

Brief overview of the KCSRA Presentations to the Hearing Panel re the notified MEP and Summary of outcomes

Introduction

As you will recall the MEP Hearing Panel divided the matters covered in the 3 volumes plus one volume of Maps making up the MEP into various blocks and subject matters. Hearings kicked off in November 2017. The decisions were released in late February 2020.

In addition to supporting our earlier formal submissions filed with MDC back in 2016 we also used the hearings to comment on the all-important **Section 42A reports** and update. The section 42A reporter is tasked with summarizing and commenting on the various submissions made about a topic and providing recommendations as to change (or not).

What follows in this note is what KCSRA said on the hearing day together with a summary of the outcomes from the revised MEP following the decisions of the Hearing Panel.

The KCSRA Hearing Presentations and Outcomes

1. Hearing Presentation 1 - Topics 1 and 3 - General and Use of Natural Resources (27 November 2017)

What we said at the hearing

Focused on issue of sedimentation, tabled NIWA coring study, Challenged the MEP map of erosion susceptibility for the Sounds, covered why we have forestry in inappropriate areas in the Sounds, sought a new policy statement re need to mitigate fine sedimentation run off into marine area, opposed Section 42 idea of addition to policy 4.3.2, supported “Jewel in the Crown” reference re Sounds,

Outcomes

The main focus of our presentation was educating the Panel of the impacts etc of sedimentation from forestry operations. KCSRA tabled four papers as evidence:

the MDC paper prepared by coastal scientist Dr Ulrich as to the adverse impacts on the Sounds coastal area from fine sedimentation run off from forestry operations;

the NIWA Coring Study Summary poster;

an affidavit recording how plantation forestry got going in the Sounds (government

grants and a push from advocates for “*use waste land to generate jobs and export dollars*”); and

some of the Council work establishing the Kenepuru area pine forest age distribution and likely harvesting volumes and patterns (KCSRA got this work done by MDC as a result of our push for logs to be barged out of the Kenepuru v’s trucked).

Change to Objective 4.2 - Jewel in the crown: As you will have read from Dr Ulrich's recent media article the forces of darkness were successful in getting **deleted** the reference to the Sounds being the **Jewel in the Crown**. The Panel’s reason was that it was a too emotive phrase and thus inappropriate in a planning document. Naturally it would have also been such a **brilliant rallying** call The Panel was more comfortable with references to “*unique and iconic*”. Good but not quite so catchy!

New policy re Sedimentation: We **failed** to persuade the Panel a general policy to mitigate sedimentation in the Sounds was needed in this chapter.

Map Re teep Erosion Prone Land: We pointed out the difference between a draft map in the NEF for Plantation forestry identifying (as you would expect) the majority of the Sounds as High or Very High erosion susceptibility compared to the much smaller area in the MDC map of Steep Erosion Prone land. **Sadly** - end result **little change** if any to the MDC /MEP map. Most unfortunate.

Changes to Policy 4.3.2 and 4.3.4: The first Policy requires the identification of the qualities and values that contribute to the unique and iconic character of the Sounds. The narrative starts off by looking to see if particular activities may have significant adverse effects and so necessary to protect these values etc. A bit of a **loss here** with new wording talking about to the need to take into account existing changes. **But slightly** off set with the new wording to **Policy 4.3.4** signalling that **the enhancement** of the qualities and values that contribute to the unique and iconic character of the Sounds should be encouraged.

So not exactly any big wins but certainly helped establish KCSRA credentials as serious/substantive submitters to the Panel.

2. Hearing Presentation 2 - Topic 6 Chapter 8 - Indigenous Biodiversity (13 Feb 2018)

What we said at the hearing

Supported change to Objective 8.1, sought amendments to various Policies (8.2.3, .8, etc to make it easier re Ecologically Significant Areas, sought changes to policy 8.1.3 to cover existing activities, and so on. Opposed the section 42A recommendation to delete policy 8.2.9, opposed biodiversity offsets re marine areas, argued the well documented massing of eleven arm sea stars under Mussel Farm's does not equate to a positive bio

diversity benefit.

Outcomes

Interesting to re-read our hearings submission back in Feb 2018, clearly we were getting the hang of it and put up a good case. Bear in mind the section 42 A reporter did not like a lot of what we had submitted on so a bit up hill but we did get stuck in. As marine farms are clearly adversely altering the indigenous biodiversity values in low flush intensively farmed bays Industry was also strongly pushing for a more permissive agenda in this very important topic.

