
MARLBOROUGH ENVIRONMENT PLAN

Section 32 Report

Chapter 6: Natural Character

**Publically notified
9 June 2016**

Contents

Overview.....	1
Background.....	1
Key changes	2
Summary of reasons for the proposed provisions	3
Description of issue	5
Statutory obligations.....	6
Information and analysis	7
Consultation.....	10
Evaluation for Issue 6A	13
Appropriateness of Objective 6.1	13
Appropriateness of Objective 6.2.....	17
Other options considered to achieve Objective 6.1 and Objective 6.2	22
Methods of implementation.....	26
Risk of acting or not acting.....	26
Appendix 1 - Section 32 of the RMA	27
Appendix 2 - Bibliography	29

Overview

Background

Section 32 of the Resource Management Act 1991 (RMA) requires that in the process of reviewing its regional policy statement and resource management plans, the Marlborough District Council (the Council) must prepare and publish an evaluation report. The three documents being reviewed are the Marlborough Regional Policy Statement (MRPS), the Marlborough Sounds Resource Management Plan (MSRMP) and the Wairau/Awatere Resource Management Plan (WARMP). Each resource management plan is a combined regional, coastal and district plan.

Section 32¹ of the RMA requires that:

- reviewed regional policy statements and plans must be examined for their appropriateness in achieving the purpose of the RMA;
- the benefits, costs and risks of new policies and rules on the community, the economy and the environment be clearly identified and assessed; and
- the written evaluation must be made available for public inspection.

The Section 32 process is intended to ensure that the objectives, policies and methods the Council decides to include in the new resource management framework have been well tested against the sustainable management purpose of the RMA. The Section 32 evaluation report for the proposed Marlborough Environment Plan² (MEP) has been prepared on a topic basis, centred on the policy chapters of Volume 1 of the MEP. Individual reports have been prepared on the following:

Topic	Volume 1 Chapter of the MEP
Introduction to Section 32 evaluation reports	
Marlborough's tangata whenua iwi	3
Use of natural and physical resources	4
Allocation of public resources – freshwater allocation	5
Allocation of public resources – coastal allocation	5
Natural character	6
Landscape	7
Indigenous biodiversity	8
Public access and open space	9
Heritage resources	10
Natural hazards	11
Urban environments	12
Use of the coastal environment – subdivision, use and development activities in the coastal environment, recreational activities, fishing, residential activity, shipping activity and Lake Grassmere Salt Works	13
Use of the coastal environment – ports and marinas	13
Use of the coastal environment – coastal structures, reclamation and seabed disturbance	13
Use of the rural environment	14

¹ See Appendix A.

² The Marlborough Environment Plan is a combined regional policy statement, regional plan, regional coastal plan and district plan.

Section 32: Chapter 6 - Natural Character

Topic	Volume 1 Chapter of the MEP
Resource quality – water	15
Resource quality – air	15
Resource quality – soil	15
Waste	16
Transportation	17
Energy	18
Climate change	19

Chapters 1 and 2 of Volume 1 of the MEP are not included within the Section 32 evaluation as they provide an introduction and background to the proposed document. These chapters do not include provisions that must be evaluated in accordance with Section 32.

The Introduction report covers the scope of the review that the Council has undertaken including consultation and the nature of information and analysis that has occurred. An overview of the Council's statutory obligations, the relationship of the MEP with other plan and strategies and working with Marlborough's tangata whenua iwi is described. A set of guiding principles the Council has used in the development of the objectives, policies and methods for the MEP is provided. The Council acknowledges that the principles have no statutory basis and do not in themselves have specific objectives, policies or methods. However, they have been included as the philosophy and values underlying the content of the MEP and consequently help to inform the Section 32 evaluation.

The policy provisions for natural character are set out in Chapter 6 of Volume 1 of the MEP. Overlay maps in Volume 4 of the MEP show the areas with natural character significance and the values of these areas and more detailed mapping is included within Appendix 2 of Volume 3. This Section 32 evaluation report on the provisions for natural character is set out as follows:

- Description of issue – this provides an overview of the resource management issue for natural character.
- Statutory obligations – the extent to which there are direct links with Section 6 or 7 matters and whether the provisions are directed or influenced by national policy statements or national environmental standards.
- Information and analysis – whether specific projects or other information have influenced the inclusion of provisions or other responses to dealing with resource management issues.
- Consultation – an overview of the extent and nature of specific consultation undertaken on the proposed provisions.
- Evaluation – an assessment of the provisions under the identified issue. Where appropriate, reference is made to supporting material that has helped to inform why a particular option has been chosen. In some cases the evaluation is undertaken on an individual provision, while in others groups of policies or methods have been assessed together.

In some parts of this evaluation report there are references to provisions within other chapters of the MEP. This is due to those provisions assisting in implementing the management framework for the subject matter of this report or vice versa. A reader should consider the evaluation for these other provisions where they are referred to in this report.

Key changes

The key changes in the MEP from the approach in the MRPS, WARMP and MSRMP are:

- Areas with significant natural character values (high, very high or outstanding) will now be mapped. This is not included within either of the current resource management plans. This change originates from the requirement in the New Zealand Coastal Policy Statement 2010 (NZCPS) to map or otherwise identify areas with high natural character.

- The NZCPS emphasises more strongly the significance of natural character values within the coastal environment including the need to avoid adverse effects of activities on areas with outstanding natural character value.

Summary of reasons for the proposed provisions

Section 32(1)(b)(iii) requires a summary of the reasons for deciding on the provisions included in the MEP. This summary of reasons for the provisions in relation to natural character are set out below, however the more detailed evaluation is set out in the remainder of this report.

There is a very strong statutory direction for the proposed provisions. Section 6(a) of the RMA requires the Council to preserve the natural character of the coastal environment, lakes and rivers and their margins and to protect this natural character from inappropriate subdivision, use and development. The NZCPS provides further direction on preserving natural character for the coastal environment through Objective 2 and Policies 13 and 14.

The resource management issue identified for natural character recognises that the entire coastal environment and all freshwater bodies have some or all of the components of natural character (natural elements, patterns, processes and experiential qualities) and therefore all have some degree of natural character. The extent of human-induced modification has a significant influence on the level of natural character in the coastal environment and in and adjacent to freshwater bodies. Some environments will have high natural character due to the lack of human-induced modification and may even be in a natural state. In other areas, there will be little remaining natural character due to the extent of human-induced modification of the environment. Given that the preservation of natural character is a matter of national importance, there is a real risk that further human-induced modification within coastal or freshwater environments will have adverse effects.

In summary, the reasons for the proposed provisions are as follows:

Identification of natural character values

- The degree of natural character in the coastal environment, and in lakes and rivers and their margins has been established to assist in achieving the direction in the RMA to protect these areas from inappropriate activities. (The natural character of wetlands has been established through a process of assessing wetland values and related policy for these areas is included in Chapter 8 - Indigenous Biodiversity.)
- The policies describe those elements that contribute to the natural character of coastal and river environments, including landforms, biota and experiential values. These have been included to inform resource users and decision makers on the elements that make up natural character. There was a lack of policy guidance on this in the MSRMP and WARMP.
- The extent of the coastal environment has been mapped to establish the areas of land and coastal marine area where management may be needed to protect natural character. This will provide resource users and the community with certainty as to the spatial areas where natural character and other provisions of the NZCPS apply.
- An appendix will list values for each of the areas identified as having significant natural character values. Having this information in the MEP will assist in determining the effects of activities on natural character by focussing on the values that contribute to natural character.
- Policy 13 of the NZCPS requires that areas of at least high natural character be mapped or otherwise identified. The Council considers that the most effective form of identification is mapping as it clearly defines the location and extent of those spatial areas. Therefore, areas of high, very high and outstanding natural character have been mapped based on the report "Natural Character of the Marlborough Coast – Defining and Mapping the Marlborough Coastal Environment" (Boffa Miskell, June 2014).
- There is no specific requirement for the Council to identify rivers that have high, very high or outstanding natural character, but the Council has undertaken an assessment to determine the natural character values of a number of Marlborough's rivers. This has

been done to recognise and provide for Section 6(a) of the RMA, as well as to give effect to Objective A2 and B4 of the National Policy Statement for Freshwater Management 2014 (NPSFM). The results of this are reported in "The Natural Character of Selected Marlborough Rivers and Their Margins" (Boffa Miskell, 2014).

Management of activities

- Where the natural character of the coastal environment is outstanding, Section 6(a) of the RMA requires this to be preserved, i.e. any adverse effects on natural character should be avoided. This is not to say that subdivision, use or development is prevented from occurring within areas of the coastal environment with outstanding natural character, as activities may not adversely affect the natural character of the surrounding environment or may include features or benefits that maintain the existing very high levels of natural character.
- Any subdivision, use or development in the coastal environment that would reduce the natural character at or near the site to a classification below that which exists at the time of the resource consent application or plan change request will be considered a significant adverse effect in the context of Policy 13(1)(b) of the NZCPS and should be avoided. Although there is no equivalent statutory direction for freshwater bodies, the Council considers that the same policy approach is relevant as freshwater bodies are included within Section 6(a) of the RMA.
- Where an activity is proposed to take place within an area of high, very high or outstanding natural character, the applicant should assess the impact of the proposal on natural character at the site and in the surrounding environment. To undertake the assessment, regard must be had to the elements, patterns, processes and experiential qualities that contribute to natural character. For both coastal and freshwater environments, there will be appendices in the MEP containing information on the values for the various areas, which will assist in the assessment process.
- It is proposed that development should be directed to those parts of the coastal environment and in those rivers and lakes and their margins that have already been modified by past and present resource use activities. This will assist to preserve the natural character of coastal and freshwater environments in less modified areas.
- Where a resource consent is necessary or a plan change is proposed in coastal environments or freshwater bodies, regard shall be given to the ability to enhance natural character in the area subject to the proposal. This is particularly relevant where coastal environments and freshwater bodies have been substantially modified by past resource use activities. This approach helps to achieve Policy 14 of the NZCPS, which seeks to promote the restoration or rehabilitation of natural character.
- Although individual activities may not adversely affect the natural character of the coastal environment or freshwater bodies, when combined with the effects of other similar activities or other activities with similar effects, there may be cumulative effects on natural character. For this reason policy has been included to describe how the cumulative effects of activities on the natural character of the coastal environment or freshwater bodies will be considered.
- The proximity of land use activity to rivers, lakes and the coastal marine area has a significant influence on the potential for adverse effects on natural character. The closer the activity, the greater the potential for modification to the elements, patterns, processes and experiential qualities that contribute to natural character. For this reason, regulating land use activities by requiring setbacks from rivers, lakes and the coastal marine area will be an important method of implementation.
- Policy has also been included to encourage and support private landowners, community groups and others in their efforts to restore the natural character of the coastal environment, wetlands, lakes and rivers. This recognises that not all of the responses to preserving natural character need to be made through regulatory methods.

