you for your submission – unfortunately there were a few things omitted – can you confirm the following;

I, ~~am~~/**am not** (choose one) 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/am not** (choose one) 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/do not** (choose one) wish to be involved in any pre-hearing meeting that may be held for this application.

I **do/do not** request\* that the local authority delegates its functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

I **have/have not** served a copy of my submission on the applicant.

Could please reply to the submission e-mail address as per your original submission.

Please do not hesitate to contact me should you have any questions.



## Karen Bagnall

SENIOR CONSENTS SUPPORT OFFICER

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Otago Regional Council  
70 Stafford St  
Private Bag 1954 Dunedin 9054  
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**From:** Nigel Paragreen <nparagreen@fishandgame.org.nz>  
**Sent:** Friday, 12 July 2019 8:56 a.m.  
**To:** Submissions <Submissions@orc.govt.nz>  
**Cc:** alisha.robinson@beca.com  
**Subject:** Fish and Game Submission on Application No. RM19.051

Hi,

Please find attached a submission on behalf of the Otago Fish and Game Council. Should you wish to further discuss anything raised here, please feel free to get in touch any time.

Cheers,

**Nigel Paragreen | Environmental Officer**  
**Otago Fish and Game Council**

**From:** [REDACTED]  
**To:** [alisha.robinson@beca.com](mailto:alisha.robinson@beca.com); [Submissions](#)  
**Subject:** Submission against Application No: RM19.051.01  
**Date:** Friday, 12 July 2019 1:03:30 a.m.

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This is a Submission on a publicly notified resource consent application pursuant to the Resource Management Act 1991.

Applicant Details: Patricia Muir

Applicant: Queenstown Lakes District Council

Application No: RM19.051.01

Consent Type: Discharge Permit

Purpose: To discharge untreated wastewater to various freshwater receiving environments, and onto land in circumstances where it may enter freshwater due to blockages, breakages, system failures, extreme storm events, and capacity exceedance in the network that cause overflows to the wastewater infrastructure throughout the Queenstown Lakes district

Location: Various locations throughout the Queenstown Lakes district

Map reference: Various locations throughout the Queenstown Lakes district

Legal description: Various locations throughout the Queenstown Lakes district

Submitter Details:

Full Name/s: Patricia Muir

Full Postal Address: Post Code: [REDACTED]

Mobile Ph: [REDACTED]

Email address: [REDACTED]

Submission No:

Please tick one of the following submission types regarding the application:

Do you: Oppose Yes

Do you: Wish to be heard Yes

The specific parts of the application/s that this submission relates to are: that the consent not be allowed in its entirety due the fact it does not meet the requirements under the National Policy Statement for Freshwater Management (NPSFM) specifically in regard to:

Safeguarding fresh water's life-supporting capacity, ecosystem processes, and indigenous species.

Safe guarding the health of people who come into contact with the water.

National Policy Statement for Freshwater Management A. Water quality Objective A1 To safeguard: a) the life-supporting capacity, ecosystem processes and indigenous species including their associated ecosystems, of fresh water; and b) the health of people and communities, as affected by contact with fresh water; in sustainably managing the use and development of land, and of discharges of contaminants.

Maintaining or improving the overall quality of fresh water within a freshwater management unit.

National Policy Statement for Freshwater Management Objective A2 The overall quality of fresh water within a freshwater management unit is maintained or improved while: a) protecting the significant values of outstanding freshwater bodies; b) protecting the significant values of wetlands; and c) improving the quality of fresh water in water bodies that have been degraded by human activities to the point of being over-allocated.

Improving water quality so that it is suitable for primary contact more often .

National Policy Statement for Freshwater Management Objective A3 The quality of fresh water within a freshwater management unit is improved so it is suitable for primary contact more often, unless: a) regional targets established under Policy A6(b) have been achieved; or b) naturally occurring processes mean further improvement is not possible.