The likes of the changes to Objective 8.1 reflect some of what we were arguing for but not necessarily carried through as clearly as we would like in the back up policies. A lot of focus on "rarity" of indigenous flora and fauna v's protecting the likes of common recreational fish species spawning grounds – spawning grounds for snapper in the Kenepuru spring to mind.

Changes to Policy 8.1.3 - On balance a small win - applies to both future and existing activities.

Change to Policy 8.2.1 - Small win - got a reference to community groups inserted

Retention of Policy 8.2.9 - We had a win here in the sense that the section 42 A reporter wanted to **delete** this policy. But balanced out somewhat in losing re the change to **Policy 8.3.1** and change to **policy 8.3.2**

New Policy 8.3.5 - concerns the critically endangered King Shag, so good to see some account of the need of the KS to feed but a bit half hearted. Organizations such as Friends are, with strong justification, **not** happy.

Changes to Policy 8.3.6 - This concerns the introduction of biodiversity offsets. (i.e. an applicant wants do something a bit bad environmentally in this area but wants to but offset the adverse effects by doing something arguably environmentally good (or not so bad) elsewhere. Didn't get it restricted to land activities but some improvement in assessment criteria. Bit of suck and see how industry tries to screw it.

Change to Policy 8.3.8 - Avoid dredging etc in ESM areas. Bit of a small win.

Not really sure/comfortable we made much progress or indeed if on balance we lost ground.

3. Hearing Presentation 3 - Topic 16 - Climate Change – Chapter 19 - 13 Feb 2018)

What we said at the hearing

Supported the section 42A reporter's rejection of the Davidson Trust application, supported the general thrust of Chapter 19, covered threats to Sounds roading network from climate change, argued the need for a policy to expressly require that the threat to existing infrastructure be assessed, suggested wording for such a new policy in section 19.2.

Outcomes

With the Association's recent experience of grappling with mitigating the effects of coastal erosion on Elie Bay road, and the likelihood that this was climate change related, we were well placed to spot the **glaring** oversight in the above Chapter.

There was no policy requiring an **assessment of existing** infrastructure by Council. The express and only focus was on **new** infrastructure.

The MEP now address's this gap in two ways.

A revised Policy 19.2.2 – This is vastly improved as a result of KCSRA input. MDC are now required to assess new, and most importantly **existing** infrastructure, against quantitative measures eg projected increase's in sea height) and the use of a "dynamic adaptive pathways planning" approach.

New Policy 19.2.3: The section 42A reporter initially rejected our submission for a new policy requiring an assessment of existing infrastructure. However we gave a clear and well-structured submission at the hearing as to the practical difficulties of getting MDC to do things in the absence of clear directives and pointing to strong legal backing from the NZCPS.

The Panel was very receptive in terms of agreeing the need for a **new Policy 19.2.3** addressing this gap. The MEP now actually requires the carrying out of a community engagement assessment of existing assets and infrastructure and then putting up an implementation plan to avoid or mitigate adverse effects. Great to see some of our suggested wording picked up.

The trick now, of course, is to have MDC actually carry out the policy intent.

4. Hearing Presentation 4 -Topic 5 – Chapters Six & Seven - Natural Character and Landscape - 28 Feb 2018

What we said at the hearing

This was a biggie. As you may recall KCSRA helped Friends to fund a landscape expert, Dr Stevens, in putting together the original submission. Friends also retained Dr Stevens who presented with Friends at the hearing. Resource limitations meant KCSRA were unable to contribute for this aspect. However, on the hearing day we did a dual presentation (in association with the Clova Bay Residents Association - they also commissioned Dr Stevens to do a separate opinion for Clova Bay) and added /supported Friends. Got stuck into aspects of the two Section 42 A reports Policies in Chapter 6 and 7.

Outcomes

I have to be frank and say that overall the dial **was not pushed** back much if at all. Dr Steven's detailed and very valid criticisms of the methodology and approach of the Council retained experts (Boffa Miskel) was largely ignored by the Hearing panel. An example of this is that in the badly flawed Natural Character Chapter Six is the deletion in its entirety of Policy 6.2.3

I am sure Friends will not let this stand unchallenged and I believe KCSRA should support them as best we can if they do so. I set out below some comments on how we fared on specific aspects we covered at the hearing.

