

Memorandum

Boffa Miskell
Level 1, 141 Cambridge Terrace, Christchurch
PO Box 110, Christchurch 8140
Telephone: +64 3 366 8891

Boffa Miskell



Attention: The Marlborough Environment Plan Hearings Panel

Company: c/o Marlborough District Council

Date: 8 March 2019

From: James Bentley

Message Ref: Topic 5: Natural Character overlay – Interim Response to Minute 49

Project No: C16091A

Marlborough Environment Plan –Response to Minute 49 concerning the ratings of High and Very High areas of natural character within the accompanying tables

This is a response to Minute 49, which itself is a continuation of Minute 47 and my response to that Minute (dated 21 January 2019). This response addresses specific concerns raised in Minute 49, notably around the rating of mixed areas of high and very high natural character and their ‘grouped’ one-colouration.

Only areas of High and Very High natural character have been mapped. These mapped areas have been ‘grouped’ based on geographic areas of commonality. Within those geographic areas, some ‘areas’ retain a mix of both High and Very High areas of natural character, while others are solely rated as either High or Very High. These mixed areas are identified only in the accompanying table, under a ‘rating column’ for each specific natural character area within a specified Coastal Terrestrial Area (CTA) or Coastal Marine Area (CMA).

Within Minute 49, the Hearing panel offered under paragraph 9 a potential solution to the mixed rated areas to avoid further ambiguities as to what area specifically rates as very high. The paragraph stated:

- (i) *by deleting the Rating column – the reason being that as presently recommended that column itself possibly gives rise to potential lack of clarity as to which areas are rated as being of Very High as distinct from High natural character.*
- (ii) *by replacing that Rating column with an amendment to the ‘Key Values’ column by adding in parentheses after the sub-header the following statement:*

Key Values

(High natural character attributes will exist in all areas, but some areas will also contain very high natural character attributes as described in this column.)

I agree that this is a sensible way forward. All mapped natural character areas are ‘at least high’, (which aligns with policy direction) therefore the written identification of values outlining exactly what comprises the areas of Very High natural character and where they are located need to be more clearly identified within the Key Values column.

As a response to this, I have amended the natural character values and descriptions table for Bulwer CTA. I have deleted the rating column. The amendments are in **green text**. These amendments relate only to the tables and the maps would remain the same as presented in my Response to Minute 47 and dated 21 January 2019.

I trust that this is an effective way forward and seek confirmation from the panel on this before proceeding further.

Section 42A Report (page 42): Coastal Terrestrial Area 3: Bulwer (Level 4/5 Table)

Map Reference	Sub Area	Key Values ¹	Additional Comments
A	<u>Land to west of Waitata Reach Eastern facing slopes extending from Reef Point Treble Tree to Bucklands Bay</u>	<p>Whilst some land has been cleared for pasture, there are limited structures on the land, especially around northern Port Ligar and land west of Waitata Reach.</p> <p>Advancing regenerating headlands and embayments holding very high biotic and abiotic values extending from ridge to foreshore throughout much of this area with noticeable lack of modification.</p> <p>Of the remaining Much of the indigenous forest holding very high natural character values is within the Area, much appears on more elevated slopes, such as on (Mt. Shewell, Mt. Drew, Bebs Peak, Okuri Peak), however a but with substantial tracts appears at lower coastal altitudes at, especially east and south aspects (Apuau Channel, Fitzroy Bay).</p> <p>Very High perceived naturalness values</p> <p>Advancing regeneration of vegetation on lower slopes east of Picnic Bay and east of Woodlands.</p>	<p>Many bays contain houses, jetties and wharves</p> <p>Modifications within this area include: Occasional area of wilding pines present, Tui Nature Lodge structures and small amount of tracking. No foreshore structures apart two from mussel farms at Treble Tree and two mooring buoys (one at Woodlands Bay and one at Bucklands Bay)</p>
B	Maud Island	<p>Maud Island is distinctive, rare and nationally important due to its predator-free status and nationally threatened fauna.</p> <p>Advanced areas of revegetation throughout the island.</p> <p>Overall island holding very high natural character values</p>	<p>Small areas of pasture and forestry, a jetty, cluster of small buildings, a gun emplacement and tracks.</p>
C	<u>Eastern Waitata Reach (Pohuenui), western and southern Forsyth Island, southern slopes of isthmus of northern Beatrix Bay and land south of Allen Strait</u>	<p>Relatively low levels of modification and extensive areas of regenerating bush in amongst areas of grazing, especially on Forsyth Island.</p> <p>Largely-intact podocarp-broadleaved forest at Kauaura Bay holding very high natural character values.</p> <p>Very High natural character values associated with Bird Island and Duffers Reach rock stacks due to undisturbed presence of habitats.</p> <p>High perceived naturalness values</p>	<p>Also contains low intensity grazed pastoral land and associated tracks and post and wire fencing.</p> <p>Includes tracks and powerlines along northern Beatrix Bay and at Allen Strait and Southern Forsyth Island.</p>
D	North West Bay	<p>Indigenous forested peninsula at Stafford Point with advanced regenerating vegetation on the upper steep and mid slopes of Miro Bay holds very high natural character values.</p> <p>High perceived naturalness values due to lack of structures and regenerating vegetation evident around mid and upper slopes of Miro Bay, within northern North West Bay.</p>	<p>Modification to the immediate north</p> <p>Modification to lower slopes of to Miro Bay and Wilson Bay include: numerous jetties, boatsheds, private residences,</p>

