

Further Submission Form

Further submission in support of, or in opposition to, a submission on the Proposed Marlborough Environment Plan



**MARLBOROUGH
DISTRICT COUNCIL**

Form 6, Clause 8 of the First Schedule, Resource Management Act 1991

ISO 9001
Document Number:
EAF0006-C11830

Further submitter details:

First Name

N/A

Last Name

N/A

Organisation (if applicable)

Kenepuru & Central Sounds Residents' Assoc

Contact Person (if applicable)

Andrew Caddie

Address for Service

1-2725 Kenepuru Road RD 2
Piton 7282

Post Code 7282

Contact Details

Email Address: andrew.caddie@extra.co.nz

Phone: [Daytime]

Phone: [Mobile] 0274 929 967

Email address as preferred address for service? ☒ Yes ☐ No

Council hearing:

Do you wish to be heard in support of your submission?

☒ Yes ☐ No

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

☒ Yes ☐ No

You must indicate which interest you represent:

I represent a relevant aspect of the public interest.



I have an interest in the proposed plan greater than the interest that the general public has.



Specify the grounds for saying that you come within the category selected:

KCSRA has around 250 Household members all concerned with issues flowing from the notified ME

Signature:

Signature of further submitter (or person authorised to sign on behalf of further submitter. Signature not required if you make your further submission by electronic means)

A Caddie
Vice President
KCSRA

Date 23/6/17

You must serve a copy of your further submission on the original submitter within **five working days** of making the further submission to Marlborough District Council.

Subject to the Resource Management Act 1991, all information contained in a submission including the name and address of the submitter, will be made publicly available. Submitters have the right to access and correct personal information.

Return submission to Marlborough District Council by one of the following options:

Post to: Attention Rachel Anderson
Marlborough District Council
PO Box 443
Blenheim 7240

Deliver to: Marlborough District Council
15-21 Seymour Street
Blenheim

Fax: 03 520 7496
Email: mep@marlborough.govt.nz

My further submission relates to: (use a separate form for each original submitter)

Name of original submitter

Marine Farming Association Inc.

Address of original submitter

4- Gascoigne Wicks P.O. Box 2 Blenheim

Number of original submission

426

7240

Submission Point No.:

see attached

☐ Support

☐ Oppose

I seek that the whole or part (describe part below) of this submission point be:

☐ Allowed

☐ Disallowed

The reason for my Support/Opposition:

See attached appendix for
the details by submitter
Point Number 1 (pages 1 to 12).

Submission Point No.:

☐ Support

☐ Oppose

I seek that the whole or part (describe part below) of this submission point be:

☐ Allowed

☐ Disallowed

The reason for my Support/Opposition:

Submission Point No.:

☐ Support

☐ Oppose

I seek that the whole or part (describe part below) of this submission point be:

☐ Allowed

☐ Disallowed

The reason for my Support/Opposition:

Submission Point No.:

☐ Support

☐ Oppose

I seek that the whole or part (describe part below) of this submission point be:

☐ Allowed

☐ Disallowed

The reason for my Support/Opposition:

Appendix to KCSRA Further Submission Form re Proposed Marlborough Environment Plan

Introduction: The Kenepuru and Central Sounds Residents' Association (**KCSRA**) has made various submissions on the Proposed Marlborough Environment Plan (**MEP**) as notified by the Marlborough District Council (**MDC**) in 2016.

The MDC has now released a summary of the submissions made by all submitters on various points re the MEP. The Marine Farmers Association Inc (**MFA**) has made various submissions on the MEP.

The primary purpose of this further submission by KCSRA is to identify which aspects of the MFA's submission, which KCSRA has not expressly or by implication opposed in the original 2016 KCSRA submissions, we now **also oppose** and wish to **see disallowed**.

Volume 1 Chapter Six of the MEP – Natural Character

Issue 6A – Submitter point 426.044- KCSRA opposes the suggested change from degradation to modification and submits it should be disallowed on the grounds that the change does not support or encourage sustainable management of the environment.

Objective 6.1 – Submitter Point 426.045 – KCSRA opposes the suggested change adding the additional sentence and submits it should be disallowed on the grounds that the change does not support or encourage sustainable management of the environment.