Description of issue

Natural character includes the natural elements, patterns, processes and experiential qualities of an environment. The natural character of the coastal environment, and rivers and lakes (freshwater bodies) and their margins, is comprised of a number of key components, including:

- coastal or freshwater landforms and landscapes (including seascape);
- coastal or freshwater physical processes (including the movement of water and sediments);
- biodiversity (including individual indigenous species, their habitats and communities they form);
- biological processes and patterns;
- water flows and levels, and water quality; and
- the ways in which people experience the natural elements, patterns and processes.

Collectively, these components combine to create the overall natural character of the environment. While provisions included elsewhere in the MEP target the individual components of natural character and provide direction about how adverse effects on particular values can be managed, Chapter 6 provides a coordinated approach to achieving the sustainable management purpose of the RMA. (The one exception to this is that the policy framework in respect of natural character values of wetlands is included within Chapter 8 - Indigenous Biodiversity.) For the sake of clarity, use of the term 'freshwater bodies' in this chapter does not include wetlands, rather it refers to rivers and lakes.

The Marlborough coastline is one of the longest in New Zealand and is geomorphologically diverse. The northern area is the drowned valley system of the Marlborough Sounds, where the intricate coastline of slender peninsulas, islands and indented waterways, with its diverse range of ecosystems, geology, climate and biota, is wholly contained within the coastal environment. The southern area encompasses the coastline of south Marlborough, which includes the large Wairau Lagoons and old stone fields, white limestone cliffs and stacks, and extends from Rarangi in the north to the District's southern boundary on the Kekerengu coast.

Similarly, there is great diversity within Marlborough's freshwater environments. Most rivers and streams in Marlborough have their headwaters within mountains, namely the Richmond Range and the series of glaciated ranges south of the Wairau River. These rivers often have extensive river catchments, with their flow regime becoming affected during periods of heavy rain or drought. However, while many of these rivers are classic braided rivers there are also spring-fed streams and creeks such as those on the Wairau Plain, high country lakes, as well as many small streams in the Marlborough Sounds. The diversity in both freshwater and coastal environments is therefore an important aspect in considering the key components of natural character in Marlborough.

In Chapter 6, one issue is identified for natural character and this is expressed as follows:

Issue 6A: Resource use and changes in resource use can result in the degradation of the natural character of the coastal environment, and of lakes, rivers and their margins.

- Section 6(a) of the RMA requires the Council to preserve "the natural character of the coastal environment (including the coastal marine area), wetlands, and lakes and rivers and their margins, and the protection of them from inappropriate subdivision, use, and development." The NZCPS contains a similar objective for the coastal environment.
- The entire coastal environment and all freshwater bodies have some or all of the components of natural character (natural elements, patterns, processes and experiential qualities) and therefore all have a degree of natural character. Some areas will have high natural character because of a lack of modification and may even be in a natural state. In other areas, there will be little remaining natural character because of the extent of human modification of the environment.

- Given that the preservation of natural character is a matter of national importance, there is a real risk that further human-induced modification within coastal or freshwater environments will have adverse effects. This risk is greatest in unmodified environments as it is more likely that subdivision, use and development will change the existing natural elements, patterns, processes and experiential qualities.

Statutory obligations

Section 6(a) of the RMA requires the Council to recognise and provide for, as a matter of national importance, “*the preservation of the natural character of the coastal environment (including the coastal marine area), wetlands, and lakes and rivers and their margins, and the protection of them from inappropriate subdivision, use, and development.*” This is a direct obligation that the Council must fulfil and is the reason why there is a specific chapter on natural character in the MEP.

Although not as significant as Section 6 matters, there are two Section 7 matters also relevant to the consideration of natural character values. These are Sections 7(c) and (f), whereby decision-makers must have particular regard to the maintenance and enhancement of amenity values and to the maintenance and enhancement of the quality of the environment, respectively.

The NZCPS has specific requirements for considering natural character within the coastal environment. Policy 13 directs that in order to preserve the natural character of the coastal environment and to protect it from inappropriate subdivision, use and development, the following should occur:

- (a) *avoid adverse effects of activities on natural character in areas of the coastal environment with outstanding natural character; and*
- (b) *avoid significant adverse effects and avoid, remedy or mitigate other adverse effects of activities on natural character in all other areas of the coastal environment;*
including by:
 - (c) *assessing the natural character of the coastal environment of the region or district, by mapping or otherwise identifying at least areas of high natural character; and*
 - (d) *ensuring that regional policy statements, and plans, identify areas where preserving natural character requires objectives, policies and rules, and include those provisions.*

The policy also recognises that natural character occurs on a continuum and a list of matters that may be included in assessing natural character is included in Policy 13(2).

Policy 14 of the NZCPS promotes the restoration or rehabilitation of natural character and directs the identification of areas and opportunities for restoration and the inclusion of provisions in statutory plans. Direction is also given in relation to the use of restoration conditions when granting resource consents and designations.

The NPSFM contains objectives concerning the protection of the significant values of outstanding freshwater bodies in Objectives A2 and B4. Although the NPSFM does not specifically refer to natural character, the definition of ‘outstanding freshwater bodies’ included in the NPSFM does reference ecological, landscape and cultural values, which are elements that contribute to natural character. By inference then, the NPSFM does reflect the need to include policy about the natural character of lakes and rivers and their margins.

The Council also has a range of statutory functions described in Sections 30 and 31 of the RMA, which enable it to establish management frameworks in response to the identified issue.

Information and analysis

An assessment of the natural character values of Marlborough's coastal environment and for some selected Marlborough rivers has been undertaken. The results of this assessment can be found in the following two reports, both of which have been prepared by Boffa Miskell Limited:

- Natural Character of the Marlborough Coast – Defining and Mapping the Marlborough Coastal Environment June 2014; and
- The Natural Character of Selected Marlborough Rivers and Their Margins June 2014.

Prior to the release of these two reports, a natural character assessment had been included within the Marlborough Landscape Study 2009 (also prepared by Boffa Miskell Limited). However, because the assessment in that study had taken place prior to the release of the new NZCPS in 2010, the Council opted to review and update its information about the natural character of the Marlborough coastal environment, in light of the new policies for natural character included in the NZCPS.

As described above, the NZCPS included a requirement to map or at least otherwise identify areas with at least high natural character. The NZCPS also introduced a new term, 'outstanding natural character.' At the time there was no guidance on how to undertake the necessary natural character assessments, so the Council's consultants developed a methodology drawing on the considerable experience gained from evaluating coastal landscapes throughout New Zealand over the past 20 years and on case law.

The Council was involved with the Department of Conservation (the Department), landscape experts and several other local authorities in developing guidance for determining areas with natural character significance. Since then, guidance material has emerged as part of the Department's³ implementation project for the NZCPS.

In addition to the two specific reports on natural character (described below), a number of other projects helped to inform the development of the natural character chapter of the MEP. An overview of these follows the description of the two natural character reports.

Natural character of the Marlborough coast

With the specific direction in Policy 13 of the NZCPS to map or otherwise identify at least areas of high natural character, the Council has had a technical assessment undertaken of natural character values in Marlborough's coastal environment. This was undertaken by Boffa Miskell with input from Lucas Associates, Landcare Research, the Department of Conservation and the Council.

The resulting publication, "Natural Character of the Marlborough Coast – Defining and Mapping the Marlborough Coastal Environment June 2014," describes the study approach and includes information on natural character values at different scales, from district wide to bay level. At the more detailed assessment level, the coastal environment is broken down into nine distinct coastal marine areas and 17 distinct coastal terrestrial areas based on land typology. For each area, abiotic systems and landforms, biotic systems and experiential attributes were assessed.

Areas with high, very high and outstanding natural character values have been mapped. The areas mapped and the descriptions of the key values that contribute to the area having significant natural character are included within the MEP. Including mapped areas as well as the key values means there is a higher degree of certainty about where there are significant natural character values in Marlborough's coastal environment. Neither the current MSRMP nor the WARMP provide mapping on areas where natural character is important and therefore determining whether an area has significant natural character values has been challenging. The level of information proposed to be included in the MEP will help both resource users and those making decisions on consent applications to determine whether an activity may have an adverse effect on natural character values.

³ NZCPS 2010 Guidance note Policy 13: Preservation of natural character September 2013.

The natural character of selected Marlborough Rivers and their margins

Unlike the coastal environment, there is no statutory requirement for local authorities to determine the degree of natural character of a region or district's rivers. However, there is still the direction through Section 6(a) of the RMA to preserve the natural character of rivers and their margins and to protect them from inappropriate subdivision, use and development.

In 2009 the Council was involved in a study co-funded by the Foundation for Research Science and Technology (FRST) which examined the values of rivers. The FRST study was a nationwide research programme, analysing different aspects of river values, including rivers in Marlborough. The results of this work were first integrated into a section of the Marlborough Landscape Study 2009 on natural character. However, as the review process evolved and the coastal natural character section of the 2009 report became its own report, similarly the work on assessing the natural character of selected Marlborough rivers also became a separate, stand-alone report.

