

Proposed Marlborough Environment Plan

**Section 42A Hearings Report for Hearing Commencing 27
November 2017**

Report dated 16 October 2017

**Report on submissions and further submissions
Topic: 3 - Natural and Physical Resources**

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List of Abbreviations

MEP	Proposed Marlborough Environment Plan
MSRMP	Marlborough Sounds Resource Management Plan
NESCS	Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011
NESDW	Resource Management (National Environmental Standards for Sources of Human Drinking Water) Regulations 2007
NESETA	Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009
NESPF	Resource Management (National Environmental Standards for Plantation Forestry) Regulations 2017
NESTF	Resource Management (National Environmental Standards for Telecommunication Facilities) Regulations 2016
NPSET	National Policy Statement on Electricity Transmission 2008
NPSFM	National Policy Statement for Freshwater Management 2014
NPSREG	National Policy Statement for Renewable Electricity Generation 2011
NZCPS	New Zealand Coastal Policy Statement 2010
RMA	Resource Management Act 1991
WARMP	Wairau/Awatere Resource Management Plan

Submitter Abbreviations

Submitter Number	Submitter Abbreviation	Full Submitter Name
100	EBCS	East Bay Conservation Society
280	NMDHB	Nelson Marlborough District Health Board
401	Aquaculture NZ	Aquaculture New Zealand
425	Federated Farmers	Federated Farmers of New Zealand
426	MFA	Marine Farming Association Incorporated
433	Port Marlborough	Port Marlborough New Zealand Limited
459	Beef and Lamb	Beef and Lamb New Zealand
482	DOC	Department of Conservation
484	Clintondale and Whyte	Clintondale Trust, Whyte Trustee Company Limited
507	QCSRA	Queen Charlotte Sound Residents Association
509	Fish and Game	Nelson Marlborough Fish and Game
548	Awatere WUG	Awatere Water Users Group Incorporated
710	Fishing Industry	The Fishing Industry Submitters
715	Forest and Bird	Royal Forest and Bird Protection Society
716	Friends of NH and TB	Friends of Nelson Haven and Tasman Bay Incorporated
768	HNZPT	Heritage New Zealand Pouhere Taonga
769	Horticulture NZ	Horticulture New Zealand
869	KCSRA	Kenepuru and Central Sounds Residents Association Incorporated
962	MFIA	Marlborough Forest Industry Association
974	MPI	Ministry for Primary Industries
993	Fire Service	New Zealand Fire Service Commission
995	NZ Forest Products	New Zealand Forest Products Holdings Limited
1039	Pernod Ricard	Pernod Ricard Winemakers New Zealand Limited
1189	TRoNT	Te Rūnanga o Kāikoura and Te Rūnanga o Ngāi Tahu
1192	Fertiliser Association	The Fertiliser Association of New Zealand
1199	Transpower	Transpower New Zealand Limited

Introduction

My name is Liz White. I am a Senior Resource Management Consultant from Incite (Ch-ch), based in Christchurch. My qualifications and experience are as follows:

I hold a Master of Resource and Environmental Planning with First Class Honours from Massey University and a Bachelor of Arts with Honours from Canterbury University. I am an associate member of the New Zealand Planning Institute and a member of the Resource Management Law Association.

I have over 10 years of resource management and planning experience spanning both the public and private sectors. My experience includes both regional and district plan development, including the preparation of s32 and s42A reports, as well as undertaking policy analysis and preparing submissions for clients on various RMA documents. I also have experience in resource consents and notices of requirement, both in preparing applications, as well as processing applications for territorial authorities.

In my current and previous roles, I have undertaken work for some of the submitters on the MEP, but I have not been involved in the preparation of any submissions made to the MEP or provided any advice with respect to projects in the MEP area.

I was not involved with the preparation of the MEP. I was contracted by the Marlborough District Council (Council) in August 2017 (after the MEP submission period had closed) to evaluate the relief requested in submissions and to provide recommendations in the form of a Section 42A report.

I have read Council's Section 32 reports.

Code of Conduct

I confirm that I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note and that I agree to comply with it.

I confirm that I have considered all the material facts that I am aware of that might alter or detract from the opinions that I express, and that this evidence is within my area of expertise, except where I state that I am relying on the evidence of another person.

I am authorised to give this evidence on the Council's behalf.

Scope of Hearings Report

This report is prepared in accordance with section 42A of the Resource Management Act 1991 (RMA).

In this report I assess and provide recommendations to the Hearing Panel on submissions made on Volume 1, Chapter 4 (Use of Natural and Physical Resources) of the MEP.

In particular, this report contains my assessment of submissions on Issue 4A, Objective 4.1 and related provisions; Issue 4B, Objective 4.2 and related provisions; and Issue 4C, Objective 4.3 and related provisions.

The following submission points were included in the summary of submissions on Chapter 4, but as they do not relate to provisions within this chapter, they will be dealt with other reports, as follows:

- Marlborough Forest (962.8 (part)) as it relates to "afforestation flow sensitive sites": Will be addressed in relation to the forestry topic.
- David Arthur Barker (317.3) and Dale Hulburt (314.1): Will be addressed in relation to water allocation and use topic
- Pinder Family Trust (578.27), Guardians of the Sounds (752.27) and Sea Shepherd New Zealand (1146.27): Will be addressed in relation to the forestry topic
- Te Atiawa o Te Waka-a-Maui (1186.25): Will be addressed in relation to the heritage topic.

As submitters who indicate that they wish to be heard are entitled to speak to their submissions and present evidence at the hearing, the recommendations contained within this report are preliminary, relating only to the written submissions.

For the avoidance of doubt, it should be emphasised that any conclusions reached or recommendations made in this report are not binding on the Hearing Panel. It should not be assumed that the Hearing Panel will reach the same conclusions or decisions having considered all the evidence to be brought before them by the submitters.

Overview of Provisions

Chapter 4 relates to the Use of Natural and Physical Resources. All of the objectives and policies within this chapter are regional policy statement (RPS) provisions. As such, the provisions within this chapter are set at a high level, and are intended to provide direction and guidance that flow through into other objectives and policies throughout the remainder of the MEP.

The chapter is essentially split into three separate and specific topics that fall within the broader topic of the use of natural and physical resources:

1. The relationship between the use of natural resources and the district's social and economic wellbeing (reflected in Issue 4A, Objective 4.1 and 3 policies 4.1.1 – 4.1.3);
2. Management of regionally significant infrastructure (reflected in Issue 4B, Objective 4.2 and 2 policies 4.2.1 – 4.2.2);
3. The particular qualities of the Marlborough Sounds (reflected in Issue 4C, Objective 4.3 and 5 policies 4.3.1 – 4.3.5).

As a result of the split between these topics, the analysis on submissions is also split between these, with a summary of each set of provisions provided at the start of the assessment of each topic.

It should be noted that Chapter 4 is not a comprehensive chapter intended to provide over-arching direction in relation to all uses of natural and physical resources. This is because in many cases, the use of particular resources is addressed in the more specific chapters relating to those resources. Instead, Chapter 4 provides direction in relation to the three particular matters identified above, all of which fall within the broad topic of resource use. This is because each of these topics have been identified as regionally significant issues, and relate to matters which span across multiple chapters within the MEP. In this way, the direction provided within Chapter 4 provides for integrated management in relation to the identified topics, and is implemented through various, more specific chapters of the MEP.

Statutory Documents

The following statutory documents are relevant to the provisions and/or submissions within the scope of this report. Although a summary of the way in which these provisions are relevant is provided below, the way in which they influence the assessment of the relief requested by submissions will be set out in the actual assessment.

Resource Management Act 1991

National Policy Statements

New Zealand Coastal Policy Statement 2010 (NZCPS)

The NZCPS sets out national policy direction in order to achieve the purpose of the RMA in relation to the coastal environment. It is the only mandatory national policy statement under the RMA. It contains seven objectives and 29 related policies. The NZCPS provides direction to local authorities in relation to how the coastal environment is to be managed, consistent with the functions given to regional councils and district councils under the RMA. The NZCPS must be given effect to in regional policy statements, regional plans and district plans.

The NZCPS is particularly relevant to Issue 4C, Objective 4.3 and related provisions, because the Marlborough Sounds area is within the coastal environment.

National Policy Statement on Electricity Transmission 2008 (NPSET)

The NPSET sets out the objective and policies for managing the electricity transmission network (the National Grid). It imposes obligations on both Transpower and local authorities. The NPSET promotes a more standardised and consistent approach throughout New Zealand to the transmission of electricity within a region or district and in managing the effects of the transmission network on the environment. The policies within the NPSET are grouped into the following five categories: recognition of the national benefits of transmission; managing the environmental effects of transmission; managing the adverse effects of third parties on the transmission network; mapping; and long-term strategic planning for transmission assets.

The NPSET is particularly relevant to Issue 4B, Objective 4.2 and related provisions, because the National Grid is identified as being regionally significant infrastructure (as well as being nationally significant). The particular policies within the NPSET are discussed in the assessment of this topic where relevant.

National Policy Statement for Freshwater Management 2014 (NPSFM)

The NPSFM sets out the objectives and policies for freshwater management, providing direction on how local authorities should carry out their responsibilities under the RMA for managing fresh water. The key requirement of the NPSFM is for regional councils to set objectives for the state of fresh water bodies in their regions and to set limits on resource use to meet these objectives.

The NPSFM is not directly relevant to the topics within Chapter 4, none of which deal specifically with freshwater management. However, some of the provisions more generally cover the use of natural resources and these must therefore be consistent with the NPSFM.

National Environmental Standards

National Environmental Standards for Telecommunication Facilities 2016 (NESTF)

The NESTF provides rules in relation to telecommunications infrastructure. This is of some relevance to the management of regionally significant infrastructure, because Chapter 4 contains overarching policy guidance relating to this infrastructure, which includes telecommunications infrastructure. While the rules in the NESTF

prevail over any district rules, the MEP's policies and objectives will be relevant in the consideration of any resource consent required under the NESTF, or any designation/outline plan process.

National Environmental Standards for Electricity Transmission Activities 2009 (NESETA)

The NESET applies to high voltage electricity transmission lines and covers activities related to the operation, maintenance and upgrading of existing lines, but does not apply to the construction of new lines or to substations. This is of some relevance to the management of regionally significant infrastructure, because Chapter 4 contains overarching policy guidance relating to this infrastructure, which includes the National Grid.

National Environmental Standards for Sources of Human Drinking Water 2007 (NESDW)

The purpose of the NESDW is to reduce the risk of contamination of drinking water sources by requiring that regional councils consider the effects of certain activities on drinking water sources. The NESDW has limited relevance to Chapter 4, but is discussed in relation to the threshold for when community water supply networks are regionally significant infrastructure.

National Environmental Standards for Plantation Forestry 2017 (NESPF)

The NESPF is designed to provide a nationally consistent set of rules that address the risks of forestry activities and protect sensitive environments. The regulations apply to any forest larger than one hectare that has been planted specifically for harvest. It covers eight core plantation forestry activities: afforestation; pruning and thinning to waste; earthworks; river crossings; forestry quarrying; harvesting; mechanical land preparation; and replanting. In recognition that there are some locations that require a greater degree of protection, the NESPF allows councils to make rules that are more stringent, where necessary, in specified instances. The NESPF does not come into effect until 1 May 2018. Until then, the relevant provisions applicable to forestry in the MSRMP, WARMP and MEP will continue to apply. The NESPF has limited direct relevance to Chapter 4, but it should be noted that Issue 4A, Objective 4.1 and related provisions apply to primary production, which includes forestry. In addition, Issue 4C, Objective 4.3 and related provisions will apply to forestry activities within the Marlborough Sounds area.

Analysis of submissions

There were approximately 1295 submission points received on provisions relevant to the Chapter 4 – Use of Natural and Physical Resources.

Of these submission points, 183 were in common formats as follows:

Group 1 submitters (8 submitters)

Group 2 submitters (174 submitters).

Individual submitters who used one of the above common formats have been grouped as a single entry per relevant point in this report to avoid unnecessary repetition and duplication. See Appendix 1 of this report for a list of individual submitters who used these templates.

Key issues

I have set out my analysis of the submissions points by issue and then by respective components of the topic, under the following headings:

Issue 1: The relationship between the use of natural resources and the district's social and economic wellbeing – provisions relating to Topic 4.1.

Issue 2: Management of regionally significant infrastructure – provisions relating to Topic 4.2.

Issue 3: The particular qualities of the Marlborough Sounds – provisions relating to Topic 4.3.

Issue 4: Additional topics or provisions sought to be included within Chapter 4.

Issue 5: General Submissions across the whole of Chapter 4, including those on the introduction and the anticipated environmental results.

Pre-hearing meetings

There have been no pre-hearing meetings for this topic.

Issue 1 - The relationship between the use of natural resources and the district's social and economic wellbeing

Overview of Provisions

This assessment relates to Issue 4A, Objective 4.1, Policies 4.1.1, 4.1.2 and 4.1.3 and methods 4.M.1-4.M.5.

This package of provisions relates to the use of natural resources within Marlborough, and in particular, focuses on the reliance on the use of these resources for the District's social and economic wellbeing. This is expressed through the overarching Objective 4.1, which seeks that the District's primary production and tourism sectors continue to be successful and thrive, whilst ensuring that the natural resources on which they rely are sustained. Policies 4.1.1, 4.1.2 and 4.1.3 support the achievement of this outcome through directing that interventions in land use are limited to those necessary to protect the environment and wider public interest in it; generally enabling use of natural resources where it is sustainable; and seeking to maintain and enhance the quality of natural resources. These policies are to be implemented through five methods, being zoning provisions, district rules, regional rules, guidelines and information.

As high level RPS provisions, these provisions guide and direct more specific policies within the MEP, for example those relating to specific resource use.

The assessment of submissions on these provisions has been undertaken as follows:

- Submissions that raise issues across various provisions
- Issue 4A
- Objective 4.1
- Policy 4.1.1
- Policy 4.1.2
- Policy 4.1.3
- Additional policies sought
- Methods

Submissions that raise issues across various provisions

The following analysis considers a number of submissions that seek a similar change across more than one of the provisions in this topic, or which relate to submissions that seek changes to one or more of the provisions, to provide greater recognition of a particular industry.

Fish and Game seeks that Issue 4A, Policy 4.1.2 and Policy 4.1.3, which currently refer only to natural resources, are amended to refer to both natural and physical resources. This is on the basis that the RMA does not separately define natural and physical resources, and as such, it is more appropriate for the MEP to refer to these collectively. Trustpower also seek this in relation to Policy 4.1.2, as they consider this reflects that the sustainable management of natural and physical resources are often intractably linked and need to be considered collectively. Totaranui Ltd also seek, in addition to other changes discussed later, that Policy 4.1.3 is extended to physical resources.

It is my view that the management of these resources can be separated out within the MEP, and that this can still achieve the overall purpose of the RMA. In this instance, the issue, corresponding objective and policies are particularly focussed on the interrelationship between the use of natural resources and the primary sector and in my view, this is appropriate. I note that there are other provisions within the MEP that are more directly aimed at physical resources, for example Objective 4.2 and related policies pertaining to infrastructure. While I accept that there are links between the management of both natural and physical resources, in my view this does not necessarily mean that they must be linked within any plan provisions providing direction on the management of resources. As such, I do not recommend that this section of Chapter 4 is amended to extend it to physical resources.

The following submissions seek that the identified provisions are amended to provide greater detail on, or specific references to, a particular industry:

- Fulton Hogan seek an additional paragraph, specific to aggregate resources, is included within the explanation to Issue 4A.
- NZ Forest Products seek that Objective 4.1 and Policies 4.1.1 and 4.1.2 specifically recognise *“the importance of commercial forestry to the region and seek to enable forestry operations to expand and develop”*. They also seek that new policies are added under Objective 4.1 *“seeking to enable the ongoing use and development of existing forestry as well as the expansion, optimisation and intensification of existing forestry”*.
- Aquaculture NZ and MFA seek that the explanation to Objective 4.1 is amended to refer to aquaculture’s need for water space and high quality water.
- Fishing Industry seek that explanation to Objective 4.1 is amended to include reference to fishing and aquaculture sectors relying on security of access to the coastal marine area, high coastal water quality and healthy marine ecosystems.
- MFIA seek that the explanation to Policy 4.1.1 is amended to include commentary about the minimal use of water by plantation forests.
- Fishing Industry seek that a new policy is added relating to integrating the Council’s responsibilities under the RMA with the management of fisheries under the Fisheries Act 1996.

It is my view, that the provisions within this section of Chapter 4 are intended to provide high level guidance relating to the use of natural resources, that is then implemented through more specific provisions within the MEP. Generally (and notwithstanding specific changes that I recommend) I consider the provisions within this part of the chapter are appropriate to provide direction at a high level in relation to the whole of the primary production and tourism sectors. I note that in some explanations, examples are given about types of primary industries and the reliance of these on various natural resources, but these are sparing, and the provisions themselves are focussed more broadly, and intended to cover a range of industries. It is therefore my view that the changes sought by the above submitters to refer to any one specific industry within the provisions are not appropriate, are not necessary to achieve Objective 4.1, and that the changes sought to explanations are unnecessarily specific and not required to provide additional clarity. I accept that it may be appropriate, as part of implementing these broader provisions, to have specific policy guidance for particular activities, but in my view, these should not be included within Chapter 4, but in other parts of the MEP, where the activities are more specifically managed. I therefore recommend that these submission points are rejected.

Issue 4A – Submissions and Assessment

Issue 4A reads:

Marlborough’s social and economic wellbeing relies on the use of its natural resources.

The explanation to the issue goes on to set out details about the primary sector and its reliance on the natural resource base, noting that this reliance creates a vulnerability to environmental change. The explanation goes on to explain that natural resources are also important to the social and economic wellbeing of the community beyond just the primary sector, for example recreational opportunities, conservation and tourism.

Seven submitters support the issue statement and either explicitly seek that it is retained or do not seek any changes to it.

PF Olsen Ltd generally support the issue statement and explanation with the *“key being that the local economy is diverse and ever changing and highly dependent upon the primary sector as well as tourism.”* They seek that the issue is retained, but that the importance of diversity and capacity for adaption is noted. Further they seek recognition that business as usual with respect to water may not be able to continue into the future and that tourism can involve high carbon based energy demands and may not be the same in future. As such, they see that flexibility is the key. It is my view that this type of consideration is a potential response to the issue, but it does not assist in explaining what the issue is. As such, I do not recommend any changes to the explanation in response to this submission.

Federated Farmers support the identification that the district’s social and economic wellbeing are reliant on its use of natural resources, but note that while there is a quantification of the conservation estate, there is no such quantification for the primary sector. They are also concerned that there is no recognition that Marlborough’s primary industries are nationally important, for example both viticulture and marine farming

contribute a “*significant proportion*” of the New Zealand economy. As such, they seek that a further three paragraphs are added that include details on the statistics relating to primary production. I note that the no references are provided for where the figures have been sourced from. These additions are opposed by Te Atiawa o Te Waka-a-Maui Trust, who consider that the submitters are over-stating the benefits of, and understating the adverse effects of, their own activities. They also oppose the insertion of economic considerations without similar consideration for cultural considerations. Horticulture NZ support the submission, and seek that information is included about horticulture. Awatere WUG consider that the opening paragraph of Issue 4A understates the contribution of Marlborough’s primary production sector to the regional economy and that consequently the social and economic benefits to the community are also understated. They consider that additional information and references are required to support the statement that the primary sector contributes over 35 percent of the local economy and employs the equivalent of 7,000 people on a permanent basis. As such, they seek that the Council undertake a range of work and amend the issue, relating to: providing a full assessment of the social and economic benefits to Marlborough, including the added value from primary production; an explanation of how the economic indicators are derived; and reference to the economic monitoring reports that are used.

I note that the issue statement is high level and provides a similarly high level statement about the economic contribution of the primary sector (being over 35 percent of the local economy and the employment of the equivalent of 7,000 people on a permanent basis). Similarly, there is a brief mention of the contribution of the conservation estate to the economy, but no additional detail. In my view, what is sought by Federated Farmers and Awatere WUG does not assist with explaining the issue – which is not about how much the economic contribution is – and instead adds unnecessary detail that will likely become out of date. In my view, the crux of the issue is about the reliance of the primary sector on the natural resource base, and the correlation between resource use and prosperity of the district. Adding numerous references to the specific contribution of various primary industries to the economy goes beyond this, because it does not assist in explaining the link between those industries and natural resources. As it does not assist with the issue, I do not recommend that the additional paragraphs sought by Federated Farmers are included. In relation to the Awatere WUG’s concerns, I have been unable to establish where the 35 percent or 7,000 employee figures have been derived from. As is discussed further on in this report, there is also an issue with the 35 percent figure used in the explanation not corresponding with one of the monitoring indicators included in the anticipated environmental result section at the end of Chapter 4. I also note that similar issues arise with these references, being that they will become out of date over the life of the MEP in any case. I therefore recommend that the sentence containing these figures is deleted. I note, in relation to the further submission of Te Atiawa o Te Waka-a-Maui Trust, that the issue relates to link between social and economic well-being and natural resource use. As such, even if the Panel were to agree with the additions sought by Federated Farmers, it is unclear to me what similar cultural considerations could be added and how they would relate to this particular issue.

J. & J. Hellstrom question the validity of the reference within the explanation to the contribution of the Queen Charlotte Track and seek that it is validated through a reliable economic reference, as during the life of the MEP the figure could go up and down. I accept that the figure is subject to change but note that the text states that it is an approximate amount. My understanding is that the figure stems from one quoted within an article in 2010¹, and in the absence of an alternate number that is shown to be more accurate, I am comfortable with the reference being retained given that it is approximate only. However, given my comments above regarding the potential for figures to become out of date, and the explanation being focussed on the link between social and economic well-being and natural resource use, I suggest the specific amount is removed and reference instead made to “*a significant amount*” or similar.

DairyNZ seek that the issue is amended to refer to use and development, as in their view, this would better align with Sections 5 and 9, and the enabling intent of, the RMA. This is supported by Trustpower, who consider the wording then better aligns with Section 5 of the RMA, and MFA and Aquaculture NZ who consider that inclusion of the word “*development*” envisages change, and that it is important to recognise that change will need to occur over the life of the MEP. In my view, the addition is appropriate. As is clear from the explanation to the issue, it is not only the use, but also in some cases the development of natural resources, that is important for the social and economic wellbeing of the District.

Friends of NH and TB seek that the issue and explanation is amended to include reference to ecosystem services provided by natural ecosystems and to refer to “*natural resources or the environment*” rather than only natural resources within the third sentence of the third paragraph of the explanation. This in on the basis

¹ ‘Editorial: Landowners’ Charge Fair Enough’, *Marlborough Express*, 24 March 2010.

that there is inadequate recognition of the non-economic intrinsic values of the environment that contribute to social wellbeing. It is not clear to me what would be meant by stating that the loss of access to natural resources “*or the environment*” would have a significant impact on the primary sector. In relation to ecosystem services, I address this further below.

MFIA and Nelson Forests seek that the ecosystem benefits of commercial forestry (habitat; recreational access; reducing flooding; carbon sequestration; other non-wood values) should also be recognised within the explanation to the issue, as they are concerned that the provision of ecosystem services from plantation forestry is absent from the discussion, and that this can provide many of the benefits attributed to the conservation estate. I agree with the submitter that the provision of ecosystem services and the contribution these services make to social wellbeing are not limited to the conservation estate, but neither is it limited to commercial forestry. As such, in my view the statement should be separated from its current paragraph so that it is a standalone point, and amended to refer to the contribution of ecosystem services to social wellbeing more generally. This also aligns with the comments of Friends of NH and TB.

Recommendation

I recommend that Issue 4A is amended as follows:

Issue 4A – Marlborough’s social and economic wellbeing relies on the use and development² of its natural resources.