Policy 6.1.1– Submitter Point 426.046 - KCSRA opposes the suggested changes to this policy by MFA and submits it should be disallowed on the grounds that the change does not support or encourage sustainable management of the environment.

Policy 6.1.2 - Submitter Point 426.047 - KCSRA supports the comment by MFA that the Boffa Miskell/MEP approach dividing sea and land is flawed. However KCSRA opposes the suggested MFA drafting changes to this policy (snorkelling depth restriction approach) and submits it should be disallowed on the grounds that the proposed drafting change does not support or encourage sustainable management of the environment.

Policy 6.1.3– Submitter Point 426.048 – KCSRA supports in part the comments by MFA as to the inadequacies of the Boffa Miskell/MEP approach but prefers the approach and recommendations of Dr Stevens as per his opinion forming part of the KCSRA submission on the grounds it better supports and encourages sustainable management of the environment v's the approach taken by MFA and to that extent the MFA approach is opposed and should be disallowed.

Policy 6.2.1 - Submitter Point 426.051 - KCSRA opposes the suggested changes to this policy by MFA and submits it should be disallowed on the grounds that the change does not support or encourage sustainable management of the environment.

Policy 6.2.3 - Submitter Point 426.054 – KCSRA opposes the suggested deletion of this policy by MFA and submits it should be disallowed on the grounds that the MFA deletion does not support or encourage sustainable management of the environment.

Policy 6.2.7 - Submitter Point 426.054 – KCSRA opposes the suggested rewording of this policy by MFA and submits it should be disallowed on the grounds that the MFA rewording is confusing and therefore does not support or encourage sustainable management of the environment.

Policy 6.2.9 - Submitter Point 426.059 – KCSRA supports the suggested addition of “*businesses*” to this policy by MFA and submits it should be allowed on the grounds that the MFA addition supports and encourage business to participate in the sustainable management of the environment.

Chapter 6 - Submitter Point 426.063 – KCSRA has some sympathy with MFA that this chapter needs significant revisions /reworking as per the opinion of Dr Steven forming part of the KCSRA submission but KCSRA opposes the suggested deletion of this chapter on natural character by MFA and submits it should be disallowed on the grounds that the MFA deletion does not support or encourage sustainable management of the environment.

Volume 1 Chapter Seven of the MEP – Landscape

Objective 7.1 – Submitter Point 426.064 – KCSRA opposes the suggested change deleting the words from this objective and submits it should be disallowed on the grounds that the change does not support or encourage sustainable management of the environment.

Objective 7.2 – Submitter Point 426.065 – KCSRA opposes the suggested change deleting the words from this objective and submits it should be disallowed on the grounds that the change does not support or encourage sustainable management of the environment.

Policy 7.1.2– Submitter Point 426.066 - KCSRA supports the concerns raised by MFA as to the manner in which the MEP approaches landscape issues and definition but supports and prefers the approach and concerns raised by Dr Steven in the KCSRA submission on the grounds that it better supports or encourage sustainable management of the environment.

Policy 7.2.1– Submitter Point 426.078 - KCSRA opposes the suggested changes to this policy by MFA and submits it should be disallowed on the grounds that the change does not support or encourage sustainable management of the environment.

Policy 7.2.6– Submitter Point 426.081 - KCSRA opposes the suggested additional category (aquaculture activities) to this policy by MFA and submits it should be disallowed on the grounds that the change does not support or encourage sustainable management of the environment.

Policy 7.2.7– Submitter Point 426.082 - KCSRA opposes the suggested changes (recognition of aquaculture) and deletions (reference to amenity) to this policy by MFA and submit it should be disallowed on the grounds that the changes do not support or encourage sustainable management of the environment and that the approach taken by KCSRA in its submission on this policy is preferred.

Policy 7.2.12– Submitter Point 426.086 - KCSRA opposes the suggested changes to this policy by MFA and submits it should be disallowed on the grounds that the change does not support or encourage sustainable management of the environment

Chapter 7 – Submitter Point 426.087 – KCSRA sees visual amenity as a landscape value and opposes the suggested changes by MFA to Chapter 7 by this submission point on the basis the change does not support or encourage sustainable management of the environment and should be disallowed.