Not all of the numerous rivers in Marlborough could be assessed and focus was placed on the larger rivers. A range of rivers and streams were assessed, with a representative sample of the different types of water bodies in Marlborough being chosen. This included identifying the diversity of smaller streams and rivers; for example, in the Marlborough Sounds and within the drier mountainous environments in the south of the District. Very long rivers were broken down into small segments for assessment. In total, 39 rivers and river segments were assessed.

Attributes relating to the natural character of rivers were broadly clustered around three components: a river's morphology (namely the river channel), the riparian edge and the wider landscape context. Within these broad attributes, a set of eight attributes were developed for assessment as follows:

River channel	Channel shape
	Degree of modification of flow regime
	Water quality
	Exotic 'aquatic' flora and fauna
	Structures and human modifications
Riparian margin	Vegetation cover
	Structures and human modifications
Wider landscape character	Landscape character modifications

A five-point scale was used to rank each primary attribute's degree of natural character on a continuum, from (1) heavily modified to (5) overwhelmingly natural, based on natural elements, natural patterns and natural processes. The higher the rating, the greater the contribution that specific attribute makes to natural character. The report includes the scores for the 39 river/river segments assessed with a possible total score of 40. Assessment scores for the rivers ranged from 16 and 17 for the Ōpaoa Loop and Tuamarina Rivers, respectively, to 40 for the Goulter River.

Joint project with Department of Conservation

The Department of Conservation and the Council undertook a project together to identify a community vision for the Marlborough Sounds. This was termed the Marlborough Sounds "Outcomes for Places" Project and aimed to help in the review of the Nelson/Marlborough Conservation Management Strategy (CMS)⁴ and the regional policy statement. The project was run with guidance from the Marlborough Sounds Advisory Group and involved a series of four interactive, participatory workshops/hui. The purpose of the project was to define a collective community vision for the Marlborough Sounds as an important first step in setting objectives for the management of the Sounds. The hope was that if both the CMS and regional policy statement shared a common community vision, then that vision would be much more likely to be realised.

⁴ The Nelson/Marlborough Conservation Management Strategy is prepared by the Department of Conservation under the Conservation Act 1987. It establishes objectives for the integrated management of the natural and historic resources managed by the Department.

The workshops/hui were designed to build upon the responses the Council had received to discussion papers prepared for the review. Participants were asked to consider:

- the factors that make the Sounds special and/or what they valued;
- the elements of the Sounds that are at risk and the factors contributing to that risk; and
- how the Sounds should look in 50 years' time and what needs to happen to achieve that vision.

Participants were asked to consider specific activities, including residential development, pastoral farming, marine farming, commercial forestry, tourist facilities and public facilities for access and recreation. The outcomes from the project were used in the process of developing new policy for the Council's resource management framework.

Landscape review

An extensive reassessment of Marlborough's landscapes was undertaken in 2009. The resulting report, "Marlborough Landscape Study 2009," identified Marlborough's outstanding natural features and landscapes, as well as many landscapes with high amenity value. This assessment was used in consultation with landowners in north and south Marlborough. As a consequence of this consultation, which included site visits in many instances, the extent of mapping has been reviewed. An updated report entitled "Marlborough Landscape Study – Landscape Characterisation and Evaluation August 2105," contains the refined maps identifying areas with outstanding values and those with high amenity value. These maps have been included within the MEP, along with a description of the values that make these landscapes significant.

Significant marine area identification

Identification of ecologically significant marine sites in Marlborough was undertaken as part of the Council's responsibilities under Section 6(a) and (c) of the RMA. It is important to identify the location and composition of significant sites – biological features that have conservation, scientific or ecological value – to ensure their sustainable management and protection into the future. The work undertaken acknowledges that relatively few studies have focussed on identifying, surveying and assessing subtidal marine habitats in New Zealand, including those of Marlborough. Therefore, our understanding and knowledge of the coastal marine environment is limited.

The assessment of significant sites was based on existing data or known information, but was not comprehensive as many marine areas are unsurveyed or poorly documented, especially below the low tide mark. A total of 129 sites of biological significance were identified in the area, from Cape Soucis (Croisilles Harbour) through the Marlborough Sounds and down the east coast of Marlborough. A subsequent survey of selected sites in 2014/2015 has seen a reduction in the overall area of significant sites. The remaining sites and areas of significance have been included in the MEP.

Freshwater values

Marlborough has been divided into a series of freshwater management units based on catchment boundaries. An assessment of the various natural and human use values of the waterbodies in these water management units has been prepared. This includes values such as ecological, habitat and natural character.

Perception surveys

The Council has carried out nationwide surveys to assist in determining perceptions of New Zealanders about the values of the Marlborough Sounds. The initial survey in 2001 was in response to a large number of marine farm applications being received at the time. The most recent survey in 2012 found that the majority of respondents considered it important that the Marlborough Sounds were available to be used now and by future generations, that they were important to people throughout New Zealand and that they were important for contributing to the image of New Zealand as a whole.

The values that led to these responses were also surveyed. The scenic beauty of the Marlborough Sounds was the most significant value in both surveys, followed by peace and tranquillity, then natural environment/absence of development.

Consultation

Early Consultation

In carrying out the review there has been significant consultation with the Marlborough community and particularly with individual landowners. The first round of consultation, undertaken in 2006 for the review of the MRPS, was the distribution of a community flyer to all ratepayers as well as to other groups and organisations in contact with the Council on resource management matters. This sought to discover the community's views of the most important resource management issues that Marlborough would face over the next ten years. Approximately 380 responses were received on this community flyer, with many signalling that a range of issues, including those identified in Chapter 6, were of significance for them.

The responses contained some comments about natural character, including that:

- The introduction of structures such as residential developments and marine farms changes the natural character of the coastline. The creation of tracking was also said to affect natural character.
- In relation to the allocation of freshwater, it was suggested that having an allocation plan for the Wairau River would allow users to know the minimum flow and flow sharing requirements to sustain instream and fisheries values, and provide for variability and natural character.
- Keeping development away from beach areas would not only allow for public access but also allow people to enjoy natural character as it relates to visual values.

Many other comments were received on the individual elements that contribute to natural character.

Subsequently, a series of discussion papers were prepared by the Council and released for public feedback in late 2007. The discussion papers prepared after this first round of consultation did not specifically include natural character as an issue that needed to be addressed. However, the elements that contribute to natural character were highlighted in the discussion of issues in a number of the discussion papers and several of these are relevant to the Section 32 evaluation report. The papers of particular relevance and an overview of the feedback received on them in relation to natural character is as follows:

Discussion Paper 1: Quality of Life

For this discussion paper, natural character was not specifically discussed. However, in the feedback received on this paper, it was stated that preservation of natural character values should be identified as a regionally significant issue, together with the protection of other special values such as landscape, cultural and biodiversity values. It was also suggested there was scope for the new regional policy statement to signal the importance of an integrated approach to managing the protection of natural character values that span both the land/sea interface, as well as the responsibilities of the Council under the RMA and the Department of Conservation in respect to the lands that it administers.

It was also noted that coastal areas beyond the Sounds have received a paucity of attention and that the natural character of the coast, visual effects and ecological habitats were as important on the east Marlborough coast.

Discussion Paper 3: Rural Issues

Under issues concerning managing change in Marlborough's landscape and determining inappropriate activity in areas of outstanding landscape value, an option proposed in the discussion paper was that policy could be included that provides for consideration of landscape values in the coastal environment and along rivers and other waterways in terms of protecting natural character.

Feedback on this paper was specific to the impacts of viticulture in relation to natural character. Feedback suggested that modification or removal of wetlands and waterways had resulted in a loss of natural character and biodiversity. It was recommended that further loss of wetlands and waterways for land conversion to grapes be halted to protect remaining natural character. Other

feedback noted that stronger policy on retention of “natural character” as it applies to landscapes was necessary. The Wairau River was highlighted as an example where the impact on natural character would be significant if the proposed TrustPower abstraction from the river proceeded.

Discussion Paper 4: The Future of the Marlborough Sounds

Given the significance of the Marlborough Sounds for many people and that this area is essentially located within the coastal environment. *Discussion Paper 4* included a summary of the natural character values of both terrestrial and marine environments in the Sounds. In many places within this discussion paper, there is also reference to the character and characteristics of the Sounds in terms of the natural values that can be found there. Many people commented on the importance of retaining these values.

Under a specific issue related to the occupation and use of the coastal marine area, the Council identified an option that suggested resource management plans could identify criteria to indicate where use and development will be appropriate. This option included matters such as landscape features, special habitat, natural character and the risk of natural hazards, including areas threatened by erosion, inundation or sea level rise.

The characteristics that make the Marlborough Sounds so special were described by many people. These included low population density, isolation, tranquillity, a visually attractive landscape/seascape, clean air and water, heritage features and the terrestrial and marine flora and fauna, many of which are directly related to the elements of natural character. Many respondents also felt that the characteristics contributing to the Sounds environment should be protected and enhanced.

Regarding issues around the future of marine farming, some responses suggested that a range of criteria could be used in identifying areas in the Marlborough Sounds where marine farms should not be established, including areas of high biodiversity or ecological significance, areas critical to the lifecycle of certain marine species (such as bird nesting colonies or fish breeding sites), areas of high natural character, outstanding landscapes, areas of dense residential activity or areas used for recreational activities.

Natural character was also highlighted in a discussion on the effects of ship wake in the Marlborough Sounds. A range of options were proposed to deal with the effects of ship wake on natural character (amongst other things). Respondents agreed that this is a significant issue in Marlborough, though there was little in the way of detailed explanatory comment. Most who responded on this issue endorsed the Council’s management of ship wake reflected in the MSRMP, although some felt it did not go far enough.