I recommend that the explanation to Issue 4A is amended as follows:

The prosperity of Marlborough has always relied upon utilising and developing the natural resources in the surrounding environment. Historically, the primary sector has driven the local economy. ~~Today, that same sector still contributes over 35 percent of the local economy and employs the equivalent of over 7,000 people on a permanent basis.~~³

...

The value of the conservation estate, which makes up 45 percent of Marlborough’s land area, should not be underestimated. For example, the use of the Queen Charlotte Track, part of which occurs in the conservation estate, adds a significant amount ~~approximately \$10 million~~⁴ to the Marlborough economy annually.

There are other ecosystem services ~~provided by the conservation estate~~ that result from different land uses, that⁵ although not quantified in a monetary sense, contribute to social wellbeing, such as reducing flood risk, sustaining whitebait catches and other fish and game and carbon sequestration⁶.

Objective 4.1 - Submissions and Assessment

Objective 4.1 reads:

Marlborough’s primary production sector and tourism sector continue to be successful and thrive whilst ensuring the sustainability of natural resources.

Twenty-seven submitters support the objective and either explicitly seek that it is retained or do not seek any changes to it.

PF Olsen Ltd agree with the objective and explanation, stating that it provides a fair analysis of the situation, namely that “*use comes with responsibilities*”. However, they seek that there should be a recognition of

² 676.1 – Dairy NZ.

³ 548.1 – Awatere WUG. Also relates to 676.2 - Dairy NZ.

⁴ 688.1 – J. & J. Hellstrom.

⁵ 716.28 - Friends of NH and TB; 962.7 – MFIA; 990.163 – Nelson Forests.

⁶ 962.7 – MFIA; 990.163 – Nelson Forests.

externalities that are created (and not mitigated) and reverse sensitivity effects (and subsequent costs) that can arise for existing land uses, from new subdivision, use and development. While I accept that the use of natural resources creates external effects, and that this includes the potential for reserve sensitivity effects to arise, in my view these are more specific issues that are dealt with elsewhere in the MEP and do not necessitate a change to this objective. For example, in my view, ensuring that the potential for reverse sensitivity effects is appropriately managed within the MEP is one way of helping ensure this overarching objective is achieved. There are also a number of provisions throughout the MEP that seek to manage the potential adverse external effects of resource use.

Aquaculture NZ and MFA seek that the objective is amended to include reference to related servicing and processing industries, noting that the tourism and primary production sectors cannot operate in the absence of related services. While I accept this, I note that the objective is about recognising the direct link between these sectors and the use of natural resources, which is something that is directly affected by the MEP. In my view, if the objective is being achieved, there will be a flow on effect for related industries. I note that the first paragraph of the explanation to the objective already explicitly states that it is important that the primary sector, as well as related servicing and processing industries, continue to thrive. In my view, it is not necessary for the objective to be extended to explicitly refer to these related industries as well, as the objective is more focussed on those sectors where there is a direct link with the natural resources. It is my view that this more appropriately aligns with the purpose of the RMA than the change sought by the submitter.

Fish and Game seek that the objective is deleted and replaced with something that provides clear guidance on how success of the primary production and tourism sectors will be measured. This is on the basis that it is not clear how decision makers will determine if this is achieved and while the explanation provides some factors that might determine success, they consider these need to be brought into the objective to ensure it is measurable and achievable. I note however, that the submitter has not proposed alternate wording to achieve this. Horticulture NZ oppose the submission on the basis that the objective is not the appropriate part of the MEP to describe how outcomes will be measured. I agree with Horticulture NZ, as I consider that the objective should state the outcome that is desired, rather than explaining how an outcome is to be measured. In some cases, I agree that it is preferable to have a clearly measurable outcome, but in many cases, a narrative objective is fine. In my view "success" falls in to the latter category. In addition, my view is that the wording of the objective alone need not be considered in isolation. I note that some guidance is already provided within the chapter as to measuring the achievement of the objective, namely, 4.AER.1 which lists the following factors under monitoring effectiveness: "*The primary sector contributes over 15% of Marlborough GDP*"; and "*The number of visitors to Marlborough exceeds 1.5 million per annum*". It is also my experience that explanations can be used within plans to provide further context for the interpretation of plan provisions and therefore be used to provide guidance as to what success means in the context of this objective. I also note that it is a drafting choice within the MEP to have relative short and concise objectives, with further explanation located within the explanation sections. In my view, it would not be appropriate or consistent with the drafting across the MEP to bring a large portion of the explanation into the objective itself. In the absence of specific alternate wording to consider, I therefore do not recommend any changes in relation to this submission point.

In summary, it is my view that no submitter has identified changes to the Objective that are more appropriate for achieving the purpose of the RMA.

With regard to the explanation to the objective, QCSRA generally agree with the final paragraph of the explanation to the objective, relating to tourism, but seek that the final sentence is amended to read: "*The Council can play a role in this by striving to maintain and enhance the quality of our environment particularly in the Marlborough Sounds*". In my view, this addition is not necessary as Objective 4.3 and its related provisions are specifically targeted to considering the management of the Marlborough Sounds.

D. Hemphill seeks that the explanation is amended to "*reflect the Council's intention to provide certainty and equity between land uses, allowing rational decisions to achieve optimum environmental outcomes.*" The submitter notes that the viability of primary production is impacted by certainty as to the Council's intentions and restrictions on land use, including confidence that the Council will not single out any one industry for inequitable treatment in the MEP. It is not clear to me what changes are required to the explanation to address the matters raised by the submitter, and in any case, my view is that the explanation does not single out any one industry.

Recommendation

I recommend that Objective 4.1 and its explanation are retained as notified.

Policy 4.1.1 - Submissions and Assessment

Policy 4.1.1 reads:

Recognise the rights of resource users by only intervening in the use of land to protect the environment and wider public interests in the environment.

Twenty-four submitters support the policy and either explicitly seek that it is retained or do not seek any changes to it.

Three submitters seek that the policy is deleted. Fish and Game seek its deletion on the basis that it is not clear what is being achieved by the policy. Ravensdown seek its deletion as they consider that it is unclear what resource management issue the policy intends to address and consider that the inference that land ownership is implicit in section 9 of the RMA (within the explanation) is incorrect. They consider that overall the policy has little merit. Fertiliser Association, while supporting the intent of the policy, seek that it is deleted "*given the rules in the Plan and that this is generally most Council's position*". In my view, it is clear what is intended by the direction in the policy, and this is expanded on within the explanation to the policy. The Section 32 report⁷ also provides further detail on its intent. In particular, I note that the policy reflects community consultation undertaken and feedback on the importance of recognising private property rights, and the desire to minimise regulatory intervention in land use, while acknowledging when such intervention is appropriate and necessary to achieve the MEP's objectives. In my view, whether or not the policy reflects the position of other councils is not relevant to the consideration of whether the policy is the most appropriate approach (in combination with other provisions in the MEP) to achieve the objective. In my view, there is benefit in retaining the policy, particularly because it provides a key direction for how it is intended that the MEP achieves Objective 4.1. In relation to Ravensdown's comment regarding reference to Section 9 of the RMA in the explanation, I recommend instead that this sentence within the explanation is deleted. In my view the current wording is slightly misleading and the relevance of Section 9 is, in any case, captured within the second paragraph.

PF Olsen Ltd supports the thrust of the policy, but considers that it is critical that such intervention is only contemplated where there are clear science and economic ecological indicators to support this. As such, they seek that the text is strengthened to commit to intervening only when there is well established science, economic and ecological grounds. It is my view that including an overarching direction that such intervention can only be when there is well established science, economic and ecological grounds is not appropriate. This is because there will be some cases where there is not sufficient information to determine the exact effects of land use, and a precautionary approach is needed, with intervention justified by this. Section 32(2)(c) of the RMA involves this type of consideration, by requiring that the risk of acting or not acting is assessed, if there is uncertain or insufficient information about the subject matter of any provisions. I also note that this policy is implemented through a range of other provisions within the MEP. In essence, it sets overarching guidance to ensure that where the Council intervenes in land use (particularly through rules) this intervention has to be justified by a wider need to protect the environment and public interest in it. It is my view that the grounds for the justification of any intervention is better considered when assessing any specific intervention proposed.

Federated Farmers support the policy in part, and appear to agree with the intent to only intervene in the exercise of private property rights where warranted to protect the environment and wider public interest in it. They support the comments in the policy explanation that clear and concise standards are important in guiding the way resource use is undertaken. However, they raise concerns that this is not the way that the rules have been drafted, and as well as seeking changes to specific rules within their submission, seek, in relation to Policy 4.1.1 that the policy is amended to read: "*Recognise the rights of resource users by ~~only~~ not intervening in the use of land to protect the environment and wider public interests in the environment, unless specifically required under the Plan." I do not agree with the change sought as it creates a circular policy, which would then provide no assistance to guide the provisions in other parts of the MEP as to when intervention is warranted.*

⁷ Section 32: Chapter 4 – Use of Natural and Physical Resources, pages 8-9.

Friends of NH and TB seek that Policy 4.1.1 is amended to read: “*Use of private land will reflect sustainable management including protection of the environment and wider public interests in this environment.*” This change is sought on the basis that environmental effects are only one reason why controls on development on private land are appropriate, with other reasons including cross-boundary effects, managing natural hazards and other hazards and reverse sensitivity. They state that the policy does not give appropriate effect to Part 2 matters. In this regard, I note that the definition of “*environment*” in the RMA is broad, including ecosystems, people and communities, all natural and physical resources, amenity values and social, economic, aesthetic and cultural conditions which affect the former matters. In my view, this covers the matters identified by the submitters. For example, it is my view that as currently worded, the policy provides justification to intervene to protect people and communities from the effects of natural hazards, where this relates to the effects of private land use. In my view, the policy as currently worded provides better direction and is better aligned with the aims of Objective 4.1, than the alternate suggested by the submitter.

TRoNT seek that the policy is amended to read “*Recognise the rights of resource users while protecting the environment, iwi rights and interests, and wider public interests in the environment.*” This is on the basis that while they understand the intent of the policy, the drafting implies that the rights of landowners to use resources is more important than the environment, and seek reference to iwi rights and interests to “*pull through*” the matters set out in Section 3. This is supported by Te Atiawa o Te Waka-a-Maui Trust on the basis that it seeks to improve and provide greater recognition and protection for iwi values, beliefs and resources. It is my view that the drafting of the policy does not place more weight on the rights of landowners to use resources, than it does on the environment. It expressly provides direction stating that intervention is appropriate, where necessary to protect the environment. In my view, the alteration sought, which removes reference to intervention, adds little value as a high level policy and would not better achieve Objective 4.1. With regard to the reference to iwi rights and interests, my view is that the objectives in the MEP need to be considered together, and that it is not necessary or appropriate for different objectives to cover the same matters.

K. Adams seeks that the phrase “*wider public interest*” is replaced with “*greater public good*” as he considers that the latter is more restrictive and will compel a greater contemplation of the “*displacement*” of the rights and freedoms of individuals. In a similar vein, Horticulture NZ supports the recognition of the rights of resource users, but considers that intervention should only be where there is a resource management issue to be addressed, not just the wider public interest. As such they seek an amendment to this policy to refer to intervention in the use of land being “*where there is a clear resource management issue that requires intervention*”. I tend to agree with both submitters that “*wider public interest*” is perhaps not an appropriate driving force for intervention. Given the breadth of the definition of “*environment*” under the RMA (which includes people and communities, and amenity values in any case), my view is that this already covers any wider public interest in the environment that is relevant. My concern with replacing reference to protecting the environment entirely, and replacing this with reference to a resource management issue, is that it risks other policies in the MEP driving the level of intervention, rather than the other way around.

Notwithstanding the above analysis of the specific changes sought by Federated Farmers, Friends of NH and TB, TRoNT, Horticulture NZ and K. Adams, it is my view that these submissions all relate to the wider question of when intervention is warranted, including consideration of what is covered (or not) by “*the environment and wider public interest in it*”, and whether this is the appropriate point at which to intervene. It is my understanding (from the Section 32 report) that minimising the extent of regulation/intervention is seen as one way to assist with ensuring that primary production and tourism sectors are successful (the first part of Objective 4.1). This needs to be balanced against other aims within the MEP, namely those focussed on managing the effects of such resource use on the environment. My concern (although not explicitly stated by these submitters, it is inferred by some) is that the use of the phrase “*protect the environment*” sets, in my view, a relatively low bar on intervention, because protection could be taken to mean no change. On this basis, my view is that the current wording of the policy does not align with what was intended (and what I understand to be supported by the majority of submitters) and in turn would actually hamper the achievement of Objective 4.1. On this basis, while I have not recommended the specific wording changes sought by these submitters, I consider that they provide scope for amending the policy to better align with Objective 4.1 and the intent behind the policy. My recommendation is therefore to amend the policy to limit intervention in the use of land to “*where it is justified to protect the environment.*”

Beef and Lamb seek that a provision be added to the policy that recognises Farm Environment Planning as a valid tool to deliver positive environmental outcomes while maintaining land use flexibility. They consider this approach is a better alternative to prescriptive activity based rules, better balancing protection of the

environment and minimisation of regulation. In my view, this change is too detailed and specific for the nature of this policy, which is intended to provide overarching direction across the MEP. In particular, my view is that Farm Environment Planning may be one tool or method that may be used to implement the policy, but there are a range of other tools and methods and these are best left to the more detailed rule packages.

Clintondale and Whyte support the policy, but note that an area where they consider intervention is necessary is exotic commercial forestry where various adverse effects can arise such as effects on coastal and marine environments through sedimentation and safety and amenity effects from transportation. As such they seek that the MEP recognises that such activity, in the Marlborough Sounds, particularly Port Underwood, can result in these adverse effects beyond the boundary of the forestry activity. In my view, the submitter provides an example of the type of consideration that that this policy is driving at, in terms of determining when intervention is warranted due to the effects on the environment and public interest in it. However, I do not consider that changes to the policy to be more specific about this particular activity are necessary. I also note, in relation to forestry, that there are now national rules relating to the management of this activity set out in the NESPF, and that this includes limited opportunity for the provisions within the MEP to differ from those set out in the NESPF.

K.R. & S.M. Roush and Port Underwood Association both seek that the last paragraph of explanation to the policy is amended to include reference to the need to control land use where the activities carried out on private land have effects beyond their boundary that affect other people and environments. They consider this is necessary to provide greater detail as to why public interest consideration should be accounted for. In my view, some amendments along the lines sought by the submitter are appropriate, and flow on from the earlier discussion about when intervention is warranted. Federated Farmers seek that the explanation is amended to better align with the intent of the RMA and the importance of protecting both existing use and private property rights unless the RMA requires such interference. It is my view that the explanatory text already appears to align with the comments of the submitter, and as the submitter has not identified any specific wording changes sought, I am unable to recommend any changes in relation to their submission.

A number of submitters (for example, Federated Farmers, Beef and Lamb, Ravensdown and Nelson Forests Ltd), while supporting the intent of the policy, raise concerns that the approach taken within the MEP, particularly in relation to rules, does not implement this policy direction. I note firstly, that these submitters are generally in support of the policy intent, and the relief sought is more aimed at aligning the rules to implement this policy direction. As such, where these claims are valid, there may be a need to amend some rules within the MEP so that they better align with the direction within the policy. That being said, my view is that there is a need for the Panel to carefully consider the direction in this policy, given that as an RPS policy, it must be given effect to by the district and regional provisions within the MEP, and that there may be a need to revisit the wording of this policy when considering various rules within the MEP. I note that consideration of specific rule changes needs to include not only the direction in Policy 4.1.1, but also other relevant (and likely more specific) policies within the MEP, as well as other objectives that will be relevant alongside Objective 4.1.

Recommendation

I recommend that Policy 4.1.1 and related explanation are amended as follows:

Policy 4.1.1 - Recognise the rights of resource users by only intervening in the use of land where it is justified to protect the environment and wider public interests in the environment.⁸

*With land ownership comes an expectation of the ability to reasonably develop and use the land. In a property owning democracy such as New Zealand, it is fundamental that the reasonable rights and expectations of private property owners are respected. This is reflected in Section 9 of the RMA, which enables people to use or develop land.*⁹

Notwithstanding these property rights, the Council can constrain such land use through rules in a regional or district plan. Under this policy, ~~t~~The Council can intervene in the exercise of private

⁸ Relates to 36.1 – K. Adams; 425.9 – Federated Farmers; 716.29 – Friends of NH and TB; 769.6 - Horticulture NZ; 1189.28 – TroNT.

⁹ Relates to 1090.4 - Ravensdown.

property rights where there is sufficient justification to do so to protect the environment and wider public interests in the environment.¹⁰ Even in these situations, the Council will seek to minimise the extent of regulation placed upon resource users. Generally speaking, resource users have a vested interest in sustaining the natural resources from which they extract an income. The Council can influence and guide the way in which resource use is undertaken by establishing clear and concise standards.

It is important to acknowledge that existing uses of land can continue under Section 10 of the RMA irrespective of the introduction of district rules to constrain the use. For this to apply, the use must be lawfully established and its effects must be the same or similar to those that existed prior to the introduction of the rule.

*The policy reflects that, At times, for example, where activities carried out on private land could adversely affect the wider environment,¹¹ it may be necessary for wider environmental ~~public~~ *interest*¹² considerations to prevail over individual expectations and land use may need to be controlled. In these circumstances, compensation to the land user is not payable under Section 85 of the RMA. The same section also provides the land user with the ability to challenge any provision of a plan on the grounds that the provision would render their land incapable of reasonable use. Section 86 of the RMA empowers the Council to acquire land with the agreement of the landowner and pay compensation for it.*

Policy 4.1.2 - Submissions and Assessment

Policy 4.1.2 reads:

Enable sustainable use of natural resources in the Marlborough environment.

Twenty-one submitters support the policy and either explicitly seek that it is retained or do not seek any changes to it.

Both Aquaculture NZ and MFA seek that the policy is amended to refer to the use “*and development*” of natural resources, as its inclusion would provide a clear reference to potential future use of the environment and in their view, is consistent with Section 5(2) of the RMA. Trustpower supports the addition sought, as it reflects, in their view, the direction provided in Section 5 of the RMA. Conversely, Clova Bay Residents Association and KCSRA state that the addition does not support or encourage sustainable management of the environment. I agree with the change sought, as in my view, it is not only the use but also development of natural resources that will contribute towards the success of the primary production and tourism sectors. I also note that reference to both use and development is consistent with the discussion in the second paragraph of the explanation. In relation to the opposing further submissions, given Section 5 of the RMA refers to managing development, as part of sustainable management, it is not clear how the addition sought does not align with sustainable management.

The following three submissions seek changes to essentially clarify the direction in the policy. Fish and Game raise concerns that the policy states that the sustainable use of natural resources should be enabled, yet the explanation talks about the prohibition of many uses unless these are provided for in the MEP or by resource consents. They consider that this creates a disconnect between the policy as drafted and its explanation. They seek that either the policy is amended to better reflect the intent of the explanation, or that an additional separate policy is included. However, no alternate wording is provided. Friends of NH and TB support the policy but consider that its scope is too wide. They seek that the policy is extended to add: “*by including permitted activity rules where adverse effects are no more than minor, taking into account cumulative effects*”. They consider this is consistent with the explanation to the policy and with Method 4.M.3. Ravensdown seek that the policy is amended to enable use (rather than “*sustainable use*”), and with the addition of “*while managing any adverse environmental effects.*” This is on the basis that while they support the enabling intent of the policy, the purpose of the RMA is to promote the sustainable management of natural resources through managing effects.

¹⁰ Consequential amendment.

¹¹ 1042.1 - Port Underwood Association; 845.1 - K. R. & S. M. Roush.

¹² Consequential amendment.

It is my view that these submitters identify that the policy, on its own, provides limited guidance. My understanding, from the policy explanation, is that the intention is to enable natural resource use where it is considered sustainable. What is considered 'sustainable' is reflected in the MEP provisions as follows: permitted activity status for natural resource use that has no more than minor effects; consideration on a case-by-case basis through the resource consent process beyond this; further definition in the MEP through policies specific to various resources; and in some cases, the use of an allocation framework. I therefore recommend that the policy is extended to provide greater detail on this.

MFIA submit that there is a disconnect between the policy and the permitted activity and performance standards, and seek that the resultant regulation should be in alignment with the policy. I agree in principle that the policies within the MEP need to be implemented through the rules and if there is such a disconnect then either the rules need to be reconsidered, or the policy amended, so that they are aligned to best achieve the MEP's objectives. As the submitter has not sought a change to the policy I do not recommend changes in relation to this submission.

With regard to the explanation to the policy, Dairy NZ seek that the first paragraph of the explanation is amended, as follows, to state the converse of the previous sentence: "*Where the adverse effects are considered minor and there is no potential for environmental effects, resources consents will not be required.*" Similarly, Pernod Ricard seek an addition to the second sentence of the explanation to state that access will be enabled "*without the need for resource consent*" where the effects of the use are no more than minor. TRoNT oppose the addition, as they consider that there may be instances where the adverse effects of an activity are minor but would still impact on Ngai Tahu values, which require management or assessment. In my view, the additions sought by both Dairy NZ and Pernod Ricard are not necessary, as they duplicate what is already clearly set out within in the paragraph.

Friends of NH and TB seek that reference to "*coastal space*" in the explanation are amended to refer to the "*coastal marine area*" to more accurately reflect the effect of Section 12 of the RMA. I agree that this change is appropriate. NZTA seek changes to the explanation to more accurately reflect the RMA. I agree that these changes are appropriate.

Port Underwood Association seek that the following sentence is added to the first paragraph of the explanation "*To ensure natural resource sustainability long-term consents (over 20 years) should not be granted in public places*". This is opposed by 14 further submitters on the basis that 20 years is the statutory minimum under the RMA and prescribing the minimum as a maximum creates inefficiencies. They further consider that consents for greater periods than 20 years provide greater certainty for businesses and are often justifiable. In my view, it is not appropriate to make a statement such as that sought by the submitter, in an explanation. In my experience, if the Council want to set such a direction within a plan, this is usually and more appropriately done at a policy level. In my view, there has to be sufficient reason and support for such limitations to be set out within a policy, and this would more usually relate to environmental effects of an activity, not to where the application relates. Although I am unclear what statutory timeframes are referred to by the further submitters, I agree that longer consent periods provide greater certainty and can be justified, but this needs to be considered alongside other factors. Overall, I do not recommend that this addition is made, nor that it is included as a policy.

Recommendation

I recommend that Policy 4.1.2 is amended as follows:

Policy 4.1.2 - Enable sustainable use and development¹³ of natural resources in the Marlborough environment, including through the use of allocation frameworks, and permitted activity rules and standards where no more than minor effects are anticipated.¹⁴

Many uses of ~~the coastal space~~ the coastal marine area¹⁵, river beds, air and water resources are ~~prohibited~~ restricted¹⁶ unless allowed by a rule in a regional plan or by resource consent (see Sections 12 to 15 of the RMA). As a principle, the Council will continue to enable access to natural resources where

¹³ 401.16 – Aquaculture NZ; 426.16 - MFA.

¹⁴ 509.17 - Fish and Game; 716.30 – Friends of NH and TB; 1090.5 - Ravensdown.

¹⁵ 716.30 – Friends of NH and TB.

¹⁶ 1002.7 – NZTA.

the subsequent use of those resources has no more than minor adverse effects on the immediate or surrounding environment. This will be achieved through the use of permitted activity rules, including conditions where appropriate, avoiding the need for resource consent. Where the adverse effects are considered potentially¹⁷ more than minor or where there is potential for cumulative effects, then resource consents will be required. Policies throughout the MEP help define sustainable resource use.

The use of allocation frameworks for the coastal space-marine area¹⁸ and freshwater will also assist to enable the sustainable use and development of these natural resources. These frameworks will provide certainty about the quantities and/or locations of resources available and the circumstances in which they may be used and developed.