Chapter 7 – Submitter Point 426.088 – KCSRA supports consistent landscape assessment methodology to the extent that this is consistent with the opinion of Dr Steven in his report filed with the KCSRA submission.

Chapter 7 – Submitter Point 426.089 – KCSRA opposes this submission point (landscape not degraded by continuation of existing aquaculture activities) by MFA on the basis it ignore reality and thus does not support or encourage sustainable management of the environment and should be disallowed.

Volume 1 Chapter Eight of the MEP – Indigenous Biodiversity

Issue 8A – Submitter Point 426.91 - KCSRA opposes the suggested wording change to this Issue by MFA (use *avoid*) and submits it should be disallowed on the grounds that the change does not support or encourage sustainable management of the environment.

Objective 8.1 – Submitter Point 426.092 – KCSRA opposes the suggested changes (inter alia “significant”) to this objective and submits it should be disallowed on the grounds that the change does not support or encourage sustainable management of the environment.

Policy 8.1.1 - Submitter Point 426.094 - KCSRA opposes the suggested changes to this policy by MFA and submits it should be disallowed on the grounds that the change does not support or encourage sustainable management of the environment.

Policy 8.1.3 - Submitter Point 426.096 - KCSRA opposes the suggested changes (rewrite) to this policy by MFA and submits it should be disallowed on the grounds that among other things the change is vague (eg., *real risk*) and uncertain and thus does not support or encourage sustainable management of the environment.

Policy 8.2.3 - Submitter Point 426.102 - KCSRA opposes the suggested changes to this policy by MFA (limit to land or delete) and submits it should be disallowed on the grounds that the change does not support or encourage sustainable management of the environment.

Policy 8.2.5 - Submitter Point 426.105 - KCSRA opposes the suggested changes to this policy by MFA (limit to land or delete) and submits it should be disallowed on the grounds that the change does not support or encourage sustainable management of the environment.

Policy 8.2.7 - Submitter Point 426.106 - KCSRA opposes the suggested changes to this policy by MFA (unnecessarily prescriptive)) and submits it should be disallowed on the grounds that the change does not support or encourage sustainable management of the environment.

Policy 8.2.8 - Submitter Point 426.107 - KCSRA opposes the suggested deletion of this policy by MFA and submits it should be disallowed on the grounds that the change does not support or encourage sustainable management of the environment.

Policy 8.3.2 - Submitter Point 426.110 - KCSRA opposes the suggested deletion of this policy and the insertion of an additional policy point (8.3.2C) by MFA and submits it should be disallowed on the grounds that the change does not support or encourage sustainable management of the environment.

Policy 8.3.8 - Submitter Point 426.112 - KCSRA opposes the suggested deletion of this policy by MFA and submits it should be disallowed on the grounds that the change does not support or encourage sustainable management of the environment and that the position taken by KCSRA in its submission is to be preferred.

Volume 1 Chapter Thirteen of the MEP – Use of the Coastal Environment

Objective 13.1 – Submitter Point 426.125 – KCSRA opposes the suggested deletion of this objective and submits it should be disallowed on the grounds that the change does not support or encourage sustainable management of the environment.

Policy 13.2.1 - Submitter Point 426.132 - KCSRA opposes the suggested deletion of this policy by MFA (unnecessarily prescriptive) and submits it should be disallowed on the grounds that the change does not support or encourage sustainable management of the environment.

Policy 13.3.1 - Submitter Point 426.140 - KCSRA opposes the suggested change to this policy by MFA (vague and in any event there can be no reverse sensitivity in regards to activities undertaken in the public domain) and submits it should be disallowed on the grounds that the change does not support or encourage sustainable management of the environment.

Policy 13.3.4. - Submitter Point 426.141 - KCSRA opposes the suggested change to this policy by MFA (excluding Tory Channel) and submits it should be disallowed on

the grounds that the change does not support or encourage sustainable management of the environment.

Policy 13.5.2 - Submitter Point 426.152 - KCSRA notes that the MDC summary appears to be **wonky** (or the MFA submission was) in that the MDC summary refers to Policy 13.12.2 not Policy 13.5.2. Accordingly we oppose any change to either of these policies as suggested by MFA and submit it should be disallowed on the grounds that the change does not support or encourage sustainable management of the environment.