¹ High natural character attributes will exist in all areas, but some areas will also contain very high natural character attributes as described in this column.

Map Reference	Sub Area	Key Values ¹	Additional Comments
			<u>powerlines and tracks</u>
E	<u>Land to west of Waitata Reach White Horse Rock, Hamilton Cove, Yellow Cliffs</u>	<p>Whilst some land has been cleared for pasture, there are limited structures on the land, especially around northern Port Ligar and land west of Waitata Reach, <u>including White Horse Rock, Yellow Cliffs and Hamilton Cove.</u></p> <p><u>Advancing regenerating headlands and embayments extending from ridge to foreshore around Hamilton Cove and White Horse Rock.</u></p> <p>Very high abiotic and biotic natural character values at Yellow Cliffs due to lack of modification.</p> <p><u>Of the remaining indigenous forests within the Area, much appears on more elevated slopes (Mt. Shewell, Mt. Drew, Bobs Peak, Okuri Peak), but with substantial tracts at lower coastal altitudes, especially east and south aspects (Apuau Channel, Fitzroy Bay).</u></p> <p>Very High perceived naturalness values experienced throughout.</p>	<u>Many bays contain houses, jetties and wharves</u> <u>Modifications within Waihinau Bay and Waitata Bay limit extent of mapping to those identified.</u> <u>Modifications within these mapped areas are restricted to several jetties, a small number of private residences, powerlines and tracks. Where aquaculture is present, this has limited the extent of mapping to the terrestrial area only.</u>
F	<u>Land to west of Waitata Reach Fitzroy Bay Area, French Pass, Okuri Bay, and land at the head of Squally Cove</u>	<p>Whilst some land has been cleared for pasture, there are limited structures <u>on within the mapped area</u>, <u>land, especially around northern Port Ligar and land west of Waitata Reach.</u></p> <p><u>Advancing regenerating headlands, slopes and embayments extending from ridge to foreshore and holding very high levels of natural character, noticeably from Bobs Peak and Okuri Peak with substantial tracts at lower coastal altitudes around northern Hallam Cove, Garne Bay, Savill Bay, northern Elaine Bay and southern Okuri Bay.</u></p> <p><u>Smaller 'pockets' of coastal vegetation retaining high levels of natural character are also present around the French Pass settlement, parts of the western slopes of Wairangi Bay and the eastern slopes of Whakakitenga Bay.</u></p> <p><u>Of the remaining indigenous forests within the Area, much appears on more elevated slopes (Mt. Shewell, Mt. Drew, Bobs Peak, Okuri Peak), but with substantial tracts at lower coastal altitudes, especially east and south aspects (Apuau Channel, Fitzroy Bay).</u></p> <p>Very High perceived naturalness values around the slopes extending from ridge to shore at northern Hallam Cove, Garne Bay, Savill Bay, northern Elaine Bay and southern Okuri Bay</p>	<u>Many bays contain houses, jetties and wharves</u> <u>Modifications within these mapped areas are restricted to one jetty in Savill Bay, several private residences in Canoe Bay, Garne Bay, small tracks extending from the French Pass Rd into Canoe Bay, Savill Bay and Garne Bay.</u> <u>Agriculture and forestry have restricted mapping to parts of Hallam Cove and Savill Bay. Aquaculture has limited the extent of mapping in Hallam Cove, Canoe Bay and around Camel Point to Elaine Bay</u>

Notes:

'A' is taken from Section 42A Report (page 42): Coastal Terrestrial Area 3: Bulwer (Level 4/5 Table)

'E' is taken from Section 42A Report (page 39): Coastal Terrestrial Area 3: Bulwer (Level 4/5 Table)

'F' is taken from Section 42A Report (page 47/48): Coastal Terrestrial Area 3: Bulwer (Level 4/5 Table)