Policy 4.1.3 – Submissions and assessment

Policy 4.1.3. reads:

Maintain and enhance the quality of natural resources

Eight submitters support the policy and either explicitly seek that it is retained or do not seek any changes to it.

Aquaculture NZ and MFA seek that the policy is deleted. This is on the basis that it duplicates Section 7(f) of the RMA, and in their view, is inherent in Policy 4.1.2. I note that Section 7(f) of the RMA relates to the quality of the environment, whereas this policy is specific to the quality of natural resources. It is my view that the policy helps to ensure that appropriate regard has been given to the direction in Section 7(f) and that this more specific policy is an important component of the achievement of Objective 4.1. In particular, Policy 4.1.1 is focussed on limiting intervention in land use, in order to assist in the success of the primary production and tourism sectors. Policy 4.1.2 similarly seeks to enable the use of natural resources, again, so as to assist in the success of these sectors, while also ensuring that the use is sustainable. Policy 4.1.3 is more particularly focussed on the “*sustainability of natural resources*” component of Objective 4.1, providing further detail that it is the maintenance or enhancement of their quality, that is to assist in ensuring that this resource base is sustained, contributing in turn to the success of the primary production and tourism sectors that rely on this base. I have considered whether this component of Policy 4.1.3 is better combined with Policy 4.1.2, but in my view, it is more appropriate to keep them separate. This is because Policy 4.1.2 is more directed at provisions within the MEP that relate to natural resource use, whereas Policy 4.1.3 guides provisions that relate to activities that can affect natural resources. I consider this is an important distinction that should be retained and is necessary to achieve Objective 4.1.

Totaranui Ltd seek that the policy is modified (or an additional policy provided) to the effect of requiring the maintenance of the quality of natural and physical resources so as to protect the continuing viability of production activities in the coastal marine area. This is related to the general concern raised in their submission regarding the MEP excluding aquaculture provisions. It is my view that such a change is not appropriate. This is because the current policy already requires the maintenance of the quality of natural resources, and this is aimed at assisting in the success of all primary production activities. In my view, it is not appropriate to limit this to primary production activities in one particular area; nor is it necessary to have another policy relating to this when this is already covered by the current policy.

DairyNZ, Ravensdown and Fertiliser Association seek that the policy is amended to read maintain “or” enhance, rather than maintain “and” enhance. Dairy NZ consider that “*maintain and enhance*” is confusing and that “or” better aligns with the terminology used in Objective A2 of the NPSFM which requires maintenance or improvement in relation to freshwater quality. Similarly, Fertiliser Association consider it is not possible to both maintain and enhance. Ravensdown also seek that the policy is amended so that enhancement is limited to “*where degraded*”, and similarly, Fertiliser Association seek its limitation to where degraded by human activity, although an explanation of this is not provided. Ravensdown’s view is that enhancement should only be required where the quality of the natural resource is degraded. Related to this, Federated Farmers supports the intent of the policy, and supports the enhancement of the quality of resources where there is a community desire for this, and subject to the costs and benefits of such

¹⁷ 1002.7 – NZTA.

¹⁸ 716.30 – Friends of NH and TB.

enhancement having been weighed up. As such they seek the following amendment to the Policy: "Maintain and, where there is community desire and costs and benefits are balanced, enhance the quality of natural resources."

I agree that it is more appropriate and provides greater clarity to amend the policy to refer to maintaining or enhancing. In terms of the various options put forward by submitters as to whether further direction should be given on when enhancement is appropriate, my concern with requiring this where such resources have been degraded, is that there may be times where maintenance is still the most appropriate course of action, for example, because the benefits of enhancement are outweighed by the costs. Conversely, there may also be times where, in order to achieve Objective 4.1, enhancement of the quality of a natural resource is justified, even when it has not been degraded. For example, various actions can be undertaken to enhance the quality of soil to increase its productive use. In my view, the additions sought by Federated Farmers, while important considerations in when enhancement might be the more appropriate course of action, are not the only consideration, and the policy should not be limited to these. In addition, I am unsure what is meant by benefits and costs being "balanced" and while I agree that they should be taken into account, the direction in Section 32 of the RMA is simply to consider costs and benefits of any approach. Given that this policy sits at a high level, it is my view that it is appropriate to retain the broad direction in relation to maintaining or enhancing without prescribing when this is to occur. This allows for consideration of when enhancement is appropriate to be determined in relation to a specific resource use.

TRoNT supports the intent of the policy but considers that further detail is required within it to improve its clarity and implementation. They therefore seek that the following is added to as follows:

"Maintain and enhancement the quality of natural resources, recognising and reflecting:

a) That a precautionary approach may be required to maintain the quality of natural resources.

b) The intergenerational needs for the quality of natural resources.

Trustpower oppose the additions, stating that a precautionary approach is already built into the policy and rule framework of the MEP and the additions proposed provide no greater direction. It is my view that the additions sought do not actually provide additional clarity to the policy. As with the comments above, I consider that while these are factors that may be appropriate to consider when determining the approach to maintenance or enhancement of any natural resource, these are not the only factors and including them in the policy might therefore unnecessarily limit the focus of consideration to these alone. In my view, this is therefore not more appropriate for assisting in the achievement of Objective 4.1.

Recommendation

I recommend that Policy 4.1.3 is amended as follows:

Policy 4.1.3 - Maintain ~~and~~ or¹⁹ enhance the quality of natural resources

New policies – Submissions and assessment

Aquaculture NZ and MFA seek that three new policies are added (4.1.1A, 4.1.2A and 4.1.2B) within the section.

The first new policy, which is also sought by the Group 1 submitters, is to recognise existing uses of natural and physical resources. They consider that existing uses should be brought through into the MEP and that where it is necessary or desirable to curtail those uses, that the production resulting from the existing use should be able to be maintained. This is opposed by Omaka Valley Group, to the extent that what is sought is seeking to over-ride the process of consent renewals. As noted earlier in relation to other submitters, I do not agree with changes to extend the policies to include management of physical resources, as this is not in line with what Objective 4.1 is seeking to achieve. Further, it is not clear to me exactly why this new policy is sought, and in particular, why there needs to be a separate policy relating to existing uses of natural resources, given that the policies within this section already address this. I also have concerns that the type of policy sought might conflict with the requirements of Section 20A of the RMA, which details how existing activities are affected by new rules introduced within regional plans. Overall, I therefore do not consider the policy is appropriate, or necessary to achieve Objective 4.1.

¹⁹ 676.17 – Dairy NZ; 1090.6 – Ravensdown; 1192.4 – Fertiliser Association.

The second new policy sought is to allow for experimentation and innovation where there are sufficient controls to appropriately manage adverse effects. They state that research and development is valuable and should be encouraged. Again, it is not clear to me how this matter is not covered more broadly by the existing policies.

The third new policy is to “*Allow for development where it will achieve a net improvement in sustainability or efficiency by: (a) offsetting effects; (b) compensating for effects; or (c) substituting one use for another*”. They state that seeking an overall net improvement is consistent with the purpose of the RMA and that the probability of offsetting or compensation being effective should at least be as likely as the probability of the adverse effect. Trustpower supports this, stating that offsetting and compensation may be appropriate mitigation measures in some circumstances and should be reflected in the MEP. Clova Bay Residents Association and KCSRA oppose the new policy, on the basis that it adds too much uncertainty and elevates development by reference to vague criteria. It is my view that this policy is not appropriate, as there may be developments that will achieve a net improvement in sustainability or efficiency, but which have adverse effects that are otherwise inconsistent with the direction in the MEP. In my view, a blanket direction to allow for such development without consideration of factors other than sustainability or efficiency is not appropriate and will not ensure achievement of the MEP’s objectives.

TRoNT seek that a new policy and corresponding explanation is included, after Policy 4.1.3, as follows: “*Integrate management of natural and physical resources within the Marlborough District.*” This is sought on the basis that the introduction and background text for the MEP places a lot of emphasis on the integrated management of natural resources, and they consider that there is a need to pull this into the MEP itself. I note that the policy and explanation are largely the same as Policy 4.3.1, except that the policy sought by the submitter would apply to the whole district, whereas Policy 4.3.1 is specific to the Marlborough Sounds area. It is my view that Policy 4.3.1 is specific to achieving the overarching objective related to a particular area – being the Marlborough Sounds. Objective 4.1 however, while being broader in reach across the district as a whole, is particularly focussed on the management of natural resources, and the interrelationship between natural resource use and the economic and social wellbeing of the district, particularly in relation to primary industry and tourism and their reliance on natural resource use. While I agree that integrated management of natural and physical resources across the district is an important part of achieving the RMA, it is my view that this is addressed in various ways across the MEP, and that the blanket policy sought in this section is not necessary to achieve Objective 4.1, which has a narrower focus. As such, my view is that the policy would not assist in achieving Objective 4.1.

In summary, I have not recommended that any of the additional policies sought by various submitters be included in this part of Chapter 4.

Methods – Submissions and assessment

Of the submissions made on the methods relating to Objective 4.1 and its supporting policies, the majority of these are in support of one or more of the methods proposed.

QCSRA question, in relation to the use of “*zoning*” as a method (4.M.1), whether some of what was Rural in the Marlborough Sounds is now zoned Coastal Living, and ask whether this reduces primary production allowance for that land and associated activities. As the submitter does not appear to seek any change to the methods proposed, I am unable to recommend a change in relation to this. I note that if submitters have concerns that any proposed zoning does not align with the direction in this chapter, this is best addressed at the time that zoning is considered.

In relation to Method 4.M.4 which relates to Guidelines, Awatere WUG seek that rather than the final sentence stating that the Council will “*rely on*” resource user groups to implement the guidelines, this should be amended to refer to the Council supporting such groups. They consider that reliance on resource user groups abdicates responsibility, and that to be effective, the Council needs to endorse and actively support the use of guidelines alongside resource user groups. Pernod Ricard agree with this change, stating that the Council should not abdicate its responsibilities in relation to implementation of guidelines. Similarly, Irrigation NZ seek that it is amended to refer to supporting “*industry good organisations*” and user groups. I agree with these submitters as in my view, the methods of implementation should be focussed on the action that the Council will undertake to implement its plan. As such I recommend that the method is amended to refer to

the Council supporting, rather than relying on, industry and resource user groups, to implement the guidelines.

Te Runanga o Toa Rangatira seek that the methods relating to Objective 4.1 and supporting policies are amended to include that all applicants should consult iwi if the area is within a statutory acknowledgement and that an accidental discovery protocol and iwi monitor may be requested due to the cultural significance of the area. This is supported by Te Atiawa o Te Waka-a-Maui Trust, insofar as the change applies broadly to iwi. It is my view that this method does not relate to the implementation of this particular chapter of the MEP and should not be included.

TRoNT seek that an additional method is added relating to working with tangata whenua iwi and educators to encourage education programmes about environmental issues and sustainable use, including traditional Maori perspectives. They consider that education is one of the most effective means of promoting sustainable use of resources and an understanding of different perspectives on the environment. It is my view that this method does not relate to the implementation of this particular chapter of the MEP and is much broader. Further, my view is that this is a matter that more appropriately sits outside the MEP and something that the Council may wish to think about in terms of its LTP.

Federated Farmers seek that a new method is added as follows: “*Council will resource priority catchments enhancement projects that develop partnerships between industry, resource users in the catchment.*” It is unclear how this relates to the implementation of this particular chapter of the MEP.

Recommendation

I recommend that methods 4.M.1, 4.M.2, 4.M.3 and 4.M.5 are retained as notified.

I recommend that method 4.M.4 is amended as follows:

4.M.4 Guidelines

The Council will make extensive use of guidelines to assist resource users to carry out their activities according to best practice for environmental outcomes. Guidelines will be developed in consultation with resource users and groups that represent their interests. The Council will ~~rely on~~ support industry and²⁰ resource user groups to implement the guidelines.

²⁰ 548.6 – Awatere WUG; 778.8 – Irrigation NZ.

Issue 2 - Management of regionally significant infrastructure

Overview of Provisions

This assessment relates to Issue 4B, Objective 4.2, Policies 4.2.1 and 4.2.2 and 4.1.3 and Methods 4.M.6 - 4.M.10.

This package of provisions relates to the operation of regionally significant infrastructure and the importance of this for the social and economic wellbeing and health and safety of the Marlborough community. This is expressed through the overarching Objective 4.2, which seeks the efficient, effective and safe operation of regionally significant infrastructure. Policies 4.2.1 and 4.2.2 support the achievement of this outcome through identifying what infrastructure is regionally significant and recognising the social, economic, environmental, and health and safety benefits from it; and seeking to protect this infrastructure from the adverse effects of other activities. These policies are to be implemented through five methods, being identification of the electricity transmission network, zoning provisions, designations, district and regional rules, and affected party status. As with all provisions within this chapter, the objective and policies are RPS provisions.

The assessment of submissions on these provisions has been undertaken as follows:

- Overarching submissions, and submissions on Issue 4B, Objective 4.2 and Policy 4.2.1
- Policy 4.2.2
- Methods

Overarching submissions and submissions on Issue 4B, Objective 4.2 and Policy 4.2.1 – Submissions and Assessment

Because of the interrelated nature of a number of submission points received on various provisions within this topic, this section of the report assesses submissions made on Issue 4B, Objective 4.2 and Policy 4.2.1, and any overarching submissions which seek changes to a number of provisions within this chapter (including additional provisions sought), which relate to the same underlying principle. The assessment is therefore grouped where possible by issue, rather than by provision. Submission points on a particular provision that are not related to one of the wider issues identified are then addressed individually at the end of this section.

Issue 4B is:

The social and economic wellbeing, health and safety of the Marlborough community are at risk if community infrastructure is not able to operate efficiently, effectively and safely.

The explanation to the issue goes on to explain that infrastructure is a regionally significant physical resource upon which the community relies to function, and that as such, there is a need for it to be able to be operated efficiently, effectively and safely on an on-going basis, to provide for the community's continued well-being. It further explains that other activities can affect existing infrastructure, and that reverse sensitivity effects can arise from the effects of infrastructure on surrounding land uses.

Objective 4.2 reads:

Efficient, effective and safe operation of regionally significant infrastructure.

Policy 4.2.1 seeks to "Recognise the social, economic, environmental, health and safety benefits from the following infrastructure, either existing or consented at the time the Marlborough Environment Plan became operative, as regionally significant." It then goes on to list infrastructure recognised in the MEP as regionally significant.

Six submitters support the issue statement and either explicitly seek that it is retained or do not seek any changes to it. Five submitters support Objective 4.2 and either explicitly seek that it is retained or do not seek any changes to it. Two submitters support Policy 4.2.1 and seeks its retention.

Should the provisions be RPS provisions only?

Transpower seek, consistent with the approach taken to giving effect to the NPSREG, that Objective 4.2 and related policies are stated as also being regional plan, regional coastal plan and district plan provisions, as well as RPS provisions. I note that all the provisions within this chapter are stated as being RPS provisions only, including those relating to this topic. It is my understanding that this is the case because these provisions are intended to provide the type of high-level overarching direction that is implemented at a more fine-grained level through other provisions within the MEP. It is my view that the overarching objective is intentionally focussed at responding to a regionally significant issue and that it is appropriate to retain this as an RPS provision. However, in relation to the policies, it is my view that in absence of these also being regional, coastal and district-level provisions, there is a potential gap between the over-arching guidance within this chapter, and the specific rules intended to implement them, because there are no finer grained policy provisions relating to all the items of infrastructure identified, particularly network utilities. As such, I recommend that policies 4.2.1 and 4.2.2 are stated as being RPS, district, coastal and regional provisions.

Should the provisions cover regionally significant infrastructure, nationally significant infrastructure, or all infrastructure?

Chorus and Spark raise concerns that throughout the MEP there is reference to “*Regionally Significant Infrastructure*”. They consider that all infrastructure is of regional significance, as it allows people, businesses and communities of the region to undertake their day to day lives in a safe and efficient manner, which contributes to wellbeing and health and safety, in line with Part 2 of the RMA. They consider that there is no planning need to determine what “*regionally significant infrastructure*” is and that instead the MEP should simply refer to “*infrastructure*”. Consistent with this, they therefore seek changes to the explanation to Issue 4B, Objective 4.2, Policies 4.2.1 and 4.2.2 and Methods 4.M.7, 4.M.8 and 4.M.9. This is opposed in a further submission by NZTA who does not agree that all infrastructure is equal and that the distinction regarding what is regionally significant should be maintained. Port Clifford also oppose removal of the distinction for regionally significant infrastructure, as they consider that “*the provisions enabling regionally significant infrastructure are important to provide for the operation and development of essential services that may not otherwise meet the restrictive policies in the PMEP*”.

I note that the provisions within this chapter are RPS provisions (notwithstanding my recommendation above that the policies are also district, regional and coastal), and under Section 62(1)(a), the resource management issues identified in an RPS must be those of significance for the region. In my view, it is implicit that the objectives within an RPS, which respond to those issues, must also be of regional significance. In my view, as reflected in the further submission of NZTA, not all infrastructure is likely to be regionally significant, and as such, the issue, objective and supporting provisions are correctly limited to infrastructure that is of regional significance.

Related to the above, Chorus and Spark seek changes to the explanation to Issue 4B to identify telecommunications as nationally important. Port Marlborough support this, and further consider that the port infrastructure at Picton is also nationally significant. While explaining why they consider that the telecommunications network is nationally important, Chorus and Spark also raise concerns that there is no real planning benefit to identifying whether infrastructure is regionally or also nationally significant. It is my view that the purpose of this part of the explanation is to identify that while all of the infrastructure identified in Policy 4.2.1 is regionally significant, some of it is also nationally significant. The explanation includes some examples, but does not attempt to define (nor, in my view, is there a need to) what infrastructure is also nationally significant. My preference is to retain the explanation as it currently is, with the two or three examples given. An alternate would be to remove the examples and amend the sentence to read simply “*Some infrastructure also has national importance.*”

Transpower seek changes across a number of provisions within this topic, to include reference to both regionally, as well as nationally significant infrastructure. I note that the issue explanation already states that some infrastructure within the District is also of national importance. In my view, the further and repeated additional references to nationally significant infrastructure sought by the submitter are not necessary, because infrastructure that is of national importance will also be of regional significance (and as such is already covered by the provisions), and therefore the additions create duplication that I do not consider is necessary.

Application of the provisions to the development of new regionally significant infrastructure

Transpower seek changes across this topic, and particularly in relation to Issue 4B and Objective 4.2, to extend the provisions to the development of new, and upgrade of existing, regionally significant infrastructure. This is supported in further submissions by NZDF, who consider that the upgrading and development of regionally significant infrastructure should be allowed for and Port Marlborough, who consider this appropriate in providing for significant infrastructure. Transpower consider that Objective 4.2 fails to give effect to the NPSET, particularly Policy 2, because it does not contemplate the upgrade and development of the National Grid. In relation to Policy 4.2.1 they consider that by confining the policy to existing infrastructure, any new assets would not be considered regionally significant in the context of the MEP and that as such the benefits of these assets are not recognised and provided for, contrary to Policy 1 of the NPSET. They also consider that the limitations within the policy to existing infrastructure mean that it has little or no relevance to notices of requirement or resource consent applications for new regionally significant infrastructure. Related to this, in the submitter's view, the policy framework recognises the significance of the National Grid, but does not enable or provide for it in a way that aligns with the Objective and Policies 2 and 5 of the NPSET. They seek the inclusion of the following additional policy "*Enable the operation, maintenance, upgrading and development of essential network utilities, including the National Grid, throughout Marlborough.*" They also seek a second additional policy, which mirrors Policy 18.1.3 (which relates to renewable energy generation), and is considered by the submitter to provide greater clarity and direction in terms of how the National Grid is recognised and provided for in the Marlborough context. Federated Farmers oppose the "*enabling*" of upgrading and development through the policy framework that is sought by Transpower, on the basis that replacement is of a different scale and can create significant adverse effects on landowners and neighbours.

NMDHB seek that the explanation to the objective is expanded to also refer to expansion of existing infrastructure, and that an additional objective is included which recognises the importance of the establishment of regionally significant infrastructure, on the basis that this also needs to be recognised and provided for. As a consequence of this, they consider that additional policies are required to implement these aims. They consider that the changes would provide recognition and certainty for existing and future operations, and in particular, for population growth. In a further submission, MFA agree with the extension of the objective to the expansion of existing infrastructure, on the basis that the objective should provide for change over time. Similarly, NZDF support the submission on the basis that it is appropriate to provide for the expansion of infrastructure where it is appropriate.

Port Marlborough seek that Policy 4.2.1 and its explanation are amended so that it is not restricted to infrastructure that is "*either existing or consented at the time the Marlborough Environment Plan became operative*". They are concerned that the policy is retrospective in nature and as such it is not enabling of upgrades, improvements and additional developments. They consider that this fails to recognise the dynamic nature of this infrastructure and that it may unnecessarily constrain its ongoing use and development. Similarly, NZDF seek the same change on the basis that the policy does not provide for future infrastructure facilities that may be established during the lifetime of the MEP. Marlborough Roads and NZTA seek that Policy 4.2.1 is amended to also refer to infrastructure "*authorised as a permitted activity, resource consent, or notice of requirement.*" This is on the basis that the recognition of benefits should not be limited to only infrastructure that is consented or exists at the time the MEP is made operative, but should include future infrastructure as well. This is supported by Port Clifford, on this basis that it ensures the benefits of new infrastructure will be recognised.

With respect to upgrading, I do not consider the addition of this is necessary, on the basis that the explanation to both Issue 4B and Objective 4.2 is clear that maintenance, upgrading and replacement is part of the ongoing operation of infrastructure.

Having considered the provisions within this section of the chapter and what they are aimed at achieving, it is my view that they are largely focussed on recognising the importance of existing infrastructure, and the need to provide for its ongoing operation (with operation encompassing maintenance, upgrading and replacement), including, in particular, protecting it from potential effects on it from other activities. The thrust is therefore largely about recognising, protecting, and appropriately managing what is already there. It is my view that if additional infrastructure is built or consented within the lifetime of the MEP, it is appropriate that it is recognised, protected and appropriately managed in the same way. For example, if the National Grid were to be extended, the land use and subdivision provisions which constrain particular land uses and subdivision should apply equally to the new infrastructure, as the same issue arises in relation to this. I therefore agree with the submitters that Policy 4.2.1 should not be limited only to infrastructure existing or consented at the

time the MEP becomes operative. The effect of this amendment is that any infrastructure which is listed in Policy 4.2.1 is appropriately recognised as being regionally significant, and managed accordingly, regardless of when it is established. In my view, this better achieves Objective 4.2, as it ensures that infrastructure of regional significance is appropriately recognised, in turn ensuring its ongoing operation.

It is my view that this change also largely addresses the concerns of these submitters regarding application of the provisions to the development of new infrastructure. I consider that the policy can be strengthened further, by extending it to recognise “*and provide for*” the benefits identified. These changes ensure that when a resource consent or notice of requirement application is being considered for new regionally significant infrastructure, regard will need to be had to its regional significance, and the necessity for the development in relation to providing for the efficient, effective and safe operation of the infrastructure. In my view, this is more appropriate than providing separate provisions relating to the development of new infrastructure. This approach also aligns with the explanation to Issue 4B which states “*Occasionally, new infrastructure may be required to provide for growth within the district.*” I recommend that a similar statement is added to the explanation to Objective 4.2 as well.

Notwithstanding the above, in relation to the National Grid I agree that it is necessary to provide more explicit guidance on the development of new National Grid infrastructure in order to give effect to the NPSET. In my view, the additional policy guidance should be limited to the National Grid, because the same circumstances (i.e. the national direction in the NPSET) do not arise in relation to the other infrastructure identified in Policy 4.2.1. Policy 2 of the NPSET explicitly requires that the effective operation, maintenance, upgrading and development of the electricity transmission network is recognised and provided for. This direction is tempered by Policies 3 – 8 of the NPSET, which provides specific direction on the management of adverse effects from transmission infrastructure and the transmission system. I note that these are generally replicated in the second policy proposed by Transpower, and in my view, such a policy is appropriate and ensures the NPSET is given effect to. I recommend slight changes to the wording to better reflect the direction in the NPSET, particularly in relation to Policies 7 and 8 of that document. In regard to the first additional policy sought by Transpower, my view is that it is not necessary, as it would largely duplicate Policy 4.2.1, as it is now recommended to be amended.