Objective 13.5 – Submitter Point 426.142 – KCSRA opposes any suggestion there can be reverse sensitivity issues in regards to aquaculture activities undertaken in public domain and submits that this submission should be disallowed on the basis it does not support or encourage sustainable management of the environment.

Chapter 13 – Submitter Points 426.143 and 426.144 – As above, KCSRA opposes any suggestion there can be reverse sensitivity issues in regards to aquaculture activities undertaken in public domain and submits that this submission should be disallowed on the basis it does not support or encourage sustainable management of the environment.

Policy 13.7.2- Submitter Point 426.145 - KCSRA opposes the suggested change to this policy by MFA (excluding aquaculture barges) and submits it should be disallowed on the grounds that the change does not support or encourage sustainable management of the environment.

Policy 13.10.3- Submitter Point 426.146 - KCSRA opposes the suggested change to this policy by MFA (deleting “necessary”) and submits it should be disallowed on the grounds that the change does not support or encourage sustainable management of the environment.

Policy 13.10.6 - Submitter Point 426.147 - KCSRA opposes the suggested change to this policy by MFA (deleting landscape) and submits it should be disallowed on the grounds that the change does not support or encourage sustainable management of the environment.

Policy 13.10.11- Submitter Point 426.149 - KCSRA opposes the suggested change to this policy by MFA (jetty - vague – there can be no reverse sensitivity) and submits it should be disallowed on the grounds that the change does not support or encourage sustainable management of the environment.

Policy 13.10.20 - Submitter Point 426.150- KCSRA opposes the suggested change to this policy by MFA (jetty - vague - adding reverse sensitivity) and submits it should be disallowed on the grounds that the change does not support or encourage sustainable management of the environment.

Policy 13.12.1 - Submitter Point 426.151 - KCSRA supports, in part, the suggested change to this policy by MFA - material derived from land should be disposed of on land and not in the CMA - but KCSRA sees this as a separate and additional addition to the list contained in Policy 13.2.1 and not a substitution for the existing wording of

13.12.1(a) as proposed by MFA and on that basis submits it should be allowed on the grounds that the change supports or encourages the sustainable management of the coastal environment.

Policy 13.14.1- Submitter Point 426.154- KCSRA opposes the suggested change to this policy by MFA (adding significant) and submits it should be disallowed on the grounds that the change does not support or encourage sustainable management of the environment.

Policy 13.17.1 - Submitter Point 426.160- KCSRA opposes the suggested changes (deletions) to this policy by MFA and submits it should be disallowed on the grounds that the changes do not support or encourage sustainable management of the environment.

Volume 1 Chapter Fifteen of the MEP – Resource Quality (Water, Air, Soil)

Submitter Point 426.182 - KCSRA opposes the suggested change to this chapter by MFA (adding a new method of implementation requiring the creation of a 1000 meter marine farm protection zone around all marine farms) as among other things it is seeking pre-emptive rights to public space over public use values and submits it should be disallowed on the grounds that the change does not support or encourage sustainable management of the environment.

Volume 1 Chapter One of the MEP – Introduction

Chapter 1 - Submitter Point 426.002 - KCSRA opposes the suggested change to this section by MFA (adding a promoting economic development guiding principle) and submits it should be disallowed on the grounds that the change does not support or encourage sustainable management of the environment.

Chapter 1 - Submitter Point 426.003 - KCSRA opposes the suggested changes to this section by MFA (among other things deleting the reference to the Sounds being the “Jewel in the Crown” and elevating economic values) and submits it should be disallowed on the grounds that the change does not support or encourage sustainable management of the environment.

Volume 1 Chapter Two of the MEP – Background

Chapter 2 - Submitter Point 426.006 - KCSRA opposes the suggested revisiting of the use of the word “avoid” in the MEP by MFA and submits it should be disallowed on the grounds that the change does not support or encourage sustainable management of the environment - the current use of the word in the MEP should not be revisited.

Chapter 2 - Submitter Point 426.007 - KCSRA opposes the suggested revisiting of the use of the word “protect” in the MEP by MFA and submits it should be disallowed on the grounds that the change does not support or encourage sustainable

management of the environment - the current use of the word in the MEP should not be revisited.

