

Submission on the Illustrative National Policy Direction: Protecting Outstanding Natural Water Bodies

Friends of Lake Hayes · Oct 14, 2026

Summary

Friends of Lake Hayes asks that the new planning system protect outstanding natural water bodies, and that the protections which have helped bring Lake Hayes / Waiwhakaata back from poor health are not lost in the move to the new system. In particular, we ask that catchment-based water-quality policies such as Policy 24.2.4.2 of the Queenstown Lakes District Plan be carried into the new plans.

Lake Hayes demonstrates that, with the right will, development can coexist with protection. We are a community group, and our concern is that the significant progress that our local community has achieved could be undone.

Why outstanding water bodies matter to visitors

The condition of our outstanding lakes and rivers is part of what New Zealand sells to the world. Lake Hayes is the first lake many visitors to Queenstown see, and its autumn reflections are among the most photographed scenes in the country.

A lake that is unsafe for swimming, or green with algae, tells visitors something about how the place is looked after.

Lake Hayes: from poor health to a community-led recovery

Lake Hayes has a long record of poor health, including algal blooms, fish kills and swimming warnings. The most recent major event was a toxic cyanobacteria bloom in February 2020, when Otago Regional Council advised people to stay out of the water.

The recovery since has been led locally. Landowners, the community and mana whenua have worked together, and development in the catchment has been tied to improving the lake's water quality rather than judged case by case.

That link is set out in Policy 24.2.4.2 of the Queenstown Lakes District Plan, which directs that subdivision, development and use of land in the Lake Hayes catchment be restricted unless it can occur consistently with improvement to water quality within the catchment. The policy was confirmed through the Environment Court in 2021, and the catchment it applies to is mapped in Schedule 24.9 of the plan.

Lake Hayes shows that development and protection can coexist. Otago Regional Council has said so itself: in its 2023 submission on the Te Pūhahi Ladies Mile variation, it supported Policy 24.2.4.2 and said the development could proceed while adhering to it. Protection and development do not have to be set against each other, and clear, well-understood rules are what made that possible.

Early results are encouraging. Sediment traps in the catchment are capturing large volumes of sediment that would otherwise reach the lake, and Otago Regional Council's monitoring of Mill Creek, and the lake itself is tracking the positive effect of this work.

Lake Hayes is also recognised in the district plan as an Outstanding Natural Feature.

Our concern

Under the new system, the district plan will be replaced by a combined Otago regional plan, including a land-use plan for Queenstown Lakes, expected to be in place by about 2030. The first National Policy Direction is due to be finalised in 2027 and regional spatial plans notified in 2028, so the direction set now will shape those plans.

Nothing in the illustrative National Policy Direction would carry protections like Policy 24.2.4.2 across into the new regulations, and some of the housing directives may push the other way. For example, the illustrative NPD would let land-use plans allow urban development in outstanding natural features if it meets criteria in national standards.

Without clear direction, a lake like Lake Hayes could go back to case-by-case decisions, and the strong progress that has been made could be lost.

What we ask

1. **Fill a gap:** direct that land-use and natural environment plans keep proven, catchment-specific water-quality policies, such as QLDC Policy 24.2.4.2, where a water body is degraded and recovering.
2. **Resolve a conflict:** state that housing and development directives do not override water-quality protections for outstanding natural features that are water bodies.
3. **Protect outstanding water bodies:** direct that the new system protect outstanding natural water bodies and their broader catchments, not just the water body itself.

Visit Lake Hayes

We would welcome officials to visit Lake Hayes and see the great work that has been undertaken by the community and see the recovery for themselves.

Kind regards

Andrew Davis

Friends of Lake Hayes Society Incorporated

cc. Michael Hanff (Friends of Lake Hayes Chair)