What should regionally significant infrastructure include?

Regionally significant infrastructure is currently defined in the MEP by way of a list within Policy 4.2.1. There are a number of submissions that seek changes to the provisions to treat other activities in the same or similar manner as proposed for infrastructure, or to extend what is defined as regionally significant infrastructure.

Fire Service seeks that various provisions within this section of the Chapter are amended to “*address the contribution that emergency services make to the health, safety and wellbeing of people and communities in Marlborough*”. In this regard, they seek: explicit reference to the role of emergency services in providing for the health and safety of the Marlborough community, in the same way that it does infrastructure, in the explanation to Issue 4B; an additional Objective that duplicates Objective 4.2, but in relation to emergency services rather than infrastructure; a new policy seeking to recognise the essential nature of emergency services through a range of methods; and a consequential change to Method 4.M.9.

NMDHB seek that the issue is amended to recognise healthcare services and facilities as regionally significant infrastructure, with these explicitly listed in Policy 4.2.1 and therefore identified as infrastructure that is regionally significant. This is on the basis that the issue does not reference the importance of these facilities and services to the social wellbeing and health and safety of the community. As a consequence of this they also seek that a definition is added for “*healthcare services and facilities*” which would include the Wairau Hospital, emergency services, general practices and community support services. In a similar vein, NMDHB further submit in support of the Fire Service’s submission, but seek that the additional provisions sought are extended to include healthcare services and associated facilities, given their equal importance to the health and safety and wellbeing of the Marlborough community.

I accept that emergency services, as well as healthcare services and facilities, are important to the social wellbeing and health and safety of the District. This is likely to be true for a number of facilities and services. However, in my view, whether this section of the MEP should be extended to include these types of facilities and services turns not on whether they are important for the District’s wellbeing and health and safety, but whether or not there is a regionally significant issue that relates to them.

In my view, there is a distinction between community facilities and services and the type of infrastructure and facilities that are identified in Policy 4.2.1 as regionally significant infrastructure. The latter are physical assets like roads, reticulated services, transfer stations, telecommunication facilities and so on. They largely reflect those things that are included in the definition of “*infrastructure*” within the RMA. A number of these are networks, with assets at multiple locations, or are a particular strategic asset in one location (e.g. airports, ports and transfer stations). The services that they provide to the community are not provided ‘in one place’, either because the assets are located in multiple locations and function as a network (e.g. electricity, roads, sewerage) or because the services are based in one location but the service provided extends beyond that (for example, collection of recycling undertaken throughout a township, and taken to a resource recovery centre). As a result of this, there is a particular need to ensure the integrated management of these activities. The nature of these activities, both in terms of the environmental effects they create, and in terms of potential for the effects of other activities to impact on them, means that appropriate direction and management under the MEP is required. The nature of these activities is also such that they do not generally “fit” well into traditional district plan zones.

It is my view that the above is not the case for healthcare services and facilities, which for the large part, are a type of activity contained within a building, with the services provided within that one building. Community facilities and services also do not fall within the RMA’s definition of infrastructure. As a result, the ability for these services to operate efficiently, effectively and safely is far less affected by the provisions in the MEP, and are more influenced by matters outside the Council’s functions under the RMA. In my view, the regional issue identified therefore does not apply to these services. I also note that the MEP already takes into account the provision of community facilities²¹ and in relation to the Wairau Hospital, I note that the activities on the site are managed as a scheduled site.²² In my view, this is a more appropriate way for the MEP to manage these types of facilities, than extending the provisions in this part of Chapter 4 to them.

In regard to emergency services, I do not agree that a separate RPS-level objective and policy is appropriate, as I do not consider elevating these services (on their own) responds to a regionally significant resource management issue. However, although these services do not fall within the RMA’s definition of infrastructure, I consider that the nature of the services and facilities is not dissimilar to that of some of the other infrastructure and therefore I consider that it might be appropriate to extend the infrastructure listed in Policy 4.2.1 to include emergency services. I consider that this is dependent on whether the same issues arise in the management of these services, that means they require this type of specific recognition and management, and the submitter may wish to provide evidence on this. For example, my understanding is that there is likely to be a similar need to protect emergency services facilities from the effects of other activities, including potential reverse sensitivity, to ensure it is able to continue to operate efficiently, effectively and safely.

The Group 2 submitters and B. Clarke seek that Issue 4B and Objective 4.2 are amended to recognise that regionally significant sectors are at risk if unable to operate efficiently and effectively. These submitters state that the landscape of the District is a good mix of use, development and conservation of natural resources. The submitters generally list a range of things that make up their vision of what Marlborough should look like, including factors such as employment and business security, good environmental factors and good quality Council services. The changes to Issue 4B and Objective 4.2 are sought on the basis that the MEP should acknowledge that aquaculture, farming, forestry and vineyards employ people and spread wealth, and that these sectors should be enabled to grow, while recognising and protecting the special qualities of the District. The Group 2 submitters also seek that Policy 4.2.1 is amended to add a list of areas of significant aquaculture and wine development. It is my view that the MEP already recognises the link between Marlborough’s social and economic wellbeing and these primary production activities through Issue 4A and Objective 4.1 and related policies. In my view, Issue 4B and related provisions are focussed on infrastructure, and extending these provisions to cover primary production activities, including through the listing of areas of significant aquaculture and wine development in Policy 4.2.1, is not necessary or appropriate.

Aquaculture NZ and MFA seek that Policy 4.2.1 is amended to specifically recognise infrastructure used for commercial purposes at Elaine Bay (Tennyson Inlet), Oyster Bay (Port Underwood) and Okiwi Bay (Croisilles Harbour). Similarly, the Group 1 submitters seek generally, in relation to Chapter 4, that the MEP specifically recognise this infrastructure. Federated Farmers are concerned that there are “critical items” that have not

²¹ For example, Policy 12.3.2 seeks to provide for appropriate community-based facilities to locate within residential environments where they meet a community need and are in keeping with the character and amenity of the zone.

²² Refer Volume 4, Appendix 16-3 – 16-4.

been identified as regionally significant infrastructure. They consider that irrigation and on-farm drainage schemes are important infrastructure, which provides the “*same degree of value*” to farmers as community stormwater networks do for urban residents, and therefore seek that it is added. Related to this, HortNZ seeks that infrastructure for irrigation be included within Policy 4.2.1 as, in their view, it is important to the region.

In my view, the primary benefits of the infrastructure identified by these submitters are private (i.e. benefits to landowners and owners of commercial businesses) and localised, and any benefits to the wider community are indirect. As such the issue identified does not arise in relation to these items of infrastructure; namely, the social and economic well-being and health and safety of the Marlborough community is not reliant on these individual items of infrastructure to the extent that specific intervention under the MEP is warranted. Nor do the same issues arise in terms of needing to manage such individual items of infrastructure on an integrated basis. Therefore, my view is that the provisions should not extend to identify these items of infrastructure as being regionally significant. In coming to this conclusion, I am cognisant that irrigation is included within the RMA definition of infrastructure²³. However, I am not certain that the identified issue (4B) arises to the same extent with irrigation infrastructure, as it does with the other infrastructure identified. In particular, I think the link between the community’s wellbeing and health and safety and the use of the other infrastructure identified is more direct (for example, access to electricity) whereas with irrigation infrastructure, the effects on wider community wellbeing are less direct. Even if the issue is valid for this type of infrastructure, I still consider there is a need to determine at what level/threshold it should be deemed to be of regional significance. My understanding is that the irrigation infrastructure in the District ranges from individual schemes (which benefit the individual) through to schemes in multiple ownership of various sizes (which benefit those landowners), and a larger community-owned scheme (the Southern Valleys Irrigation Scheme). The benefits associated with these schemes therefore range from individual benefits only, through to benefits to multiple owners and users. In my opinion, many of these benefits are therefore not of regional significance, but I accept that there may be a level at which some schemes tip into a level of regional significance. However, I am not currently in a position to determine where this level might be. I also note that the benefits from irrigation water (as opposed to irrigation infrastructure) are recognised in the provisions that address Issue 5C of the MEP. In my view, this appropriately reflects that it is not the infrastructure of itself, but the access to and use of the water that is the central management issue and focus within the MEP.

Irrigation NZ also seek that Policy 4.2.1 is amended so that it applies to all reticulated community water supply networks and water treatment plants, not limited to those operated by the Council. This is opposed in a further submission by TRoNT, who consider that supplies operated by the Council service the greater community need. Similarly, Federated Farmers consider that small community domestic water takes should be recognised by the policy, even when these takes are not operated by the Council. It is my understanding that non-Council operated water supplies are generally smaller and therefore the social and economic well-being and health and safety benefits are localised and not of regional significance. My view is that a useful threshold for significance might be that used in the NESDW, which sets out greater restrictions on other activities which may affect a supply that provides drinking water for 501 people or more. The Register of Drinking Water Suppliers²⁴ shows that non-Council operated schemes are all below this threshold, except for a supply at the Woodbourne RNZAF Base. However, I note that the Base is listed within Policy 4.2.1 as regionally significant in its own right. Therefore, in my view, the limitation to community water supply networks operated by the Council is appropriate, due to this reflecting the size of the schemes. I also note that this is linked to the earlier discussion regarding irrigation infrastructure. I have been advised that the reason behind limiting the policy to “Council” schemes was to avoid the potential for the policy to be interpreted as applying to any irrigation scheme. This relates to the definition of infrastructure under the RMA including water supply distribution systems, which in turn explicitly includes a system for irrigation. As such, my view is that if a change is made to this part of the policy to remove the reference to networks operated only by the Council, a definition should subsequently be included in the MEP for “*community water supply networks*”, to avoid such an interpretation. For example, the definition could link to provision of drinking water for 501 people or more.

Port Marlborough seek that reference to the Port of Picton and Havelock Harbour is extended to include Shakespeare Bay. However, the MEP already includes various references²⁵ which outline that the Port of

²³ Section 2(1) “...infrastructure, in section 30, means- ... (e) a water supply distribution system, including a system for irrigation”.

²⁴ <http://www.esr.cri.nz/assets/WATER-CONTENT/Images-and-PDFs/RegisterOfSuppliers-2017a.pdf>

²⁵ For example, Volume 1, Chapter 13 (Use of the Coastal Environment), in the Introduction to the “Ports and marinas” section, states “*The deep water port of Picton, which includes Shakespeare Bay...*”; the explanation to Policy 13.17.1

Picton is already inclusive of Shakespeare Bay, and the Bay is also within the Port Zone. As such, the change sought is not necessary.

NZDF seek that reference to the RNZAF Base at Woodbourne is extended to refer to “*and other defence facilities*”. My understanding is that this point is related to their concern that Policy 4.2.1 as notified was limited only to infrastructure existing or consented at time the MEP is made operative. While I have recommended the policy is amended so that it is not time restricted, I do not consider that the policy should be extended to include any future defence facilities, as it is not clear what this would and would not include, nor whether any facilities would qualify as being of regional significance. That is not to say that if further defence facilities were developed in future that these would not be of regional significance, rather that in my view, this cannot be predetermined at this time, and is best considered at the time the MEP is reviewed.

Fulton Hogan state that the issue correctly identifies the link between safe, efficient and effective infrastructure and the wellbeing of the Marlborough community and also support reference to the ability to maintain, upgrade and replace existing infrastructure without significant constraint. In their view, a “*significant part*” of this is ensuring that the materials needed for this are also available, such as aggregates. As such, they seek that the policies addressing Issue 4B are amended to cover more than just the existence of infrastructure but also to recognise and provide for the material and processes that contribute to its construction, operation and maintenance. In line with this, they seek the following additional policy: “*Recognise that the use of natural and physical resources is essential for the construction, operation and maintenance of community infrastructure.*” NZTA supports this, as it seeks to provide for material required to enable the construction, operation and maintenance of the state highway network.

Related to this, Simcox Construction Ltd notes that Policy 4.2.1 identifies “*Council administered flood defences*” as regionally significant infrastructure, but considers that the policies and objectives within this section of the Chapter should “*recognise that quarries are an essential part of flood protection*”, with quarries being of the few places providing the resources for flood protection. I note that the submitter has not identified the specific changes that are sought to the provisions. Omaka Valley Group consider that the submitter is seeking to have “*private quarries recognised as regionally significant infrastructure if they provide material for flood defences*”. They oppose this, stating that there is no basis for this recognition and noting that quarries are not normally identified at RPS level in this manner. They consider this would not allow for appropriate management of effects on the environment.

It is my view that there are likely to be a number of factors that influence the ability to maintain, upgrade and replace existing infrastructure, and that it is not appropriate to single out one particular aspect of this and prioritise it within this chapter of the MEP. In other words, the matter identified by both these submitters (provision of resources) is peripheral, rather than central to the issue. For completeness, I note that within the MEP, any provisions relating to a particular resource use will need to align with the objectives of the MEP, including, where it is of relevance, Objective 4.2. Overall, I therefore do not recommend any changes, including the additional policy sought by Fulton Hogan, to this section of Chapter 4.

NZ Forest Products seek that Policy 4.2.1 is amended so that transport infrastructure associated with primary industry is included as regionally significant infrastructure. This relates to their general view that the MEP should enable primary industry, and that this requires the provision of appropriate infrastructure to support it, which in turn should be enabled in the MEP. They state that these need to be enabled because the benefits that arise from such infrastructure “*can be far more widespread and significant than localised effects of the infrastructure.*” NZTA further submit in support, insofar as the road network is to be included as regionally significant infrastructure. TRoNT oppose this, on the basis that the district roading network is already included in Policy 4.2.1. In the absence of specific wording changes proposed by the submitter, it is my view that no changes are required to Policy 4.2.1, as the policy already identifies the road network as being regionally significant infrastructure.

Implications of provisions on land owners

K. & J. Wills seek, in relation to Objective 4.2, that “*objectives and policies be included in the Plan that recognise the effect that Rules 5.2.1.18 and 24.3.1.5 may have on residential activities, development and subdivision and amenities and the location of any new or replacement lines and associated equipment, installations or facilities should be such that they do not present restrictions or effects on land used for and*

includes the following statement: “...the port in Shakespeare Bay (which is part of the Port of Picton)”; 13.M.24 states “A Port Zone is applied to land and water areas in Picton (including Shakespeare Bay)”.

zoned or otherwise identified or provided for use, development and subdivision for residential purposes.” They seek this on the basis that these provisions are necessary to reflect the direction of the NPSET for a balance to be achieved, including consideration of the effects of restrictions on the use of people’s private property. The submitter also states, in relation to their request, that objectives and policies should also apply to the location and operation of National Transmission Lines, Grids and Corridors so that decisions on where they are located avoids adversely affecting use and development of property for the purpose it is zoned for. The rules referred to by the submitter relate to requiring buildings or structures to be setback 90m from the designation boundary or secured yard of the National Grid Blenheim substation (Rules 5.2.1.18) and for subdivision of land within 90m of the substation, the subdivision would not be a controlled activity (24.3.1.5).

Similar to this, P F Olsen Ltd raise concerns that while regionally significant infrastructure is important, the objective could be perceived as implying that upgrading and replacement of existing infrastructure can be established without question, despite the impacts on private land use options being significant. They seek that the objective is amended to *“recognise that major changes to existing infrastructure that may impose significant costs or opportunity costs to third parties should consider matters of compensation.”*

I note that the Section 32 report has identified that there are costs associated with the objective (and ultimately with how it is implemented through the MEP’s policies and rules, such as those identified by K. & J. Wills,) in terms of limitations placed on activities near regionally significant infrastructure. This concluded that these costs are offset by the significant community benefit that arises through the existence of such infrastructure. I agree with this assessment in general, noting that when the Panel comes to consider the specific rules identified, further consideration will be required as to whether those rules are the most appropriate to achieve the MEP’s objectives and give effect to the RPS-level provisions, taking into account the costs and benefits associated with them. I also consider that the ability to upgrade and replace existing infrastructure is not able to happen unconstrained as a result of Objective 4.2, as consideration of any particular resource consent application (or notice of requirement with respect to designations) would also need to consider other objectives within the MEP, including those relating more specifically to managing the adverse effects of activities. Therefore, I do not recommend any changes in relation to these submission points.

Other miscellaneous submission points

The following submitters seek changes to Issue 4B, Objective 4.2 and/or Policy 4.2.1 that do not fall within the topics identified above:

- A.M. & L.M. Campbell Family Trust agree with the aims of Issue 4B but question if the Council’s actions meet these aims, especially in relation to various rural water supplies. As no change is sought to the issue, I do not recommend any changes in relation to this submission.
- Chorus seek minor changes to the Issue explanation to remove reference to *“strategic”* infrastructure. I agree with this change, as introducing another term (in addition to significance) lacks clarity.
- Transpower consider that Issue 4B is *“unduly constrained”* through its reference to *“community”* infrastructure and seek its deletion. Related to the earlier discussion, I consider some reference to the type of infrastructure to which the provisions apply is helpful (i.e. that which primarily serves the community, rather than primarily serving a private interest). However, I tend to agree that the reference to *“community infrastructure”* is not the most accurate reflection of what this section relates to, nor is it a term that is used within the provisions itself. I therefore recommend that the reference is changed to *“infrastructure serving the community”*.
- Transpower are concerned that the explanation to Issue 4B understates the national significance of the National Grid and seek the inclusion of several sentences outlining the existence of, and direction in, the NPSET. In my view, the additions sought to be added by Transpower simply provide statements about the NPSET, but do not assist in helping to explain the particular issue. As such, I do not recommend their inclusion in the issue explanation. However, I consider they provide helpful explanation that is appropriate to include under the recommended new policy.
- Marlborough Roads and NZTA seek that the explanations to Issue 4B and Objective 4.2 are amended to include reference to *“operation”*, alongside maintenance, upgrading and replacement. NMDHB also seeks this additional reference to operation in the explanation to Objective 4.2. While I agree with the principle behind what is sought, in my view these changes are not necessary, as in both cases, the previous sentence explicitly talks about the importance of being able to operate efficiently, effectively and safely. The next sentence, which refers to the ability to maintain, upgrade and replace infrastructure, is an expansion of what is meant by *“operation”*, and further reference to

operation would therefore not make sense in this context. Because of this, I do not consider that the related change sought by Marlborough Roads and NZTA to the explanation to Method 4.M.9 is necessary.

- Marlborough Roads and NZTA seek that Objective 4.2 is amended to recognise that the resilience of significant infrastructure is a key issue. I agree with the principle of resilience being important for the ongoing operation of regionally significant infrastructure. However, in my view, resilience is part of effectiveness and therefore does not need to be added to the objective. If the Panel is of a view that resilience does not fall within what is effective operation of such infrastructure, then I would agree with amending the objective as sought.
- Marlborough Roads and NZTA also seek that the explanation to the objective is extended to refer to infrastructure having been developed to protect and support the population “*and economy*”. In my view, this addition does not align with the terminology in Section 5 of the RMA, which is focussed on enabling people and communities to provide for their economic wellbeing (rather than providing for “the economy”). As such my view is that the current wording, which refers to protection and support of the population, and already encompasses support for the population’s economic wellbeing, is more appropriate than the addition sought.
- Chorus and Spark seek amendments to simplify the reference to telecommunications facilities and radiocommunications facilities within Policy 4.2.1, rather than referring to “*strategic*” facilities and including reference to the relevant Acts which purportedly define these. This is on the basis that these Acts do not define “strategic” facilities, and these facilities are already defined in the MEP. I agree that the references should be amended because there are no such definitions (i.e. for “*strategic telecommunications facilities*” or “*strategic radiocommunications facilities*”) within the Acts referred to. In addition, “*facilities*” are not defined in these Acts. My preference, rather than referring to “*facilities*” is to use the wording from the definition of infrastructure within the RMA, which refers to telecommunications and radiocommunications networks.
- Marlborough Roads and NZTA raise concerns, in relation to Policy 4.2.1, that it is not clear whether the “*district roading network*”, which is not defined, includes the State Highway network. They consider that reference to “*road network*” is more appropriate as it is a term frequently used within the MEP and seek that a definition for this is included, which would include State Highways. In my view, reference to “*road network*” is more consistent with the terminology used elsewhere in the MEP, particularly in Volume 1, Chapter 17 (Transportation) and I recommend this change. As a consequence of this, the same change is recommended to the explanation to Objective 17.4. However, I do not consider that a definition of “*road network*” is necessary as this is self-evident in the context of Chapter 17, which contains the provisions which give effect to this component of Policy 4.2.1.
- Marlborough Roads and NZTA seek that a definition is included for “*regionally significant infrastructure*”. In my view, this is not necessary because the policy itself (4.2.1) already defines this. The definition sought essentially just repeats Policy 4.2.1 in any case and therefore results in unnecessary duplication.
- Federated Farmers seek that Policy 4.2.1 is amended so that the list of regionally significant infrastructure is included in an appendix. In my view, given that the list is relatively brief, there is little benefit in moving it to an appendix and it is better retained within the policy.

Recommendation

I recommend that Issue 4B and its explanation is amended as follows:

Issue 4B – The social and economic wellbeing, health and safety of the Marlborough community are at risk if community infrastructure servng the community²⁶ is not able to operate efficiently, effectively and safely.

We rely on a range of physical resources to allow our communities to²⁷ function on a day-by-day basis. These resources include the water, stormwater and waste disposal services provided to townships and small settlements; the transport links within Marlborough and connecting Marlborough to the remainder of the country; the provision of electricity and telecommunications; and, on the Lower Wairau Plain, the drainage of land. Collectively, this infrastructure is regionally significant due

²⁶ Relates to 1198.2 – Transpower.

²⁷ Minor amendment.

to the contribution it makes to our social and economic wellbeing, health and safety. Other infrastructure in (e.g. RNZAF Base Woodbourne) or running through Marlborough (e.g. the National Grid and state highways) also has national importance. It is important that this ~~strategic~~²⁸ infrastructure is able to operate efficiently, effectively and safely on an ongoing basis for community wellbeing. The ability to maintain, upgrade and replace existing infrastructure without significant constraint is important in this respect. ~~Occasionally~~ Additionally, new infrastructure may be required to provide for growth within the district and it is also important that this can be developed efficiently, effectively and safely²⁹.

...

I recommend that Objective 4.2 is retained as notified.

I recommend that the explanation to Objective 4.2 is amended as follows:

The community relies on the considerable infrastructure that has been developed to protect and support the population. It is essential for the social and economic wellbeing, health and safety of the Marlborough community that this critical infrastructure continues to operate efficiently, effectively and safely on an ongoing basis. This includes the ability to maintain, upgrade and replace existing infrastructure and may include the development of new infrastructure³⁰.

I recommend that Policy 4.2.1 and related explanation are amended as follows:

Policy 4.2.1 – Recognise and provide for³¹ the social, economic, environmental, health and safety benefits from the following infrastructure, ~~either existing or consented at the time the Marlborough Environment Plan became operative,~~³² as regionally significant:

- (a) reticulated sewerage systems (including the pipe network, treatment plants and associated infrastructure) operated by the Marlborough District Council;***
- (b) reticulated community stormwater networks;***
- (c) reticulated community water supply networks and water treatment plants operated by the Marlborough District Council;***
- (d) regional landfill, transfer stations and the resource recovery centre;***
- (e) National Grid (the assets used or owned by Transpower NZ New Zealand³³ Limited);***
- (f) local electricity supply network owned and operated by Marlborough Lines;***
- (g) facilities for the generation of electricity, where the electricity generated is supplied to the National Grid or the local electricity supply network (including infrastructure for the transmission of the electricity into the National Grid or local electricity supply network);***
- (h) a network, for the purpose of telecommunications, as defined in section 5 of the Telecommunications Act 2001, or the purpose of radiocommunications, as defined in section 2(1) of the Radiocommunications Act 1989~~strategic telecommunications facilities, as defined in Section 5 of the Telecommunications~~***

²⁸ 464.4 – Chorus; 1158.2 - Spark.