Natural Character – Chapter Six Volume 1

In terms of KCSRA submissions on policy matters we made some small gains. Examples include;

Change to Objective 6.2 - The insertion of the reference "*to promote the restoration*" in the context of the costal environment reflects our submissions. This reference is very applicable to the Clova Bay situation.

Changes Policy 6.1.1 – Arguably, shifts a little way from a flawed focus on visual and landscape values.

Change to Policy 6.2.2 - As we (good work Trevor) pushed for, his now captures Natural Character areas that are **less** than outstanding. The constraining link to the unchanged criteria in appendix 4 is still a bit of a kicker. However, all a little overshadowed by the deletion of Policy 6.2.3 I fear.

Change to policy 6.2.6 - We did not really achieve what we were argued for but the insertion of the word "restore " is I suggest a small step forward.

As noted we contributed to the cost of Friends commissioning Landscape/Natural Character expert Dr Stevens original highly critical big picture opinion on this area. As always we learn on the trot and I better understand (now) what Dr Steven's was driving at. The Boffa Miskel (BF) approach **was/is fundamentally flawed**.

Thus in terms of Natural Character BF were very landscape orientated vs seeing Natural Character as a separate aspect. This really shows in BF's reluctance to attribute "Outstanding, High or Very high" Natural Character ratings to marine areas adjacent to land areas so characterized.

One of the few inner Sounds sea areas so recognized by BF is a chunk of French Pass seascape-. Why? I suggest it was because of the BF landscape lens – they were focused on the visuals of the dramatic tidal movement v's, say, what lay beneath. Areas with marine farms have been seen as degraded and not worthy of identification.

The Panel has also shied away from the more fundamental reappraisal approach as suggested by Dr Stevens. That said there has been a bit of a shift away from this landscape focus with a move to recognizing the likes of biotic elements in the redrafted Policy 6.1.1. There was also a significant rewrite of the introduction to Appendix One of Volume 3.

So some small policy gains, but in terms of **the actual assessment and identification of Natural Character areas** not much change unfortunately. Some pretty good outcomes for industry users of the marine area I would have thought.

Landscape – Chapter Seven, Volume 1.

In terms of the KCSRA hearing submission on Landscape policy matters we made some gains and a few notable losses. Examples include;

Policy 7.2.7 - Not a big surprise to see **we lost** on arguing an express reference to - adverse impacts of marine structures should be avoided etc.

Change to Policy 7.2.8 - We had a **win** here in the sense this reference to primary production is now restricted to land farming as we argued.

New Policy 7.2.12 - **Pleasing win** here with this new policy now requiring at least "assessment" and consideration" of cumulative effects on ONF, ONL and High amenity areas as we forcibly argued was missing. Good work Trevor. Policies still a bit on the wimpy side though.

Implementation Method 7.M.3 - We failed to get an "aquaculture" reference in here-highlights the difficulty of addressing aquaculture impacts in the absence of any aquaculture policy chapter in the MEP. Presumably we have to argue for a specific reference back in due course.

Again a couple of useful policy gains but not much change in terms of assessment and mapping of ONL or OFL. In other words once aquaculture appears in the neighbour hood then in terms of landscape values (which the NZCPS expressly says includes seascapes) it goes down hill rapidly!

We understand the frustration of Friends and expert Dr Stevens with the very blinkered approach adopted to assessing and identifying ONL, OFL's. KCSRA will encourage them to take a stand via the appeal process.

5. Hearing Presentation 5 - Topic 7 Public access and Open Space - 13 March 2018

What we said at the hearing

Restricted ourselves to some comments on the section 42 A report. Supported various rejections by the S42A reporter of things put forward by Marine Farm Association, Again dual presentation with CBRA.

Outcomes

This Chapter dealt with Public Access to Open Space and thus included the coast line.

We did not submit directly on this back in 2016 but picked it up in Further Submissions when we (Huneker, Trevor and I) were reviewing the Marine Farms Association (**MFA**) submissions.

MFA sought a number of changes to make Aquaculture a special case eg that Policy 9.1.5 be amended to state that aquaculture does not impede access to the coast. Another MFA one was to remove the word protecting from the phrase "*recognizing and protecting the value of open space in the coastal marine area*".

The section 42 A reporter argued against these types of insertions. We supported the same.

Pleased to advise that **MFA failed** to get the various changes it sought to this chapter.

6. Hearing Presentation 6 - Topic 11 - Use of the Coastal environment - - Chapter 13 - 12 April 2018

What we said at the hearing

Dual presentation - Focus on section 42 A report. Opposed deletion of issue 13 C and Objective 13.4 - Argued Council can support/advocate for better management of commercial and recreational fishing activities and stay within the law.