Discussion Paper 5: Water Allocation

The discussion on the allocation of water in the face of uncertainty recognised that water resources should be sustained to continue to be available to existing and future users, but also that the life supporting capacity of the water resources should be safeguarded. In highlighting this, Marlborough’s water resources were identified as supporting a diverse range of natural and human use values, including natural character. In response to this issue, proposed options included monitoring the effects of water abstraction on flows and levels in rivers (and consequentially on the natural and human use values supported by those water bodies) and that the Council should actively collect and record information on the values of Marlborough’s water bodies.

There was widespread acceptance that the unprecedented demand for water, combined with a lack of water resource information, created significant uncertainties. A range of views were expressed on how to address this issue, depending on whether the respondents were resource users or environmental groups. However, both agreed on the need for additional investigations and research on Marlborough’s water resources. Some also supported the option of gathering more information on the values of Marlborough’s rivers.

Discussion Paper 6: Water Quality

On the issue of sustaining the quality of water in our rivers, streams, lakes and coastal areas, it was discussed that Marlborough’s water resources support a diverse range of natural and human use values, including natural character, and that these values relied upon the generally good

quality of water. It was proposed that the regional policy statement could recognise the importance of good water quality by continuing to set, as an objective, the maintenance and enhancement of fresh and coastal water quality. If achieved, this objective would ensure the wide range of natural and human use values currently supported by Marlborough's water bodies would be sustained.

The feedback received overwhelmingly agreed that sustaining the quality of water in our rivers, streams, lakes and coastal areas was a significant issue for Marlborough. Respondents expressed strongly held views that clean water is the essential basis of all life and should be protected for current and future generations. Many people noted the important role that water plays in sustaining various natural and human use values and emphasised that most of these uses and values rely on good water quality.

Discussion Paper 7: Biodiversity and Natural Areas

In responding to issues on the pressures and threats to biodiversity and areas of native vegetation, many respondents agreed a range of threats exist to biodiversity and areas of native vegetation. There was support for a robust planning framework that encourages the enhancement of indigenous biodiversity, preservation of high natural character and protection of outstanding natural features, especially for the Sounds environment.

Based on this feedback, the Council undertook an investigation to determine the presence and degree of natural character in Marlborough's coastal environment, rivers, lakes and their margins.

Later Consultation

Early in the review process, the Council decided on an iterative approach in developing provisions for the MEP. This sought to test as many of the provisions as possible before the new resource management documents were formally notified under the First Schedule of the RMA. The rationale for this was that the greatest flexibility for change to provisions exists prior to notification of a proposed document; once notified, only those provisions submitted on can be changed and then only within the scope of those submissions. The Council therefore established a number of focus groups with the task of reviewing the provisions to discuss their likely effectiveness or otherwise. The aim was to have as much community participation in developing the provisions as possible to reflect the community's views and to resolve any substantive issues prior to notification.

In terms of these external focus groups, the policy provisions for natural character were considered, and as a consequence refined, through the Landscape Group, Sounds Advisory Group, Marine Group, Practitioners Group, Rural Group and the Energy Group. Other groups that provided feedback included the Royal Forest and Bird Protection Society of NZ Inc and the Department of Conservation.

In mid-2013 the Council released a set of draft provisions for community feedback. Although the main focus of the provisions was related to policy and rules for the coastal environment, certain other policy, including that on natural character, was also released. Although limited feedback was received on natural character provisions specifically, what was received helped to further inform development of the chapter.

No specific consultation has been undertaken with the wider community on the areas identified as having natural character values. This was because for most activities involving disturbance, deposition, occupation or the erection of structures in the coastal marine area, there is already a discretionary activity resource consent requirement in the current MSRMP and WARMP. The Council has no intention of changing this approach, even for areas being mapped that have high, very high or outstanding natural character values.

For land, including privately owned land, the areas mapped with natural character significance do not in themselves trigger a requirement for a resource consent. Mapped areas of significant natural character values and the values themselves as set out in the MEP are considered only when there is a requirement for a resource consent for another reason.

Given the Department of Conservation is responsible for administering the NZCPS, and there are specific requirements for local authorities in respect of managing natural character, the Council has undertaken considerable consultation with the Department. Initial consultation occurred through the Department's involvement in the focus group process. The Council was also a part of the

Department's project team for preparing material for local authorities around the country to assist in implementing the NZCPS. For natural character specifically, the Council took part in several workshops run by the Department in 2011 to develop a consistent method of determining how natural character should be assessed. The outcomes of these workshops ultimately lead to the publishing of guidance notes on the Department's website for implementing the natural character policies of the NZCPS.

The Department has also had significant involvement through the provision of information and the assessment work undertaken for the natural character report prepared for the Council by Boffa Miskell, published in 2014.

Evaluation for Issue 6A

Issue 6A – Resource use and changes in resource use can result in the degradation of the natural character of the coastal environment, and of lakes, rivers and their margins.

The response to the identified issue is proposed to be dealt with in two ways. The first is based on establishing the degree of natural character in the coastal environment and for lakes and rivers and their margins (Objective 6.1). The reason for this is that Marlborough's diverse coastal and freshwater environments, are diverse, which reflects a variation in landform and landscape, natural processes and characteristics, and biodiversity. The degree of human-induced modification in our coastal environment, and in our lakes and rivers also varies significantly: some areas are in a relatively natural state, while others have been significantly modified as a result of human activity. The management framework for Objective 6.1 essentially sets out the criteria to determine the degree of natural character and the mapping of significant areas.

The second response is to preserve natural character of the coastal environment, and lakes and rivers and protect them from inappropriate development (Objective 6.2). The management framework includes policy that helps to give effect to the NZCPS.

Appropriateness of Objective 6.1

Objective 6.1 – Establish the degree of natural character in the coastal environment, and in lakes and rivers and their margins.

Relevance

Objective 6.1 effectively acknowledges and seeks to rectify a situation where there has been no overall assessment of natural character for Marlborough's coastal environment, and lakes and rivers. Although Appendix A of Volume One of the WARMP does include a schedule identifying various values of a range of waterbodies, there is no specific natural character assessment. This has meant that a consent-by-consent assessment of natural character values has needed to be undertaken in relation to rivers.

The MSRMP does have a framework in Appendix Two of Volume One that divides the Marlborough Sounds into natural character areas or units, which are then mapped⁵. The natural character of the Sounds as a whole is described in this Appendix, as are the constituent land and marine natural character management areas. These descriptions were to be considered in the preparation of resource consent and plan change applications and in decisions made on these. The descriptions were also intended to provide direction in determining appropriate measures to avoid, remedy and mitigate adverse effects. While the descriptions for each of the character units are useful, indications of the degree of natural character significance for each of the units are not discussed.

Therefore, Objective 6.1 aims to provide a greater level of certainty and understanding about where natural character values are significant in Marlborough. This will help give effect to Section 6(a) of the RMA, as well as to Policy 13(1)(c) of the NZCPS, which requires that areas with at least high natural character be identified in some way.

⁵ See Map 106 of Volume Three of the MSRMP.

Section 32: Chapter 6 - Natural Character

Objective 6.1 is also enduring, as subsequent policy recognises the need for enhancing natural character and acknowledges efforts by the community in restoring natural character. By implication, this may lead to a review of natural character values at particular locations over time.

Feasibility

The identification of the degree of natural character in Marlborough's coastal environment and for rivers and lakes and their margins is feasible. The identification of the degree of natural character undertaken thus far is described in two publications prepared by Boffa Miskell Limited:

- Natural Character of the Marlborough Coast – Defining and Mapping the Marlborough Coastal Environment, June 2014; and
- The Natural Character of Selected Marlborough Rivers and Their Margins, June 2014.

Given that a consistent and robust method was used in the identification process, including at a range of scales, the Council is confident that Objective 6.1 is able to be achieved. The Objective is also useful in that it provides certainty and understanding that the degree of natural character values present in the coastal environment and along the margins of lakes and rivers will be established. This means that an appropriate management framework to protect these significant areas can then be implemented through subsequent policy.

Acceptability

Section 6(a) of the RMA and Policy 13 of the NZCPS have determined that such an objective is appropriate to achieve the purpose of the RMA. Objective 6.1 is therefore considered acceptable given these statutory directions. There has been a cost in assessing natural character values but these costs are considered warranted given the statutory directions and the community benefit in having values identified. Indeed, identifying areas and their values actually focusses the assessment process and makes it more efficient. Within the coastal marine area, there is unlikely to be any significant additional cost to resource users from the Objective as resource consents are already required for most activities within this environment.

For private landowners, the identification of natural character values on their land does not create a need for a resource consent, so there is no additional cost involved for activities classified as permitted activities. However, as under the current resource management plans, if significant natural character values are present and there is a resource consent requirement, there will need to be some assessment of the potential adverse effects on natural character values. The costs of the Objective are therefore already incurred under the current resource management plans.

Establishing (through Objective 6.1) the degree of natural character values present means that for activities on private land or in the public area, any resource consent process and subsequent decision making can be focussed.

Community feedback through various consultations undertaken by the Council has identified natural character (and its constituent components) as an important consideration in resource use. This includes the perception surveys, the joint project with the Department of Conservation and the feedback received on the discussion documents highlighted earlier in this report.

Assessment of provisions to achieve Objective 6.1

Policies 6.1.1, 6.1.3 and 6.1.5

Policy 6.1.1 – Recognise that the following natural elements, patterns, processes and experiential qualities contribute to natural character:

- (a) areas or water bodies in their natural state or close to their natural state;
- (b) coastal or freshwater landforms and landscapes (including seascape);
- (c) coastal or freshwater physical processes (including the natural movement of water and sediments);
- (d) biodiversity (including individual indigenous species, their habitats and communities they form);
- (e) biological processes and patterns;
- (f) water flows and levels and water quality; and

(g)	the experience of the above elements, patterns and processes, including unmodified, scenic and wilderness qualities.
Policy 6.1.3 – Determine the degree of natural character in both the coastal marine and coastal terrestrial components of the coastal environment by assessing:	
(a)	the degree of human-induced modification on abiotic systems and landforms, marine and terrestrial biotic systems and experiential qualities; and
(b)	natural character at a range of scales.
Policy 6.1.5 – Determine the degree of natural character in and adjacent to lakes and rivers by assessing the degree of human-induced modification to the following:	
(a)	channel shape and bed morphology;
(b)	flow regime and water levels;
(c)	water quality;
(d)	presence of indigenous flora and fauna in the river channel;
(e)	absence of exotic flora and fauna;
(f)	absence of structures and other human modification in the river channel/lake;
(g)	vegetation cover in the riparian margin;
(h)	absence of structures and other human modification in the riparian margin; and
(i)	the experience of the above elements, patterns and processes, including unmodified, scenic and wilderness qualities.

