

**IN THE ENVIRONMENT COURT OF NEW ZEALAND  
CHRISTCHURCH REGISTRY**

**ENVC-2020-CHC-**

**I TE KŌTI TAIAO O AOTEAROA  
ŌTAUTAHI ROHE**

**IN THE MATTER** of the Resource Management Act 1991 (the Act)

**AND**

**IN THE MATTER** of an appeal under Clause 14, Schedule 1 of the Act

**BETWEEN** **Sanford Limited** 22 Jellicoe Stret

**Appellant**

**AND**

**MARLBOROUGH DISTRICT COUNCIL**

**Respondent**

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**NOTICE OF APPEAL  
Dated this 8th day of May 2020**

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Next Event Date:  
Judicial Officer:

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**SANFORD LIMITED**

Sanford Limited  
PO Box 443  
AUCKLAND 1140  
Tel: 027 293 7795

**Notice of Appeal to Environment Court against decision on a proposed Plan**

*Clause 14(1) of Schedule 1, Resource Management Act 1991*

**To:** The Registrar  
Environment Court  
Christchurch

**Name of Appellant and Decision Maker**

- 1 Sanford Limited (Sanford) of Auckland appeal against part of the decision of the Marlborough District Council (“MDC”) on the proposed Marlborough Environment Plan (“the proposed Plan”).
- 2 Sanford is marine farmer with licences in the Marlborough District.
- 3 Sanford made a submission on the proposed Plan.

**Trade Competition**

- 4 Sanford is a marine farmer and seafood processor, in this appeal Sanford is not a trade competitor for the purposes of s 308D of the Act.

**Date of Decision appealed against**

- 5 The reasons for the decision were released from 21 February 2020, with the tracked changes decision version of the proposed Plan being released on 3 March 2020.

**Date on which Notice of Decision was received by Appellant**

- 6 Sanford received notice of the decision on 21 February and 3 March 2020.

**The Decision and Reasons**

- 7 Sanford is generally supportive of the proposed Plan provisions, we consider that some change is required on the planning maps and Schedules to ensure that the proposed Plan:
  - (a) Promotes the purpose of the Act, being the sustainable management of resources (section 5);
  - (b) Is not contrary to Part 2 and other provisions of the Act;
  - (c) Will meet the reasonably foreseeable needs of future generations.
- 8 Sanford supports and adopts all points made in the Aquaculture NZ / Marine Farmers Association notice of appeal, and will collaborate with our industry

bodies on all matters raised in the MFA/AQNZ appeal, in addition Sanford raises particular matters of relevance to marine farms that it owns.

- 9 In particular, and without limiting the generality of the above paragraph, the parts of the decision that Sanford is appealing and the reasons for the appeal are as follows:

#### **Landscape and Natural Character**

10 Sanford appeal:

- (a) The extent of mapping of Outstanding Natural Character, Very High Natural Character, High Natural Character, and Outstanding Natural Landscapes and Features of the proposed Plan, as it affects our marine farming licences, set out in the table below.
- (b) The lack of recognition of marine farms as part of the existing environment of the Marlborough Sounds in the above mapping and Appendices.

11 The reasons for the appeal include:

- (a) Recognition for the location of current marine farms is an appropriate starting point for assessment.

#### **Indigenous Biodiversity**

12 Sanford appeal:

- (a) Appendix 3 in Volume 3 of the proposed Plan and Appendix 27 in Volume 3 of the proposed Plan, to the extent that the buffers overlap with existing marine farms.

13 The reasons for appeal are as follows:

- (a) The buffer surrounding an Ecologically Significant Marine Site (ESMS) should be removed where it overlaps an existing marine farm. In these circumstances, the farm itself acts as a buffer to protect the sites.

#### **Relief Sought**

14 The Appellant seeks the following relief:

- (a) Amendments to the relevant planning maps as set out in Schedule A to this notice; and
- (b) Any necessary consequential amendments; or

- (c) Other equivalent relief.

**Attached Documents**

15 The following documents are attached to this notice:

- (a) Schedule A referred to above;
- (b) A copy of Sanford's submissions and further submissions; and
- (c) A copy of the relevant parts of the decision, provided as hyperlinks.

16 A copy of this notice will be lodged electronically with the Environment Court and the Marlborough District Council in accordance with the updated and amended directions in the Court's Minute of 15 April 2020. The Appellant notes that the requirements to serve a copy of this notice on other parties and provide a list of names to the Registrar have been waived.

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Alison Undorf-Lay  
Industry Liaison Manager  
Sanford

**Address for service of the Appellant**

Sanford Limited, PO Box 443 AUCKLAND 1140

Telephone: 027 293 7795

E-mail: [aundorf-lay@sanford.co.nz](mailto:aundorf-lay@sanford.co.nz)

Contact person: Alison Undorf-Lay

## **Note to appellant**

You may appeal only if—

you referred in your submission or further submission to the provision or matter that is the subject of your appeal; and

in the case of a decision relating to a proposed policy statement or plan (as opposed to a variation or change), your appeal does not seek withdrawal of the proposed policy statement or plan as a whole.

Your right to appeal may be limited by the trade competition provisions in Part 11A of the Resource Management Act 1991.

The Environment Court, when hearing an appeal relating to a matter included in a document under section 55(2B), may consider only the question of law raised.

You must lodge the original and 1 copy of this notice with the Environment Court within 30 working days of being served with notice of the decision to be appealed. The notice must be signed by you or on your behalf. You must pay the filing fee required by regulation 35 of the Resource Management (Forms, Fees, and Procedure) Regulations 2003.

You must serve a copy of this notice on the local authority that made the decision and on the Minister of Conservation (if the appeal is on a regional coastal plan), within 30 working days of being served with a notice of the decision.

You must also serve a copy of this notice on every person who made a submission to which the appeal relates within 5 working days after the notice is lodged with the Environment Court.

Within 10 working days after lodging this notice, you must give written notice to the Registrar of the Environment Court of the name, address, and date of service for each person served with this notice.

However, you may apply to the Environment Court under section 281 of the Resource Management Act 1991 for a waiver of the above timing or service requirements (see form 38).

## **Advice to recipients of copy of notice of appeal**

*How to become party to proceedings*

You may be a party to the appeal if you made a submission or a further submission on the matter of this appeal.

To become a party to the appeal, you must,—

- within 15 working days after the period for lodging a notice of appeal ends, lodge a notice of your wish to be a party to the proceedings with the Environment Court and serve copies of your notice on the relevant local authority and the appellant; and
- within 20 working days after the period for lodging a notice of appeal ends, serve copies of your notice on all other parties.

Your right to be a party to the proceedings in the court may be limited by the trade competition provisions in section 274(1) and Part 11A of the Resource Management Act 1991.

You may apply to the Environment Court under section 281 of the Resource Management Act 1991 for a waiver of the above timing or service requirements (*see* form 38).

*How to obtain copies of documents relating to appeal*

If this appeal is being served on you in hardcopy, the copy of this notice served on you does not attach a copy of the appellant's submission or part of the decision appealed. These documents may be obtained, on request, from the appellant.

*Advice*

If you have any questions about this notice, contact the Environment Court in Auckland, Wellington, or Christchurch.