Outcomes

This chapter was of some interest as it originally touched on Fishing and moorings. It **now** also contains the section dealing with Coastal Occupancy Charges (this was shifted by the Panel from chapter 5 which now deals only with the "*Allocation of Freshwater Resources*"). Accordingly, the chapter heading has been expanded to include "...and the *Allocation of Coastal Space*". We cover off Occupational Charges at Section 10 of this note.

Fishing

Originally this section contained a good Objective and policies about MDC being an advocate (not a controller or regulator but the non regulatory spot of an advocate) for sustainable management of the Sounds fisheries and fishing in the Sounds.

We **actively and strongly supported this "soft" approach** against a hurricane of opposition from industry interests and the section 42 A reporter. Clearly the Panel took fright and (notwithstanding recent legal developments) obviously keen to avoid litigation so DELETED the lot. So that will be the last of the Council support for the Marine Futures I suspect, particularly given Mr Hook's departure (who seemed to be their champion on Council).

To be fair, Some new vague references to working with other agencies in the likes of Policy 4.3.1 under Chapter 4 re Sustainable management of Natural and Physical resources.

But overall bit of a bugger and vindicates the marine subcommittees tactical decision to largely ignore MDC when pursuing sustainable management of the Sounds scallops resource, but still very disappointing.

Moorings

New Policy 13.9.9 - This policy represents a **good win** after a strong submission from KCSRA challenging the approach taken by the section 42A reporter around moorings design with disturbing implications for existing mooring holders. We put benthic impacts in context and took Council to task over lack of consultation. It was clear that Council was using this to introduce the bungy type mooring for all consents as they came up for

renewal.

The policy will now **not apply** to applications for the renewal of existing moorings (subject to a bit of detail around sensitive Indigenous biodiversity areas). So now a more balanced and equitable outcome.

7. Hearing Presentation 7 - Topic 15 -Transportation – Chapter 17 - 22 May 2018

What we said at the hearing

We emphasized community concerns over a fragile Sounds road network trying to cope with large volumes of Logging trucks and trailers. We challenged how Issue 17 D of the MEP fell well short of addressing known problems, looked at the section 32 report and put up wording for a **new policy** to address the issue. That is when considering Resource consent applications consideration to be given to mitigating etc., adverse impacts on the Sounds road network (barge them).

We had a few goes at the issue of the adverse impacts of Commercial Forestry (and poor planning) in the Sounds. But as no designated forestry chapter our efforts were spread through a few hearings and topics. This topic was an obvious one to focus on in terms of forestry impacts.

Outcomes

First up you have to appreciate that Kenepuru Road is well down the roading hierarchy - described (generally at Policy 17.3.2 and classified at Appendix 17 of Volume 2) as a **Collector Route**. It is a little unclear what that means in practical terms but generally you get the idea it is not designed to take the cumulative impact of heavy loads.

What we wanted

Logging trucks and Sounds roading network negative impacts were not specifically addressed in the notified MEP. So, the KCSRA thrust was to get the relevant section of the Transportation Chapter to **simply specifically recognize**, by a new policy, the adverse impact from commercial forestry activities (eg harvesting) on the Sounds roading network and look to mitigate, avoid or remedy when granting resource consents to harvest.

Such a specific policy was opposed by the Council section 42 A reporter - too industry specific.

What Happened?

We did not get express acceptance of a new specific policy but after presentation of a pretty compelling case a number of possibly helpful changes to existing land transportation Objectives and Policies were made. This included a **new specific Method Of Implementation**, referring to harvested logs, being inserted.

So not the clear/simple outcome as what the Sounds community wanted but still some **useful gains** here.

Actual Changes

Issue 17 D: Both the title and narrative usefully changed here. Narrative specifically refers to: adverse effects of activities can have on the efficiency, effectiveness and integrity of individual roads, to the cumulative flow on consequences for road safety and diminished ability to use the land transport network as planned.

Revised Objective 17.4 – Now reworked so conflict between use of the network by new activities etc is to be avoided, remedied and mitigated.

Addition to Policy 17.4.1: Activities to be managed so as to maintain the planned function of a particular road and not impair the function of the same including as a **result of cumulative impacts**.

Change to Objective 17.5 - Safety and accessibility of roads **for all users is** maintained or improved.