Benefits

There is a degree of ambiguity about what natural character is. Therefore, a major benefit of Policy 6.1.1 and Policy 6.1.5 will be to provide certainty as to what elements make up natural character, which in turn provides a clear understanding for users of the MEP. The list included in Policy 6.1.1 further defines the matters identified in Policy 13(2) of the NZCPS relating to natural character and clearly identifies that it is more than just landscape (as does the NZCPS).

For Policy 6.1.3, the MEP will have updated natural character assessments compared to those in the MSRMP. The assessments have been taken a step further by considering environmental change and making the natural character information more fit for purpose than the approach set out in the MSRMP. This is particularly important in terms of Policy 13(1) of the NZCPS, which sets out the following hierarchy for dealing with effects, depending on the degree of natural character:

“... (a) avoid adverse effects of activities on natural character in areas of the coastal environment with outstanding natural character; and

(b) avoid significant adverse effects and avoid, remedy or mitigate other adverse effects of activities on natural character in all other areas of the coastal environment;...”

Policy 6.1.3 also acknowledges that natural character can be viewed at a range of scales, where the effects of any activity may differ depending on the scale at which the effects are assessed. With the natural character values being included within the MEP, an assessment can be directed to considering how an activity may affect the values that make an area significant.

The current resource management plans fail to address the elements that contribute to natural character in freshwater environments; Policy 6.1.5 addresses this situation. Furthermore, the Council was involved in a 2009 nationwide research programme (co-funded by FRST) that analysed different aspects of river values. The results of this research lead to the development of significance threshold criteria to assess river values and Policy 6.1.5 criteria have partly evolved from this work.

Costs

There are no costs specifically associated with identifying the elements of natural character. The elements of identification have been developed through the methodology used by the Council's consultants, who have drawn on the considerable experience gained from evaluating coastal landscapes over the past 20 years, and through case law.

Efficiency

The policies are considered efficient relative to the low cost involved in setting out the elements contributing to natural character. Additionally, the policies are efficient from an assessment perspective, as applying a consistent framework of elements to assess the degree of natural character results in a high level of consistency.

Effectiveness

The effectiveness of the three policies will be largely due to the consistently applied approach in determining areas that have natural character significance, which in turn will lead to a more robust approach to decision making. It would be impossible to truly preserve natural character as required by Section 6(a) without clearly identifying the elements that make up natural character and the locations of significant areas. These policies are therefore directly relevant to Objective 6.1 and to Issue 6A.

Policies 6.1.2, 6.1.4 and 6.1.6

Policy 6.1.2 – The extent of the coastal environment is identified in the Marlborough Environment Plan to establish the areas of land and coastal marine area to which management may need to be applied in order to protect the natural character of the coastal environment from inappropriate subdivision, use and development.
Policy 6.1.4 – Identify those areas of the coastal environment that have high, very high or outstanding natural character.
Policy 6.1.6 – Identify those rivers or parts of rivers that have high or very high natural character.

No specific assessment of Policy 6.1.4 has been undertaken given the direction through the NZCPS to map or otherwise identify areas with at least high natural character. However, the following evaluation is nonetheless applicable in terms of mapping known areas.

Benefits

The extent of Marlborough’s coastal environment has been debated for some time. Neither the MSRMP nor the WARMP have mapped the coastal environment and so it is not clear which of the policies outlined in these resource management plans should apply to a proposal. The major benefit of identifying the extent of the coastal environment in the MEP (in a mapping sense) is that it gives certainty as to where specific management should apply.

Identifying where significant natural character values have been determined by mapping the areas, whether in Marlborough’s freshwater or coastal environments helps resource users know which areas are important. This can help focus assessments for resource consents where necessary and avoid a case-by-case assessment, which has the potential to lead to inconsistent outcomes.

Appropriate management can also be targeted to areas with significant natural character values, which is much easier once areas are identified and defined.

Costs

There are no specific costs associated with implementing the policies. Any costs in identifying the extent of the coastal environment and areas with natural character significance are related to the initial assessments of natural character undertaken through the Marlborough Landscape Study 2009. These areas have been refined after having regard to the NZCPS, which became effective in 2010.

Efficiency

It will be clear to landowners and resource users which areas have significant natural character values that need to be considered in any resource consent application. Having the values on what makes each of the natural character areas significant included within the MEP means that assessments can be focussed on what it is that needs protection. This makes it very efficient not only for landowners and resources users, but also for decision makers, who can focus their consideration on areas with significant natural character identified as needing preservation in terms of Section 6(a) of the RMA.

Effectiveness

For both coastal and freshwater environments the policies are considered very effective in helping to identify areas of Marlborough where significant natural character values need protection. The policies also help give effect to Policy 13 of the NZCPS and Objective A2 of the NPSFM. In respect of the

NPSFM, it is noted that Objective A2 requires the protection of the ‘*significant values of outstanding freshwater bodies*,’ while Objective B4 similarly requires the protection of the ‘*significant values of wetlands and outstanding freshwater bodies*.’ However, there is no guidance in the NPSFM as to what constitutes ‘outstanding.’ Until further guidance becomes available, the Council has relied upon the approach undertaken by Boffa Miskell in ‘The Natural Character of Selected Marlborough Rivers and Their Margins, June 2014’, to determine natural character values for rivers or parts of rivers that have high or very high values.

Appropriateness of Objective 6.2

Objective 6.2 – Preserve the natural character of the coastal environment, and lakes and rivers and their margins, and protect them from inappropriate subdivision, use and development.

Relevance

Objective 6.2 is a restatement of Section 6(a) of the RMA and recognises the value of natural elements and the functioning of coastal and freshwater environments for their contribution to sustainable management. Within this context, natural character is identified as a matter of national importance, which has to be preserved and protected from inappropriate subdivision, use and development.

The current MSRMP and WARMP have a similarly worded objective for natural character and the Council has seen no need to change this approach at the objective level. However, the new MEP approach is different from the two current resource management plans as it includes an objective (6.1) on identifying areas with significant natural character values. The two objectives (6.1. and 6.2) therefore work in tandem, as it is difficult to achieve Objective 6.2 without first identifying the locations of significant areas and what the specific values of those locations are. This objective therefore aims to accomplish that, which is lacking from the current resource management plans.

Feasibility

The Council considers Objective 6.2 is feasible, mainly because with assessments of the degree of natural character in coastal and freshwater environments having been undertaken, it is more likely that preservation of natural character can be appropriately achieved. Identification and clearer definitions of those areas and values with significant natural character will certainly make achieving Objective 6.2 much more likely.

Achievability

No greater costs are placed on the community with the inclusion of Objective 6.2 than currently exist in similar objectives included within both MSRMP and WARMP, and importantly the direction given through Section 6(a) of the RMA.

The community has identified the importance of natural character values in Marlborough, especially in the coastal environment of the Marlborough Sounds. Much of the early feedback supported an approach of retaining natural character values, with a particular focus on the elements that contribute to natural character.

Assessment of provisions to achieve Objective 6.2

Policies 6.2.1 to 6.2.3

Policy 6.2.1 – Avoid the adverse effects of subdivision, use or development on areas of the coastal environment with outstanding natural character values and on lakes and rivers and their margins with high and very high natural character values.

Policy 6.2.2 – Avoid significant adverse effects of subdivision, use or development on coastal natural character, having regard to the significance criteria in Appendix 4.

Policy 6.2.3 – Where natural character is classified as high or very high, avoid any reduction in the degree of natural character of the coastal environment or freshwater bodies.
--

Benefits

Policy 6.2.1 is effectively a restatement of Policy 13(1)(a) of the NZCPS and therefore no detailed assessment of the ‘avoid’ approach has been included here (though there is a significant addition to Policy 6.2.1 when compared with Policy 13(1)(a) of the NZCPS). It is important to acknowledge that it

Section 32: Chapter 6 - Natural Character

is the adverse effect of activities on natural character values that are to be avoided, not the activities themselves. This is why the word 'values' has been included within Policy 6.2.1.

Other chapters of the MEP help to inform how adverse effects can be avoided. For example, the policies in Chapter 7 - Landscape, Chapter 8 - Indigenous Biodiversity and Chapter 15 - Resource Quality (Water, Air, Soil) specify the individual components of natural character and therefore help to provide a framework to avoid significant adverse effects on natural character values. This approach reflects the integrated nature of the MEP and specifically assists to achieve integrated management of the natural and physical resources of the whole of Marlborough, as required by Section 59 of the RMA (the purpose of regional policy statements).

Policy 13(1)(b) of the NZCPS states that significant adverse effects on natural character are to be avoided. Therefore, providing guidance on what constitutes a significant adverse effect, as proposed through Policy 6.2.2, is beneficial to an applicant as it allows the potential adverse effects of a proposal to be considered against consistently applied criteria. This guidance is also beneficial for decision makers in considering the degree of effect that may be acceptable in a particular case. In addition, the Department of Conservation guidance material⁶ on Policy 13 indicates that including criteria to determine 'significance' in a regional policy statement or plan is helpful.

Although there is no comparable direction within the NPSFM for freshwater environments in terms of natural character, there is the requirement within Section 6(a) of the RMA to preserve the natural character of lakes and rivers and their margins. The Council has therefore opted for a similar approach to freshwater environments in terms of avoiding adverse effects where there is high or very high natural character. There is benefit in having a similar approach for both freshwater and coastal environments.