Volume 1 Chapter Three of the MEP – Iwi

Chapter 3 - Submitter Point 426.008 - KCSRA believes the economic interests of Iwi have been adequately represented in the MEP and thus opposes the suggested change elevating those interests by MFA and submits the suggested change should be disallowed on the grounds that the change introduces, among other things, too much present and future uncertainty and unfairness and thus does not support or encourage sustainable management of the environment.

Volume 1 Chapter Four of the MEP – Use of Natural and Physical Resources

Chapter 4 - Submitter Point 426.011 - KCSRA opposes the suggested changes to this section by MFA (adding a new Issue (4D), Objective (4.4) and Policy(4.4.1)) promoting development and submits it should be disallowed on the grounds that the change does not support or encourage sustainable management of the environment.

Objective 4.1 - Submitter Point 426.012 - KCSRA opposes the suggested changes to the commentary on this objective by MFA elevating aquaculture development and submits it should be disallowed on the grounds that the change does not support or encourage sustainable management of the environment.

Objective 4.3 - Submitter Point 426.013 - KCSRA opposes the suggested changes to this objective (among other things adding a new Objective 4.3A) by MFA and submits it should be disallowed on the grounds that the change does not support or encourage sustainable management of the environment.

Issue 4C - Submitter Point 426.014 - KCSRA opposes the suggested changes to this Issue 4C (adding a new objective 4.3A and a new policy 4.3.6 etc) by MFA and submits it should be disallowed on the grounds that the change does not support or encourage sustainable management of the environment.

Objective 4.1 - Submitter Point 426.015 - KCSRA opposes the suggested changes to this objective (adding a new Policy 4.1.1A among other things - existing uses to be grandfathered in) by MFA and submits it should be disallowed on the grounds that the change does not support or encourage sustainable management of the environment.

Policy 4.1.2- Submitter Point 426.016- KCSRA opposes the suggested change to this policy by MFA (adding *development*) and submits it should be disallowed on the grounds that the change does not support or encourage sustainable management of the environment.

Objective 4.1 - Submitter Point 426.017 - KCSRA opposes the suggested changes to this objective (adding a new Policy 4.1.2A) by MFA and submits it should be disallowed on the grounds that the change does not support or encourage sustainable management of the environment.

Objective 4.1 - Submitter Point 426.018 - KCSRA opposes the suggested changes to this objective (adding a new Policy 4.1.2B) by MFA and submits it should be disallowed on the grounds that it adds too much uncertainty (e.g., off sets, substitutions) and elevates development by reference to vague criteria (net improvements) and thus the change does not support or encourage sustainable management of the environment.

Policy 4.1.3- Submitter Point 426.019- KCSRA opposes the suggested change to this policy by MFA (deleting the same) and submits it should be disallowed on the grounds that the change does not support or encourage sustainable management of the environment.

Objective 4.3- Submitter Point 426.026 - KCSRA opposes the suggested change to this method of implementation by MFA (adding new policy 4.3.6 and new Objective 4.3A) and submits it should be disallowed on the grounds that the change does not support or encourage sustainable management of the environment.

Volume 1 Chapter Five of the MEP – Allocation of Public Resources

Objective 5.10 - Submitter Point 426.34 - KCSRA opposes the suggested change to this policy by MFA (replace *equitable* with *efficient* and delete *avoids conflict*) and submits it should be disallowed on the grounds that the change does not support or encourage sustainable management of the environment.

Policy 5.10.1- Submitter Point 426.35- KCSRA opposes the suggested change to this policy and commentary by MFA and submits it should be disallowed on the grounds that the change does not support or encourage sustainable management of the environment.

Policy 5.10.2- Submitter Point 426.36- KCSRA opposes the suggested change (delete reference to possible alternative allocation regime) to this policy and commentary by MFA and submits it should be disallowed on the grounds that the change does not support or encourage sustainable management of the environment.

Policy 5.10.3- Submitter Point 426.37- KCSRA opposes the suggested change to this policy (delete *necessary*) by MFA and submits it should be disallowed on the grounds that the change does not support or encourage sustainable management of the environment.

Policy 5.10.4- Submitter Point 426.38- KCSRA opposes the suggested change to this policy (amending the basis upon which charges for coastal permits are imposed and seeking controlled activity status for aquaculture) by MFA and submits it should be disallowed on the grounds that the change introduces vagueness and does not support or encourage sustainable management of the environment.

