

# Kenepuru & Central Sounds



Kenepuru & Central Sounds Residents Association Inc.

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*(President)*  
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Dear Pere

## **Review of Marlborough Regional Policy Statement (RPS) and Marlborough Sounds Resource Management Plan**

1. At the SAG workshop on the above, you indicated that the Council would be interested in attending a meeting of members of the Association called to discuss the above review.
2. At a recent Committee meeting we discussed the review in the context of the draft plan change materials provided by the Council to date. A consensus emerged that in order for our members to be able to fairly and properly engage in any such discussion the Committee would need to better understand the context surrounding the proposed changes and the process itself.
3. From that discussion it quickly emerged that the Council needs to provide answers to a number of high level salient questions, which the Council consultation material either does not address or only briefly addresses. Accordingly, we would be grateful if you could respond to the following:
  - Please outline the steps (process) and timeline by which any proposed review of the Sounds' Plans will be implemented.
  - What is the number of pre-1996 marine farms that have Controlled Activity status in the current Sounds' Plan? What was the basis by which

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

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they were given that status?

- Please outline the basis upon which the Regional Planning and Development Committee ('RPDC') considered it appropriate that Controlled Activity status be maintained for all such farms.
- Please outline the basis by which the RPDC consider it appropriate that Controlled Activity status be extended to all other existing marine farms within a 100 to 300 metre zone.
- Mussel farms constitute by far the greatest number and area of marine farms in the Sounds. Please outline the basis by which the RPDC was assured that the existing level of mussel farming is ecologically sustainable in the current locations.
- As we understand it, if the proposed changes are implemented then other Sounds users/residents will have no right to be heard when existing marine farmers apply to have their farms re-consented if a controlled activity status. Accordingly, did the RPDC consider the impacts upon other Sounds users/residents wanting to object to re-consenting because changes have occurred in public demands or values, or in local environments, or because existing farms are inappropriately sized and/or sited even if within the zone? If yes, please supply the background material upon which the RPDC made this decision.
- As the Association sees it, a particularly contentious part of the proposed changes relates to extending the preferred zone for marine farms from 200 metres to 300 metres from the reference point (effectively the shoreline). Accordingly, please outline the basis upon which the RPDC reached this decision.
- Fundamentally this will result in an expansion of marine farming (most likely mussel farms) in a larger preferred zone. Given the level of concern as to the current impact of overstocking on indigenous ecosystems in enclosed areas, and the correlation of this to farm yields in those areas, please confirm if the RPDC holds or has access to what it considers to be reliable and comprehensive information on mussel farm yields per hectare of operational farm in the Sounds for each year over the last 20 years. If yes, please provide details. If not, what details do you have? At a Sounds level, does the RPDC know what the current total annual mussel harvest in green weight tonnes is? If yes, please provide details.
- As we understand it, marine farmers will still be able to make applications for marine farming beyond the preferred zone. Do you agree? We are concerned that the proposed changes are deficient in that there is no additional assessment criteria currently proposed for such applications. In other words, draft policy 1.4 applies equally to a farm within the preferred

zone and to any applications outside the preferred zone. Surely, there should be further criteria of a much higher threshold for applications beyond the preferred zone. Further, policy 1.7 does not supply any assessment guidelines. Please can you explain these apparent anomalies?

- Can you clarify why the RPDC decided that the overriding importance of the Sounds as a public recreation amenity was not carried over and recognised as such in the proposed new plans?
4. Once we have your response to the above in hand, the Committee requests that the Council set up a telephone conference call with the Committee so the Committee can explore with you and better understand the proposed plan changes.
  5. Following that discussion, the Committee envisages that it would circulate its members as to the proposed plan changes, the process and provide some commentary on the same. Contemporaneously the Committee would discuss the format, venue and time of the suggested meeting with members.
  6. We note the ambitious timeline that Council is proposing to complete its public consultation with the likes of the Association and accordingly we look forward to a speedy response to the above.

Yours faithfully



Ross Withell

President

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