

BEFORE THE MARLBOROUGH DISTRICT COUNCIL

IN THE MATTER OF the Resource Management Act 1991

AND

IN THE MATTER OF Plan Change 21 Waikawa Bay – Mooring
Management Areas and Marina Zone to
the Marlborough Sounds Resource
Management Plan

SUPPLEMENTARY STATEMENT OF EVIDENCE

BY ROSEMARY ANNE PRENDEVILLE

ON BEHALF OF PORT MARLBOROUGH NEW ZEALAND LIMITED

1. INTRODUCTION

Qualifications and Experience

- 1.1. My name is Rosemary Anne Prendeville and I am Projects Manager for Port Marlborough New Zealand Limited. My qualifications and experience were set out in my Evidence in Chief.

Scope of Evidence

- 1.2. This supplementary evidence responds to questions raised by Commissioners during the hearing of Plan Change 21, and to issues raised in the oral and written submissions put forward by Te Atiawa submitters on 30 November and 1 December 2010.
- 1.3. This evidence specifically addresses biosecurity and environmental management practices at Waikawa Marina, and 'drystack' boat storage.

2. BIOSECURITY

- 2.1. Questions from Commissioner Rennie and comments from a number of submitters raised concern about potential biosecurity risks which might arise from further marina development at Waikawa.
- 2.2. Port Marlborough as the operator of the port at Picton and Shakespeare Bay, as well as marinas in Havelock, Picton and Waikawa, has extensive experience of managing biosecurity risk on a daily basis. The company has clear strategic and operational links to national biosecurity initiatives and agencies through its active participation in the New Zealand Port Company CEO's forum, executive membership of the New Zealand Marina Operators Association, and participation in the 'Clean Marinas' programme (Waikawa was the first New Zealand marina to gain accreditation under this programme).

2.3. Port Marlborough actively participated in development of, and is a foundation signatory to, the 2009 Top of the South Island Marine Biosecurity Strategic Plan. Other foundation signatories are MAF Biosecurity New Zealand, Ministry of Fisheries, Department of Conservation, Te Tau Ihu Customary Fisheries Forum (representing the eight top of the South iwi, including Te Atiawa), the Marine Farming Association, Marlborough District Council, Nelson City Council, Tasman District Council, Port Nelson, NIWA, and Cawthron Institute.

2.4. The Top of the South biosecurity partnership:

- Undertakes coordinated marine biosecurity education and advocacy activities;
- Works with central government agencies – MAFBNZ, DoC, MFish – to coordinate regional marine biosecurity activities;
- Provides integration of regional with national marine biosecurity systems;
- Provides partners with access to regional intelligence, resources and organizational structures;
- Provides operational resources for national-led activities (e.g. personnel, boats, etc.);
- Coordinates local surveillance programs including stakeholder involvement;
- Uses regional powers of regulation under the Resource Management Act and Local Government Act to support regional marine biosecurity;
- Uses asset management authorities of partners as owners and managers of local ports, marinas and other areas of intense marine activity to enhance marine biosecurity;
- Provides funding according to legal responsibility, capacity to pay and agreed priorities;

- Uses such other powers and resources (e.g. Harbour Master roles) as appropriate to support regional marine biosecurity.

2.5. The principles of this plan are:

- Acting constructively and promptly in the face of uncertainty;
- Taking a cautionary approach in making decisions to allow for the limits of our understanding of environmental complexity;
- Taking action by those best placed to act with the resources that are available;
- Acknowledging the kaitiakitanga of tangata whenua iwi and Crown commitments under the Treaty of Waitangi relevant to this strategic plan insofar as these commitments are consistent with partners' obligations under their relevant legislation;
- Rigorously assessing costs, benefits and risks, including social, economic, cultural and environmental effects to enable best use of limited resources;
- Apportioning costs equitably taking into account legal obligations, roles and responsibilities, contribution to risk, and benefit received;
- Encouraging community involvement, individual responsibility and full participation.

2.6. At a day-to-day operational level within the marina, active biosecurity management by Port Marlborough includes:

- Working closely with NIWA and Cawthron Institute to provide secure areas for test grids and other equipment associated with the biosecurity monitoring which is on-going in all three of Port Marlborough's marinas;
- Vigilance from operational staff for vessels displaying excessive underwater marine growth, which can facilitate the spread of invasive marine pests;

- Contact with vessel owners, and facilitation of removal and cleaning of affected vessels;
- Display and distribution of educational material (eg: flip cards) and other information to help boat owners and others to become aware of and to identify invasive marine pests;
- Advising and working with Biosecurity NZ if any infestation was suspected;
- Dissemination of relevant information to Port Marlborough's marina clients via the regular marina newsletter 'Marina Matters'.