## SCHEDULE A – Relief Sought

- As per the Sanford submission the following Planning Maps 3, 4, 8, 9 and 14 and Landscape and Natural Character areas are appealed.
- Relief sought is either to remove the zoning or recognise existing marine farms as being part of the background environment on the Planning Maps and criteria for establishing zones.
- Landscape zones in Bays and areas are summarised on this table below.
- Council decision is provided by way of hyperlink are here on [indigenous biodiversity](#), [natural character](#) and [natural character mapping](#)

Maps	Landscape provisions in the vicinity of:	Natural Character provisions in the vicinity of:	Council Decision
<b>Pelorus Sound</b>	<p>Hikapu Reach and above Maori Bay</p> <p>Putanui Point</p> <p>Nydia Bay and Fairy Bay</p> <p>Yncyca Bay</p> <p>Hopai Bay</p> <p>Waimaru Bay</p> <p>Waihinau Bay</p> <p>Homestead Bay</p> <p>Waterfall Bay</p> <p>Cape Horn</p> <p>Te Akaroa (West Entry Point)</p> <p>Kaitira (East Entry Pint)</p> <p>Inclusion of the water space around:</p> <ul style="list-style-type: none"> <li>• Pipitawai</li> <li>• Harding Point</li> <li>• Paparoa</li> </ul>	<p>Putanui Point.</p> <p>Schapper Point</p> <p>Pipi Beach</p> <p>Southern tounge of the VHNC just above ML 8416.</p> <p>Nydia Bay (Chance Bay</p> <p>Penguin Bay).</p> <p>Hopai Bay, at Crail Bay</p> <p>Waimaru Bay.</p> <p>Kitira (East Entry Point) up to Paparoa</p> <p>White Horse Rock</p> <p>Yellow Cliffs</p> <p>Reef Point</p>	

	<ul style="list-style-type: none"> <li>• Blow Hole Point.</li> </ul>		
<b>Kenepura Sound</b>	Gold Reef Bay	Gold Reef Bay	
<b>Squally Cove</b>	Lone Rock to Kakaho Point	<p>Lone Rock to Kakaho Point</p> <p>Round Hill along the southern side of Whakitenga Bay.</p> <p>Oyster Bay</p> <p>Matarau Poiint.</p>	
<b>Tawhitinui Reach</b>	<p>Tawe Point</p> <p>Cregoe</p>		<p>Maud Island</p> <p>Mt Shewell.</p> <p>Wilson Bay/Spenser Point.</p>
<b>Waitata Reach</b>	<p>Hamilton Cove</p> <p>Yellow Cliffs</p> <p>Horseshoe Bay</p>	<p>Horseshoe Bay</p> <p>Ketu Bay</p> <p>Richmond Bay</p> <p>Hamilton Cove.</p> <p>Burnt Point including White Rock</p>	
<b>Waitata Bay including Horseshoe, Richmond and Ketu Bays</b>	Tapapa Point		
<b>Forysth Bay</b>	<p>Kaitira (East Entry Point).</p> <p>Sugar Loaf</p> <p>Paarekeke Point.</p> <p>Tawaroa Point.</p> <p>Orchard Bay.</p>	<p>Duffers Reef</p> <p>Kaitira (East Entry Point)</p> <p>Forsyth Bay</p> <p>Anakoha Bay</p> <p>Orchard Bay.</p>	



<b>Anakoha Bay</b>	Tawaroa Point Titirangi Bay		
<b>Melville Cove</b>	Recongise existing marine farms ML 8169, 8598, 8171, 8591, 8174, 8173 and 8599.		
<b>Port Underwood</b>	Horahora Kakahu Island  Pipe Bay and		
<b>Beatrix Bay</b>	Kauauroa Bay  Tawhitinui Bay  Te Purakia Point  Waimaru Bay  Tuhitarata Bay  Mt Kiwi.  Sugar Loaf  Tawero Point	Richmond Bay  Horseshoe Bay  Tawhitinui Bay  Suguar Loaf  Beatrix Bay  Kauauroa Bay  Tawero Point south towards Capsize Point	
<b>Onauku Bay</b>	Arapaw Island on easten side of Onauku Bay	Onauku Bay so that it does not lie within 400m of exsting marine farms including LL 8509, 8400, 8510	
<b>Current Basin</b>		Waikawa Bay  Malven Hill Point.	
<b>Admiralty Bay</b>	Clayface Point  Waikawa Bay  Two Island Point.		

<b>Waikawa Bay</b>	Savill Bay Game Bay Cregoe Rock	Fitzroy.  Woodlands, around Canoe Bay  Camel Point  Elaine Bay.  Cregoe Rock  Camel Point.	
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## Sanford Limited Submission on the Proposed Marlborough Environment Plan

Thank you for the opportunity to comment on the proposed Marlborough Environment Plan (**the Plan**). Sanford has made a significant financial investment in Marlborough aquaculture including developing mussel lines, a processing plant in Havelock and most recently partnering with Skretting International to support the development of finfish research and development centre in Okiwi Bay.

Sanford requests an opportunity to present at the oral hearing.

**For questions relating to this submission please contact:**

Alison Undorf-Lay, PO Box 443 Auckland, 1010

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### Marine Farmers Association

In preparing our submission Sanford has worked closely with the Marlborough Marine Farmers Association (**MFA**).

#### General Principle

**Submission** Support of MFA submission

**Reason** Sanford and the MFA have collaborated closely on the writing of submissions, this should be reflected in a similar approach to the proposed Plan Volume 1 – 3 Issues, Objectives, Policies and Methods. Where we differ this is inadvertent, and we will seek to resolve these inconsistencies in our further submissions – but as a general principle we would defer to the MFA recommendation.

In relation to Volume 4 and the zoning overlays, Sanford has lodged specific submissions suggesting either the (i) deletion of the zone or (ii) moving the zone boundary – where this is sensible and pragmatic in relation to farms we own, lease, manage for others or who contract grow for Sanford.

**Relief** To be noted

### Volume One

**Across the Plan** – all volumes

**Submission** Oppose

**Reason** The plan contains few examples in the accompanying s32 analysis where methods other than rules were considered, equally there has been little consideration of costs (and benefits) of imposing regulation including an evaluation of the ‘do nothing’ option. The landscape, ecological areas and natural character overlays have put significant additional risk into the re-consenting process for Sanford’s marine farms. It is our submission that the council should have undertaken a comprehensive s32 evaluation at the start of the planning process to support its choice of methods.

**Relief** During the Officer’s reporting on submissions we ask that a s32 evaluation as to the benefits and costs across the full suite of methods ranging on the continuum of voluntary to regulatory be undertaken as part of making the recommendations.

**Guiding Principle 2** page 1- 3

**Submission** Amend

**Reason** Rewrite this principle so that it more clearly articulates the Council’s commitment to enable, promote and grow economic development.

**Relief** Amend to read, 'A healthy Marlborough economy is a place where people and businesses are encouraged to grow and flourish with certainty and confidence'

**Avoid** page 2-16

**Submission** Oppose

**Reason** To reduce uncertainty the word 'avoid' should have a consistent meaning in the plan – where the intention is not to prohibit the activity (or effect) it would be helpful to use the words 'take practical steps to minimise or remedy ..'.