Change to Policy 17.5.1: more focus now on what is the planned function is the road is designed for.

Change to Policy 17.6.1 (b): The "discourage" aspect of this policy now clearly refers to heavy vehicles. New narrative wording also makes it clear that the previous exception for the transport of primary produce **is caveated** with a new reference to "where no alternative route of method of transport exists".

New Method of implementation - 17.M.15 - Our **concrete gain** - The Council will consider using its powers under the Land Transport Act (eg S 516A, s 22AB) to **manage** the potential damage associated with the transportation of heavy loads - "**including harvested logs**" **or** impose temporary restrictions on heavy traffic. The controls would be used to protect the physical condition and integrity of the road or for reasons of road safety.

8. Hearing Presentation 8 - Topic 13 - Chapter 15 - Resource Quality - 10 October 2018

What we said at the hearing

Strongly opposed Aquaculture push for a 1000 m zone of control around all marine farms (Extends landward). Supported section 42A reporter's rejection of this push. Septic tanks already covered by MOI 16.M.20. Piled into the so-called evidence.

Outcomes

Our hearing submission largely revolved around Chapter 15 of the MEP and the attempt by the Marine Farmers Association (**MFA**) to create a 1000 m special zone around every marine farm. This would extend landward and enable MFA to have oversight of any land-based activity if MFA felt it might impact adversely on the marine farm activity. We all know how MFA likes to operate by placing covenants etc as the quid pro for not challenging a land-based resource consent application.

The MFA legal and expert rationale was all about pointing to a sewage discharge and associated contamination of marine water space problem in Ngakuta Bay from one or more faulty residential septic tanks (no marine farms in Ngakuta bay!)

Anyway we strongly supported the section 42A reporter's rejection of this grab for power by MFA. I am pleased to report that the MFA **made no traction with this push**.

In part we argued that the concerns raised by MFA were already and more effectively addressed at Chapter 16 of the MEP (Waste and discharges to Land) and in particular Method of Implementation 16.M.20.

For **those members** with existing "old style" septic tanks they **should again note** that within 5 years of the MEP becoming operative MDC is required to develop and implement a Warrant of Fitness scheme for assessing on site waste management systems in the Sounds. (Note the alternative is to commence the development of a reticulated community scheme).

The WoF system will require an initial inspection as to adequacy and effectiveness and then a follow up every 5 years.

9. Hearing Presentation 9 - Topic 22 - Forestry - Volume 2 - Rules and Standards

What we said at the hearing

This turned into a real narly one as the National Environment Standard for Plantation Forestry (NES PF) came into effect after notification of the MEP. This generated a **significant rewrite** of the subject Chapters, Rules etc., by MDC.

Anyway the significant hassle of trying to figure out from the MDC 51-page report on the “realignment” exercise as to what and why they had made changes burnt most submitters off. But the likes of KCSRA and Forest and Bird hung in there.

You need to appreciate that Forestry in the Sounds is largely a permitted activity under the old plan. At the hearing and seeing which way the wind was blowing we shifted from pushing for a “special high focus“ 300m costal strip as suggested by Dr Ulrich’s paper to the proposed 200m coastal strip.

We noted the need for a water catchment basis approach to forestry both at planting and harvesting. Disagreed with S42 A reporters approach over Rule 4.6.3, re discretionary or restricted discretionary, argued Rule 4.5.3 too sketchy. Erosion prone mapping exercise flawed and made recommendations etc

We strongly opposed the idea that the NES PF severely limited the Councils discretion under the MEP to do much to address Forestry matters. At least one of the local councillors on the hearing Panel did not take well to the argument from KCSRA that they were in an unseemly haste to unnecessarily offer their regulatory hands for tying.

Outcomes

Well this outcome review turned into a bit of a mission. The MEP is now quite a convoluted and complex read on this topic and I spotted at least one stuff up, to which I have alerted Council.

In the end I decided to do a detailed note which focus's on where we are with Plantation Forestry, so what follows is more of a **brief summary**.

Introduction

In a nut shell – KCSRA sort Discretionary Activity status in the Sounds land area up to 300m landward of the coastline, with a tougher line on forestry activities 50m landward of the coastline.

The Panel **did not** use the wide Discretionary Activity status approach and/or get into the detail of standards etc.

The emergence of the National Environment Standard for Plantation Forestry (NES for PF) and its stated restriction on plans with more stringent rules was the official reason for the **light handed** approach to a well established set of problems consequential upon Plantation forestry in the Sounds. The Panel thought what they proposed was nevertheless quite bold.