The benefits of Policy 6.2.3 are that it provides a threshold below which changes in natural character are not acceptable or appropriate. This will ensure that natural character, which has been highlighted as a matter of national importance, is preserved in terms of Section 6(a).

Collectively, the policies have environmental benefits in terms of helping to achieve the direction sought by both the NZPCs and the RMA in Section 6.

Costs

If landowners or resource users cannot avoid adverse effects of activities, especially within the coastal environment, they may not be able to carry out their planned activities. Within the Coastal Marine Zone there have always been resource consent requirements for most activities, so the proposed policies do not introduce any additional costs to those that already existed under the MSRMP or WARMP, i.e. areas mapped as having natural character significance do not prompt the need for additional resource consent.

Efficiency

The policies are efficient as they aim to recognise and provide for Section 6(a) of the RMA. In this regard the approach benefits the whole community as natural character values will be preserved and inappropriate activities will not occur. In conjunction with the mapping of areas with significant natural character values, the policies provide an efficient approach in directing the situations where adverse effects have to be avoided or otherwise remedied or mitigated, especially in terms of the direction in the NZCPS.

Effectiveness

The three policies combine to be effective in achieving Objective 6.2 to preserve natural character from inappropriate subdivision, use and development, which is also the requirement of Section 6(a) of the RMA. The policies do not completely prevent activities from occurring within coastal and freshwater environments for natural character reasons. Rather, they attempt to ensure that activities occur within appropriate limits and locations.

⁶ Department of Conservation. NZCPS 2010 Guidance note Policy 13: Preservation of natural character. Version 1 September 2013.

Policy 6.2.4

Policy 6.2.4 – Where resource consent is required to undertake an activity within coastal or freshwater environments with high, very high or outstanding natural character, regard will be had to the potential adverse effects of the proposal on the elements, patterns, processes and experiential qualities that contribute to natural character.

Benefits

The policy directs that where consent is required, regard is to be had to the effects of the activity on the elements that contribute to natural character. This policy compliments Policy 6.1.3, which explains that those values that contribute to natural character within the coastal environment will be described in an appendix to the MEP. This will enable resource users and landowners to consider the actual values that contribute to natural character at a particular location, which then provides a focus for determining how a particular proposed activity may affect those values. This policy is therefore very beneficial for individuals proposing activities within the coastal environment.

Although the same level of assessment for natural character has not been completed for all of Marlborough's rivers, a similar approach for identifying the values of freshwater bodies, including natural character values, is used. This approach again reflects the integrated nature of the MEP as including the information in the Plan is of benefit to landowners, resource users and decision makers alike.

Costs

The policy only applies in a resource consent (or possibly plan change) situation, where there is already a cost to an applicant (although not necessarily because of natural character rules). There is unlikely to be any additional cost, as an applicant would have had to assess natural character values if their proposal was in either a coastal or freshwater environment. Having the information in the MEP about the values that contribute to natural character provides direction and focus for applicants, thereby potentially reducing the costs of an assessment of environmental effects.

Efficiency

Policy 6.2.4 is efficient as it provides guidance about natural character values within the MEP context, rather than leaving it to individuals to determine what contributes to natural character. This improves efficiency as without guidance, inconsistent decision making could result.

Effectiveness

Policy 6.2.4 focusses on the values that contribute to natural character. Were these values not identified and defined, it would be difficult to know whether a particular area has natural character values and what the significance of those values would be. By requiring an assessment of effects to be made against the values that constitute natural character, it is considered more likely that Objective 6.2 will be achieved and that Section 6(a) will be appropriately recognised and provided for. In addition, Policy 13(2) of the NZCPS describes those matters that may contribute to natural character, while Policy 6.2.4 of the MEP refines this in conjunction with the earlier policies in this chapter.

Policy 6.2.5

Policy 6.2.5 – Recognise that development in parts of the coastal environment and in those rivers and lakes and their margins that have already been modified by past and present resource use activities is less likely to result in adverse effects on natural character.

Benefits

Through Policy 6.2.5, areas of significant natural character that have been largely unmodified by human activities will remain so for future generations. The policy directs where activities can be appropriately located. There is also an element of flexibility in this approach, as directing people away from areas with significant natural character values means that a natural character assessment may not be necessary in a resource consent application.

Costs

Individuals may not be able to carry out activities in an area that has high, very high or outstanding natural character values, or it may be harder for them to achieve their aspirations. Conversely, directing people away from areas with significant natural character values means that a natural

Section 32: Chapter 6 - Natural Character

character assessment may not be necessary in a resource consent application, thereby reducing costs.

Efficiency

While there may be costs associated with the policy for an individual wishing to locate in an area with significant natural character values, there is a greater benefit to the whole community as areas with significant natural character values will be preserved.

Effectiveness

Policy 6.2.5 helps to achieve Objective 6.2 by guiding activities to locations where there are likely to be less natural character values present, and therefore a more likely positive outcome in terms of what has been proposed. The policy is also effective as it helps to give effect to Policies 6(1)(c) and 7 of the NZCPS.

Policy 6.2.6

Policy 6.2.6 – In assessing the appropriateness of subdivision, use or development in coastal or freshwater environments, regard shall be given to the potential to enhance natural character in the area subject to the proposal.

Benefits

The main benefit of the policy is that it provides options for a resource user to be able to restore and/or enhance natural character as part of a proposal. Ultimately there is a significant environmental benefit if restoration of natural character occurs throughout Marlborough in freshwater and coastal environments.

Costs

Any restoration works offered by an applicant as part of a resource consent application would see the cost of undertaking that work lie with the consent holder. Restoration works could be imposed as a condition of resource consent if granted and again the costs of this would fall to the applicant.

Efficiency

The efficiency of the policy relative to the costs sees a significant benefit to the wider community from enhancement works, although it is difficult to quantify this other than in terms of the costs of enhancement works.

Effectiveness

Restoration efforts would see significant environmental benefits, although the frequency, extent and nature of such work is unknown. Until the MEP is reviewed in the future and reassessments of natural character are undertaken, the effectiveness of the policy cannot be truly determined. This is partly because some of the approaches set out in Policy 14(c) of the NZCPS for restoration or rehabilitation are in different chapters of the MEP, such as provisions for pest management, reducing discharges to water and restoring indigenous habitats. The other reason is that the policy is reliant on subdivision, use and/or development activities taking place and there being some requirement for, or offer of, enhancement works to improve natural character as part of the activity. These particular consents would have to be monitored to determine gains in terms of enhancing natural character.

Policy 6.2.7

Policy 6.2.7 – In assessing the cumulative effects of activities on the natural character of the coastal environment, or in or near lakes or rivers, consideration shall be given to:

- (a) the effect of allowing more of the same or similar activity;
- (b) the result of allowing more of a particular effect, whether from the same activity or from other activities causing the same or similar effect; and
- (c) the combined effects from all activities in the coastal or freshwater environment in the locality.

Benefits

The main benefit of Policy 6.2.7 is that it provides guidance beyond the RMA on what constitutes cumulative effects and instruction to decision makers about the points at which an activity may trigger cumulative effects on natural character.

Costs

The costs of the policy are difficult to assess as it is dependent on there being a resource consent application for a particular activity that may trigger some or all of the matters in (a) to (c) of the policy. The policy itself does not generate a need for consent; rather, consent will already be required for another reason. Because a cumulative effects assessment is within the realms of assessment for any resource consent, there should not be any significantly greater cost from applying the policy.

Efficiency

The same response in terms of costs is appropriate for efficiency.

Effectiveness

The policy is considered effective as it defines the limit beyond which the effects on the environment become too great. This will help focus applicants in preparing resource consent applications and assist decision makers in determining whether cumulative effects limits are being reached. From this perspective the policy is helping to resolve Issue 6A, which identifies that there is a real risk that further human-induced modification within coastal or freshwater environments will have adverse effects (including cumulative effects). This risk is greatest in unmodified environments, as it is more likely that subdivision, use and development will change the existing natural elements, patterns, processes and experiential qualities. As the degree of existing human-induced modification in the coastal or freshwater environment increases, so too does the ability of the environment to assimilate change into the components that contribute to natural character. This is where cumulative effects assessments are important.

Policy 6.2.8

Policy 6.2.8 – Require land use activities to be set back from rivers, lakes and the coastal marine area in order to preserve natural character.

Benefits

Policy 6.2.8 acknowledges that proximity of land use activity to rivers, lakes and the coastal marine area has a significant influence on the potential for adverse effects on natural character. The closer the activity to these areas, the greater the potential for modification to the elements, patterns, processes and experiential qualities that contribute to natural character. For this reason, land use activities will be required to be set back from rivers, lakes and the coastal marine area. The main benefit of the policy is the recognition that there will be rules limiting the proximity of land use activities to rivers, lakes and the coastal marine area.

Costs

The main cost likely to result from implementing the policy occurs where a landowner cannot undertake a permitted activity in the location that they propose and consequently will have to go through the resource consent process. However, the costs are not likely to be significantly different from those of the current resource management plans. This is because these current plans have set back rules for a range of buildings, structures and other activities. In some cases these rules are in place to protect water quality and for amenity purposes, so they are a common tool currently used in both the MSRMP and the WARMP.

Efficiency

The community-wide benefit from implementing set back rules are greater than the costs to individual landowners having to go through a resource consent process.

Effectiveness

Policy 6.2.8 is effective as it recognises the interface between land and water and the vulnerability to changes in natural character that exists at this boundary. For this reason the policy is important in achieving Objective 6.2 and helping to resolve Issue 6A.

Policy 6.2.9

Policy 6.2.9 – Encourage and support private landowners, community groups and others in their efforts to restore the natural character of the coastal environment, wetlands, lakes and rivers.

Benefits

The benefit of Policy 6.2.9 is that it recognises that not all responses to enhance or restore natural character need to come from a regulatory context. This means there is flexibility in the Council's overall approach to preserving natural character. There is also an acknowledgement of the efforts of landowners and community groups in helping to enhance, maintain or restore natural character. The policy may ultimately mean that more is done to assist in preserving natural character than might have otherwise been done given the explicit support indicated.