**Relief** Where there is not an intention to prohibit replace the use of the word avoid with, 'take practical steps to xxxx'

**Objective 5**, page 65-15-27

**Submission** Oppose

**Reason** – Unclear what 'equitable' means in relation to the sustainable allocation of public space within Marlborough's marine area.

**Relief** – Replace with Efficient

**Policy 5.10.4**, page 5-32

**Policy 5.10.5**, page 5-33

**Policy 5.10.6**, page 5-33

**Policy 5.10.7**, page 5-34

**Policy 5.10.8**, page 5-34

**Submission** Amend

**Reason** In introducing coastal occupation charges it is Sanford's view that the Council needs to acknowledge that many coastal permits already contain extensive community contributions – these need to be reviewed and either (i) able to be offset against the charge or (ii) removed if charges are introduced. Consent / uses of the marine space that are required to be pay an occupancy charge should be afforded more security through a re-consenting process.

**Relief** : i) Farms incurring coastal occupancy charges should have controlled status (ii) Include in the plan a formula for determining the coastal occupation charge (iii) provide for coastal occupation charges to be offset by other contributions such as provision of water quality information to council, surveying information, community contributions towards infrastructure (iv) ensure money raised from coastal contributions is reinvested into sustainable management of the near-coastal environment to where the occupation takes place (v) add a provision that gives transparency as to how .

**Issue 6A**, page 6-1

**Submission** Oppose

**Reason** Resource use or a change of use is in itself not automatically degradation.

**Relief** Replace degradation with, modification

**Objective 6.1** page 6-2

**Submission** Support in part

**Reason** Support the need to establish and recognise the degree of modification of the natural character of coastal environment but not that unmodified defaults to a higher ranking.

**Relief** Amend to read 'Describe the biological features that contribute to natural character and the community's level of acceptance to modification'

**Add new Objective and Policy** page 6-2

**Submission** Add a new policy

**Reason** Recognise and provide for existing activities that are already legally established in landscape zones (aquaculture, forestry, farming) and provide for their continuation including they are not encumbered / constrained by the proposed new landscape controls. And, recognise that these uses (such as marine farming) are (i) regionally significant investments and (ii) have reversible effects.

**Relief** Add a policy that Recognise existing and legally established uses such as marine farms are significant investments which are reversible.

**Policy 6.1.1** page 6-2

**Submission** Support in part

**Reason** While we support the definition of natural as being biological processes, the policy should be extended to include a description of the values that people hold in relation to the landscape ie their reactions and perceptions to the natural process.

**Relief** Amend to, 'Recognise the natural elements, patterns and processes which contribute to natural character and the communities' responses to these:

**Policy 6.1.3**, page 6-3

**Submission** Oppose

**Reason** Dividing the region into nine coastal marine areas is unnecessarily complicated and has created uncertainty. Natural character does not correlate to the degree of un-modification, amend the policy to recognise legally established activities already present in the landscape.

**Relief** (i) manage the coastal marine area as one area (ii) recognise existing uses (modifications) to the natural character ie marine farming and forestry.

**Policy 6.1.4**, page 6-5

**Submission** Oppose

**Reason** Amend the policy to explicitly identify the 'values' of the coastal environment that contribute to its high and outstanding ranking including recognising existing modifications that are lawful ie marine farming is appropriate, existing, productive and a sustainable use/development of the Sounds.

**Relief** Amend the policy to read, 'Identify those areas of the coastal environment that are valued by the community as high and outstanding natural character'.

**Objective 6.2**, page 6-6

**Submission** – oppose

**Reason** – the challenge is preserve the 'values' that are identified not prohibit change. Recognise that change does not equate to an adverse effect; recognise that many areas contain developments that were present when the area was identified and were lawfully established

**Relief** (i) Amend both the Objective and Policy so that intent is to 'Preserve the values in the natural character rather than avoiding changes to the character', and (ii) 'Recognise ongoing use and developments that are lawfully established'.

**Policy 6.2.6**, page 6 - 8

**Submission** Support in part

**Reason** Extend the policy to recognise existing uses in the area

**Relief** Add to policy the (i) recognition of what the existing modifications to values in natural areas are, and (ii) what the cumulative effect of a new development would bring

**Issue 7A**, page 7-2,

**Policy 7.1.2** page 7-3

**Submission** Oppose

**Reason** – This chapter is dealing with outstanding landscapes not significant landscapes

Relief – (i) Delete Policy (ii) delete references to significant landscapes throughout this chapter

Objective 7.1, page 7-3

Policy 7.1.5

Method 7.M.1

Objective 7.2

Policy 7.2.3,

Submission Oppose

Reason Remove all references to amenity, this is a landscape chapter

Relief Delete references to amenity

Policy 7.1.1 (c), page 7-3

Submission Amend

Reason Recognise that an associated value of landscape is how people perceive their economic wellbeing is provided for ie by employment, productive ability, food creation etc.

Relief Amend to include ‘... Valued by the immediate and wider community for its contribution to a their sense of place or economic wellbeing’

Policy 7.1.3, page 7-4

Submission – Oppose

Reason Goes beyond the RMA, which does not require a ranking of amenity, and delete reference to landscapes being sensitive to change

Relief (i) in clause b delete reference to high-amenity value and (ii) delete clause c in its entirety

Policy 7.1.5, page 7-5

Submission Oppose the proposition that any change to an area land/coastal uses requires a detailed assessment.

Reason Landscape is dynamic and changes. Oppose that a landscape reassessment needs to go through First Schedule process

Relief Delete Policy 7.1.5(b)

Objective 8 and Policy 8.1.1 page 8-5

Submission The NZCPs does not require regionally significant areas of indigenous coastal biodiversity to be mapped, the NZCPS focus is on nationally significant areas.

Reason the Plan lacks criteria and any ranking system to determine what is/is not nationally significant as per Policy 11 of NZCP.

Relief (i) Delete ecologically significant marine sites and reassess using nation criteria and (ii) recognise that many areas contain

## Volume Two

Rule 2.13.1.1, page 2-19

Submission Amend

Reason Restrictions on the storage of oil etc within 20m of MHWS – it is unclear how this rule applies to vessels and machinery on the wharf.

Relief Specifically exempt vessels, fork lifts etc from the rule.

Rule 3.3.7, page 3-10

Submission Amend

**Reason** Forestry clearances greater than 50ha should notify adjacent aquaculture farmers prior to clearance so that potential downstream adverse effects can be mitigated

**Relief** Require forestry clearances greater than 50ha to notify adjacent aquaculture farmers.

**Rule** Appendix 22

**Submission** Amend

**Reason** Recognise existing downstream marine farms

**Relief** Amend point 5 to include the Location map of CMA to include the presence of marine farms downstream of the planting

**Rule** 3.3.21.3, page 3-22

**Submission** Support

**Reason** Retain

**Relief** Protects downstream water quality

**Rule** 13.6.4, page 13-20

**Rule** 13.6.5 page 13-20

**Rule** 13.6.6 page 13-20

**Rule** 7.3.13.1 page 7-9

**Rule** 14.5.4 page 14-8

**Rule** 14.5.5 page 14-8

**Rule** 16.7.2 page 16-3

**Rule** 16.7.3 page 16-13

**Rule** 14.5.4 page 14-8

**Rule** 14.5.5 page 14-8

**Submission** Oppose

**Reason** Sanford supports cessation of direct discharge of human waste into the coastal marine environment from vessels of all types including recreational anywhere in the marine environment. Owners of vessels should be put on notice that they have limited time to upgrade their vessel's effluent system i.e. by installing holding tanks. Equally marinas (commercial and recreation) need encouragement/incentives to extend their effluent collection services to cater for the additional demand – by for example a streamlined consent process for building the necessary infrastructure.