²⁹ Relates to 1198.3 – Transpower.

³⁰ Relates to 280.7 – NMDHB; 433.7 – Port Marlborough; 1198.5 - Transpower.

³¹ 1198.5 – Transpower. Also relates to 425.16 - Federated Farmers

³² 433.7 – Port Marlborough; 967.4 – Marlborough Roads; 992.4 – NZDF; 1002.9 – NZTA; 1198.5 - Transpower.

³³ 1198.5 – Transpower.

~~Act 2001, and strategic radiocommunication facilities, as defined in Section 2(1) of the Radiocommunications Act 1989³⁴;~~

- (i) **Blenheim, Omaka and Koromiko Airports;**
- (j) **main trunk railway line;**
- (k) **district roading³⁵ network;**
- (l) **Port of Picton and Havelock Harbour;**
- (m) **Picton, Waikawa and Havelock marinas;**
- (n) **RNZAF Base at Woodbourne; and**
- (o) **Council administered flood defences and the drainage network on the Lower Wairau Plain.**

The policy identifies infrastructure considered regionally significant due to its contribution to the social and economic wellbeing or health and safety of a large proportion of Marlborough's population, or because of its strategic importance nationally. These benefits will be taken into account when developing district and regional rules and when considering resource consent applications, notices of requirement and plan change requests. This policy recognises the significance of the infrastructure whether it is existing or consented at the time that the MEP becomes operative, or developed subsequently.³⁶

I recommend that an additional policy (Policy 4.2.3) is included as follows:

When considering the environmental effects of National Grid activities, to have regard to:

- (a) the national, regional and local benefits of sustainable, secure and efficient electricity transmission;**
- (b) the technical and operational requirements that constrain measures to avoid, remedy or mitigate adverse effects;**
- (c) the extent to which any adverse effects have been avoided, remedied or mitigated by route, site and method selection;**
- (d) the extent to which existing adverse effects have been reduced as part of any substantial upgrade;**
- (e) the extent to which adverse effects on urban amenity have been minimised.**
- (f) whether adverse effects on outstanding natural landscapes, areas of high natural character, town centres, areas of high recreation value and existing sensitive activities, have been avoided.**

Central government has recognised the importance of electricity transmission through the National Policy Statement on Electricity Transmission (NPSET) which came into effect in 2008. The NPSET establishes that the need to operate, maintain, develop and upgrade the National Grid is a matter of national significance. The Objective of the NPSET is to recognise the national significance of the National Grid by facilitating its operation, maintenance upgrade and development while managing adverse effects of, and on, it. When considering an application for resource consent(s) or notice of requirement for National Grid activities the Council will have regard to the positive and adverse effects on the environment associated with the activity. This policy provides guidance on the matters that are relevant to this consideration, which reflects the particular direction in the NPSET.³⁷

³⁴ 464.6 – Chorus; 1158.4 – Spark.

³⁵ 967.4 – Marlborough Roads; 1002.9 – NZTA.

³⁶ Consequential amendment – 433.7 - Port Marlborough; 967.4 – Marlborough Roads; 992.4 – NZDF; 1002.9 – NZTA; 1198.5 - Transpower.

³⁷ 1198.3, 1198.8 – Transpower.

Policy 4.2.2 - Submissions and Assessment

Policy 4.2.2 reads:

Protect regionally significant infrastructure from the adverse effects of other activities.

Four submitters support the policy and either explicitly seek that it is retained or do not seek any changes to it.

Transpower seek that “*other*” activities is amended to refer to “*subdivision, use and development*” activities, to achieve greater consistency with Policies 10 and 11 of the NPSET. I note that the policy extends beyond direction in relation to the National Grid, and therefore careful consideration needs to be given to aligning the terminology used with that in the NPSET because of this wider application. That being said, my understanding is that the “*other*” activities referred to, and those managed within the MEP to implement this policy, are subdivision, use and development activities. As such, I agree with the change sought as it provides greater clarity as to what is intended.

Federated Farmers do not consider that it is always necessary or appropriate to protect infrastructure from the adverse effects of other activities. They cite discussions in other jurisdictions with Transpower, as an example of where it has been accepted that, particularly in rural zones, it is not always necessary to protect infrastructure from the effects of existing farming activities. They consider it more appropriate for the policy to be amended to simply “*Recognise and provide for regionally significant infrastructure*”. Horticulture NZ support this, stating that it is more appropriate to recognise and provide for infrastructure than to protect it, which in their view implies limiting activities rather than ensuring the operation is not impeded. Conversely, Trustpower oppose the submission, on the basis that the original drafting was concerned with reverse sensitivity whereas the change sought significantly changes the intent of the policy. NZTA raise similar concerns. Transpower also oppose the changes on the basis that the MEP would then fail to give effect to Policies 10 and 11 of the NPSET.

My understanding of the purpose of Policy 4.2.2 is to ensure that other activities that may have effects on regionally significant infrastructure are managed so as to ensure the efficient, effective and safe operation of such infrastructure. In my view, the change sought by Federated Farmers does not align with this and duplicates the recognition element (and the recommended addition of the provision element) of Policy 4.2.1. However, I agree with the submitter’s point that protection from all adverse effects goes beyond what is necessary to achieve Objective 4.2. In my view, it is the adverse effects that may compromise the operation of regionally significant infrastructure, that the policy should focus on, as identified by Horticulture NZ, and I recommend a change along these lines. I consider that the recommended change addresses Federated Farmer’s underlying concerns, while avoiding the issues raised in the further submissions of Trustpower, NZTA and Transpower, and ensuring that the original intent of the policy is kept.

Trustpower seek that the policy is amended to read “*Avoiding adverse effects where practical on regionally significant infrastructure.*” They consider that the protection of infrastructure is more akin to an outcome that is sought, rather than a course of action to be undertaken, and therefore seek the change to focus on the avoidance of adverse effects. I disagree with this, as the wording used is clear that the action directed is to protect infrastructure, with the consequence of this action being the outcome stated in Objective 4.2, i.e. one of the ways to ensure that infrastructure is operated effectively, efficiently and safety is through the action of protecting infrastructure from the effects of other activities. It is also not clear to me when avoiding adverse effects would not be “*practical*”, and how allowing for effects not to be avoided in those instances would achieve Objective 4.2. However, if the Panel is of the view that the policy should focus on the action directed towards other activities, I consider that the same intent could be achieved by wording the policy as follows: “*Avoid the adverse effects of subdivision, use and development that may compromise the operation of regionally significant infrastructure.*”

Marlborough Roads and NZTA seek that the policy is extended to refer to “*including reverse sensitivity and cumulative effects*” in order to provide clarity. It is my view that it is not necessary within the policy itself to provide examples of what adverse effects include, noting that the explanation expands on this in any case.

NMDHB seek changes to the policy explanation to remove reference to avoiding establishment of incompatible activities in “*close proximity to infrastructure in the first place*”, instead replacing this with in “*locations where reverse sensitivity effects may arise.*” They consider that the current wording is not certain

or measurable and that application of the policy should not be restricted to those activities in close proximity. I generally agree with the change, although consider that keeping “*in close proximity to*” as an example of the type of location where reverse sensitivity may arise, is helpful.

Transpower seek a change to the explanation where it refers to the NPSET to refer to reverse sensitivity effects on the network being avoided “*to ensure that the National Grid is not compromised*” rather than reference to them being avoided “*as much as possible*”. Given this part of the explanation is specific to the NPSET, and taking into account the specific wording of Policy 10 of the NPSET, I agree with this change.

Recommendation

I recommend that Policy 4.2.2 and its explanation are amended as follows:

Protect regionally significant infrastructure from the adverse effects of ~~other~~ subdivision, use and development³⁸ activities that may compromise its operation.³⁹

The effective and efficient operation of regionally significant infrastructure can be ~~protected~~ ensured⁴⁰ by avoiding the establishment of incompatible activities in locations (for example, those in close proximity to the infrastructure) where reverse sensitivity effects may arise in the first place⁴¹. This policy recognises that there has already been significant investment in the infrastructure and that there are usually considerable difficulties relocating the infrastructure in the event of conflict with other land uses. In respect of the electricity transmission network, it is a requirement of the National Policy Statement on Electricity Transmission (NPSET) for decision makers to manage activities to avoid reverse sensitivity effects on the network to ensure that the National Grid is not compromised as much as possible⁴².

Methods – Submissions and assessment

Method 4.M.6 is “*Identification*”, the explanation to which states that the electricity transmission network will be identified on the planning maps. Transpower seek that references to the network are replaced by reference to the National Grid, in order to align with the terminology, including definitions, used elsewhere in the MEP, and to more clearly distinguish the National Grid from electricity distribution lines. I agree with this change, on the basis that the network identified on the planning maps and the related rules apply to the National Grid.⁴³

NZTA seeks that the method is extended to also refer to “*State Highway buffer areas, and State Highway effects areas*” and that an additional paragraph explaining these is added to Method 4.M.9 (relating to district and regional rules). Consequentially, they seek that these be identified on the planning maps to “*facilitate Council in appropriately addressing reverse sensitivity effects*”. These submission points relate to a wider request for how the MEP manages activities within their proposed buffer and effects areas. I note that the mapping request and proposed provisions relating to these buffer areas will be considered in the assessment of submissions on Volume 1, Chapter 16 (Topic 15). In my view, the alteration to the method statement is ultimately a consequence of that request, and therefore I only recommend a change to the method statement if the substantial request is recommended.

Method 4.M.7 is “*Zoning*”, the explanation to which states that explicit zoning for infrastructure will be used, where appropriate, and alongside district rules, in order to recognise regionally significant infrastructure and enable it to operate efficiently and effectively. Chorus and Spark consider that the most efficient way to

³⁸ 1198.6 – Transpower.

³⁹ Relates to 425.16 – Federated Farmers.

⁴⁰ Consequential change, relates to 425.16 – Federated Farmers.

⁴¹ 280.9 – NMDHB.

⁴² 1198.6 – Transpower.

⁴³ I note that Marlborough Lines have requested the mapping of all local sub transmission lines. This matter will be addressed in a separate hearing topic, but for completeness I note that if the panel agrees to the mapping change, this method would need to be consequentially amended. The recommendation is therefore based only on what is currently mapped in the notified MEP.

provide for regionally significant infrastructure is through the application of district-wide rules and standards, rather than explicit zoning for infrastructure, and consider that this aligns with the rules for utilities set out in Volume 2, section 2.38 of the MEP. I note that the use of district rules as an implementation method is included as a separate method, and therefore do not agree that this method should be extended to also refer to rules as sought. However, there are some other minor changes sought by these submitters that I recommend are made as they provide greater clarity. NZTA seek a minor change to the start of the method explanation to say “*where not designated*”. They seek this on the basis that the method does not recognise that the ongoing operation of many infrastructure assets is provided for by designations rather than by district rules. I agree in principle with the submitter, but recommend an alternate change to the wording which I consider better addresses the submitter’s concern, and reflects that this particular method relates to zoning.

Method 4.M.8 is “*Designations*”. Transpower seek changes to the explanation to refer to the utilisation of designations for developing (and well as identifying and protecting) infrastructure. This is on the basis that the method statement does not clearly state that designations may be used for the development of new regionally (or nationally) significant infrastructure. I agree with this change to refer to development, as it recognises one of the primary functions of designations – to authorise an activity to be established on a designated site. As set out earlier, I do not consider there is a need to refer to nationally significant infrastructure, because anything of national significance is in any case regionally significant and therefore already covered.

Method 4.M.9 is “*District and regional rules*”. The method statement includes reference to the NESETA applying in addition to the MEP rules. Spark and Chorus seek that reference is also made, in the same way, to the NESTF. I agree that this is appropriate.

Transpower seek a raft of changes to the method statement, some of which relate to matters already discussed earlier in this report. I agree with those changes sought where I have agreed with the substantial request, but disagree with those where I have not recommended a change in the first instance, for the reasons outlined earlier. Of the remaining changes sought, Transpower submit that these relate to: better aligning the language used with that of the NPSET and NESETA; and inclusion of reference to rules addressing the proximity of activities in the coastal marine area in order to provide for the protection of Transpower’s submarine cables in a manner that is consistent with Policy 10 of the NPSET. I generally recommend that the former are accepted, although in some instances I have recommended alternate wording. In terms of the latter, I agree in general that the method statement should not be limited to rules controlling the proximity of activities to infrastructure, in river beds alone. However, rather than extending the reference to include the CMA as well, my view (and understanding of what is proposed within the rules within the MEP) is that the method should relate to controlling proximity of activities generally, i.e. not only in relation to activities in river beds and the CMA. As such I recommend that the method statement is amended to read: “*Rules will be used to control the proximity of activities ~~and uses in river beds~~ that could have adverse effects on regionally significant infrastructure.*”

Method 4.M.10 is “*Affected party status*”, with the explanation providing for owners and operators of affected regionally significant infrastructure to be notified as an affected party where a resource consent application may adversely affect the infrastructure, and providing a further statement in relation to particular regulations applying to the National Grid. Transpower seeks a minor change, with which I agree, to refer to their full name. Federated Farmers seek that the first statement is deleted, on the basis that the regulations referred to in the second paragraph only apply to the National Grid and should not be extended to other infrastructure owners and operators, stating that this goes beyond the intent of the RMA and the regulations. Transpower and NZTA both oppose this, on the basis that it is appropriate for owners and operators of regionally significant infrastructure to be served notice. In my view, the two sentences are separate, and the former is not purporting to extend the direction in the regulations to other infrastructure owners and operators. Rather, the method is identifying that in order to implement the policy direction set, relating to all regionally significant infrastructure, and in particular, Policy 4.2.2, owners and operators of infrastructure that is affected by a proposal will be considered as an affected party. In my view, this is appropriate and entirely in line with the RMA. NZTA seek that reference to the grant of a resource consent application is extended to also refer to a Notice of Requirement. I am comfortable with this addition. They further seek that this method is replicated or cross-referenced within applicable sections of the MEP, as they are concerned that it will be ‘lost’ within the methods section and may be overlooked in the applicable policies and rules. In my view, there are likely to be numerous rules where activities trigger a consent requirement and there may be adverse effects on regionally significant infrastructure that need to be considered. Trying to identify every provision where this may occur, and cross-referencing all such rules is therefore inefficient and unwieldy.

Recommendation

I recommend that methods 4.M.6, 4.M.7, 4.M.8, 4.M.9 and 4.M.10 are amended as follows:

4.M.6 Identification

~~The National Grid electricity transmission network~~ will be identified on the planning maps. This will allow other methods to be applied to manage the adverse effects of third parties on the National Grid⁴⁴ ~~transmission network~~.

4.M.7 Zoning

Recognition will be given to regionally significant infrastructure by providing, where appropriate, explicit zoning for the infrastructure. This, in conjunction with the application of district rules specific to infrastructure, zoning⁴⁵ and the use of designations,⁴⁶ will assist to enable the infrastructure to operate efficiently and effectively.

4.M.8 Designations

Encourage requiring authorities (as defined by Section 166 of the RMA) to utilise designations as an effective means of identifying, developing⁴⁷ and protecting regionally significant infrastructure. Designations can then be explicitly included in the MEP.

4.M.9 District and regional rules

Rules will be used to enable activities associated with the maintenance, alteration, minor upgrading and replacement of regionally significant infrastructure. Standards will specify the extent of works involved with any of these activities.

Rules will be used to control the proximity of activities and uses in river beds that could have adverse effects on regionally significant infrastructure. This includes development in the vicinity of ~~within~~ the National Grid ~~corridor~~.⁴⁸

A buffer corridor for the National Grid transmission lines will be established through rules within which activities will be managed to reduce the risk of electrical hazard, ~~the potential for avoid reverse sensitivity effects and ensure that adverse effects on the structural integrity of the National Grid is not compromised~~. The width of the corridor will vary depending on the activity, type of National Grid asset and the sensitivity of the network to the activity. This method gives effect to Policy 10 and⁴⁹ Policy 11 of the NPSET.

~~In addition to the rules in the MEP, the~~ Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009 ~~establishes various classes of activity for certain activities relating to~~ contain separate rules for the operation, maintenance, upgrading, relocation or removal of existing National Grid⁵⁰ transmission lines. The Resource Management (National Environmental Standards for Telecommunication Facilities) Regulations 2016 contain separate rules for telecommunication facilities and activities associated with the establishment of such facilities.⁵¹ Where activities are managed by these Regulations, no rules in the MEP apply to such activities.⁵²

⁴⁴ 1198.9 – Transpower.

⁴⁵ 464.8 – Chorus; 1158.6 – Spark.

⁴⁶ Relates to 1002.12 – NZTA.

⁴⁷ 1198.10 – Transpower.

⁴⁸ 1198.11 – Transpower.

⁴⁹ 1198.11 - Transpower.

⁵⁰ 1198.11 - Transpower.

⁵¹ 464.10 – Chorus; 1158.8 - Spark

⁵² 1198.11 - Transpower.

4.M.10 Affected party status

Where the grant of a resource consent application or approval of a Notice of Requirement⁵³ may adversely affect regionally significant infrastructure, the owners and operators of the infrastructure will be served notice of the application as an affected party. Transpower New Zealand Limited NZ⁵⁴ is required to be served notice if a resource consent application may affect the National Grid under Regulation 10 of the Resource Management (Forms, Fees and Procedures) Regulations 2003.

⁵³ 1002.15 – NZTA.

⁵⁴ 1198.12 – Transpower.

Issue 3 – The particular qualities of the Marlborough Sounds

Overview of Provisions

This assessment relates to Issue 4C, Objective 4.3, Policies 4.3.1 - 4.3.5 and Method 4.M.11.

This package of provisions relates to the particular character and intrinsic values of the Marlborough Sounds and the potential for the use and development of natural and physical resources to detract from these. This is responded to through the overarching Objective 4.3, which seeks that the particular qualities that contribute to the character of the Marlborough Sounds are maintained and enhanced. This is supported through five policies which direct that: the management of resources within this area is integrated; the particular qualities and values that contribute to the unique and iconic character of the area are (1) identified and protected from inappropriate activities and (2) enhanced; direction is provided on the appropriateness of resource use activities within this area; and recognition is given that the area is a dynamic environment. These policies are to be implemented through a single method, being through other policies within the MEP. As with all provisions within this chapter, the objective and policies are RPS provisions.

The assessment of submissions on these provisions has been undertaken as follows:

- Overarching submissions
- Remaining submissions on Issue 4C and Objective 4.3
- Submissions on Policies 4.3.1 – 4.3.5 and Method 4.M.11.

Overarching submissions – Submissions and Assessment

This section of the report addresses submissions that have sought changes across this topic, or related submissions made across more than one of the provisions within it. In several cases, more than one submitter has raised similar concerns; or a submitter has sought changes across more than one provision in this section of the chapter based on the same underlying principle. In these cases, the submission points are considered together, on a topic basis. Any recommended changes to the provisions are then included at the end of the following section, which considers all remaining submission points on Issue 4C and Objective 4.3.

Issue 4C reads:

The use and development of the natural and physical resources in the Marlborough Sounds has the potential to detract from the character and intrinsic values of this unique and iconic environment.

The explanation to the issue provides a summary about the physical and ecological environment that makes up the Marlborough Sounds, its history in terms of resource development, and its tourism and recreational attractiveness. The explanation goes on to explain that use and development of the natural and physical resources within this area can result in environmental change, and while the environment is dynamic, there are some qualities which can be adversely affected by such change, which may affect the character of and value of the Marlborough Sounds.

Five submitters support the issue statement and either explicitly seek that it is retained or do not seek any changes to it.

Objective 4.3 reads:

The maintenance and enhancement of the visual, ecological and physical qualities that contribute to the character of the Marlborough Sounds.

Seven submitters support the objective and either explicitly seek that it is retained or do not seek any changes to it. Aquaculture NZ and MFA also support the objective, although the support is conditional on the additional provisions they seek (discussed elsewhere) being added.

Is this section of Chapter 4 necessary?

As noted above, this section of Chapter 4 provides particular over-arching guidance within the MEP regarding the management of the Marlborough Sounds, which is to be implemented through other policies within the MEP. Two submitters have raised issues with the inclusion of this section within Chapter 4, as follows.

Federated Farmers seek that Issue 4C and its related provisions are moved to Chapter 13 (The Use of the Coastal Environment) as they consider the issue is best addressed in that chapter. I note that Federated Farmers have also sought changes to the various provisions within this topic, and I address the specific wording changes sought in the discussion on those provisions below.

Port Marlborough seek that Issue 4C, Objective 4.3, and policies 4.3.1 - 4.3.4 are deleted. Deletion of the policies is considered in the next section of this report because more specific reasons are given for each of the deletions sought. In terms of the issue, the submitter raises concerns about the necessity for the issue and consider that it is contradictory to the other provisions in Chapter 4. They consider that the management of the effects of activities on natural and physical resources is “*aptly and fully*” addressed in other places in the MEP. In relation to Objective 4.3, Port Marlborough seek that the objective be deleted, on the basis that it may preclude changes to the visual, ecological and physical qualities of the Marlborough Sounds, which in their view creates an inherent difficulty in the objective being able to be achieved, and contradicts the provisions in section 4.2 of the chapter. They consider that the outcomes set in the objective are more appropriately addressed in other chapters of the MEP such as the Landscape and Indigenous Biodiversity chapters.

As set out in the Section 32 Report, the issue and objective reflect a matter identified as being important to the community through feedback and consultation, namely that this area is special and maintaining and enhancing the values associated with this area for present and future generations is important. I accept that the more specific management of this area is implemented through other parts of the MEP, for example provisions which apply to the coastal environment, and provisions which apply to landscapes. However, my view is that given the particular status of, and community interest in this area, it is appropriate to set out within the MEP the overall outcome sought for this area. While this overall aim will be achieved through more specific provisions within various other parts of the MEP (for example the Landscape, Coastal Environment and Indigenous Biodiversity provisions), my view is that in absence of the overarching direction within this section of the Chapter, there is a risk that the approach taken in other sections is not as integrated as it could be and that this would not better achieve the purpose of the RMA in relation to this area.

Further, the geographic nature of this area (in particular, the extensive areas of coastline, where the land and sea interact) is such that land use, subdivision, discharges, and activities within the Coastal Marine Area, all need to be managed in an integrated way if the community vision (as set out in Objective 4.3) is to be achieved. As such, my view is that this section of Chapter 4 is the most appropriate way to achieve the purpose of the RMA, as it provides clear guidance as to how sustainable management of natural and physical resources is to be promoted in relation to this geographical area. In relation to Port Marlborough’s view that the objective may preclude changes to the visual, ecological and physical qualities of the Marlborough Sounds and that it contradicts Section 4.2, I note that the objective seeks to maintain and enhance the identified qualities. In my opinion, this does not mean no change to the visual, ecological and physical environment, rather it means that such changes must still maintain those qualities that contribute to the overall character of the area. In my opinion, this is an outcome that can be achieved alongside Objective 4.2 and the two do not overtly contradict.

The appropriateness of the provisions when taking into account the modification of some parts of the Marlborough Sounds area

There are a number of submitters who raise concerns that this section of Chapter 4 does not adequately take into account the modification that has already occurred within some parts of the Marlborough Sounds. These are set out as follows.

MFA and Aquaculture NZ seek that a new objective (4.3A) is added as follows:

Recognise that the visual, ecological and physical qualities of the Marlborough Sounds have been altered by cultural and social use and those uses have become part of the character of the Marlborough Sounds and do not detract from it.