Policy 5.10.5- Submitter Point 426.39- KCSRA opposes the basis for the provisional support by MFA to this policy (see above) and again submits the basis for such provisional support should be disallowed on the grounds that the change introduces

vagueness and does not support or encourage sustainable management of the environment.

Policy 5.10.6- Submitter Point 426.40- KCSRA opposes the basis for the provisional support by MFA to this policy (see above) and again submits the basis for such provisional support should be disallowed on the grounds that the change introduces vagueness and does not support or encourage sustainable management of the environment.

Policy 5.10.7- Submitter Point 426.41- KCSRA opposes the basis for the provisional support by MFA to this policy (see above) and again submits the basis for such provisional support should be disallowed on the grounds that the change introduces vagueness and does not support or encourage sustainable management of the environment.

Policy 5.10.8 - Submitter Point 426.42- KCSRA opposes the basis for the provisional support by MFA to this policy (see above) and also notes KCSRA strong opposition to the MFA additional suggested changes to this policy (among other things that any representative coastal occupancy charge overview body be dominated by the aquaculture industry and that the MFA be guaranteed representation) and again submits the basis for such provisional support and the suggested changes should be disallowed on the grounds that the changes introduce vagueness and do not support or encourage sustainable management of the environment.

Policy 5. M.10- Submitter Point 426.43- KCSRA opposes the suggested change to this regional rule by MFA and submits it should be disallowed on the grounds that the change does not support or encourage sustainable management of the environment.

Volume 1 Chapter Nine of the MEP – Public Access and Open Space

Policy 9.1.5- Submitter Point 426.116- KCSRA opposes the change sought to this policy (have it specifically state existing aquaculture does not impede public access to the coast) and submits the change should be disallowed on the grounds that the change unreasonably elevates aquaculture to the exclusion of the public and thus does not support or encourage sustainable management of and public access to the environment.

Objective 9.1 - Submitter Point 426.118- KCSRA opposes the change sought to this policy (have it specifically state the 2005 MNZ Guidelines do not apply in the Marlborough Sounds) should be disallowed on the grounds that the blanket proposed change ignores helpful parts of the MNZ Guidelines and its suggested exclusion does not support or encourage sustainable management of and public access to the environment.

Policy 9.2.1- Submitter Point 426.119- KCSRA opposes the change sought to this policy and submits the change should be disallowed on the grounds that the change unreasonably elevates aquaculture and other private gain users of the coastal area to the exclusion of the public and thus does not support or encourage sustainable management of and public access to the environment.

Policy 9.2.2- Submitter Point 426.120- KCSRA opposes the change sought to this policy and submits the change should be disallowed on the grounds that the change unreasonably elevates aquaculture and other private gain users of the coastal area to the exclusion of the public and thus does not support or encourage sustainable management of and public access to the environment.

Policy 9.3.2 - Submitter Point 426.121- KCSRA opposes the change sought to this policy (9.3.2(d) – removing the word *protecting*) and submits the change should be disallowed on the grounds that the change does not support or encourage sustainable management of, and the value of public access to these high value (to the public) environments.

Volume 2 – Rules - MEP

Submitter Point 426.239 - whilst KCSRA has sympathy with MFA's comments re the MEP's poor and inadequate articulation around what is or is not outstanding in terms of landscape etc (see the opinion attached to the KCSRA submission from Dr Steven) KCSRA opposes the suggested definition of Outstanding (with its reference to obviously) by MFA and submits it should be disallowed on the grounds that the definition is vague and thus does not support or encourage sustainable management of the environment.

Submitter Point 426.225 - KCSRA opposes the change sought to this provision 16.2.1 (making the dumping of, inter alia, shell waste a permitted activity). This suggestion appears to be based on an incorrect interpretation of the latest available scientific evidence from a coring study which shows no scientific support for assumption made by MFA (long term existence of natural mussel beds) nor the use of shell waste in the manner proposed and KCSRA submits the change should be disallowed on the grounds that the change does not support or encourage sustainable management of the environment.

Standard 16.2.3.2 - Submitter Point 426.127 - KCSRA opposes the change sought to this standard (adding an extra sub clause to exclude marine farm vessel activity from the ambit of this noise standard) and submits the change should be disallowed on the grounds that the change does not support or encourage sustainable management of, environmental impacts such as noise from commercial operations which should be controlled.