**Relief** Amend the rule so that all vessels with the capability to overnight on have wastewater (effluent) systems holding systems installed (and monitored for use) within five years of the plan being operative.

**Rule** 16.2.1 page 16-2

**Submission** Support

**Reason** Pragmatic solution for minor effects

**Relief** Retain

**Rule** 14.2.3.1

**Rule** 14.2.3.2

**Rule** 16.2.3.1 page 16-3

**Rule** 16.23.2 page 17-2

**Rule** 17.2.2 page 17-2

**Rule** 15.2.3.1 and 15.2.3.2 page 15-4

**Submission** Oppose

**Reason** Aquaculture activities often begin before 7am, and go longer than 10pm. It is unclear where noise is measured i.e. at the boundary of the property or at source.

**Relief**

- (i) Amend the daylight noise threshold to 06:00 - 23:00, to 70 dBA and measure at the notional boundary.
- (ii) Amend 16.2.3.2 by adding noise generated from commercial fishing activities, including marine farming servicing and harvesting barges'.

**Rule** 16.3.16 page 16-7

**Submission** Oppose

**Reason** Boats of all sizes take and use water for cooling etc. or apply the rule to non-consumptive uses

**Relief** Amend the rule, 'Other than for the purposes of running a vessel xxx'

**Rule** 16.13.9 page 16-5

**Submission** Oppose

**Reason** 31 days is insufficient time for monitoring purposes

**Relief** Amend to read 100 days and delete reference to scientific, permitted rule should apply to all monitoring. Make consequential changes to similar rule across all sections

**Rule** 16.7.6 page 16-13

**Submission** Oppose in part

**Reason** Minor and spot removal of biofouling (including marine pests) from a ship, which inadvertently removes antifouling, should be permitted. Maintenance and applications of antifouling below MHWS should be prohibited, other than minor works and keel strip.

**Relief** Amend the rule to permit minor maintenance and remedial work removal

**Rule** 16.5.1 page 16-11

**Submission** Oppose

**Reason** Adds unnecessary costs for no benefit.

**Relief** Amend to limited notification to effected parties.

**Rule** 13.2.3.1 page 13-5

**Rule** 13.3.2 page 13-5

**Submission** Amend

**Reason** While it is understood that Port Picton and Shakespeare Bay are commercial ports, Havelock Marina and Okiwi Bay have commercial wharfs that should be afforded the same protection and enabling provisions as other commercial wharfs

**Relief** Extend the provisions to include all commercial wharfs

**Rule** 13.2.3.3 page 13-5 and 13-6

**Submission** Amend

**Reason** Provides certainty

**Relief** Add to the list aquaculture harvesting and the mussel processing plant

**Rule** 13.3.4.2 page 13-7

**Submission** Oppose

**Reason** Clarification to ensure that the waste arising from activity is captured and stored, and that it is not the activity itself that needs to be undertaken under cover.

**Relief** Amend so that the effect not the activity is managed

**Rule** 13.3.17.3 page 13-10

**Rule** 13.3.17.5 page 13-10



[Submission](#) Support

[Reason](#) Support the 8m buffer

[Relief](#) Retain

[Rule](#) 13.3.21 page 13-13

[Rule](#) 14.3.11 page 14-6

[Rule](#) 15.1.29 page 15-3

[Submission](#) Oppose the reliance on Maritime Transport Act s467.

[Reason](#) Ensure that soil spill dispersants can be administered by trained and authorised staff. This ensures that spills of other people, can be mitigated by Sanford staff. Current procedure is that we would ring the Harbour Master and advise we are doing this.

[Relief](#) Amend

[Rule](#) 13.4.4 page 13-18

[Submission](#) Oppose in part

[Reason](#) Existing processing activities requiring re-consenting activities should not be subject to reverse sensitivity

[Relief](#) Delete reserve sensitivity

[Rule](#) 14.1 Port Landing Area Zone

[Submission](#) Amend

[Reason](#) Include the commercial wharfs at Okiwi Bay, Port Underwood, Havelock Marina and Elaine Bay

[Relief](#) Manage all commercial wharfs across the region to the same policies and methods. Amend the maps, descriptive and rules accordingly.

[Rule](#) 14.2.5

[Rule](#) 13.2.7.1 page 13-6

[Rule](#) 16.2.4.1 page 16-3

[Submission](#) Amend

[Reason](#) Odour

[Relief](#) Amend to read, 'Where practicable odour must not be objectionable or offensive, as detected at or beyond the legal boundary of the area of land on which the permitted activity is occurring'.

[Rule](#) 14.3.1 Page 14-4

[Submission](#) Oppose

[Reason](#) Small, minor alterations to a building's scale, size and height should be permitted subject to standards and not trigger a resource consent

[Relief](#) Amend to provide for minor alternations that do not discernibly change the scale, size and height as a permitted activity that do not require a resource consent

[Rule](#) 15.2.1 page 15.3

[Submission](#) Amend

[Reason](#) Existing lawful activities would be inadvertently picked up by this rule

[Relief](#) Amend to exclude existing users.

[Rule:](#) Definitions

[Submission](#) Amend

[Reason](#) the following definitions, see below, are uncertain

[Relief](#)

- Intensive farming – exclude ocean based aquaculture

- Marine farm – specify that farms need to be located seaward of MHWS
- Meat processing – exclude the yarding of animals (ie aquaculture sorting and washing) and on-water processing
- Non-consumptive - examples of water use should include cooling of vessels

## Volume 4 – Planning Maps

### Coastal Natural Character Maps

*Overlay Maps including Coastal Natural Character – high, very high and outstanding*

**Submission:** Oppose

**Reason:** Do not support naturalness equating to absence of modification. Naturalness is more than a list of characteristics, it is also a reflection of the values that people and communities place on those areas. The criteria as proposed do not provide for a means to identify areas where aquaculture exists, and where the community has long accepted that marine farming is an appropriate use of the waterspace.

**Relief:** (i) Delete the coastal Natural Character overlays from the planning maps, or (ii) amend as proposed in Part 3 of our submission (the table setting out changes to boundaries) which are relatively minor and will ensure that existing marine farms are not unnecessarily encumbered.

### Natural Character - Seaward Extent

*Overlay Maps - Coastal Natural Character all overlays*

**Submission:** Oppose

**Reason:** No reason has been given to explain the location of the seaward extent of the areas identified as natural character. The boundaries appear arbitrary, and create uncertainty as to what value is being recognised and protected.

**Relief:** (i) Delete the Coastal Natural Character overlays, or (ii) redraw the seaward boundary as set out in the Sanford submission, see attached table.

