

11 April 2023

Marlborough District Council
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Email: variations@marlborough.govt.nz



Dear Sir/Madam

**Kenepuru and Central Sounds Residents' Association
Submission on Variation 2 to the Proposed Marlborough Environment Plan –
Ecologically Significant Marine Sites**

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

1. Introduction

- 1.1 The Association was established in 1991 and currently has approximately 330 household members who 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 represent members on matters of interest to them.
- 1.2 Of particular interests to members is the preservation and safeguarding of the integrity, form, resilience and functioning of the unique and iconic coastal environment making up the Marlborough Sounds.
- 1.3 To this end the Association has actively engaged in the likes of the Marlborough District Council (**Council**) planning process leading up to the release of the proposed Marlborough Environment Plan (**MEP**). We made extensive submissions on the same and supported those submissions at the Council various hearings. We have as a section 274 party made the considerable effort to participate in several of the appeals on the proposed MEP (including those matters associated with better protecting Indigenous Biodiversity in the Sounds) currently winding their way through the Environment Court process.
- 1.4 We are pleased to have the opportunity to briefly comment on the above Variation to the MEP as proposed by the Marlborough District Council ("**Council**").

2. Overview

- 2.1 As a general statement **the Association supports** the approach Council has taken in identifying and proposing new ESM sites and enlarged buffer zones on existing sites as an appropriate step towards the continuing protection of sensitive marine sites. We have been most uncomfortable about the intensive wide scale industrialization of parts of the marine environment of the Sounds with little or no ongoing monitoring of effects of these activities on sensitive environments. We see this proposal as a good step to help address some of these concerns. We also urge that Marlborough Sounds ecologically sensitive marine sites be recognized and protected in law to the greatest extent possible.

3. Discussion

- 3.1 Based on the Council Section 32 report Council has identified 64 new significant sites. **We support that outcome. We support** Council's proposal that these ESM sites be added to Appendix 27 of volume 3 of the MEP.
- 3.3 Council has adjusted the spatial boundaries of 44 existing sites. As far as we can ascertain from the Section 32 report all but one of those adjustments resulted in the current ESMS category being retained or upgraded. **We support that outcome.** Similarly in all but one case the review has resulted in all but one of the subject 44 existing sites having its current buffer boundary retained or increased. **We support that outcome and any necessary consequential adjustments to the MEP.**
- 3.4 From the section 32 report we understand that Council is proposing that current ESMS 4.25 (East Bay North) is to have its current A category status reduced to B and its current buffer boundary reduced from 100 m to 50 m. We have not been provided with enough information to support that adjustment and accordingly, in the interim, **we do not support those proposed changes.**
- 3.5 From the section 32 report we understand that Council is proposing that current ESMS 7.4 (Moturara Bay) is to have its current A status **reduced** to B. We feel we have not been provided with enough information to support that adjustment and accordingly, in the interim, **we do not support that proposed change.**

4. Other Matters – Potential significant oversight - McManaway Rock

- 4.1 We wish to express our concerns regarding the level of significance given to McManaway Rock. We are surprised this very significant site appears to have been overlooked in this review. We believe that this superb and ecologically diverse site has not been given the same level of protection as other ecologically sensitive marine sites in the region. McManaway Rock needs, we submit, a category A designation and an increased buffer zone to 200 meters as a minimum. We strongly submit that further scientific research be conducted on the pristine marine environments in the marine area surrounding McManaway Rock. This could help us all better understand the unique ecological features of the site and the impact of human activities on these

delicate ecosystems. A video was submitted for the New Zealand King Salmon application for new marine farms at Cape Lambert. It clearly demonstrates, in our view, the unique attributes and outstanding biodiversity qualities of this site.

We respectfully submit that Council needs to urgently review and consider this footage as part of its assessment and review of McManaway Rock as an ESMS.

- 4.2 We note the focus of this review particularly around identifying new ESM sites seems to have a particular focus on areas other than the Kenepuru and Central Sounds. We urge Council to take a careful look at these areas for ESM sites notwithstanding the industrialization by marine aquaculture of this area. We are confident there is a plethora of new ESM sites to be identified and better protected here.

5. Request to Appear

- 5.1 The Association confirms that it would like to present/talk to this submission if there is to be a public hearing and will be represented.

Yours faithfully

President
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