

# Kenepuru & Central Sounds



Kenepuru & Central Sounds Residents Association Inc.

Planning and Consent Division  
Marlborough District Council  
PO Box 443  
Blenheim 7240  
Email: Bruno.Brosnan@marlborough.govt.nz

*Ross Withell  
(President)  
Kenepuru Road  
RD 2  
Picton 7282*

Dear Madam/Sir

## **Kenepuru and Central Sounds Residents' Association Submission on Resource Consent Applications UO90660, U130781 and U130743 from New Zealand King Salmon, site 8513 Crail Bay**

I write in my capacity as President of the Kenepuru and Central Sounds Residents' Association Inc.

### **Introduction**

1. The Association was established in 1991 and currently has over 260 household members whose residents live full time or part time in the Kenepuru and Pelorus Sounds. The Association's objects include, among others, to coordinate dealings with central and local government and promote the interests of residents of Kenepuru Sound and adjacent areas and to promote and act in the best interests of residents, ratepayers and persons associated with the Kenepuru and Central Sounds area. AGMs of the Association are well attended. The Association receives no government funding.

---

#### **Kenepuru & Central Sounds Residents Association Inc.**

President	Ross Withell
Vice President	Adrian Harvey
Vice President	Andrew Caddie
Secretary	Maggie Girling
Treasurer	Stefan Schulz
Chairman Roding Committee	Robin Bowron

withell@clear.net.nz  
mountstokes@xtra.co.nz  
andrew.caddie@xtra.co.nz  
maggie@clovabay.net.nz  
kcsra@pws.co.nz  
info@thenikaus.co.nz

2. The Association takes a keen interest in the issues and impacts arising from finfish farming in the Marlborough Sounds. As you will be aware, the Association put considerable effort and resources into making extensive submissions and appearances at the recent Board of Inquiry concerning the Applicant's desire to massively expand salmon finfish farming in the Marlborough Sounds. From that experience, we have learnt much about the impacts and issues arising from this form of marine farming. Accordingly, we take a keen interest in these applications, albeit they refer to proposed substantive changes to an existing approved operation.

### **Association's Submission**

3. One of our members whose property is situated close to the east of this site has taken the time and effort to research and prepare a thorough and thoughtful submission on these applications. That member has chosen to share that submission with the Association.
4. After a careful review and consideration of our member's submission, the Association is of the view that rather than reinvent the wheel, our submission should support and endorse the contents of Kristen and Michael Gerard's submission, **a copy of which is attached** for your ease of reference and which forms part of the Association's submission.
5. We urge you to carefully consider the various comments, questions, requests and recommendations contained in this submission. We are particularly mindful of the recommendations as to the need for more extensive sampling and monitoring should you decide to grant the consents sought by the Applicant.

### **Request to Appear**

6. The Association confirms that it would like to present/talk to this submission at the public hearing.

Yours faithfully



Ross Withell

President

Kenepuru and Central Sounds Residents' Association

c/- 2725 Kenepuru Road

RD 2, Picton 7282

Email: [withell@clear.net.nz](mailto:withell@clear.net.nz)

Attached: Submission from Kristen an Michael Gerard

## Submission to Three Resource Consent Applications by NZKS at site #8513 Crail Bay, Central Pelorus East

U090660 - change to the existing conditions to update the monitoring programme

U130781 - to allow the change in cage design and move them around the site

U130743 - for a feed barge with no accommodation and associated discharge of grey water.

### Introduction

This submission is made by Kristen and Michael Gerard, farmers, of Hopai and Elie Bays, Pelorus Sounds. Our property lays some 2 kms to the east of this site, along the eastern shores of the Crail Bay basin.

The Marlborough District Council notified us about these Applications as affected landowners.

In general our position on aquaculture with-in the Sounds, is that we accept the possibility of marine-farming in suitable areas in the Coastal Zone 2 areas.

We accept that this site in Crail Bay was approved for fin-fish farming some years ago, but also believe that due to its less than favourable aspects of low current, shallow waters, and moderate temperatures, most likely would not pass the thresholds necessary for approval in todays' world. Consequently most of our comments will be to address the issue of ensuring that this fish-farm meets the stringent environmental standards necessary to limit its impact on the enclosed waters of the Crail Bay basin.

Resource Consent Application U090660 - change to the existing conditions to update the monitoring programme

### Background/Control Sites

The Crail Bay basin is one small 'side-branch' of the greater

Pelorus Sound, and as has been well documented by King Salmon in this Application, its shore-lines are dominated by aquaculture on the western and southern sides.

As residents in this area we are well aware of the impacts of marine-farming, in particular mussel farming, but we have also seen the demise of several earlier attempts at fin-fish farming (in Elie and Wet Inlet) within the Crail Bay basin.