Standard 16.7.1 - Submitter Point 426.127 - KCSRA opposes the change sought to this standard (adding an extra sub clause to exclude marine farm vessel cleaning from the ambit of this standard) and submits the change should be disallowed on the grounds that the change does not support or encourage sustainable management of, environmental impacts from bio fouling applications.

Definitions Submitter Point 426.236 - KCSRA opposes the change sought to this standard (adding the use of water to cool vessels to the non consumptive definition) and submits the change should be disallowed on the grounds that the change does not support or encourage sustainable management of the environment in the manner intended by the standard (currently restricted to the likes of swimming water).

Volume 3 - Appendices

Submitter Point 426.073- KSCRA opposes the deletion of references to “high amenity values” or “where those values are more sensitive to change” and submits the change should be disallowed on the grounds that the change does not support or encourage sustainable management of the environment.

Submitter Point 426.076- KSCRA opposes the deletion of amenity values from Policy 7.2.3 and submits the change should be disallowed on the grounds that the change does not support or encourage sustainable management of the environment.

Submitter Point 426.240- KSCRA opposes the inclusion of any provision suggesting that existing marine farms do not affect landscape values and submits the change should be disallowed on the grounds that the change does not support or encourage sustainable management of the environment.

Submitter Point 426.241- KSCRA opposes the inclusion of any provision suggesting that existing marine farms do not affect natural character values and submits the change should be disallowed on the grounds that the change does not support or encourage sustainable management of the environment.

Submitter Point 426.242- KSCRA opposes the proposed assessment principles (e.g. alignment to national significance and a cascading approach) and submits the change should be disallowed on the grounds that the change does not support or encourage sustainable management of the environment.

Submitter Point 426.243 – KSCRA encourages objective guidance on significant adverse effects and submits in opposition to the proposed MFA change and that it should be disallowed on the grounds that the change does not support or encourage sustainable management of the environment.

Submitter Point 426.245 – KSCRA opposes a marine farm protection overlay as proposed by MFA as it elevates aquaculture over other public values in the public domain and submits the change should be disallowed on the grounds it does not support or encourage sustainable management of the environment.

Volume 4 - Maps

Submitter Points 426.249 through to 426.251- KSCRA believes the natural character mapping inadequately protects the areas identified by the submitter under these submission points - as outlined in the opinion of Dr Steven accompanying the KCSRA - and the presence of existing marine farms does affect natural character values. As such the submission points by MFA are opposed and should be disallowed as they do not support or encourage sustainable management of the environment.

Submitter Points 426.253 through to 426.256- KCSRA believes the landscape mapping inadequately protects the areas identified by the submitter under these submission points - as outlined in the opinion of Dr Steven accompanying the KCSRA - and the presence of existing marine farms does affect landscape values. As such the submission points are opposed and should be disallowed as they do not support or encourage sustainable management of the environment.

Submitter Points 426.257 through to 426-272 The ecologically significant areas identified by the submitter warrant the full protection of the New Zealand Coastal Policy Statement and as such these submission points are opposed by KCSRA and should be disallowed as they do not support or encourage sustainable management of the environment.

Submitter Points 426.275 through to 426-277. The ecologically significant areas identified by the submitter warrant the full protection of the New Zealand Coastal Policy Statement and a prohibition of marine farming. As such these submission points are opposed by KCSRA and should be disallowed as they do not support or encourage sustainable management of the environment.

Submitter Point 426.278 – Marine farms do adversely affect gannet colonies and as such this submission point is opposed by KCSRA and it is submitted it should be disallowed as it does not support or encourage sustainable management of the environment.

Submitter Point 426.279- Spat catching may have an adverse ecological impact on the surrounding environment and as such this submission is opposed by KCSRA and it is submitted should be disallowed as it does not support or encourage sustainable management of the environment.

Submitter Point 426.281- Marine farms can adversely affect red algae beds and as such this submission is opposed by KCSRA and submits that it should be disallowed as it does not support or encourage sustainable management of the environment.

Kenepuru and Central Sounds Residents' Association
Marine Sub Committee
June 2017