### Ecologically Significant Marine Sites Maps 1 - 16

*Overlay Maps showing Ecologically Significant Marine Sites*

**Submission:** Oppose

**Reason:** Sanford acknowledges the work carried out in the Davidson 2011 Significant Sites Report. The 2011 significant sites work is a regional assessment, and was not intended to mirror the approach in Policy 11 of the NZCPS. It is also unclear whether the mapped sites are intended to meet 11(a) or 11(b) of the NZCPS. Overall, the MEP mapping lacks consistency with the subsequent policies in the plan, and the intended outcome is unclear.

**Relief:** Delete or amend these areas from the plan as follows:

#### 1. Amend Map 8

Realign what appears to be an arbitrary boundary of Ecological site 3.6 so that it is 400m away from Sanford ML 8313.

#### 2. Amend Map 3

Either delete Ecological site 3.8 or amend so as to acknowledge that ML 8190 sits fully inside this site and at the time of consenting was assessed as being an appropriate use of the coastal water space.

### 3. Amend Map 9

Ecological area 3.11 is made up of three discrete areas. Sanford's contract farm ML 8216 appears to sit inside the bottom south east corner of the most northern ecological site – amend the boundary of the ecological area so that it abuts but does not lie across the marine farm.

Recognise ML 8217 is close by the site and during the consenting process was deemed to be an appropriate use of the water space.

Adjust the boundary of ML 8218 (another Sanford owned farm) on the south west corner so that the ecological site is alongside the marine farm, rather than inside it.

### 4. Amend Map 14

Ecological site 6.2 abuts our ML 8444 in the south west corner. Adjust the map as it relates to ML 9442 and ML 8440 so that the ecological site does not sit over the farm or acknowledge the marine farms are located there and are coexisting

### 5. Amend Map 4

Ecological site 3.8 includes parts or all of ML 8203, ML 8200, ML 8573, ML 8194, ML 8193, ML 8190 – amend the seaward boundary so that it excludes these existing marine farms

Ecological site 3.12 is located inside the Sanford share farm ML 8240, and is within 400m of ML 8240, and ML 8579. This is a small site where the matters of significance were assessed at the hearing and the farm deemed to be an appropriate use.

Ecological site 3.6 is within 400m of ML 8178 and the matters of significance were assessed at the hearing and the farm deemed to be an appropriate use.

### 6. Amend Map 9

Ecological area 3.16 includes parts of ML 8532 on the South West corner of the ESMS boundary. Adjust the boundary line so that there is no overlap.

## **Marine Mammal Map - dolphins**

*Overlay Maps including Ecologically Significant Marine Sites*

**Submission:** Oppose

**Reason:** Sanford acknowledges that we work in a special environment and that comes with duties and responsibilities. That said, the Davidson's mapped sites (dolphins) should not be equated with Policy 11(a) sites, because the significant sites work did not adopt the NZCPS Policy 11(a) criteria.

The assessment of whether the 2011 significant sites fall within Policy 11(a) or 11(b) criteria in the NZCPS is yet to be undertaken.

Sanford has management plans in place in respect of marine mammals.

**Relief:** (a) The dolphin map should be redrafted to be consistent with the text of the Davidson 2011 Significant Marine Sites report. Delete all marine mammal dolphin sites from the plan and at a later stage develop and apply at a national significant threshold test.

## **Landscape Overlay Maps**

*Overlay Maps – outstanding*

**Submission:** Oppose

**Reason:** The approach in Appendix 1 is focused on descriptions and characterisation of landscapes ie the components making up the landscape, rather than the values that people and communities appreciate or attribute to each area that make it stand out. Most often these descriptions are lists, which have failed to recognise the presence of aquaculture, despite in many cases marine farms being present in the landscape for many years.

**Relief:** Withdraw the layer from the Plan, or amend according to the Sanford submission, refer to the table.

### **National Transportation Route**

*Overlay Maps, National Transportation Route*

**Submission:** Oppose

**Reason:** The National Transportation Route in Torry Channel and Queen Charlotte Sound should not be mapped to extend into all of the side bays.

**Relief:** The National Transportation Route map should show the route as being confined to the main part of Tory Channel and Queen Charlotte Sound.

### **Okiwi Bay**

**Submission:** Oppose in part

**Reason:** The map of the waters of Okiwi Bay are proposed "Very High" Coastal Natural Character although the land immediately adjacent is not. Inner Okiwi Bay is a beautiful and well visited area but also has 200+ residential and holiday baches, a marine farm, a commercial wharf, a launching ramp and multiple moorings. The marine farming area of Croisilles Harbour is not high CNC

**Relief:** Remove the classification

### **Sanford land in Okiwi Bay**

**Submission** The Sanford site in Okiwi Bay has a commercial not residential use.

**Reason** Correct the zoning of this land.

**Relief** Rezone the site from residential to business zone

Maps	Landscape Including	Natural Character	Ecological Significant Marine Sites
<b>Pelorus Sound</b>	<p><b>Delete</b> the seaward extent of the ONL above (north) of Hikapu Reach and above Maori Bay</p> <p><b>Delete</b> ONL at or on the Putanui Point</p> <p><b>Amend</b> the ONL that extends into Nydia Bay and Fairy Bay so that the seaward boundary abuts the MHWS.</p>	<p><b>Delete</b> the HNC overlay at Putanui Point.</p> <p>Delete the HNC at Schapper Point</p> <p><b>Amend</b> the northern extent of the HNC at by ending at Pipi Beach in a straight line with the VHNC</p>	

	<p><b>Amend</b> the OHL at Yncyca Bay so that it is at least 500m from ML 8343 and abuts MHWS</p> <p><b>Delete</b> corner of ONL by ML 8343.</p> <p><b>Delete</b> the OHL at Hopai Bay</p> <p><b>Delete</b> the OHL of Waimaru Bay</p> <p><b>Delete</b> the ONL at Waihinau Bay, Homestead Bay and Waterfall Bay around Cape Horn and down to Te Akaroa (West Entry Point)</p> <p><b>Delete</b> the ONL around Kaitira (East Entry Pint) where it is 400m from ML 8109</p> <p><b>Delete</b> the inclusion of the water space around:</p> <ul style="list-style-type: none"> <li>• Pipitawai</li> <li>• Harding Point</li> <li>• Paparoa</li> <li>• Blow Hole Point.</li> </ul>	<p><b>Delete</b> the southern tounge of the VHNC just above ML 8416.</p> <p><b>Amend</b> the VHNC so that it does not include seascapes in Nydia Bay (Chance Bay and Penguin Bay).</p> <p><b>Delete</b> the areas of HNC at Hopai Bay, at Crail Bay and at Waimaru Bay.</p> <p><b>Delete</b> the VHNC zone as it extends seaward from Kitira (East Entry Point) up to Paparoa , at White Horse Rock and around Yellow Cliffs and Reef Point</p>	
<b>Kenepura Sound</b>	<b>Delete</b> the OML at Gold Reef Bay by drawing the line at the Kenepuru Road	<b>Delete</b> the VHNC at Gold Reef Bay by drawing the line at the Kenepuru Road	
<b>Squally Cove</b>	<b>Amend</b> the ONL so that it stretches from Lone Rock to Kakaho Point (west of Squally Cove)	<b>Amend</b> the VHNC so that it stretches from Lone Rock to Kakaho Point (west of Squally Cove)	