The submitter cites reports showing that New Zealanders have a positive view of the aquaculture industry and considers that other activities are more likely to have an adverse impact on the characteristics and qualities of the Marlborough Sounds. They also seek a new policy is added to give effect to the proposed new objective, but do not provide wording for the policy. As an alternate to the additional objective, MFA and Aquaculture NZ seek that the objective is amended to reflect that social and cultural uses are part of the character of the Marlborough Sounds.

The Group 1 submitters seek changes to Chapter 4 to recognise that the visual, ecological and physical qualities of the Marlborough Sounds have been altered by social and cultural use.

The Group 2 submitters seek that Issue 4C, Objective 4.3 and related policies are amended to recognise and provide for existing and changing land and seascapes of use of aquaculture, vineyards and pastoral farming. This relates to a desire for the MEP to grow the region while also caring for the environment, landscapes and protecting natural character.

Federated Farmers seeks that Objective 4.3 is extended by adding “*and the appropriate recognition of the land use activities that have created the landscape.*” This is on the basis that it is important to recognise activities that have been part of and shaped the area’s landscape as legitimate activities contributing to its character.

D. Hemphill seeks that the issue is revised to reflect that the Marlborough Sounds have been heavily modified and are a working landscape with periodic change part of the norm. The submitter considers it ludicrous to state that the Marlborough Sounds are “*iconic*”. Related to this, the submitter seeks that reference to “*and iconic*” are removed from Policy 4.3.2.

FP Olsen Ltd raises concerns with the reference in the issue to “*iconic*” to describe the whole Marlborough Sounds area, noting that the explanation goes on to discuss the extensive modification and environmental change within parts of the area. As such, they seek that “*iconic*” is removed, or the Marlborough Sounds are partitioned into areas which justify that description. Similarly, the submitter raises concerns that the objective fails to link the existing character of the Marlborough Sounds to the modification that has occurred to it and seeks changes to the objective to reflect this. (Note that further changes sought by the submitter to these provisions but not relating to this topic are discussed in the next section).

Ernslaw One Ltd seek that the issue is amended to distinguish between the Inner and Outer Marlborough Sounds, and acknowledge that the Inner Sounds are a highly modified working landscape. This is opposed by D. Hemphill, who considers that much of the Outer Sounds is a highly modified working landscape. Further, Ernslaw One Ltd seek that the objective is amended to recognise that the visual landscape is continuously changing and the ecological setting is highly modified. Nelson Forests also seek that a distinction is made between the inner and outer Sounds area, based on land use, with a consequential review of the regulation for commercial forestry. Both submitters consider that the inner Marlborough Sounds are not unique and iconic. Both submitters state that there are commercial plantations within the Marlborough Sounds that have become so as a result of failed farms, and both consider that these existing plantations are not of very high or outstanding natural character. Windermere Forests Ltd also seek that the issue distinguishes between the inner and outer sounds, and do not consider that the Marlborough Sounds are as unique or iconic as the Council states. None of these submitters has provided particular details about where the boundary between the inner and outer area should be.

In my view, the issue needs to clearly state what the significant resource management issue is, with the objective then responding to this by describing the outcome that is sought. In this instance, the issue relates to the potential for resource use to detract from the character and values of this area, and the outcome sought is that those particular qualities identified, which contribute to this area’s character, are maintained and enhanced. The explanation to the issue already includes reference to the impacts and modification that have occurred as a result of human activity in the area. In my view, the changes sought by all the above submitters – essentially to recognise that various activities are part of the area and have influenced its character – do not relate to an outcome that is sought. The proposed new objective sought by Port Marlborough, for example, does not specify an outcome. In my opinion, neither the issue nor the objective is

seeking to ignore the impact that historic and current activities have had and continue to have on this environment – what it is seeking is that future resource use does not undermine those factors that makes the area special. Further, the objective is not trying to define all of the aspects that make up the character of the Marlborough Sounds. Rather, it is seeking that the visual, ecological and physical qualities that contribute to the special character of the area are maintained and enhanced. My view is therefore that the changes sought by the submitters, in relation to the issue and objective, are not appropriate.

I do, however, consider that further reference could be made to the matter raised by submitters, in the explanation to Policy 4.3.2, which goes on to direct that the qualities and values that contribute to the character of the Marlborough Sounds are identified, and protected from inappropriate subdivision, use and development. In part, this is because the submitters do not necessarily seem opposed to the outcome that is sought; rather they appear to be more concerned about how the outcome is to be achieved, and the potential impacts of this on existing, legitimate activities. It is my opinion, that the effects that existing activities have had on this area will necessarily need to be considered in the process of identifying the qualities and values of importance (i.e. they will be part of the consideration required by Policy 4.3.2), and that commenting on this in the policy explanation would therefore be appropriate to address the concerns of the submitters. This is discussed further in relation to Policy 4.3.2.

With regards to distinguishing between the inner and outer Sounds areas, my view is that this is not appropriate. As noted earlier, my view is that the character of the area as a whole, as well as its geography, means that integrated management is required to ensure that the outcome sought is achieved. Partitioning it into two parts would, in my view, be less likely to result in integrated management. It also does not reflect that the area as a whole is included within the coastal environment and within the Marlborough Sounds Coastal Landscape. I also note that the process of identifying the qualities and values that contribute to the particular character of the area as a whole will necessarily take into account the extent to which these are present (or not) in various parts of the Marlborough Sounds. The provisions within the MEP will then only need to be targeted to protecting (from inappropriate activities) qualities and values in areas where they are present. As such, my view is that excluding part of the area is not a more appropriate way to achieve the purpose of the RMA.

With regards to the use of the word “*iconic*”, my understanding is that this reflects the feedback received from community consultation during the review process. In essence, it reflects that the character of this area is special and widely regarded. I note that the use of the word within the issue and within Policy 4.3.2 does not state that individual areas within the Marlborough Sounds are all “*iconic*”, rather iconic is used in reference to the area as a whole, and in relation to its particular character and the qualities that contribute towards this character. On that basis, I am comfortable with retaining the use of the word within these provisions.

Other Overarching Matters

EDS consider that this section of Chapter 4 should identify that use and development should only occur within the capacity of the environment/within environmental limits. This is on the basis that the RMA was intended to install a regulatory regime with non-negotiable environmental bottom lines to provide for development within the capacity of the environment and its supporting ecosystems. Development beyond bottom lines would then be subject to limited restrictions and achieve better environmental outcomes, while having few restrictions on use and development. In their view, the MEP should therefore set environmental bottom lines in the regional context. As such, they seek that the following additional objective is added after Objective 4.3:

Use and development occurs within the ability of the environment to sustain its life supporting capacity.

The supporting policy would then direct that clear and “*non-derogable*” environmental limits are set for each resource that ensures the above. Several further submitters oppose the relief sought. MFA and Aquaculture NZ oppose it, as the limits for each resource have not been described, and they have particular concerns in relation to landscape and natural character, where their view is that values are not typically quantified, with judgements varying over time between commentators. Similarly, Port Marlborough consider the relief sought is not specific and does not include the non-derogable limits. NZTA consider that the intent and implications of the provisions are unclear and therefore a full assessment of the potential outcomes and implications cannot be made. Trustpower consider that the issue of bottom lines has not been determined. Federated Farmers consider that through the rule framework, such bottom lines are effectively established. They also

raise concerns, in relation to the policy wording, that it could lead to subjectivity, confusion and uncertainty. They consider that it is impossible for the level of complexity proposed to be detailed within a single policy. Ravensdown consider that the provisions are not necessary as the outcome sought in the objective and the direction within the policy is, in their view, already appropriately covered in other provisions within the MEP.

Although the changes are sought in relation to this part of Chapter 4, it is not clear how the objective and supporting policy relate to the issue identified, and in particular, appears to extend beyond application within the Marlborough Sounds. I therefore do not consider these to be appropriate within this section. If they are intended to be a separate, fourth topic within this section I note that further detail would be required, such as the identification of the underlying resource management issue of significance to the region. In terms of the appropriateness of the provisions sought, I have concerns that the wording of the objective takes pieces of that used in Section 5 of the RMA and confuses them. For example, Section 5(a) refers to “*sustaining*” the potential of natural and physical resources to meet people’s needs, while (b) refers to safeguarding “*the life-supporting capacity*” of air, water, soil and ecosystems. Given the broad definition of “*environment*” within the RMA, it is not clear to me how the life-supporting capacity of all aspects of it can be “sustained”, for example what is the life-supporting capacity of amenity values or outstanding landscapes? In relation to the corresponding policy direction, I also have concerns that setting limits for each resource is not practicable in all cases, nor is it the most appropriate way to achieve the RMA’s purpose. For example, it is not clear what sort of “limits” can be set for the use of physical resources, nor for aspects of land use, particularly those that relate to managing amenity effects. As such, my view is that the additional provisions sought are not the most appropriate for achieving the purpose of the RMA.

Friends of NH and TB support this section of the MEP, but consider that it is unclear why there are not similar sections for other parts of the District, particularly the coastal marine area within Tasman Bay. The submitter has concerns that there has been significant environmental degradation in this area, including as a result of cumulative effects of land use within Marlborough, Nelson City and Tasman District. As such they consider that there is a need for integrated cross-boundary management, including with DOC. They state that varying regional coastal plan provisions will result in less effective implementation of the Council’s responsibilities for promoting integrated coastal management. As such, they seek that in conjunction with Nelson City and Tasman District that a new set of provisions are included addressing the important resource management issues in Tasman Bay and that these areas are shown on a map. It is my view that this request amounts to a desire for a combined plan, across three jurisdictions. The MEP is only a plan for the Marlborough District and provisions are therefore not able to be included within it to manage activities within Nelson City or Tasman districts, nor to direct those matters for which DOC is responsible. As such, what is sought by the submitter would need to be pursued by way of a separate plan-making process.

NZ Forest Products seek that Objective 4.3 and policies 4.3.1 to 4.3.3 are amended to recognise the importance of forestry within the Marlborough Sounds, and that it is part of the area’s visual character, with temporary adverse effects from activities such as felling being part of that character rather than an adverse effect on it. The submitter is of the view that there are extensive areas within the Marlborough Sounds where primary industry currently, or should, occur, and that the provisions within this section of the chapter should enable such activities within this area. The earlier assessment, in relation to the broader submission points about activities that have modified the landscape, applies equally to forestry activities and is not repeated here. Consideration of the effects of various activities (including primary industry) on the qualities and values of the Marlborough Sounds and the appropriateness of any particular resource use activity, is a matter that needs to be considered within the more specific provisions of the MEP, i.e. as part of giving effect to Policies 4.3.2 and 4.3.3. In my view, it is not appropriate to make comments about what is or is not appropriate within these over-arching provisions. Similarly, I do not agree that including provisions within this section of the chapter generally enabling primary activities within the Marlborough Sounds is appropriate and may risk the achievement of Objective 4.3.

Issue 4C and Objective 4.3 – Submissions and Assessment

This section addresses submissions made on Issue 4C and Objective 4.3 that have not been addressed in the previous section.

K. & S. Ponder-West oppose Issue 4C although no reason is given. For the reasons set out earlier, I consider that the provisions set out in this part of Chapter 4, including Issue 4C, are appropriate. I therefore recommend that this submission is rejected.

KCSRA generally support the issue, but seek changes to expand it to “*properly encompass the real and present impacts in the context of Commercial forestry operations in the Coastal Environment Zone of the Sounds.*” They state that the potential for forestry in the Marlborough Sounds has already been realised. As such they seek that the final sentence of the explanation, which talks about the potential for the qualities of the Marlborough Sounds to be adversely affected by the use and development of resources and the flow on adverse effects to people’s perception of the Marlborough Sounds, to be extended to add “*and in the case of Commercial forestry activities in the Sounds is doing so*”. This is opposed by D. Hemphill who considers this to be an attack on one specific land use, that is out of context at a policy level. He further considers that most forestry operations are part of the dynamic, working landscape of this area, and that there are only a few “cowboy” operators who detract from the character of the area. In my view, the statement is not appropriate. Firstly, the paragraph is more general in nature whereas the addition is, in contrast, specific. Secondly, while I accept that it may reflect the views of the submitter, it is essentially an opinion about one activity, which in my view, is out of place in the issue statement. The further submission also indicates that it is not necessarily a widely held view. KCSRA also support the objective but seek that the narrative is amended to clearly reference the need to act in a precautionary way in terms of commercial forestry operations in the Marlborough Sounds. It is my view that this is not appropriate, as the objective and its explanation are intended to set out the desired outcome – not provide direction about how this is to be achieved.

Federated Farmers seek that the issue is amended to refer to the balance required between the social, cultural, economic and environmental values of the area, which in their view, is required under the principles of the RMA. It is my view that the issue should reflect whatever the resource management issue is. If the underlying issue is an environmental one, the issue statement itself should reference that. The wider consideration of social, cultural, economic and environmental matters required under Part 2 of the RMA, is in my view, more valid for assessing the appropriateness of the objective, in achieving the RMA’s purpose. For example, whether the response to an environmental issue appropriately takes into account economic implications. As such, I do not consider changes are required to the issue. Federated Farmers seeks that the objective is amended to refer to maintenance only (rather than maintenance and enhancement), on the basis that it is not always possible or practicable to enhance the qualities identified in the objective. It is my view that the objective does not seek enhancement in all cases. Rather it reflects that overall, some enhancement of the specified qualities is the desired outcome. In my view this is appropriate. For completeness, I note that I have made some recommendations to the policy direction relating to the enhancement aspect of the objective (Policy 4.3.4) which may address, at least in part, the concerns of the submitter.

EBCS raise concerns with the portion of the explanation statement that talks about many pastoral farms having been left to revert to indigenous forest and shrub cover. They state that the issue explanation does not address why this has happened, which in their view, is because the use of the land was unsustainable and uneconomic. Similarly, in relation to the statement noting the growth of the marine farming industry, they state that the explanation does not address “*the fact that marine farming has proliferated in an environment where profit can be made from free use of the public environment with absolutely NO controls on the waste emitted from marine farming.*” They seek that the explanation is amended so that the issues of unsustainable use of the environment is spelt out and can be learnt from. In their view, Issue 4C is the appropriate place to highlight these issues and how they have been addressed in the past. It is my view that the issue that has been identified within the MEP, and which is responded to within the provisions, is not related to the concerns the submitter raises. The issue is focused on the important values and character of the Marlborough Sounds and the potential for these to be affected by the use and development of natural and physical resources. It is my view that providing commentary on the appropriateness of past actions is not related to expanding on the character and values of the Marlborough Sounds, nor the potential impact of future use of its natural and physical resources. As such, I do not recommend the changes sought by the submitter.

PF Olsen Ltd seek that the issue is qualified by referring to “*inappropriate*” use and development. I do not agree that this change is necessary, as the issue is outlining the potential for resource use and development to detract from the character and values of the identified area. It is the response to this issue that then seeks to address this potential by protecting the character from inappropriate activities. In relation to Objective 4.3, PF Olsen Ltd raise concerns that in discussing the need for precaution within the explanation, there is no mention made of needing to relate this to established baseline science and measures. They seek changes to

the text to include this matter. It is my view that this is not appropriate, as there are a range of factors beyond science and baseline measures along that will influence the exercise of precaution.

In relation to Objective 4.3, HNZPT consider it important that historic heritage values are also maintained and enhanced, as these are also important contributors to the character of the Marlborough Sounds and require protection. They consider that the current reference to “*qualities*” does not cover historic heritage values, which are instead a type of natural and physical resource. As such, these seek that the reference to visual, ecological and physical qualities is replaced with a reference to “*qualities of natural and physical resources*”. Te Ātiawa o Te Waka-a-Maui Trust support this, as it recognises spiritual and cultural values and the protection that should be afforded to things of cultural significance. It is my view that the changes sought are not more appropriate. In particular, changing the focus of the objective to the qualities of natural and physical resources generally does not target the matter identified in the issue, namely is it those identified qualities which are considered to contribute to the unique and iconic character of the Marlborough Sounds that are those sought to be maintained and enhanced. I also note that in identifying qualities and values that contribute to the area’s character (i.e. implementing Policy 4.3.2), there may be some historic heritage values identified that form part of the visual, ecological or physical qualities of importance to the area’s character.

QCSRA seek that the final sentence of the explanation to the objective is amended, so that rather than reference to exercising “*an element of precaution*”, it refers to simply exercising precaution. I am comfortable with this amendment, on the basis that it is a relatively minor wording change, which uses simpler and clearer language.

D. Hemphill raise concerns about the explanation to Objective 4.3, relating to resource use needing to be complimentary to visual, ecological and physical values. He is concerned that the current wording suggests that “... *the Council intends to subordinate resource use to subjective environmental values*” without sufficient regard to the area being a working landscape, primarily in private ownership. He seeks that the explanation is revised to reflect that the Marlborough Sounds are a working landscape and to note that ecological and physical values may support certain vegetation that may be incompatible with some visual values. As such, he seeks that it is specified that visual values have a lower priority. In my view, this is not appropriate. As noted earlier, it is my view that the wording of the objective (and as reflected in its explanation) does not mean that resource use cannot occur, nor does it ignore the impacts of past and current uses on the area. What it seeks is to ensure that resource use maintains the identifies qualities of the area that contribute to its particular character. In my view, the submitter has not provided a compelling reason as to why visual values should have a lesser priority, and how this would better achieve the purpose of the RMA.

Te Ātiawa seek that the explanation to the objective is amended to formally recognise and include Te Ātiawa in the meaning and application of the objective. This is on the basis that they are not merely a member of the community, but also the kaitiaki, who also seek that the visual, ecological and physical qualities of the Marlborough Sounds are maintained and enhanced. It is not clear what specific changes to the explanation are sought by the submitter. It is my view that the objective and its explanation should be focussed on the outcome that is intended to be achieved through the MEP, in this case the maintenance and enhancement of the identified qualities. As this aligns with what the submitter considers is an appropriate outcome for them, it is my view that no change is necessary.

Recommendation

I recommend that Issue 4C and Objective 4.3 are retained as notified.

I recommend that the explanation to Objective 4.3 is amended as follows:

The Marlborough Sounds is a truly exceptional place - it is considered to be our "jewel in the crown" in terms of natural assets. The landscapes and seascapes within the Marlborough Sounds and the ecology and natural processes that occur within them are unique and highly valued. This objective seeks to maintain and enhance these qualities to ensure that the community and visitors to the district can continue to enjoy this environment now and into the future. This does not mean that use and development of natural and physical resources cannot occur within the Marlborough Sounds,

but an element of⁵⁵ precaution needs to be exercised to ensure that resource use is complimentary to the visual, ecological and physical qualities that give the Marlborough Sounds its iconic character.

Policies 4.3.1 – 4.3.5 and Method 4.M.11 – Submissions and Assessment

There are five specific policies set out within this part of Chapter 4, which read as follows:

Policy 4.3.1 – Integrate management of the natural and physical resources within the Marlborough Sounds environment.

Policy 4.3.2 – Identify the qualities and values that contribute to the unique and iconic character of the Marlborough Sounds and protect these from inappropriate subdivision, use and development.

Policy 4.3.3 – Provide direction on the appropriateness of resource use activities in the Marlborough Sounds environment.

Policy 4.3.4 – Enhance the qualities and values that contribute to the unique and iconic character of the Marlborough Sounds.

Policy 4.3.5 – Recognise that the Marlborough Sounds is a dynamic environment.

There is general support for these policies - Seven submitters support both Policy 4.3.1 and Policy 4.3.2, six support Policy 4.3.3, and eight support both Policy 4.3.4 and Policy 4.3.5. These submitters either explicitly seek that the policies are retained or do not seek any changes to these policies. In addition, Aquaculture NZ and MFA also support these policies, although the support is conditional on the additional provisions they seek (discussed elsewhere) being added.

There is only one method associated with this section of the chapter (4.M.11), which is to implement the policies though other policies within the MEP. I note that no submitters have sought a change to this method.⁵⁶

E. Jorgensen raises concerns, in relation to Policy 4.3.1, that the policy only deals with one aspect of integration of the management of resources, namely the management of land and coastal resources within the Council's regulatory framework. He notes that other agencies such as DOC, MfE and MPI also have management responsibilities relating to the natural and physical resources of the Marlborough Sounds. In his view, full integration of the management of the natural and physical resources within this area will require all agencies with management responsibilities, together with the community, to work together collaboratively. He therefore seeks an enabling policy in relation to this matter, to further enhance the opportunity to implement integrated management of the Marlborough Sounds marine environment.

In my view, an additional policy in itself is not necessary, as the matter is already covered by the proposed wording of Policy 4.3.1. Also, while I accept that there are other agencies who have management responsibility for the natural and physical resources within the Marlborough Sounds, caution needs to be exercised to ensure that the MEP does not include policy "direction" relating to other agencies or matters that fall outside the Council's functions under the RMA. However, my view is that as part of implementing Policy 4.3.1 - integrating the management of resources within the Marlborough Sounds – the Council can actively pursue collaboration with other agencies, ultimately aimed at assisting in achieving Objective 4.3. I therefore recommend that some discussion regarding this is added to the explanation to Policy 4.3.1, and that a further method is added at the end of this section of Chapter 4. The drafting proposed is intended to focus on the Council pursuing discussions with other parties, to ultimately assist in the achievement of Objective 4.3; rather than trying to direct other agencies or step outside the council's functions under the RMA.

PF Olsen Ltd considers that while the qualities and values that contribute towards the unique and iconic characteristics of the Marlborough Sounds need to first be identified, this should only be in conjunction with a "scientifically valued understanding of the impacts of activities on these values and qualities." As such, they

⁵⁵ 504.7 – QCSRA.

⁵⁶ Awatere WUG comment on the method, but the comments and relief sought appears to relate to the following section of the chapter which sets out the anticipated environmental result and monitoring of effectiveness, rather than applying to Method 4.M.11. It has therefore been assessed in relation to the anticipated environmental result.

seek that Policy 4.3.2 is amended to recognise the need for well-founded data or baseline trends, with these used to inform consideration of the potential significance of adverse effects. Similarly, D. Hemphill considers that the policy fails to identify the need for the Council to base its evaluation of the qualities and values of the Marlborough Sounds on sound, peer-reviewed science. D. Hemphill also considers that Policy 4.3.3 fails to reassure resource users that decisions will be based on sound peer-reviewed science. The submitter seeks that a statement is added to this effect for each policy. It is my view that the data relied on to inform the identification of qualities and values, and the appropriateness of resource use activities does need to be carefully considered. This includes considering any science which is relied on. However, in my view, identification of values and qualities, and determination of resource use, cannot be made by relying on science, data and trends alone. Community and cultural values, for example, are often not based on science. In some cases, judgements on values must also be made based on the professional views of qualified and experienced experts, for example, the views of landscape architects. In my view, it is therefore inappropriate to add the additional statements sought by these submitters.

Federated Farmers raise concerns about the use of the terms “*unique*” and “*iconic*” in Policy 4.3.2, and how they are to be used in the resource management decision making context. Further, while they note that some values have been identified within the MEP (e.g. in Landscape and Coastal Natural Character appendices), these fail to recognise the importance of the Marlborough Sounds as a working landscape, and the contribution of primary production activities to the landscape. They consider that all of the activities and characteristics of the Marlborough Sounds should be set out in the MEP, such as forestry and agriculture. As such, they seek that the policy is amended to include recognition of the importance of the Marlborough Sounds as a working landscape and to specify where these qualities and values can be found in the MEP (e.g. cross-referencing the Landscape and Coastal Natural Character Appendixes.) They further seek that a schedule of the activities and characteristics of the Marlborough Sounds are included within the MEP.