As stated in our introduction we accept the validity of King Salmon's site in the bay, but hope that its attempts at salmon farming will be more successful than those previously, and that they will also leave no long-term detrimental impacts on our area.

With this premise in mind, we have several suggestions we believe would improve the proposed monitoring of the salmon farm, and give us greater peace of mind about such an activity in our midst.

1.

Prior to the re-establishment of salmon farming at this Crail Bay site, we would like to see water/benthic sampling undertaken at various sites around the bay to more fully determine the current state of the marine environment. Our suggested background/control sites would be-

- North of the site (at the entrance to Crail Bay),
- South of the site in the middle of Crail Bay,
- East of the site in Hopai and,
- West of the site along the adjacent shoreline.

If it is accepted that the current flow in the vicinity of the site is N-NE then it is logical that more sample sites should also be in that direction. Likewise, as a reassurance for the adjacent mussel farmers, land-owners, and the recreational users of the shoreline, sample sites must be established to determine what (if anything) is happening in those areas.

Such measurements would give a totally appropriate indication of the background/control ES levels within the Crail Bay basin - rather than the somewhat vague (i.e. unstated) positions of the "appropriate reference stations"

mentioned in the Cawthron AEE Report.

2.

By their own admission, King Salmon acknowledges that the low current (2.5 - 3.5 cm/sec), water temperatures (11-20) and depths (19-31m) are less than ideal for salmon farming. (See footnote 1.)

We believe it is imperative due to these less than ideal conditions in Crail Bay, that benthic sampling is -

- more extensive than that proposed in the Application,
- more frequent than the once-yearly proposal in this Application, and that,
- should the conditions be non-consenting, be handed on promptly to Council.

We would also expect Council/NZKS to be able to react quickly to halt, or change operations at the site should the monitoring show unfavourable results. It is vital our local community can be assured that a salmon farm in our midst, does not lead to any negative impacts on the wider marine environment, such as Harmful Algal Blooms.

*Footnote 1.*

*Mark Gillard's extensive Evidence in Chief to the 2012 BOI Hearing shows that depths of 30 - 40 meters or more and a high current are best for salmon farming, and also that temperatures above 17 are marginal.*

ES Levels.

Without establishing the background control ES measurements for the greater Crail Bay (as suggested above), there is no logical conclusion for the Applications' suggested ES level of less than or equal to ES 3 within the

outer Zones 3 and 4.

We note from the Cawthron AEE Report (4.2 History of Enrichment Levels) the monitoring results from within Zones 3 and 4 as being 1.6 (in 2010) 2.1 (in 2011) and 2.3 (in 2012). The Resource Consent Conditions at the time stated that the acceptable ES levels in Zones 3 and 4 were to be ES 1 - 2.

(Cawthron's readings from un-named Sounds' control sites were also creeping upwards - from 1.3 and 1.2 in 2010, to 2.1 and 1.7 in 2011 and then 2.3 in 2012.)

Do these Zone 3 and 4 figures mean that enrichment from the previous salmon farming operations was already starting to occur within the wider Crail Bay by 2012?

Does increasing the level to ES3 for these Zones in the new proposed Conditions predict/allow/accept a continued deterioration in enrichment levels within the area?

We note Cawthron's AEE statement that base ES levels of around 3 are typically encountered on the Sounds seabed; however this is not backed up with actual results from Crail Bay.

We also note from the Final Report and Decision of the Board of Enquiry into the New Zealand King Salmon Proposal , Consent Condition 48 (which sets the allowable ES levels for Zones) is set at **<3 for Zone 3 /4 boundary**.

Also that this sampling is to be done at the similar low current flow site of Papatua in Port Gore (which is still twice as fast as the Crail Bay current), only **100m** from the nearest net pen boundary, on the Zone 3 / 4 boundary.

Therefore this Crail Bay Application is seeking Consent Conditions above the levels, and beyond the distances, specified in the BOI Decision, which is not consistent with the ideal of rationalising all salmon farm Consent Conditions in the Sounds. As such we contend that the revised conditions sought in this Crail Bay Application (should it be approved) be consistent with those of the Board of Inquiry.

It is pleasing that more Sounds wide water quality and benthic monitoring is taking place, and if the Sounds' seabed is continuing to deteriorate then we must all accept responsibility and work towards halting the decline.

So, we suggest that more monitoring of Crail Bay should be done, results published, and not only controls put in place to halt this slide downwards, but the community also involved and informed on improving the health of our "backyard".

Resource Consent Application U130781 - to allow the change in cage design and move them around the site

During the years the salmon farm was most recently operating in Crail Bay, the residents, holidaymakers and other regular users of the bay got used to seeing the polar circle salmon cages along the western shores. Being constructed of black plastic with black and/or green cages and predator nets, they seemed to assimilate into the marine-farming area of the bay quite well. We note King Salmon's use of "ephemeral" in regards their visual appearance, and this seems somewhat appropriate in contrast to the steel pens now applied for.