		<p><b>Delete</b> the VNHC at Round Hill along the southern side of Whakitenga Bay.</p> <p><b>Delete</b> the HNC around Oyster Bay (both sides) and Matarau Point.</p> <p><b>Draw</b> a straight line in the HNC so that it does not include the two tounges down to the foreshore by ML's 8271, 8272, 8273.</p>	
<b>Tawhitinui Reach</b>	<p><b>Delete</b> the ONL at Tawe Point</p> <p><b>Move</b> the ONL boundary at Cregoe so that it follows the creek line to the west.</p>		<p><b>Amend</b> the HNC over Maud Island so that it does not extend over coastal water (ie the boundary is MHWS).</p> <p><b>Delete</b> the HNC zone at and near Mt Shewell.</p> <p><b>Delete</b> the coastal parts of the VHNC around Wilson Bay/Spenser Point.</p>
<b>Waitata Reach</b>	<p><b>Delete</b> the OND overlay on the northern side of Hamilton Cove so that it follows the bush line out to Yellow Cliffs in a straight line</p> <p><b>Delete</b> the ONL around Horseshoe Bay and .</p> <p><b>Delete</b> the so that it follows the bush line.</p>	<p><b>Delete</b> the HNC and VHNC aroundthat includes Horseshoe Bay, Ketu Bay and Richmond Bay etc</p> <p><b>Delete</b> HNC above Hamilton Cove.</p> <p><b>Delete</b> HNC at Burnt Point including White Rock</p>	
<b>Waitata Bay including Horseshoe, Richmond and Ketu Bays</b>	<p><b>Delete</b> the ONL at Tapapa Point</p>		

<b>Forysth Bay</b>	<p><b>Delete</b> the ONL at the southern end of Kaitira (East Entry Point).</p> <p><b>Delete</b> ONL at Sugar Loaf, by pulling back to Paarekeke Point.</p> <p><b>Delete</b> ONL in south west corner at Tawaroa Point.</p> <p><b>Delete</b> ONL around Orchard Bay.</p>	<p><b>Delete</b> HNC from Duffers Reef to just below Kaitira (East Entry Point)</p> <p><b>Delete</b> VHNC below Forsyth Bay and west of Anakoha Bay</p> <p><b>Delete</b> HNC around Orachard Bay.</p>	
<b>Anakoha Bay</b>	<p><b>Amend</b> the ONL at Tawaroa Point so that it (i) abuts the MHWS and (ii) end at the head of Titirangi Bay</p>		
<b>Melville Cove</b>	<p><b>Amend</b> the ONL so that it (i) abuts MHWS and recongise existing marine farms ML 8169, 8598, 8171, 8591, 8174, 8173 and 8599.</p>		
<b>Port Underwood</b>	<p><b>Delete</b> ONL around Horahora Kakahu Island by ending the overlay at Pipe Bay and pulling the seaward boundary back to MHWS.</p>		<p><b>Delete</b> the proposed marine mammal site</p>
<b>Beatrice Bay</b>	<p><b>Delete</b> the ONL at:</p> <ul style="list-style-type: none"> <li>• Kauauroa Bay</li> <li>• Tawhitinui Bay</li> <li>• Te Purakia Point</li> </ul>	<p><b>Delete</b> the HNC overlay around Richmond Bay, Horseshoe Bay, Tawhitinui Bay, Sugar Loaf and Beatrice Bay – parts of which are also ONL</p>	

	<ul style="list-style-type: none"> <li>• Waimaru Bay and Tuhitarata Bay by drawing the boundary just below Mt Kiwi.</li> <li>• Sugar Loaf</li> <li>• Tawero Point</li> </ul>	<p><b>Delete</b> the VHNC at Kauauroa Bay as no discernable difference with surrounding landscape</p> <p><b>Delete</b> the VHNC at Tawero Point south towards Capsize Point</p>	
<b>Onauku Bay</b>	<b>Delete</b> ONL Arapaw Island on eastern side of Onauku Bay	<b>Delete</b> VHNC around Onauku Bay so that it does not lie within 400m of existing marine farms including LL 8509, 8400, 8510	<b>Delete</b> extend of marine mammal zone (dolphin) into Onauku Bay
<b>Current Basin</b>		<b>Delete</b> the VHNC so that it does not extend into Waikawa Bay (ie ends at Two Island Point and crosses over in a straight line to the northern tip of Malven Hill Point.	
<b>Admiralty Bay</b>	<p><b>Amend</b> the ONL around coastal boundary at Clayface Point so that it includes the inner bays and does not extend seaward. This appears to make no discernable difference to the ONL and recognises ML 8014.</p> <p><b>Amend</b> the boundary of the ONL in Waikawa Bay by pulling the northern</p>		<b>Delete</b> the marine mammal site (dolphins) as not nationally significant



	boundary up to Two Island Point.		
<b>Waikawa Bay</b>	<p><b>Delete</b> seaward extent of ONL in Savill Bay, Game Bay and pull back to MHWS.</p> <p><b>Delete</b> ONL from Cregoe Rock that extends in a north west line and includes ML 8203 and is 400m from ML 8301.</p>	<p><b>Delete</b> the HNC landscapes as they extend over bays of Fitzroy.</p> <p><b>Delete</b> the VHNC west of Woodlands, around Canoe Bay and Camel Point and around , west of Elaine Bay.</p> <p><b>Dele</b> the ONC from Cregoe Rock in a north west line to Camel Point.</p>	

END

**SUBMISSION LODGED BY SANFORD LIMITED**  
**AND ON BEHALF OF THE OWNERS OF FARMS THAT WE PARTNER WITH**  
**FURTHER SUBMISSIONS**  
**VOLUME 1 – ISSUES, OBJECTIVES AND POLICIES**

Sanford is submitter number 1140

**Address for service:**

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PO Box 443  
Auckland 1140

[Aundorf-lay@sanford.co.nz](mailto:Aundorf-lay@sanford.co.nz) | 027 293 7795

**We oppose the submission of Port Underwood Association, PO Box 59, Blenheim 7240 (1042)**

**The particular part of the submission we oppose is** Point 2 where they submit that policy 4.12 should be altered so that consents for more than 20 years should not be granted in public spaces.

**The reasons for our opposition**

Where the effects of an activity are well understood or are able to be managed through adaptive management, consents for more than 20 years are justifiable.

**Relief**

We seek that Point 2 of this submission be disallowed.

We oppose the submission of Kenepuru and Central Sounds Residents Association Incorporated, 2725 Kenepuru Road, RD 2, Picton 7282 (submitter 869)

**The particular part of the submission we oppose is** their submission point 43, which seeks to delete from Coastal Occupancy Charges, coastal permits for moorings, jetties and boatsheds.

**The reason for our opposition is that**

Owners of moorings, jetties and boatsheds are generally occupying public space. In practice, the public does not benefit, but where it does (such as a community jetty or community mooring or where a private jetty is used by the public) we agree that an exception ought to be made.

**Relief**

We seek the part of submission point 43 be allowed, which is where a private facility such as a mooring, jetty or boat ramp can be used by the public coastal charges should be waived. Council should retain its discretion.