As outlined earlier, my view is that as part of implementing Policy 4.3.2, the identification it requires will need to take into account any influence that historic and existing activities have had on these qualities and values. However, in terms of the wording of the policy itself, my view is that it needs to clearly relate to the achievement of the outcome sought, being that the visual, ecological and physical qualities that contribute to the character of the Marlborough Sounds area are maintained and enhanced. Policy 4.3.2 directs that it is these qualities, and the values that contribute to the particular character of the Marlborough Sounds which are to be identified and protected from inappropriate activities. In my view, it is not appropriate to extend this direction to identification or some sort of cataloguing of *activities* within the Marlborough Sounds, and the impact such activities have on this environment; because it is not required to achieve Objective 4.3. The change I recommend is therefore to retain the proposed wording of the policy, but to include specific reference within the policy explanation to acknowledge that the character has been and is influenced by past and present activities within the area, and the identification of the particular values that is required need to be undertaken with this in mind. In relation to the other matters raised, I do not consider cross-references to be appropriate, as Method 4.M.11 makes it clear that the provisions are given effect to throughout other policies in the MEP. As noted earlier, I am comfortable with the use of the term “*iconic*” and similarly with “*unique*” as in my view, these will assist in determining the types of values and qualities that the policy directs be identified.

Port Marlborough seek that Policy 4.3.2 is deleted on the basis that it is already covered in other policies and overlays and they consider this creates duplication and is unnecessary. As set out earlier, my view is that this section provides appropriate guidance in relation to the management of activities within the Marlborough Sounds. This policy, which requires identification of the qualities and values which the objective seeks are maintained and enhanced, is a necessary step in achieving the objective. This is not duplicated in other policies and overlays, but implemented through them.

QCSRA seek a minor amendment to the explanation to Policy 4.3.2 to use the word “*may*”, rather than “*will*” in relation to determining whether particular activities will/may have significant effects. I agree with this change as I consider it better reflects that consideration of effects (in this context) is based on what is anticipated to arise, rather than a definitive knowledge.

QCSRA provide support for the policies stating that they “*must include avoidance of the proliferation of subdivision along the coastal margin.*” It is not clear to me which policies this statement applies to, or whether changes are sought to the policies themselves (as opposed to making a comment on their implementation). I am therefore unable to recommend any changes to these policies in relation to this submission point.

Port Marlborough seek that Policy 4.3.3 is deleted as while they consider it appropriate that the MEP provides clear direction regarding activities that are suitable in various locations within the District, they consider this outcome is facilitated via the MEP, and a policy is not required to achieve this outcome. It is my view that such policy direction is necessary and in fact aligns with what they submitter supports. A policy provides direction as the action to be undertaken, which in combination with other actions, is intended to achieve the desired outcomes (the objectives). Because the policy is at the RPS level, the direction is then required to be given effect to through the regional, district and coastal plan provisions (as appropriate). As such, removing the policy does not provide the overarching direction required to then justify the various rules and other policies within the MEP that are intended to implement this policy direction.

KCSRA seek that the explanation to Policy 4.3.3 is amended to “*clearly identify commercial forestry operations as an activity both likely to and actually impacting on the Sounds environment and thus needing to be subject to resource consent procedures*”. Like the similar submission points discussed earlier, my view is that this specific comment is not appropriate here. Policy 4.3.3 requires that the MEP provide direction on the appropriateness of resource use activities; however, it is not the appropriate place to state specifics regarding the implementation of the policy.

Port Marlborough seek that Policy 4.3.4 is deleted as they consider it is vague and likely that any activities that result in adverse effects on the environment will not achieve it. They further state that the specific values associated with the Marlborough Sounds are identified elsewhere in the MEP. Federated Farmers also seek that the policy is deleted on the basis of concerns with its implementation. They consider that it is difficult to enhance outstanding natural character, and question whether it will mean that every resource consent within this area will be required to show that enhancement is achieved. They suggest that a policy would be more appropriate in Chapter 13, relating to having regard to aspects of projects that enhance character of the Marlborough Sounds (the exact wording sought is unclear). I agree to an extent with the submitters that the wording of policy goes beyond what is necessary to achieve the outcome sought and I have concerns that it also conflicts with Policy 4.3.2. In essence, both policies refer to the qualities and values that contribute to the unique and iconic character of the Marlborough Sounds, with Policy 4.3.2 directing that these are identified, and then protected from inappropriate activities, while Policy 4.3.4 directs that these are enhanced. As such, there is a tension between when protection from inappropriate activities should occur, and when enhancement should occur. The explanation to Policy 4.3.4 and the Section 32 assessment indicate that the intention is not to require enhancement in all instances, nor in my view, is that outcome sought in all cases by Objective 4.3. I therefore recommend changes to Policy 4.3.4 to provide greater guidance as to when enhancement should be considered. I consider that the recommended changes address the underlying concerns of Federated Farmers and are more appropriate than deleting the policy and thereby providing no guidance around the enhancement aspect of Objective 4.3.

Federated Farmers seek that Policy 4.3.5 is amended to add “*and some use and development activities will have positive effects*”. They consider that this would make the policy more useful. It is my view that this addition is not necessary and goes beyond what is necessary to achieve the objective. The explanation already identifies that some changes may enhance the environment and qualities of the Marlborough Sounds, and in my view means that consideration of positive effects, where those effects relate to such enhancement, is already captured. This is also addressed, to an extent, through Policy 4.3.4 as it is recommended to be amended. General consideration of positive effects, in my view, goes beyond the direction in the provisions in this chapter, and therefore I do not recommend a change is made.

K.R. & S.M. Roush and Port Underwood Association seek that the explanation to Policy 4.3.5 is amended to add “*And in recognition of this ability to change, there needs to be caution in assigning long term resource consents.*” They state that this recognises that with or without human intervention, changes can take place that make long term resource consents inappropriate, particularly in public spaces. It is my view that this addition seeks to add a direction that goes beyond the intention of the policy. In my view, the duration of resource consents is a matter best considered in other parts of the MEP, and should be guided by all the provisions in this section of Chapter 4, not only Policy 4.3.5.

Recommendation

I recommend that Policies 4.3.1, 4.3.2, 4.3.3 and 4.3.5 are retained as notified.

I recommend that the following paragraph is added to the explanation to Policy 4.3.1:

There are very strong connections between land and marine environments in the Marlborough Sounds. This means that activities occurring in one locality can easily affect the surrounding environment and other activities occurring in that environment. This is especially true considering that the activities and values described in the issue and objective above are not always compatible. This makes integrated management of land and coastal water resources critical to retaining the special qualities of the Marlborough Sounds. As a unitary authority, the Council is well placed to achieve integrated management of natural and physical resources through its policy making and consenting functions. The policies in the MEP ensure that all of the effects of the use, development and protection of resources are identified and managed in a consistent manner.

*In addition, there are other agencies, including the Ministry for Primary Industries, the Department of Conservation and the Ministry for the Environment, who have statutory responsibilities that influence the management of natural and physical resources within the Marlborough Sounds. The Council can take active steps to facilitate discussions with these agencies regarding their management roles and how they can work together to best integrate the management of natural and physical resources to maintain and enhance the qualities that contribute to the character of the Marlborough Sounds.*⁵⁷

I recommend that the explanation to Policy 4.3.2 is amended as follows:

*In order to determine whether particular activities in the Marlborough Sounds will ~~will~~ may⁵⁸ have significant adverse effects, it is necessary to identify the qualities and values that contribute to the unique and iconic character of the Marlborough Sounds. These qualities and values are identified in the objectives and policies of other chapters, where criteria to help define appropriate activities are provided. In some cases, these qualities and values are also mapped and/or scheduled in the MEP. The identification of the qualities and values of importance required under this policy will also need to take into account the effects that past and present activities have had, and continue to have, on the character of the Marlborough Sounds.*⁵⁹

I recommend that Policy 4.3.4 and its explanation are amended as follows:

Policy 4.3.4 – ~~Encourage the e~~Enhancement of⁶⁰ the qualities and values that contribute to the unique and iconic character of the Marlborough Sounds.

Objective 4.3 seeks to maintain and enhance particular qualities of the Marlborough Sounds environment. Policy 4.3.2 generally provides direction relating to the identification and maintenance of these qualities. Policy 4.3.4 signals that beyond this, enhancement of these qualities should be encouraged. This means that the Council can manage the use, development and protection of natural resources to enhance the qualities and values that contribute to the character of the Marlborough Sounds. This can occur through regulatory methods. For example, environmental enhancement may be a means of remedying or mitigating the adverse effects of resource use and development. Resource consent applicants and the Council should have regard to these opportunities when preparing or processing resource consent applications. Other opportunities may exist beyond the use and development of natural resources. The implementation of non-regulatory methods to enhance particular parts of the Marlborough Sounds environment, particularly the landscape and biodiversity, will make significant contributions in this regard. These non-regulatory methods are signalled throughout the MEP.

I recommend that the following Method is added after 4.M.11:

4.M.12 Collaboration and Liaison

There are a number of Crown and other agencies with statutory responsibilities that influence the management of the natural and physical resources within the Marlborough Sounds. The Council will

⁵⁷ Relates to 404.2 - E. Jorgensen.

⁵⁸ 504.8 – QCSRA.

⁵⁹ 425.20 – Federated Farmers. Also relates to 149.6 – PF Olsen Ltd; 401.14 – Aquaculture NZ; 425.19 – Federated Farmers; 426.14 – MFA; 505.5 Ernslaw One Ltd; 648.7 & 648.8 – D. Hemphill; Group 1 submitters (submission point 4); Group 2 submitters (submission points 7&8).

⁶⁰ 425.21 – Federated Farmers; 433.13 – Port Marlborough.

take steps to encourage discussions with these agencies to facilitate a discourse on the respective management roles of each party and how they could be better integrated to achieve Objective 4.3.⁶¹

⁶¹ Relates to 404.2 - E. Jorgensen.

Issue 4 – Additional Topics

This section of the report addresses submissions that seek that additional topics and provisions are included within Chapter 4.

Aquaculture NZ and MFA seek that the chapter is amended to include a new issue, objective and policy, which are set out as follows:

Issue 4D - Recognise that the choice whether or not to use natural and physical resources has consequences

Objective 4.4 - Recognise that limiting development has a tradeoff; and

Policy 4.4.1 - Identify the consequences of not allowing development in terms of:

- *Substitution;*
- *Adverse effects from other alternative activities in the area; and*
- *Loss of environmental, economic and social benefits.*

The reason given is that the proposed new policy is consistent with Section 7(b) of the RMA. Trustpower supports the new provisions, on the basis that the protection of values has consequences for resource use that should be recognised within the MEP. Conversely, Clova Bay Residents Association and KCSRA both oppose the provisions on the basis that they do not support or encourage sustainable management of the environment.

In my view, the link between the provisions sought and the efficient use and development of natural and physical resources (Section 7(b) of the RMA) is not particularly clear. In my experience, consideration of the efficiency of resource use is more usually about how such resources can best be used to maximise the returns gained from them. Limiting use, in my experience, is more usually a response to managing adverse effects of any particular resource use, and relates to the overarching purpose of the RMA to manage resource use to enable people and communities to provide for their well-being, while sustaining the potential for these resources for future generations, safe-guarding the life-supporting capacity of the matters identified in Section 5(2)(b) and ensuring the adverse effects of the resource use are appropriately managed. It is also not clear to me, from the drafting of the provisions, what the underlying issue is, nor what the actual outcome sought it. Rather, it appears to me that the provisions are particularly narrow, and while they may be valid considerations in terms of matters to be assessed under Section 5 of the RMA, the provisions would seem to prioritise these aspects of consideration at the expense of various other relevant matters. I also note that the matters identified in the proposed provisions are matters that are addressed, at least in part, by the requirements under Section 32 of the RMA, and which therefore need to be considered in the assessment of the provisions of the MEP. I do not consider there to be a need to include this within the MEP provisions themselves. It is therefore my view that the provisions sought are not necessary, or appropriate to achieve the purpose of the RMA.

Aquaculture NZ and MFA seek that, in order to manage biosecurity threats, the deliberate introduction of exotic or introduced plants into the CMA should require consent, as is required under Rule 35.5 of the MSRMP, and that a policy should be added into Chapter 4 to this effect. In my view, such a policy would be too specific for inclusion in this chapter, and the necessity for such a policy would be better considered in relation to Chapter 13 – Use of the Coastal Environment. Such an assessment would need to take into account the more over-arching direction in Chapter 4, for example the direction in Policy 4.1.3 in relation to maintaining the quality of natural resources.

Fulton Hogan raise concerns that Chapter 4 of the MEP focuses narrowly on the use of natural and physical resources in relation to primary industry and tourism. While acknowledging their significance, they are concerned that there is limited policy direction relating to other resource uses, including the aggregate industry. In their view, aggregate is a significant natural resource “*required in order for primary production, tourism, regionally significant infrastructure and almost all facets of life in the Marlborough region to be successful.*” They consider that the narrow focus of the chapter will mean that the stated anticipated environmental results will not be achieved. They note that the rule framework in Volume 2 of the MEP relies heavily on the use of discretionary activity status for all activities not otherwise specified, and therefore

consider that a more comprehensive suite of objectives and policies are required to address all activities, stating that this is essential to provide guidance to inform resource consent applicants and decision makers.

As a result of these concerns, Fulton Hogan seek that Chapter 4 is extended to include issues, objectives and policies that address a wider range of resource uses than only those for primary industry and tourism. In addition to this general request, an addition to the explanation to Issue 4A is sought, to address other resource uses that play an important role in providing for Marlborough's social and economic wellbeing, and then several sentences particularly discussing aggregate resources (the latter is addressed earlier in this report). A new objective is sought for resource uses that are not associated with the primary production and tourism sectors. It is stated that in terms of aggregates extraction and use, the objective "*needs to recognise the importance of the resource to Marlborough, identify that there are factors that play a significant role in determining the cost of the resource and the products, processes and industries that rely on it, and that this resource use comes with responsibilities.*" The following is used as an example of such an objective:

Objective 4.X – Marlborough's natural resources are recognised as an enabler of the economic and social wellbeing of the region.

This is stated as being necessary to address other uses of resources such as aggregates, as there is a "*significant gap*" in the planning framework, highlighted, in their view, by Policies 4.1.1 – 4.1.3 which appear to have wider application than just to primary industry and tourism. The additional objective is supported by MFA and Aquaculture NZ on the basis that the reference to primary production and tourism in Objective 4.1 is overly narrow.

I note that Chapter 4 relates to the use of natural and physical resources. However, the provisions within it provide high level direction in relation to particular issues with such resource use, that are identified as being of regional significance. The provisions within the chapter do not seek to cover all and every matter relating to the use of natural and physical resources. In particular they focus on the three particular matters outlined in this report, and are intended to provide over-arching guidance that is then given effect to through the more detailed and specific provisions within the rest of the MEP.

While I accept that the anticipated environmental result stated is influenced by factors other than those identified in Chapter 4, it is my view that this should not drive the provisions within the Chapter: rather the provisions should be driven by the outcomes which are desired (the objectives), which respond to those resource management issues that are regionally significant. If the anticipated environmental result goes beyond the outcomes sought, it is my view that it should be amended, rather than the other way around.

In terms of Issue 4A and its related provisions, I note that it is neither natural resource use in itself nor primary production and tourism activities in themselves, that the provisions relate to – rather it is the link between these, namely the reliance of these sectors on natural resource use, and ultimately the impact this has on Marlborough's social and economic wellbeing. This is an issue identified as being of regional significance. The provisions that seek to address this provide over-arching guidance about the use of natural resources, without focussing, within this Chapter, on the use of specific resources. It is therefore my view, that more specific provisions relating to one particular resource such as aggregates, is not appropriate at this level, in the same way that the provisions within this chapter do not include specific directions in relation to water resources. In addition to this, in terms of the proposed objective, it is not clear to me the actual environmental outcome that is sought, as to me "*recognition*" of something is less of an outcome and more of an action. In my view, enabling the use of natural resources is already addressed in Policy 4.1.2 in any case. As noted earlier in this report in relation to various specific amendments sought to provisions across this chapter by this submitter, it is my view that aggregate extraction and use is one activity that contributes to the outcomes sought, namely it is a matter that can influence the success of the primary production and tourism sectors, and contributes towards the operation of regionally significant infrastructure. It is my view that these are matters that should be considered in any more specific policy guidance relating to this particular resource use.

Overall, I therefore do not agree with the additional provisions sought by the submitter being included within Chapter 4. For completeness, I note that this does not preclude more specific policies relating to aggregates being considered within the MEP, in the same way that there are more specific policies pertaining to particular resources, for example, particular items of infrastructure and water resources. However, in my view, the appropriateness of any additional provisions should be considered within the relevant detailed chapters of the MEP, particularly Chapter 14 (Use of the Rural Environment).

Issue 5 - General submissions across Chapter 4

The submissions addressed in this section of the report are those which relate to Chapter 4 as a whole. This includes submissions on the introduction to the chapter and the anticipated environmental result, which relate to all three sections of the chapter.

Forest and Bird supports Chapter 4 in part, but consider that the chapter, as written, is very limited in terms of the matters covered and in their view, it is not clear whether the purpose of this separate chapter is to help provide integration, or for some other purpose. They consider that while the objective and policy explanations provide some context of how the use and development of primary industry, tourism and public infrastructure topics integrate and the management approach taken within the MEP, this is, in their view, not clearly captured by the policy wording. They also consider that the method of implementation for Issue 4C (being that they will be implemented through other policies) makes the inclusion of the policies in this chapter irrelevant or of very little weight. They state that the chapter overall appears to capture matters that are also addressed, to a large extent, in other chapters. They seek that the chapter is deleted, ensuring that its provisions are captured appropriately within other chapters, or that it is amended to provide a clear purpose and avoid duplication or unnecessary separation of similar matters between chapters. They also explicitly seek that all three issues are deleted, with Issue 4A and provisions included within other chapters such as the Rural Environment and Coastal Environment chapters; Issue 4B and provisions incorporated in the Transportation and Energy chapters of the MEP; and Issue 4C and provisions incorporated in the Natural Character Chapter. The further submission of Trustpower opposes this, as they consider that each of the matters identified are a legitimate resource management issue. NZTA oppose the deletion of Issue 4B, as they consider that regionally significant infrastructure “holds relevance in a chapter which discusses the importance of sustainable management and use and development of natural and physical resources” and is not better placed in the Transportation and Energy chapters of the MEP.

As set out earlier in this report, the chapter contains three distinct sections. I accept that these cover a limited range of matters within the broader topic of the use of natural and physical resources. However, each of these sections seek to provide over-arching guidance on topics that are otherwise spread out within the MEP. In my view, trying to separate out the provisions within Chapter 4 and insert them into other sections, misses the opportunity to provide more integrated management in relation to each of these matters, and could result in unnecessary duplication across various chapters. I therefore do not agree that the provisions within Chapter 4 should be deleted and moved to other parts of the MEP.

K. Adams raises concerns with the approach taken in the MEP to the allocation of resources “beyond the bubble of reasonable sustainability”. In particular, he questions whether it is in the best long-term interest of the environment to extend limited water resources to arid and currently unirrigated land at the periphery of suitable growing areas and considers that the issuing of recent water permits to some areas should not have been allowed. Further, he raises concerns that once water allocation consents are issued, the existing use rights provide under Section 10 of the RMA and limitations on the ability to review such consents under Section 128 of the RMA means that the Council’s only “moral” alternative is to cease issuing consents for the conversion of “dry barren land to lush vineyards at the expense of collapsing our entire Natural Resources”. He seeks that the Council “amend the MEP Section 4 (and related sections) to recognise the necessity of a moratorium or the complete cessation of issuing new Water Resource Consents” to those areas identified in his submission; and seeks that any claw-back of existing consents be aimed, firstly, as “institutional properties”. He further seeks that “Prior Use (to include Natural Watering and Traditional Use) should be explicit in the wording, not just implied to protect businesses and family farms.” Trustpower opposes this position, stating that there is no scope for the Council to place a moratorium on resource consent applications for water takes.

It is not clear to me what changes are ultimately sought to Chapter 4 of the MEP through this submission. Objective 4.1 seeks that the primary production sector continues to be successful, while ensuring the sustainability of natural resources. Policies 4.1.2 and 4.1.3 seek to achieve this through enabling natural resource use that is “sustainable” and through the maintenance or enhancement of the quality of natural resources. In my view, these aims are generally appropriate, and do not appear to be challenged by the submitter. The subsequent framework within the MEP for water resource allocation will need to give effect to these directions, and must also give effect to the direction in the NPSFM to avoid the over-allocation of fresh water (as that is defined in the NPSFM), and where it is already over-allocated, to phase it out (Objective B2). This will require consideration of the appropriate sustainable limits for water resources within the District. I note, for completeness, that Section 10 of the RMA does not relate to water take and use consents.

It is my view that changes in relation to the matters raised by the submitter are not required to Chapter 4, and that rather, consideration of the sustainable limits for water resources is a matter to be determined in consideration of the more specific provisions in the MEP relating to water allocation.

In a separate submission, K. Adams opposes Section 4 of the MEP on the basis that it is “*a poorly conceived draft full of reckless disregard for the rights of landowners, farmers, and the economic well-being of Marlborough.*” He outlines concerns regarding what has happened with water allocation in Rapaura, and while acknowledging that historical actions cannot be undone, considers that the Council “*can begin working with farmers and vineyard owners who have a special connection to the land.*” He seeks that entire portions of the MEP are re-written, or amendments are added to Section 4, and that the Council acknowledge that “*Rapaura has preeminent rights to unrestricted water from the aquifer immediately beneath our land*” and seeks that the “*full water rights*” are returned to the hereditary land his family has farmed for generations. He further seeks that the “*unique position farming families hold in the heritage of our district, that these are the families that founded Marlborough*” is recognised, and that water allocations are returned to their original descriptions, that recognise prior use, if that purpose is still practicable. Again, it is not clear to me what changes are sought to the MEP, and a number of the matters raised are, in my view, outside the scope of the RMA. As noted above, consideration of the water allocation framework, as it applies to Rapaura, is a matter to be determined in consideration of the more specific provisions in the MEP relating to water allocation. In light of the above, I am therefore not in a position to recommend any changes to Chapter 4 in relation to the matters raised.

NZ Forest Products considers that Chapter 4 appropriately recognises that the prosperity of Marlborough relies on utilising natural resources and the importance of the primary sector. They state that the MEP requires clear objectives and policies that recognise the importance of commercial forestry as a primary industry and enable forestry operations to continue, expand and develop, recognising the use of natural resources is vital to the success of primary industries. They also generally seek that the MEP rules do not inappropriately restrict such activities, and further, that the provisions should enable the intensification of primary production. They also note the importance of appropriate infrastructure to support primary industry and similarly seek that this is enabled in the MEP. Their view is that infrastructure which operates to support primary industry should be classified as regionally significant. Further, they consider that primary production activities should be enabled within the Marlborough Sounds as there are extensive areas where primary industry occurs, or in their view, should occur, in future. Related to this, they seek that new objectives and policies are included within the chapter “*recognising that infrastructure required to support primary industry often has a functional need to be in certain locations such as at the interface with the Coastal Marine Area and that such infrastructure should be enabled notwithstanding that localised environmental effects may be significant.*” New rules, or modifications to proposed rules are sought to give effect to the objective and policy modifications sought.

In addition to the above, NZ Forest Products also seek more specific changes to various provisions within the chapter, which are addressed and considered above in relation to each topic. I do not recommend any changes to address the more general comments of the submitter set out here for the following reasons. In relation to primary production, I consider that Chapter 4 already appropriately recognises the matters raised. In particular, the MEP already recognises the importance of the primary production sector continuing to be successful, and directs limited intervention in the use of land. This needs to be balanced with ensuring the sustainability of the use of, and maintaining and enhancing the quality of, natural resources. As such, in my view, the appropriate balance is struck in this Chapter, and a broad-brush approach to simply “enable” intensification of primary production, including the infrastructure that supports it, is not appropriate and would not meet the purpose of the RMA. Similarly, I do not consider it appropriate to provide direction, at an RPS level, to enable infrastructure to support primary industry in particular locations, even if there are significant effects. In my view, such provisions go beyond what is necessary or appropriate to achieve the MEP’s objectives, and do not strike the balance required by Section 5 of the RMA.