What we got

A. Harvesting of Plantation forest is a **Restricted Discretionary Activity** in the Sounds Coastal Environment (most of the Sounds). An application for a resource **Consent is required**.

The Panel chose to significantly restrict Councils discretion to a few matters - essentially to the effects of Sedimentation and effects on Sounds Landscape/Features and High Amenity landscape. **Council can decline or grant but impose** conditions on an application under these discretionary heads only.

A useful, but small, step forward.

B. Replanting within 5 years of harvesting in the Coastal environment Zone is a Permitted **Activity** - **no consent** required. The requirements of the NES for PF for permitted activities of this type to be observed.

However, if a landowner wants to replant within 200m of the **coastline** things get a little more difficult. You need to make a **consent application**.

Landward 30m of the coastline to 200m landward (a strip 170 m wide) is a **Controlled Activity**. You **cannot be declined** the consent but the Council can impose controls re the matters over which control is reserved. Namely - Location of planting, effects of sedimentation including those likely to arise from future harvesting and measures proposed to mitigate these effects.

From the coastline and 30 landward. This strip is said to be a **Restricted Discretionary Activity for replanting**. The consent application **can be declined or granted** with conditions by reference to the matters over which discretion is restricted. The matters over which control is reserved are as for the 170m strip (- essentially the effects of Sedimentation and effects on Sounds Landscape/Features and High Amenity landscape).

C. Afforestation - this is new planting on say pastureland or on land previously in plantation forestry but harvested more than five years ago.

This activity is a **Restricted Discretionary Activity**. The same set of matters over which discretion is restricted to as for replanting in the 30m strip from the coastline (essentially the effects of Sedimentation and effects on Sounds Landscape/Features and High Amenity landscape).

Bit of a **useful gain** here upon reflection. Good, as I did spend some time pointing out the potential adverse implications of the Government's one billion afforestation tree scheme (grant) on fragile areas like the Sounds.

D. Forestry Roads and tracks

Construction/maintenance of forestry roads etc is a **Restricted Discretionary Activity**. The matters over which discretion is restricted are effects of sedimentation, reduction of sediment loadings in run off (*why was one this not included in harvesting?*), and effects on ONL and ONF landscapes (*why no High Amenity Landscape reference?*).

Conclusion

What we got was fairly minimal deviation from the existing permissive regime but at least some small recognition that planting plantation forestry for harvest in a sensitive coastal marine zone like the Sounds does generate issues around sedimentation etc. However, the topic of Forestry in the Sounds has (understandably) generated a lot of media publicity and concern amongst members so I am pleased KCSRA gave advocating for a more sensible sustainable managed approach a good go. We will be alert to attempts by industry to water the MEP down any further in this sensitive area via the appeal process.

10. Hearing Presentation 10 - Topic 11- Coastal Occupancy charges

At the hearing we went hard into this one. We teamed up with other like-minded groups (Brent Yardley and QCRA) and had a good go at matters in submissions and then at the hearing panel (back in December 2018).

Not happy about shift from specifying a charge to one giving MDC the power to introduce a monetary amount at a later date via the Council Annual plan process. Got stuck in to the Marine Farm Association "demands" around likes of Policy 5.10.4, 5.10.7 and how section 64A of the RMA should work. Opposed the less than equitable outcome for mooring, boatshed and Jetty consent holders the proposed "pricing" approach generated. Our concession was a flat \$30 charge.

Outcomes

Unfortunately little changes in the direction of travel but did get a couple of wording change. Eg., Occupation charges are not to be seen as the only source of funds for the various environmental monitoring etc activities such charges are to be put too.

However overall **not too much joy** here as essentially the package of policies **13.19.4 to 13.19.11** mean the determination of the actual quantum of charges for various types of

occupation right holders (jetties, moorings etc v's marine farm structures) is pushed into the MDC Annual Plan round.

Note the waiver policy we will have to go through re "the KCSRA" consent for the Portage Boat ramp (**policy 13.19.9**).

Hearing Presentation 11 - Notable Trees and Historic Sites

Ron Rolston and I also attended a Panel hearing to advocate for our submission that the Norfolk Pines at Portage rated classification as notable trees and that the Torea Saddle War Memorial be registered as an historic site.

We **were successful** with both those applications.

Trust this assists

Andrew Caddie
President KCSRA, June 2020