We oppose the submissions of The Clova Bay Residents Association, trevor@offenadvisors.co.nz (submitter 152)

**The particular part of the submission we oppose is** Point 20 where they seek Clova Bay be identified as an area at threat or risk from significant adverse cumulative effects on natural character.

**The reason for our opposition is**

In our view Clova Bay is not an area at threat or risk from significant adverse cumulative effects on natural character, substantial change has already occurred in Clova Bay, primarily due to vegetation clearance on land. There are also marine farms in the area with long established use rights, Sanford owns six of these.

**Relief**

We seek that the whole of submission point 20 be rejected.

We oppose the submissions of

The Clova Bay Residents Association Incorporated, [trevor@offenadvisors.co.nz](mailto:trevor@offenadvisors.co.nz) (submitter 152) and

The Kenepuru and Central Sounds Residents Association Incorporated, 2725 Kenepuru Road, RD 2, Picton 7282 (submitter 868)

**The particular part of the submission we oppose is** Clova Bay Point 16 and Kenepuru and Central Sounds Residents Association Incorporated Point 10 where they seek amendments to policy 6.2.7 so that re-consenting existing structures be treated the same way as new activities in so far as cumulative effects are concerned.

**The reason for our opposition is**

The Plan should recognise existing activities as the context in which future resource management decisions are made.

**Relief**

We seek that the whole of Clova Bay's submission point 16 and Kenepuru and Central Sounds Residents Association Incorporated's submission Point 10 be rejected.

We oppose the submissions of The Kenepuru and Central Sounds Residents Association Incorporated, 2725 Kenepuru Road, RD2, Picton 7282 (submitter 868)

The particular part of the submission we oppose is Point 13 which seeks to amend policy 7.2.4 to require, at a resource consent level, an assessment of cumulative effects of all similar activities in the locality.

**The reason for our opposition is**

Effectively this change would require every consent holder to justify the activity of every other consent holder undertaking the same activity or similar activities. This is not the intention of the RMA in relation to the management of cumulative effects.

**Relief**

We seek that the whole of submission point 13 be disallowed.

We support the submissions of Te Runanga O Ngati Kuia, PO Box 1046, Blenheim 7240 (501).

**The particular part of the submission we support is** Point 74, where they seek to prohibit the discharge of untreated human sewerage to water bodies or coastal waters.

**The reason for our support is**

This policy will protect the marine environment, and aquatic life. It will also protect aquaculture. We would like to negotiate the precise detail of the policies and rules with the various interested parties.

**Relief**

We seek that the whole of submission point 74 be allowed.

**VOLUME 2 - RULES**

We support the submissions of The Pinder Family Trust, 4 Poynter Street, Blenheim 7201 (578); The Guardians of the Sounds, 32 Hinepango Drive, RD 3, Blenheim 7273 (751); Sea Shepherd New Zealand, 67 Milton Terrace (1146) and The Marlborough Environment Centre Incorporated, 72 Ferry Road, Spring Creek 7202 (1193)

**The particular parts of the submissions we support are** Pinder submission point 50; Guardian submission point 50; Sea Shepherd submission point 50 and The Marlborough Environment Centre submission point 45 which seeks that a collaborative approach is established between Council and boating clubs, recreational fishers and tourism operators to come up with workable regulations to keep human sewerage out of the coastal marine environment.

**The reason for our support is**

Sanford supports a collaborative approach to addressing this issue, and would appreciate being part of the conversation.

**Relief**

We seek that the part of the submissions identified above be allowed.

## VOLUME 4 – MAPS

We oppose the submission points of

- Submitter 716 The Friends of Nelson Haven and Tasman Bay Incorporated, P O Box 98, Rai Valley 7145 points 197, 198, 202, 203, 204, 206, 207, 208, 209 and 210
- Submitter 468 The Port Gore Group, PO Box 310, Blenheim 7240 points 3, 4, 5 and 6
- Submitter 493 Karen Marchant, PO Box 310, Blenheim 7240 points 4, 5, 6
- Submitter xxxx Kenneth R and Sara M Roush, PO Box 446, Blenheim 7240 points 19, 20, 21 and 23
- Submitter 1042 The Port Underwood Association, PO Box 59, Blenheim 7240 points 23, and 24.
- Submitter 100 The East Bay Conservation Society, Stingray Bay, Private Bag 427, Picton 7250 points 2, 15, 31, 33 and 34
- Submitter 152 The Clova Bay Residents Association c/ trevor@offenadvisors.co.nz points 16 and 20
- Submitter 578 The Pinder Family Trust, 4 Poynter Street, Blenheim 7201 point 16
- Submitter 752 Guardians of the Sounds, P O Box 197, Picton 7220 point 16
- Submitter 1146 Shepherd New Zealand, 67 Milton Terrace, Picton 7220 point 16

**The particular the part of their submission we oppose are** where their proposed RMA s6 zone extensions (ONL, ONC, ASNV etc) overlap with a marine farm we own or lease.

The reason for submission is that their proposed extension have not contained reasoning why additional protection is being sought, nor have they recognised the presence of existing marine farms, many of which have been located in these areas for many years.

Sanford would welcome a discussion with the parties as to what their concerns are, and how we can do as coastal marine occupiers to address them.

Sanford's written submission sought to amend the boundaries of map overlays so that the effect of the overlay on lawfully consented activities could be mitigated, we believe a similar approach could work here.

Sanford has drawn maps on how these submissions could affect our farms, which we will provide at the hearing.

**The reasons for our opposition is**

The amendments as proposed are not justified.

**Relief**

We seek that submission points be disallowed.

**We conditionally support the submission of Te Atiawa o Te Waka-a-Maui, PO Box 340, Picton 7250 (1186).**

**The particular part of the submission we conditionally support** is submission point 8 which seeks an appropriate buffer to be provided around ecologically significant marine sites within the Queen Charlotte Sound, Tory Channel and Port Gore.

**The reason for our conditional support is:**

The use / appropriateness of a buffer zone needs to be assessed on a case by case basis. Marine farms can provide a buffer from other human activity.

**Relief**

We seek that this submission be allowed so long as it does not interfere with existing aquaculture.