The policy has an additional benefit in that some of the efforts to restore natural character also enhance other values, such as landscape. An example of this is the support given to the Marlborough Sounds Restoration Trust whereby wilding pines are being progressively removed from the Sounds, improving landscape values.

Costs

Supporting landowners and community groups in this way will be ratepayer funded. This means there are implications from the policy for Long Term Plan and Annual Plan processes. Staff resources may also need to be directed to restoration works.

Efficiency

There is a whole of community benefit and cost in implementing this policy. The community benefits by helping to restore natural character, thereby recognising and providing for Section 6(a) of the RMA. However, the cost to the community comes through the use of rates to fund restoration efforts.

Effectiveness

The policy does not specifically rely on resource use as the means to carry out restoration works. Such works can be carried out at any time, subject to funding being available. The policy helps to address Issue 6A as a response to the degree of human-induced modification in coastal or freshwater environments that has affected natural character values.

Other options considered to achieve Objective 6.1 and Objective 6.2

Seven other options were considered by the Council to achieve Objective 6.1 and Objective 6.2. These options were:

1. Status quo in terms of the existing provisions of the MRSP, the MSRMP and the WARMP

There are specific objectives and policies in the MRPS to address natural character. Criteria are included in Policy 5.1.14 of the MRPS to identify those matters to be considered in determining the natural character of wetlands, lakes and rivers. These include matters such as the existing degree of human modification, the presence of areas of significant flora and habitats of indigenous fauna, the diversity of species, communities or habitats, the amenity values, including cultural and recreational values, and the degree to which the area provides for the continued functioning of ecological and physical processes. However, there is no equivalent for determining natural character values within the coastal environment.

For both freshwater and coastal environments, the MRPS includes a method indicating that the resource management plans will include criteria to describe natural character. Specifically for the coastal environment, the method also indicates that the resource management plans would determine the amount of change permissible. Oddly for the coastal environment the main policy regarding preservation of natural character (Policy 8.1.6) comes under an objective (Objective 8.1.2) that is focussed on maintaining and enhancing landscape values in indigenous, working and built environments. Although landscape is a component of natural character, it is not the only aspect, as Policy 13(2) of the NZCPS describes a much more comprehensive list of elements.

The management framework for natural character in the MSRMP is set out in Chapter 2 of Volume One. The policies included in Chapter 2 have similar elements as those proposed through the MEP. For example, Policy 2.2.1.2 in the MSRMP effectively encourages appropriate use and development in areas where natural character has been compromised and adverse effects can be avoided, remedied or mitigated. Similarly, Policy 6.2.5 in the MEP recognises that development in areas already modified by past and present activities is less likely to result in adverse effects on natural character. Other policy in the MSRMP with similarities to the MEP include avoiding adverse effects in areas that are

unmodified/outstanding (Policy 2.1.1.1), identifying the elements, qualities and features that contribute to natural character (Policy 2.2.1.3) and restoration of natural character (Policy 2.2.1.6).

Appendix Two of Volume One of the MSRMP also contains a framework that divides the Marlborough Sounds into natural character areas or units, which have been mapped⁷. The natural character of the Sounds as a whole is described in this Appendix, as are the constituent land and marine natural character management areas. These descriptions were to be considered in the preparation of resource consent and plan change applications and in the decision making process on these. The descriptions were also intended to provide direction in determining appropriate measures to avoid, remedy and mitigate adverse effects. While the descriptions for each of the character units are useful, indications of the degree of natural character significance for each of the units are not provided.

The WARMP has a very similar policy approach to the MSRMP, with the addition of one policy to address cumulative effects of activities in the coastal environment (Policy 10.2.1.9). A similar policy has been included in the MEP (Policy 6.2.7) to address cumulative effects for both freshwater and coastal environments. The major difference between the two plans is that no assessment of the values for natural character in either the coastal environment or for lakes and rivers is included within the WARMP. Appendix A of Volume One of the WARMP does include a description of a range of values for some rivers (including values that contribute to natural character); however, there is no reference to natural character itself.

There is an argument that the current framework described in the resource management plans could be used in the MEP. As explained, there are a number of similarities between the current framework and what is proposed. However, it has been decided that the current policies are not sufficiently robust to achieve the purpose of the RMA. The reasons for this include:

- The current MSRMP and WARMP provisions were prepared under the NZCPS 1994 and are not considered to reflect the intent of the 2010 version of the NZCPS.
- While the Council had already undertaken work on natural character assessments for the District as part of the Marlborough Landscape Study 2009, the NZCPS introduced new requirements for preserving natural character of the coastal environment, including introducing the notion of areas with outstanding natural character values, requiring identification of areas with at least high natural character and including a list of matters that contribute to natural character.
- For the Council to be able to give effect to the NZCPS, it needed to undertake an assessment of natural character values across the whole District. While the Marlborough Sounds coastal environment had its natural character components described in the MSRMP, no assessment as to the level of values had been undertaken for this area. Furthermore, no assessment of natural character values had been undertaken for the coastal environment south of the Marlborough Sounds, nor had any specific assessment of natural character values been undertaken for Marlborough's lakes and rivers. Some assessment of the components of natural character for rivers in the WARMP area had been carried out (see Appendix A of Volume One – Values Associated with Freshwater Resources) but this did not include specific reference to natural character.

From this evaluation it is apparent that the identification of areas with significant natural character and the specific values for each of these is lacking in the both the MSRMP and WARMP. Therefore, it is not beneficial nor particularly effective to continue with the existing framework, given the direction through Section 6 of the RMA and, specifically for the coastal environment, the direction through the NZCPS. The costs of continuing the existing framework would fall to resource users, who would have to undertake detailed natural character assessments in any resource consent or plan change applications to determine whether natural character was an issue or not.

2. An alternative method of assessing natural character in the coastal environment

The 'Marlborough Landscape Study 2009' contained an assessment of natural character values for the coastal environment. Subsequent to this assessment the NZCPS was reviewed and when it became operative in 2010, contained new policies for the management of natural character values, including requiring the mapping or other identification of areas with at least high natural character.

⁷ See Map 106 of Volume Three of the MSRMP.

Through involvement in the Department of Conservation's implementation project⁸ for the NZCPS, the Council took part in several workshops in 2011 to develop a consistent method to determine how natural character should be defined. The purpose of the workshops was to reach agreement on a methodology for undertaking assessments of natural character in the coastal environment.

The method proposed for use by Boffa Miskell, as used in their assessment of natural character for Marlborough's coastal environment, identified that:

- the methodology can be adapted to suit different types and scales of coastal landscapes and ecosystems;
- an understanding of biophysical natural character does require the input of terrestrial, freshwater and marine ecologists and other natural scientists (e.g. geomorphologists), as well as the input of landscape architects and planners; and
- natural character can be assessed on a continuum that describes the expression of natural elements, patterns and processes (or the 'naturalness') in a coastal landscape/ecosystem, where the degree of 'naturalness' depends on:
 - the extent to which natural elements, patterns and processes occur and are legible;
 - the nature and extent of human modifications to the landscape, seascape and ecosystems;
 - the fact that the highest degree of natural character (greatest naturalness) occurs where there is least modification, uncluttered by obvious or disruptive human influence; and
 - recognition that the degree of natural character is context-dependent, is perceived differently by different communities of interest and can change over time.

An alternative to this method proposed a more quantitative approach to determining natural character, i.e. that experiential views of an area were not considered relevant to the main assessment of natural character values. However, because the Council had already commenced work on natural character assessments for the coastal environment and committed ratepayer investment in the approach, the methodology developed by Boffa Miskell was adopted rather than beginning again with the quantitative approach. There was also widespread acceptance of the approach proposed by Boffa Miskell at the workshops.

The outcomes of the workshops are reported in two Department of Conservation publications⁹ and include a detailed overview of the quantitative approach.

3. Not mapping rivers and lakes with significant natural character values

If rivers and lakes with significant natural character values are not mapped or otherwise identified, it is more difficult to recognise and provide for Section 6(a) of the RMA. No mapping occurs within the current MSRMP or WARMP, although the WARMP does describe a range of values for a number of Marlborough rivers in Appendix A of Volume One. This would mean that in every resource consent application associated with a lake or river, there would be potential for natural character values to have to be considered by an applicant and decision makers, the result being that an applicant and decision makers are potentially focussing on matters that may not actually be an issue. This option would not help to achieve Objective 6.1 in a particularly effective manner, especially as the Council has already undertaken natural character assessments for a number of Marlborough's freshwater bodies as reported in "The Natural Character of Selected Marlborough Rivers and their Margins" (Boffa Miskell, 2014).

⁸ The implementation project arose out of requests by local authorities, planners, landscape architects, consents officers and other practitioners for support and possible guidance on how to implement the NZCPS, including for policies on assessing and planning for natural character.

⁹ Department of Conservation. Natural Character and the New Zealand Coastal Policy Statement 2010 National workshop (Wellington 2 August 2011) - summary of discussion and outcomes. October 2012.

Department of Conservation. Natural Character and the NZCPS 2010: Marlborough workshop (30 September 2011) - summary of discussion and outcomes. October 2012.

4. Criteria to determine areas with natural character significance are not included

If no criteria are included within policy to guide natural character assessments, consent-by-consent decision making could result. The consequence of this would be that inconsistent outcomes to preserve natural character may occur and areas in Marlborough with significant natural character values may not be protected from inappropriate subdivision, use or development. This would make it difficult for the Council to fulfil statutory responsibilities in terms of Section 6 of the RMA and for the coastal environment, Policy 13 of the NZCPS. Given that a significant area of Marlborough falls within the coastal environment (i.e. the Marlborough Sounds), this is particularly important.