3. ENVIRONMENTAL MANAGEMENT

3.1. Several submitters referred to potential discharges from vessels and potential discharges within and from the marina. Supplementary Evidence of Council's planner, Mr Quickfall, including Carol Taylor's 2003 report 'Antifouling Co-biocides in New Zealand Coastal Waters' reported levels of heavy metals in various locations, including a site adjacent to the travel-lift dock within Waikawa Marina.

3.2. There is active environmental management land-side and water-side within the marina to ensure that waste and stormwater disposal is appropriately managed. This active management includes provision and progressive upgrading of infrastructure and monitoring, complemented by active operational management and education of marina users.

History of Continuous or Step Improvements to Discharge Management

3.3. Historically, boat building and boat maintenance has been associated with significant discharges of heavy metals and other contaminants from antifouling products. The current situation is much improved through new generation antifouling products, and physical practices in antifouling application and removal.

3.4. The 2003 Taylor report (refer 2.3) measured point levels adjacent to the travel lift and washdown area. At that time, and as identified in the Report, contaminants from the wash-down area adjacent to the travel lift berth were discharged to the marina waters. Since 2003, a number of step improvements have been made to discharge practices at Waikawa:

- 2003 – Sewer connection for main travel lift area washdown removes bulk of contaminants previously directly entering water;
- 2006 – New yard management practices implemented limiting what activities can be carried out, and where;
- 2010 – New storm water system installed at existing hardstand area, incorporating three-chamber oil and grit separator and separation of clean stormwater from yard runoff;
- 2010 – Consent granted for ‘state of the art’ stormwater treatment plant for new hardstand area, including hydro-dynamic vortex separator, settlement chamber and sand filters – to be installed early 2011.

3.5. Complementing these improvements in infrastructure, management practices within the marina are documented and continuously reviewed. They include:

- Well developed ‘Oil Spill Response’ protocols and annual refresher training through participation in fuel spill exercises organised and run by the Harbour Masters Office (the Marlborough Harbour Master is a National Commander for oil spill response);
- Annual full fire-fighting / emergency response exercises to test a comprehensive plan, including expeditious removal and management of vessels to reduce the environmental impacts of emergencies;
- A hardstand ‘best practices’ manual providing information on ways to minimise, capture and store pollutants that is a ‘living document’, reviewed and updated regularly;

- Active on-site management by marina staff, including enforcement of marina environmental management rules and regulations, with specific policing of marina waste and immediately halting activities that generate adverse effects;
- Registration of tradespeople working within the marina, involving education in and commitment to the Marina Rules and Regulations, and Hardstand Best Practices Manual;
- Support of the Marlborough Marine Industries Association, which includes maintenance operators at Waikawa and requires its members, as a condition of membership, to comply with all rules and regulations (including environmental) required by Port Marlborough at Port Marlborough facilities;
- Ongoing participation in 'joint venture' education between PMNZ, MDC and DOC to recreational boaties regarding rubbish disposal, recycling and pump-out facilities throughout the Marlborough Sounds and through Port Marlborough's marinas in particular;
- Management of resource consent requirements and conditions, including monitoring protocols and results.

3.6. Other physical environmental management facilities within the marina include:

- Vessel ablution pump-out facilities provided on the fuel berth at Waikawa Marina for pump-out of vessel ablution facilities;
- Used oil recovery – receptacles for used oil for recycling or reuse;
- Provision of rubbish and recycling facilities.

3.7. Marina staff are also active in collaboration with Ministry of Fisheries, Department of Conservation, Biosecurity NZ, Maritime NZ and the Harbour Master to ensure that information is available and is actively distributed to marina users regarding marine reserve areas, fishing regulations and good practice, refuelling and fuel

spills, and so on. Information of this nature is passed on through our Marinas newsletter, Marina Matters, on a regular basis.

4. DRYSTACK

- 4.1. There were several questions from Commissioners regarding the possibility of dry-stack as a potential alternative method of vessel storage. In particular, there was discussion between Commissioner Rennie and some submitters regarding a large-scale drystack operation at Tauranga.
- 4.2. Port Marlborough is very familiar with dry-stack as a method of boat storage, having held resource consent for a 250-vessel drystack facility at Waikawa, and having achieved support from the company's Board of Directors for a drystack development project, contingent on certain sell-down thresholds being achieved.
- 4.3. The drystack contemplated for Waikawa would have been similar to the Tauranga operation, and would have accommodated launches between six and twelve metres in length. Drystack by its nature is practically limited to accommodating launches with limited superstructure height, and yachts with retractable keels and removable masts.
- 4.4. The Waikawa drystack project did not reach the required sell-down thresholds to reach commercial viability, and the resource consent for the project lapsed in September of this year. Despite a rational attraction for drystack boat storage, our experience is that this form of boat storage is not commercially viable in our market. If this changes at some point in the future we would be prepared to reconsider whether there are opportunities for this type of boat storage at Waikawa. Our understanding is that the Tauranga drystack, although operational, has also experienced some challenges in reaching commercial viability.

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