Sanford Ltd submission on Volume 4  
The proposed Marlborough Environment Plan Planning Maps

Maps	Landscape Including	Natural Character	Ecological Significant Marine Sites
<p><b>Pelorus Sound</b></p>	<p><b>Delete</b> the seaward extent of the ONL above (north) of Hikapu Reach and above Maori Bay</p> <p><b>Delete</b> ONL at or on the Putanui Point</p> <p><b>Amend</b> the ONL that extends into Nydia Bay and Fairy Bay so that the seaward boundary abuts the MHWS.</p> <p><b>Amend</b> the OHL at Yncyca Bay so that it is at least 500m from ML 8343 and abuts MHWS</p> <p><b>Delete</b> corner of ONL by ML 8343.</p> <p><b>Delete</b> the OHL at Hopai Bay</p> <p><b>Delete</b> the OHL of Waimaru Bay</p> <p><b>Delete</b> the ONL at Waihinau Bay, Homestead Bay and Waterfall Bay around Cape Horn and down to Te Akaroa (West Entry Point)</p> <p><b>Delete</b> the ONL around Kaitira (East Entry Pint) where it is 400m from ML 8109</p> <p><b>Delete</b> the inclusion of the water space around:</p> <ul style="list-style-type: none"> <li>• Pipitawai</li> </ul>	<p><b>Delete</b> the HNC overlay at Putanui Point.</p> <p><b>Delete</b> the HNC at Schapper Point</p> <p><b>Amend</b> the northern extent of the HNC at by ending at Pipi Beach in a straight line with the VHNC</p> <p><b>Delete</b> the southern tounge of the VHNC just above ML 8416.</p> <p><b>Amend</b> the VHNC so that it does not include seascapes in Nydia Bay (Chance Bay and Penguin Bay).</p> <p><b>Delete</b> the areas of HNC at Hopai Bay, at Crail Bay and at Waimaru Bay.</p> <p><b>Delete</b> the VHNC zone as it extends seaward from Kitira (East Entry Point) up to Paparoa , at White Horse Rock and around Yellow Cliffs and Reef Point</p>	



Sanford Ltd submission on Volume 4  
The proposed Marlborough Environment Plan Planning Maps

	<ul style="list-style-type: none"> <li>• Harding Point</li> <li>• Paparoa</li> <li>• Blow Hole Point.</li> </ul>		
<b>Kenepura Sound</b>	<b>Delete</b> the OML at Gold Reef Bay by drawing the line at the Kenepuru Road	<b>Delete</b> the VHNC at Gold Reef Bay by drawing the line at the Kenepuru Road	
<b>Squally Cove</b>	<b>Amend</b> the ONL so that it stretches from Lone Rock to Kakaho Point (west of Squally Cove)	<p><b>Amend</b> the VHNC so that it stretches from Lone Rock to Kakaho Point (west of Squally Cove)</p> <p><b>Delete</b> the VNHC at Round Hill along the southern side of Whakitenga Bay.</p> <p><b>Delete</b> the HNC around Oyster Bay (both sides) and Matarau Point.</p> <p><b>Draw</b> a straight line in the HNC so that it does not include the two tounges down to the foreshore by ML's 8271, 8272, 8273.</p>	
<b>Tawhitinui Reach</b>	<p><b>Delete</b> the ONL at Tawe Point</p> <p><b>Move</b> the ONL boundary at Cregoe so that it follows the creek line to the west.</p>		<p><b>Amend</b> the HNC over Maud Island so that it does not extend over coastal water (ie the boundary is MHWS).</p> <p><b>Delete</b> the HNC zone at and near Mt Shewell.</p> <p><b>Delete</b> the coastal parts of the VHNC around Wilson Bay/Spenser Point.</p>
<b>Waitata Reach</b>	<b>Delete</b> the OND overlay on the northern side of	<b>Delete</b> the HNC and VHNC around that includes Horseshoe	

Sanford Ltd submission on Volume 4  
The proposed Marlborough Environment Plan Planning Maps

	<p>Hamilton Cove so that it follows the bush line out to Yellow Cliffs in a straight line</p> <p><b>Delete</b> the ONL around Horseshoe Bay and .</p> <p><b>Delete</b> the so that it follows the bush line.</p>	<p>Bay, Ketu Bay and Richmond Bay etc</p> <p><b>Delete</b> HNC above Hamilton Cove.</p> <p><b>Delete</b> HNC at Burnt Point including White Rock</p>	
<b>Waitata Bay including Horseshoe, Richmond and Ketu Bays</b>	<b>Delete</b> the ONL at Tapapa Point		
<b>Forsyth Bay</b>	<p><b>Delete</b> the ONL at the southern end of Kaitira (East Entry Point).</p> <p><b>Delete</b> ONL at Sugar Loaf, by pulling back to Paarekeke Point.</p> <p><b>Delete</b> ONL in south west corner at Tawaroa Point.</p> <p><b>Delete</b> ONL around Orchard Bay.</p>	<p><b>Delete</b> HNC from Duffers Reef to just below Kaitira (East Entry Point)</p> <p><b>Delete</b> VHNC below Forsyth Bay and west of Anakoha Bay</p> <p><b>Delete</b> HNC around Orachard Bay.</p>	
<b>Anakoha Bay</b>	<b>Amend</b> the ONL at Tawaroa Point so that it (i) abuts the MHWS and (ii) end at the head of Titirangi Bay		
<b>Melville Cove</b>	<b>Amend</b> the ONL so that it (i) abuts MHWS and recongise existing marine farms ML 8169, 8598, 8171, 8591, 8174, 8173 and 8599.		

<b>Port Underwood</b>	<b>Delete</b> ONL around Horahora Kakahu Island by ending the overlay at Pipe Bay and pulling the seaward boundary back to MHWS.		<b>Delete</b> the proposed marine mammal site
<b>Beatrix Bay</b>	<p><b>Delete</b> the ONL at:</p> <ul style="list-style-type: none"> <li>• Kauauroa Bay</li> <li>• Tawhitinui Bay</li> <li>• Te Purakia Point</li> <li>• Waimaru Bay and Tuhitarata Bay by drawing the boundary just below Mt Kiwi.</li> <li>• Sugar Loaf</li> <li>• Tawero Point</li> </ul>	<p><b>Delete</b> the HNC overlay around Richmond Bay, Horseshoe Bay, Tawhitinui Bay, Sugar Loaf and Beatrix Bay – parts of which are also ONL</p> <p><b>Delete</b> the VHNC at Kauauroa Bay as no discernable difference with surrounding landscape</p> <p><b>Delete</b> the VHNC at Tawero Point south towards Capsize Point</p>	
<b>Onauku Bay</b>	<b>Delete</b> ONL Arapaw Island on eastern side of Onauku Bay	<b>Delete</b> VHNC around Onauku Bay so that it does not lie within 400m of existing marine farms including LL 8509, 8400, 8510	<b>Delete</b> extend of marine mammal zone (dolphin) into Onauku Bay
<b>Current Basin</b>		<b>Delete</b> the VHNC so that it does not extend into Waikawa Bay (ie ends at Two Island Point and crosses over in a straight line to the northern tip of Malven Hill Point.	

<p><b>Admiralty Bay</b></p>	<p><b>Amend</b> the ONL around coastal boundary at Clayface Point so that it includes the inner bays and does not extend seaward. This appears to make no discernable difference to the ONL and recognises ML 8014.</p> <p><b>Amend</b> the boundary of the ONL in Waikawa Bay by pulling the northern boundary up to Two Island Point.</p>		<p><b>Delete</b> the marine mammal site (dolphins) as not nationally significant</p>
<p><b>Waikawa Bay</b></p>	<p><b>Delete</b> seaward extent of ONL in Savill Bay, Game Bay and pull back to MHWS.</p> <p><b>Delete</b> ONL from Cregoe Rock that extends in a north west line and includes ML 8203 and is 400m from ML 8301.</p>	<p><b>Delete</b> the HNC landscapes as they extend over bays of Fitzroy.</p> <p><b>Delete</b> the VHNC west of Woodlands, around Canoe Bay and Camel Point and around , west of Elaine Bay.</p> <p><b>Dele</b> the ONC from Cregoe Rock in a north west line to Camel Point.</p>	

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