5. The values of areas with significant natural character values are not included within the MEP

The current MSRMP does describe values associated with natural character units in Appendix Two of Volume One, while the WARMP describes a range of values for a number of Marlborough rivers in Appendix A of Volume One. However, no assessment of the level of significance of these values has been determined in relation to overall natural character for a particular area/river and therefore it is difficult to assess the extent of natural character.

Including the values for each of the areas with significant natural character within the MEP provides a starting point to assess how a particular proposal may affect those values. While the values may lie outside the MEP, including them within it, provides a greater level of certainty for all concerned and focusses on the important factors.

6. Wait until national guidance is prepared on identifying 'outstanding' water bodies

As explained in the evaluation for Policy 6.1.6, there is currently no national guidance as to what constitutes 'outstanding' in terms of Objectives A2 and B4 of the NPSFM. Appendix 1 of the NPSFM includes national values and uses for freshwater, but does not include natural character values specifically, despite the direction of Section 6(a) of the RMA and the fact that the definition of 'outstanding freshwater bodies' included in the NPSFM does reference values such as ecological, landscape and cultural, which are elements that contribute to natural character.

At the time of preparing this Section 32 evaluation report, a project to develop a set of criteria that could be applied to the assessment and identification of 'outstanding freshwater bodies' for the purposes of the NPSFM had been initiated by the Hawkes Bay Regional Council. A secondary outcome for the project is a recommended method or methodology for applying the criteria. This work has not been completed but the Council could have opted to wait until it had progressed further.

The main reason this approach is not favoured is because an early assessment of the natural character of Marlborough's rivers has already taken place as part of the Marlborough Landscape Study 2009. This was some two years prior to the introduction of the first NPSFM in 2011, which introduced the notion of 'outstanding freshwater bodies.' It is unclear when the Hawkes Bay Regional Council project will be completed and also when guidance from the Ministry for the Environment would be developed from the project outcomes.

7. Greater regulation of activities on land in the coastal environment with significant natural character values

There is an option to impose higher levels of regulation to help protect areas on land in the coastal environment that have significant natural character values. This would see more activities controlled either through permitted activity standards, the resource consent process or even the prohibition of some activities. The reason the focus would be on land-based activities is because in the coastal marine area most activities already require a resource consent (for ecological, landscape, natural character, navigation and public access reasons). This means there is already a high level of regulation for the coastal marine area, which is public space.

There would be a greater cost for landowners and resource users associated with this option, but it is uncertain whether any greater protection for areas with natural character significance would result. Because the Council has focussed on those areas where natural character values are high, very high or outstanding and the activities that may impact on those values, this option does not seem efficient as landowners and resource users may be required to go through a resource consent process unnecessarily.

Furthermore, this option does not acknowledge the capacity of some areas to absorb change, nor that some areas identified as having significant natural character values still have activities occurring within them. Therefore, the Council has opted for the policies set out in 6.2.1 to 6.2.9.

Methods of implementation

The methods of implementation for Objectives 6.1 and 6.2 have been grouped together.

Essentially, the MEP methods of implementation for natural character are very similar to those currently within the MSRMP and WARMP. What is different is the identification or mapping of areas of natural character significance and inclusion of information on the values that make these areas significant.

Risk of acting or not acting

It is considered there is certain and sufficient information on which to base the policies and methods. The information relied upon are the two natural character reports prepared as part of the overall review of the MRPS, MSRMP and WARMP.

Appendix 1 - Section 32 of the RMA

32 Requirements for preparing and publishing evaluation reports

- (1) An evaluation report required under this Act must -
 - (a) examine the extent to which the objectives of the proposal being evaluated are the most appropriate way to achieve the purpose of this Act; and
 - (b) examine whether the provisions in the proposal are the most appropriate way to achieve the objectives by -
 - (i) identifying other reasonably practicable options for achieving the objectives; and
 - (ii) assessing the efficiency and effectiveness of the provisions in achieving the objectives; and
 - (iii) summarising the reasons for deciding on the provisions; and
 - (c) contain a level of detail that corresponds to the scale and significance of the environmental, economic, social and cultural effects that are anticipated from the implementation of the proposal.

- (2) An assessment under subsection (1)(b)(ii) must -
 - (a) identify and assess the benefits and costs of the environmental, economic, social and cultural effects that are anticipated from the implementation of the provisions, including the opportunities for -
 - (i) economic growth that are anticipated to be provided or reduced; and
 - (ii) employment that are anticipated to be provided or reduced; and
 - (b) if practicable, quantify the benefits and costs referred to in paragraph (a); and
 - (c) assess the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions.

- (3) If the proposal (an **amending proposal**) will amend a standard, statement, regulation, plan or change that is already proposed or that already exists (an **existing proposal**), the examination under subsection (1)(b) must relate to -
 - (a) the provisions and objectives of the amending proposal; and
 - (b) the objectives of the existing proposal to the extent that those objectives -
 - (i) are relevant to the objectives of the amending proposal; and
 - (ii) would remain if the amending proposal were to take effect.

- (4) If the proposal will impose a greater prohibition or restriction on an activity to which a national environmental standard applies than the existing prohibitions or restrictions in that standard, the evaluation report must examine whether the prohibition or restriction is justified in the circumstances of each region or district in which the prohibition or restriction would have effect.

- (5) The person who must have particular regard to the evaluation report must make the report available for public inspection -
 - (a) as soon as practicable after the proposal is made (in the case of a standard or regulation); or
 - (b) at the same time as the proposal is publicly notified.

Section 32: Chapter 6 - Natural Character

(6) In this section -

objectives means -

- (a) for a proposal that contains or states objectives, those objectives:
- (b) for all other proposals, the purpose of the proposal.

proposal means a proposed standard, statement, regulation, plan or change for which an evaluation report must be prepared under this Act.

provisions means -

- (a) for a proposed plan or change, the policies, rules or other methods that implement or give effect to the objectives of the proposed plan or change;
- (b) for all other proposals, the policies or provisions of the proposal that implement or give effect to the objectives of the proposal.

Appendix 2 - Bibliography

Boffa Miskell (2009). *Marlborough Landscape Study 2009*.

Boffa Miskell (September 2011). *Natural Character Assessment of the Coast*. Prepared for Marlborough District Council.

Boffa Miskell (June 2014). *Natural Character of the Marlborough Coast – Defining and Mapping the Marlborough Coastal Environment*.

Boffa Miskell (June 2014). *The Natural Character of Selected Marlborough Rivers and their Margins*.

Boffa Miskell (August 2015). *Marlborough Landscape Study 2015. Landscape Characterisation and Evaluation*. Report prepared for Marlborough District Council.

Corydon Consultants (May 2001). *Perceptions of the Marlborough Sounds and the Impacts of Marine Farms. Results of a Nation-Wide Survey*. Report for the Marlborough District Council.

Corydon Consultants Ltd (Dianne Buchan and Kirsty Austin), (April 2009). *Outcomes for Places Stakeholder Views on Future Development in the Marlborough Sounds*. Report prepared for Department of Conservation and Marlborough District Council.

Corydon Consultants (April 2012). *New Zealanders' Perceptions of the Marlborough Sounds in 2012. Results of a Nationwide Survey*. Report to the Marlborough District Council.

Davidson RJ; Duffy CAJ; Baxter A; DuFresne S; Courtney S; Hamill P, (September 2011). *Ecologically significant marine sites in Marlborough, New Zealand*. Coordinated by Davidson Environmental Limited for Marlborough District Council and Department of Conservation.

Department of Conservation (October 2012). *Natural Character and the New Zealand Coastal Policy Statement 2010 National Workshop (Wellington 2 August 2011) - summary of discussion and outcomes*.

Department of Conservation (October 2012). *Natural Character and the NZCPS 2010: Marlborough Workshop (30 September 2011) - summary of discussion and outcomes*.

Department of Conservation (September 2013). *NZCPS 2010 Guidance note Policy 13: Preservation of Natural Character Version 1*.

Department of Conservation (September 2013). *NZCPS 2010 Guidance note Policy 14: Restoration of Natural Character Version 1*.

Marlborough District Council (November 2006). *Community Views on Significant Issues for Marlborough – Summary of responses received on the review brochure*.

Marlborough District Council (2007). *Discussion Paper 1: Quality of Life in Marlborough*.

Marlborough District Council (2008). *Summary of responses to Discussion Paper 1/Quality of Life in Marlborough*.

Marlborough District Council (2007). *Discussion Paper 3: Rural Issues*.

Marlborough District Council (2007). *An Overview of Rural Area Issues*.

Marlborough District Council (2008). *Summary of responses to Discussion Paper 3/Rural Area Issues*.

Marlborough District Council (2007). *Discussion Paper 4: The Future of the Marlborough Sounds*.

Marlborough District Council (2007). *An Overview of the Future of the Marlborough Sounds*.

Section 32: Chapter 6 - Natural Character

Marlborough District Council (2008). *Summary of responses to Discussion Paper 4/The Future of the Marlborough Sounds.*

Marlborough District Council (2007). *Discussion Paper 5: Water Allocation and Use.*

Marlborough District Council (2007). *An Overview of Water Allocation and Use Issues.*

Marlborough District Council (2008). *Summary of responses to Discussion Paper 5/Water Allocation and Use Issues.*

Marlborough District Council (2007). *Discussion Paper 6: Water Quality.*

Marlborough District Council (2007). *An Overview of Water Quality Issues.*

Marlborough District Council (2008). *Summary of responses to Discussion Paper 6/Water Quality Issues.*

Marlborough District Council (2007). *Discussion Paper 7: Biodiversity and Natural Areas.*

Marlborough District Council (2007). *An Overview of Biodiversity and Natural Area Issues.*

Marlborough District Council (2008). *Summary of responses to Discussion Paper 8/Biodiversity and Natural Area Issues.*

Marlborough District Council (February 2012). *New Zealand King Salmon Plan Change and Resource Consent Applications: Key Issues Report.* Prepared for the Environmental Protection Authority.

National Policy Statement on Freshwater Management 2014.

New Zealand Coastal Policy Statement 2010.