In the event that a consent is granted then it must contain clear and strict requirements for infrastructure upgrades to occur within defined time period of no longer than 10 years so that these discharges are reduced and eliminated. Any such consent granted must be short-term so that the effectiveness of these upgrades, and also the performance of ORC's compliance team in undertaking the necessary monitoring and enforcement, is reviewed once again in the public arena. Transparency and an accountable promise that both organisations QLDC AND ORC work together to work towards reducing spills to zero over a set and agreed time frame.

The reasons for this submission are:

ORC is responsible for safeguarding fresh water's life-supporting capacity, ecosystem processes, and indigenous species, as per the National Policy Statement for Freshwater Management (NPSFM).

ORC is responsible for safe guarding the health of people who come into contact with the water (NPSFM).

ORC is responsible for maintaining or improving the overall quality of fresh water within a freshwater management unit (NPSFM).

"The applicant, QLDC, has failed to demonstrate how ORC can possibly grant the consent sought whilst ensuring that ORC's statutory obligations under the NPSFM are satisfied at all times"

Both ORC and QLDC, under section 6 (e), 7 (a) and 8 RMA, are responsible for recognising and providing for, having particular regard to, and taking into account both the principles of the Treaty of Waitangi and matters of importance to iwi. These values include but are not limited to:

Protecting the mauri of our waterways. Mauri is the life energy which binds and animates all things in the physical world. It is the force behind that which is manifested, the force that sparkles alive the waterways, the force of beat in the human pulse, the force that shines out through the native greenery. Discharging untreated water into waterways will diminish and degrade mauri.

To aid further understanding, a breakdown of the word mauri may help:

Ma = To be connected to, bound to, linked to, joined

Uri = Descendants. All things, seen and unseen

Protecting whakapapa. Whakapapa is the word for connections and relating. If the Enlightenment view is epitomised in 'I think therefore I am', the Maori understanding is 'I relate therefore I am'. In this cultural context, whakapapa refers to the need to treasure relationships, including the human relationship with water.

Upholding our responsibility as Kaitiakitanga of the whenua. In a cultural context our role is guardian or protectors of the land, and our function is to understand the significant values of outstanding freshwater bodies and to improve the quality of fresh water in water bodies that have been degraded by human activities to the point of being over-allocated. Kaitiakitanga refers to our need to lead the conversation about conservation - as people, organisations and businesses, and collaborate on how we protect and enhance the mauri of this water.

Wahi taonga refers to places in the landscapes that are treasured and in need of acknowledgement and protection. This includes our Central Lakes waterways and lakes which are precious and unique to us.

It is understood that the drains in the Queenstown region have unique issues with high fat content (and blocking), and discharge from industry in to drains. This is a related concern to me, and I am requesting that:



More emphasis be placed on educating the public on what is NOT flushable or drainable. Our biological system, which is excellent, can only accept the 3 P's- poo, pee, paper. Nothing else!

More stringent conditions are put in place in regards to households and industry discharge, including investment in more stringent monitoring of household and trade waste bylaw.

That no consent is granted unless it is for a very limited term, with stringent monitoring, and review provisions, and clear timelines within which QLDC must upgrade infrastructure so that these discharges are reduced and eliminated within a very clear timeframe.

I am concerned that ORC will not provide adequate monitoring and enforcement of these discharges and the required upgrades unless it is clearly defined on the aforementioned short-term consent, so that it may be given priority in ORC's compliance monitoring programme. It is a fact that ORC embarked on an Urban Water Strategy in 2017. It was agreed by ORC (worked on it partnership with QLDC) but has not progressed into an actual plan. So as a result has no teeth. Unfortunately there have been additional delays in doing this with the new NPSFM being proposed and now the complete review of the Water Plan: Otago. However there are key points in here about needing to upgrade infrastructure, partnership etc etc. THIS MUST BE PRIORITISED if we seek outcomes of the overall quality of fresh water within a freshwater management units are to be maintained or improved.

Submission No:

I seek the following decision from the consent authority: that the consent not be allowed in its entirety due to the reasons above