King Salmon's landscape expert Mr R Langbridge states that the proposed steel pen set-up will be significant at 700m (page 15 of his report). As this is about where the main navigation channel into Crail Bay lies, it is therefore a valid conclusion that most if not all boaters into this area will be made aware of the salmon farms presence shortly after entering the bay.

This is probably good from a navigation perspective, but less so for those who enjoy the finer attributes of the Sounds landscape.

The people we feel most sorry for are the owners of the properties on the adjoining land. Although they would have accepted the salmon farm's presence some time ago when it was initially consented, the fact that it has now not been operational for several years, will make the arrival of a fully functional steel-pen unit with accompanying large barge, and most likely flocks of seagulls, a very sudden, dominant feature in their outlook. As this structure will also have all the attendant night-time lighting, there will be negative

visual consequences for the residents both day and night.

We have also noted Mr Langbridges' comments on the use of recessive/dark colours as being best to help lessen the visual impacts of the salmon farm structures, and therefore support this part of his recommendation for whatever structures the Applicants are given approval to use.

It is our opinion that polar circle cages are still the most visually preferable option for a salmon farm in Crail Bay.

In this area of low current flow, we question what modelling (if any) has been done to determine which of the 4 cage pen options as presented in the Application, has the least effect on current flow. The preferable option would be the one which has the least impact on the wider marine environment, by affecting the current flow the least.

Resource Consent Application U130743 - for a feed barge with no accommodation and associated discharge of grey water

In regards to this particular Application from King Salmon, many of our comments will be repeated and/or similar to those made above (under U130781) on the visual impacts the proposed changes will make to the existing marine environment.

#### Visual Changes

The proposal to include a permanently moored large 30m barge on-site will add a significant cumulative visual effect to the existing salmon farm site. Although the farm was previously serviced by a similar boat, as the polar circle cages were spread around the site, so the barge had to move about to service each one.

There were instances when the barge was not on site at all. This contrasts markedly to the new Application for a fixed barge, alongside the farm day and night.

The barge will have to have night-time lighting (versus no lighting previously because the service boat was usually not there at night.)

The barge will also significantly raise the height of the salmon farm, from a 2.5m high polar circle farm, to - cages alongside a barge (with an attached building) that will be over 5m high. We contend that there is nothing "ephemeral"

about that set-up.

### Grey water

Should this Application be successful, and a barge be approved for the site, then we question the necessity of allowing greywater from the boat to be allowed into the sea.

Given that there will be no accommodation on-board the barge (a move which we completely support), there will be limited sewage to collect and dispose of on-shore, so we contend that the greywater could be added to this, and also taken away to the appropriate facility.

The Application makes no mention of what products are to be used on-board that would end up in the greywater, so we recommend that this be addressed by adding a clause into the Consent Conditions requiring the use of eco-friendly products.

### Noise

Should the barge be given Consent, we would request that strict controls be kept on all noise issuing from the farm. It is impossible to imagine what the allowable levels they mention in their Application actually sound like, but as this site is very close to several dwellings, noise from the farm could be a big issue.

We also believe that there should be no radio/siren/phone noises audible outside the vessel.

### Smell

As stated above, as this salmon farm site is very close to several dwellings, on-shore winds could easily carry smell from dead fish (morts) on the farm, ashore.

Consequently residents need to be assured that the morts will be regularly removed from not only the cages, but also the holding tanks on the barge as well.

There is also some belief amongst our community that these morts, particularly when in the water, can attract scavenging marine-life (like sharks and seals) that the local residents understandably do not want to see increase in numbers!

It is highly likely that these 'smell' issues would be worst in the warmer months of the year, and when combined with

the warmer waters which also make salmon-farming problematic, it seems it would be a very good time to remove the farm from this site - as has been suggested in the Applications.

Having also read portions of the BOI Decision over NZKS new salmon farms in the Sounds, we have noted the Consent Conditions of Marine Mammal and Shark Management Plans, Residential Amenity Management Plans and Wildlife Nuisance Management Plans, and hope that these aspects can also be carried over to all the existing NZKS salmon farms, as the principals/ideas are pertinent to them all.

### Conclusion

Should these Resource Consent Applications go to a Hearing, we would like to be heard. However we are hopeful that if our suggestions can be taken on board by King Salmon, we may not have to.

We would welcome any discussion with the team in charge of the Applications over the points we have made, and/or corrections if our understanding of their evidence has been mistaken.

One final point we would like to make for the future of good community liaison between the local residents of Crail Bay, and King Salmon, is that we would like to have a contact person at King Salmon available to discuss any issues we may have with their operation.

Kristen and Michael Gerard

Hopai

Pelorus Sounds