H. Ballinger seeks that the Chapter is amended to include an additional objective and policy relating to road reserves. For completeness, it is noted that these provisions are sought to be added in Chapter 4, Chapter 7 (Landscape), Chapter 12 (Urban Environments) and Chapter 14 (Rural Environments) as well. The objective sought is:

Maintain, preserve and, enhance and increase the amenities of [refer to the headings of chapters 12, 14, and 7 referred to above] .. provided in road environments.

M. Batchelor makes a similar submission, seeking that the objective in Chapter 4 refer to increasing “*the amenities of natural and physical resources...*” The submitter consider that landscape quality, urban design and public safety provisions should be included in the matters over which the Council will exercise control and discretion.

The policy sought by both submitters would direct that rules be included within each zone, relating to roadways and reserve areas, requiring retention of existing trees and the requirement for landscape plans to accompany subdivision applications. In my view, an additional objective and policy of the type sought is not appropriate in this chapter. It does not respond to any of the issues identified within this chapter, and neither submitter has identified another regionally significant issue relating to the use of natural and physical resources, which requires such a response. It is my view that landscape quality, urban design and public safety are matters that are better considered within the zone provisions, rather than within Chapter 4.

Friends of NH and TB seek that a new policy or policies is included in the MEP to address the concepts of natural capital and ecosystem services. This is sought on the basis that protecting the environment is not only required to secure public benefits but also to ensure the natural capital that the economy relies on is maintained, and where practicable, restored. I note that Objective 4.1 seeks that the District’s primary production and tourism sectors continue to succeed, while ensuring the sustainability of natural resources. This reflects the link between the wellbeing of the District and its reliance on the natural resource base. It is not clear to me exactly what is sought by the submitter, nor how it relates to the existing provisions. As such, I am not in a position to recommend any additional policies.

Introduction - Submissions and Assessment

The introduction is supported by QCSRA.

Friends of NH and TB seek that the second paragraph of the introduction, which discusses Section 5 of the RMA, be amended to essentially quote Section 5(a), (b) and (c), as they consider the current explanation wording does not provide an appropriate framework consistent with Part 2. MFA and Aquaculture NZ oppose this change on the basis that it is not helpful to restate the RMA. In my view, the paragraph as currently worded paraphrases those sections of the RMA and in doing so provide a summary that is more helpful than simply quoting the whole RMA section. As such, I recommend that the current wording is retained.

K. Adams seeks that the first paragraph from the Section 32 report on the benefits of Policy 4.1.1 be included in the main body of Chapter 4 of the MEP. The paragraph relates to the acknowledgement of private property rights, the importance of these rights, as identified through consultation, for those involved in primary production activities and the benefit of having this expressly recognised through a policy. I note that an assessment of the benefits of proposed provisions within a plan, as required under Section 32, is different to an explanation that sits within a plan itself. It is my view that the matter of private property rights is already discussed to an appropriate extent within the explanation to Policy 4.1.1 and that the additional paragraph from the Section 32 report would not improve the explanation.

Recommendation

I recommend that the introduction to Chapter 4 is retained as notified.

Anticipated Environmental Results - Submissions and Assessment

Chapter 4 contains one anticipated environmental result (4.AER.1) which is:

People and communities have appropriate access to natural and physical resources in the Marlborough environment in order to provide for their social, economic and cultural wellbeing and health and safety.

There are four indicators listed for monitoring the effectiveness of the provisions in achieving this result: the first two relate particularly to Issue 4A and the primary production and tourism sectors; the third to Issue 4B and regionally significant infrastructure; and the fourth to Issue 4C and the Marlborough Sounds.

In terms of the result, Friends of NH and TB consider that the use of “*appropriate*” is not correct and should be deleted, as the “*effect*” of access requires measurement and is not an environmental result. I am not sure I understand the point made by the submitter, and note that the current wording of the result reflects that the provisions within Chapter 4 do not seek to provide unrestrained access to resources. As such, I consider referring to “*appropriate access*” reflects this. They further seek that “*while reflecting sustainable management*” is added to the end of the result. I am not sure what is meant by “*reflecting*” sustainable management, nor how this would be measured and therefore do not recommend this is added.

Dairy NZ raise concerns as to the correlation between the first indicator (“*The primary sector contributes over 15% of Marlborough GDP*”) and the reference in Issue 4A to the primary sector historically contributing 35% to the local economy. They consider it important to know the current baseline indicator, so that it is clear “*where we are relative to where we want to get to*”. They also note that the indicator is a proportional contribution and consider that it may be appropriate to measure absolute growth to track whether the primary sector continues to thrive over the life of the MEP. AWUG raise concerns in relation to this indicator that the historical benchmarks for GDP contribution are not explained, nor any explanation to justify the monitoring target chosen. They seek that the Council provides more information on this, in order to provide submitters with the ability to make an informed judgment on whether the target is appropriate, including a summary of the GDP contributions from the primary sector over the last ten years, and the rationale for the 15% target.

As noted earlier in relation to the assessment of Issue 4A, it is not clear how the 35% figure referred to in the issue explanation has been derived, and I agree with Dairy NZ that it does not appear to correlate with the monitoring indicator. As such I have recommended that the statement within the issue is deleted. In terms of the monitoring indicator proposed, I have been advised that the figure of 15% chosen reflects the contribution the sector made at the time the drafting of Chapter 4 was finalised. As such, it is the baseline, with the intent being that the contribution remains or increases above this level. This reflects Objective 4.1, in relation to measuring if the primary production sector continues to be successful and thrive. It is based on information provided to the Council by Infometrics, who monitor economic activity for the Council and provide regular updates on a range of indicators including total GDP and GDP by sector. The information is publicly available, and includes the historic proportion of primary production to GDP, since 2000.⁶² However, I also understand that since this time, the methodology used in calculating this has changed, and there are potentially activities that include some (but not just) primary production that are not included within the current GDP figures for primary production. As such, the current figures are more around the 10% mark. In my view, given that the intention was for the AER to reflect the baseline, and in my view this is consistent with the objective, it is most appropriate to amend the AER to 10%. In terms of Dairy NZ’s alternate absolute growth option, in the absence of a specific suggestion, I am not in a position to recommend a change in relation to this, but note that given that the proposed indicator reflects the baseline, a growth target would likely go beyond this.

Fishing Industry considers that the indicators would be enhanced by also monitoring the relative contribution that Marlborough makes to the national GDP, which would allow for comparison of Marlborough’s economy with other regions, and in their view, would inform consideration of whether the District’s primary production sectors “*have appropriate access to natural and physical resources*”. As such they seek an additional measure that “*Marlborough continues to contribute over 1% of New Zealand’s GDP.*” MFA and Aquaculture NZ support this, on the basis that while a number of factors can impact economic activity, in their view, it is straightforward to report on economic activity in comparison to other regions. It is my view that this indicator is not linked to the anticipated environmental result stated, and goes beyond those matters which the chapter aims to achieve (i.e. Objectives 4.1, 4.2 and 4.3). This is because this chapter of the MEP is not focussed on achieving a particular level of GDP in relation to the rest of the country, and the proposed indicator in relation to GDP relates to the success (or otherwise) of the primary sector within the region, i.e. Objective 4.1. Further, it is my view that the MEP cannot influence the management of natural and physical resources in other regions, which will almost certainly seek different outcomes than those in the MEP, and therefore it is not appropriate to provide a measure of comparison with other regions.

Fishing Industry also state that consideration could be given to the adoption of environmental accounting practise as a better measure for monitoring RMA obligations, as it assesses the future value of natural resources rather than current value in GDP terms. As such, they seek the addition of another indicator “*Where appropriate, environmental accounting is used to monitor effectiveness*”. MFA and Aquaculture NZ support this, as they consider the use of environmental accounting will become increasingly relevant and the

⁶² <https://ecoprofile.infometrics.co.nz/Marlborough%2bRegion/Gdp/Structure>

MEP should anticipate and foster the use of such tools. While I accept that environmental accounting may provide appropriate measures for monitoring effectiveness, the proposed indicator is not phrased in a way that makes it clear what is to be measured and therefore, in my view, is not helpful. I also note that the anticipated environmental result is not related to the “value” of natural resources, but about the contribution that access to physical and natural resources makes to people and communities.

In relation to the second indicator, J. & J. Hellstrom raise concerns that the aim for 1.5 million visitors to Marlborough per annum will put significant strain on natural and physical resources, without a corresponding increase in infrastructure such as public toilets and camping spots. They state: “*To aim for 1.5 million tourists within 10 years, without corollary statements about how the infrastructure throughout Marlborough will be geared up to cope with this, is neither socially nor environmentally responsible.*” I note that an anticipated environmental result is a way of measuring the success of the MEP’s provisions, whereas the aims of the MEP are articulated in the MEP’s objectives, and the provisions linked to the achievement of those aims. As such, the number of tourists is not an aim in itself, but rather a measure of whether the tourism sector within the District continues to be successful. It is my view that managing facilities for tourists, such as accommodation and toilets, are matters outside the MEP but which may need to be considered by the Council as part of its wider functions under the Local Government Act.

Friends of NH and TB seek deletion of the fourth indicator, that states “*Public perception survey indicates that a majority of residents and ratepayers believe that the Marlborough Sounds environment is in good health*”, on that basis that is an “*unhelpful statement*” and does not reflect the 2015 State of the Environment Report. Similarly, East Bay Conservation Society challenge the fourth indicator. Their view is that the Council does little or no marine environment monitoring, and where it is done it shows “*woeful performance of the Marine Benthic environment*”. They raise concerns about the lack of action from the Council in relation to plastic pollution and state that their perception is that the East Bay environment is not in good health. They request that the Council takes action to benchmark and monitor the environment and regulate where the MEP’s policies and rules are not met, and support the use of a coastal occupancy charge to resource monitoring and regulation of the marine environment. I note in relation to both submissions, that the indicator is not a statement regarding the current perception, rather it is a measure to be used in determining whether the MEP’s outcomes, in terms of Issue 4C, are being achieved through the MEP. Where the indicator is not met, my view is that this needs to be considered through a plan review process and cannot be pre-determined. Given the high-level nature of the provisions within this chapter, my view is that the indicator proposed is appropriate, and more specific indicators, for example those that may relate to monitoring of particular aspects of the Marlborough Sounds environment, are more appropriately considered in relation to other chapters of the MEP.

Federated Farmers seek that this indicator is deleted, as while they agree that the health of the Marlborough Sounds is an important goal, they consider that reliance on the subjective nature of a perception survey is not appropriate. They consider that there are risks that people’s perceptions can be based on opinion, hearsay or belief, rather than fact or reality. While I accept that this can be the case, in the absence of an alternate being proposed by the submitter, I cannot agree with the deletion of the indicator altogether, as it is the only measure proposed relating to the achievement of Objective 4.3. I also note that what is proposed is the use of a public perception survey as a monitoring measure. There is nothing in the MEP, to my knowledge, that is tied to the results of this. In my experience in other districts and regions, when undertaking the efficiency and effectiveness monitoring required under Section 35, and in reviewing plan provisions, the survey results would not be considered in isolation. In particular, other information indicating whether or not the Marlborough Sounds environment is in good health would be considered alongside public perception.

QCSRA dispute the anticipated environmental result “*as no documentation seen*”. They seek that it is amended to read “*Monitoring of the views of Residents and ratepayers in the Sounds will be undertaken to assist Council decision making.*” In my view, this is not phrased as an environmental indicator. In any case, I note that the proposed indicator will require that views be monitored (through the Public Perception Survey) and this can be used to assist in Council decision making, including identification of where any revision of the MEP’s provisions may be warranted.

KCSRA submits that the fourth indicator needs to be amended to insert that public perception surveys will be independently prepared and implemented, with participants surveyed given sufficient advanced information to make informed responses. This is on the basis that there have been “*various recent self serving industry focussed surveys concerning their sector’s activities in the Sounds that fail dismally on this score*”. It is my understanding that the monitoring of the specific indicators will be undertaken by the Council, not by

industry sectors, thus avoiding the underlying concern of the submitter. In my view, it is not appropriate to direct within the MEP exactly how the monitoring will be undertaken, as this is a matter of detail for the Council to determine when it undertakes the public perception survey.

Friends of NH and TB consider that there is inadequate recognition of maintaining the “*natural capital*” which the productive sector relies on and which affects the quality of the environment. They request the following additional anticipated environmental result “*That a majority of residents, visitors and ratepayers consider that the Marlborough Sounds has not been the subject of human induced degradation*” and that this is assessed by a public perception survey. It is my view that this matter is already covered by the fourth indicator proposed and the further indicator sought is therefore not required.

Recommendation

I recommend that the Anticipated environmental result is retained as notified.

I recommend that the monitoring effectiveness section is amended as follows:

The primary sector contributes over ~~10-15%~~⁶³ of Marlborough GDP.

The number of visitors to Marlborough exceeds 1.5 million per annum.

Regionally significant infrastructure continues to operate effectively and without disruption from other activities.

Public perception survey indicates that a majority of residents and ratepayers believe that the Marlborough Sounds environment is in good health.

⁶³ 548.7 – Awatere WUG; 676.2 – Dairy NZ.

Appendix 1: Common Template Submissions

Submitters who submitted one or more of the following standard-text submissions are listed below in the following tables:

Table 1: List of Common Format submitters – Group 1

Submitter Number	Submitter Name
514	A J King Family Trust and S A King Family Trust
574	B. Skeggs
726	Canantor Mussels Limited and N. I. Buchanan-Brown
809	J. Jessep
926	Wainui Green 2015 Limited
936	M. Jessep
964	Marlborough Oysters Limited
1157	Southern Crown Limited

Table 2: List of Common Format submitters – Group 2

Submitter Number	Submitter Name
477	J. M. McKee
510	A. Allison
535	A. Riddle
538	A. Smith
539	A. Steele
540	A. Stewart
541	A. Te Uatuku
543	A. Willis
549	B. Albrey
551	B. Armstrong
555	B. Glover
559	B. Jones
560	B. Lee
562	B. Lucas
564	B. Materoa
565	B. Mathews
576	C. O. Chin
582	C. Burnett
583	C. Cheong
584	C. Dixon
588	C. Hall
590	C. Harvey
593	C-S. Jeon
595	C. McIntyre
600	C. Rangī
603	C. S. Chin
606	C. Steele

607	C. Tepu
611	C. Velez
618	B. Lewis
620	B. Lines
621	B. Findlayson
624	C-A. Herbert
625	C. Harris
627	C. Scholefield
628	C. Nott
641	D. McCall
649	D. Herbert
654	D. Jones
655	D. Karunakaran
656	D. King
658	D. Lawrence
659	D. M. Curie
660	D. Manson
661	D. Marfell
663	D. McCauley
664	D. McKenzie
665	D. McManaway
667	D. Paget
677	D. Walker
678	David Horton
680	Delwynne Horton
694	E. Shin
703	F. Fosbender
704	F. Jones
705	F. Mathews

708	F. Tuese
709	I. Dunlop
721	G. Boyd
722	G. C. Tan
729	G. Hayter
731	G. Jones
734	G. Learmonth
737	G. McIlroy
741	G. Slipper
745	G. Tregidga
753	H. Lagden
756	H. S. Ha
758	H. Stanford
759	H. Steele
760	H. T. Ng
761	H. Timoti
773	I. Kaisara
781	J. Adam
784	J. Biggs
787	J. Braven
793	J. Cleal
796	J. Craddock
799	J. E. Epere
803	J. Healy
804	J. Herbert
805	J. Higgin
807	J. Hunter
812	J. Ko
814	J. L. Jeon

817	J. McCowan
825	J-A. Rickard
826	J. Riri
829	J. Smith
831	J. Taylor
834	J. Udy
836	J. W. Epere
851	K. Hawkins
856	K. Mant
857	K. Millan
863	K. Soloman
877	L. Ashby
878	L. Daymond
881	L. Gibbins
884	L. J. Moleta-Bentham
885	L. McClung
886	L. McGee
887	L. Mitchell
888	P. Lily
889	L. Rickard
892	L. Simpson
901	L. W. Wing
902	L. Ward
912	M. Augustine
914	M. Burne
918	M. Cleal
926	Wainui Green 2015 Limited
927	M. Gillard
929	M. Hargood

941	M. Marfell
942	M. Mitchell
943	M. Naplawa
948	M. Smith
951	M. Wallace
953	M. Whittal
955	M. Winter
976	N. A. Yazid
982	N. Grey
985	N. McCulloch
988	N. Wallace
989	N. Watts
1008	P. A. Hawke
1026	P. Riri
1029	P. Shirley
1031	P. Snape
1053	R. Bee
1055	R. Bryant
1057	R. Dippie
1063	R. G. B. MacPherson
1067	R. Heta
1072	R. MacGibbon
1073	R. Murdoch
1077	R. Roberts
1079	R. Stanford
1080	R. Steele
1097	S. Ferguson
1103	S. Barnes
1108	S. Bray

1112	S. Cumming
1113	S. Devaraj
1115	S. Dyer
1116	S. E. Borrie
1119	S. Hill
1120	S. Holdem
1122	S. J. Bickley
1127	S. Ng
1128	S. Oliver
1130	S. P. Lim
1131	S. Pereyra
1138	S. Turnbull
1139	S. Williams
1144	S. Foster
1168	T. Jones
1170	T. Lindsay
1172	T. Materoa
1175	T. O'Grady
1177	T. S. Wong
1178	T. Shaw
1181	T. Tautari
1211	V. Hall
1221	W. de Joux
1224	P. Wood
1225	W. Hollis
1226	W. Kingi
1227	W. Neame
1241	Y. H. Son
1243	Z. Charman

1247	R. Walker
1252	F. Prendeville

Appendix 2: Recommended decisions on decisions requested

Submission Number	Submission Point	Submitter	Volume	Chapter	Provision	Recommendation
21	1	Keith M J Adams	Volume 1	4 Use of Natural and Physical Resources		Reject
36	1	Keith M.J. Adams	Volume 1	4 Use of Natural and Physical Resources	4.	Accept in part
263	6	Mark Batchelor	Volume 1	4 Use of Natural and Physical Resources	4.	Reject
401	11	Aquaculture New Zealand	Volume 1	4 Use of Natural and Physical Resources	4.	Reject
401	14	Aquaculture New Zealand	Volume 1	4 Use of Natural and Physical Resources	4.	Accept in part
401	33	Aquaculture New Zealand	Volume 1	4 Use of Natural and Physical Resources	4.	Reject
404	1	Eric Jorgensen	Volume 1	4 Use of Natural and Physical Resources	4.	Accept in part
426	11	Marine Farming Association Incorporated	Volume 1	4 Use of Natural and Physical Resources	4.	Reject
426	33	Marine Farming Association Incorporated	Volume 1	4 Use of Natural and Physical Resources	4.	Reject
504	4	Queen Charlotte Sound Residents Association	Volume 1	4 Use of Natural and Physical Resources	4.	Accept
514	3	A J King Family Trust and S A King Family Trust	Volume 1	4 Use of Natural and Physical Resources	4.	Reject
514	4	A J King Family Trust and S A King Family Trust	Volume 1	4 Use of Natural and Physical Resources	4.	Accept in part
514	5	A J King Family Trust and S A King Family Trust	Volume 1	4 Use of Natural and Physical Resources	4.	Reject
574	3	Bryan Skeggs	Volume 1	4 Use of Natural and Physical Resources	4.	Reject
574	5	Bryan Skeggs	Volume 1	4 Use of Natural and Physical Resources	4.	Reject
715	1	Royal Forest and Bird Protection Society NZ (Forest and Bird)	Volume 1	4 Use of Natural and Physical Resources	4.	Reject
716	27	Friends of Nelson Haven and Tasman Bay Incorporated	Volume 1	4 Use of Natural and Physical Resources	4.	Reject
717	10	Fulton Hogan Limited	Volume	4 Use of Natural and	4.	Reject

Submission Number	Submission Point	Submitter	Volume	Chapter	Provision	Recommendation
			1	Physical Resources		
717	12	Fulton Hogan Limited	Volume 1	4 Use of Natural and Physical Resources	4.	Reject
726	3	Canantor Mussels Limited and N. I Buchanan-Brown	Volume 1	4 Use of Natural and Physical Resources	4.	Reject
726	5	Canantor Mussels Limited and N. I Buchanan-Brown	Volume 1	4 Use of Natural and Physical Resources	4.	Reject
809	3	Jim Jessep	Volume 1	4 Use of Natural and Physical Resources	4.	Reject
809	5	Jim Jessep	Volume 1	4 Use of Natural and Physical Resources	4.	Reject
926	13	Wainui Green 2015 Limited	Volume 1	4 Use of Natural and Physical Resources	4.	Reject
926	15	Wainui Green 2015 Limited	Volume 1	4 Use of Natural and Physical Resources	4.	Reject
936	3	Michael Jessep	Volume 1	4 Use of Natural and Physical Resources	4.	Reject
936	5	Michael Jessep	Volume 1	4 Use of Natural and Physical Resources	4.	Reject
964	3	Marlborough Oysters Limited	Volume 1	4 Use of Natural and Physical Resources	4.	Reject
964	5	Marlborough Oysters Limited	Volume 1	4 Use of Natural and Physical Resources	4.	Reject
1157	3	Southern Crown Limited	Volume 1	4 Use of Natural and Physical Resources	4.	Reject
1157	5	Southern Crown Limited	Volume 1	4 Use of Natural and Physical Resources	4.	Reject
1189	31	Te Runanga o Kaikoura and Te Runanga o Ngai Tahu	Volume 1	4 Use of Natural and Physical Resources	4.	Reject
464	2	Chorus New Zealand limited	All	4 Use of Natural and Physical Resources	4.	Reject
1158	77	Spark New Zealand Trading Limited	All	4 Use of Natural and Physical Resources	4.	Reject
149	1	PF Olsen Ltd	Volume 1	4 Use of Natural and Physical Resources	Issue 4A	Accept in part

Submission Number	Submission Point	Submitter	Volume	Chapter	Provision	Recommendation
401	9	Aquaculture New Zealand	Volume 1	4 Use of Natural and Physical Resources	Issue 4A	Accept
425	8	Federated Farmers of New Zealand	Volume 1	4 Use of Natural and Physical Resources	Issue 4A	Reject
425	14	Federated Farmers of New Zealand	Volume 1	4 Use of Natural and Physical Resources	Issue 4A	Reject
426	9	Marine Farming Association Incorporated	Volume 1	4 Use of Natural and Physical Resources	Issue 4A	Accept
455	1	John Hickman	Volume 1	4 Use of Natural and Physical Resources	Issue 4A	Accept
456	1	George Mehlhopt	Volume 1	4 Use of Natural and Physical Resources	Issue 4A	Accept
509	14	Nelson Marlborough Fish and Game	Volume 1	4 Use of Natural and Physical Resources	Issue 4A	Reject
548	1	Awatere Water Users Group Incorporated	Volume 1	4 Use of Natural and Physical Resources	Issue 4A	Accept in part
676	1	Dairy NZ	Volume 1	4 Use of Natural and Physical Resources	Issue 4A	Accept
688	1	Judy and John Hellstrom	Volume 1	4 Use of Natural and Physical Resources	Issue 4A	Accept in part
715	2	Royal Forest and Bird Protection Society NZ (Forest and Bird)	Volume 1	4 Use of Natural and Physical Resources	Issue 4A	Reject
716	28	Friends of Nelson Haven and Tasman Bay Incorporated	Volume 1	4 Use of Natural and Physical Resources	Issue 4A	Accept in part
717	11	Fulton Hogan Limited	Volume 1	4 Use of Natural and Physical Resources	Issue 4A	Reject
738	4	Glenda Vera Robb	Volume 1	4 Use of Natural and Physical Resources	Issue 4A	Accept
935	1	Melva Joy Robb	Volume 1	4 Use of Natural and Physical Resources	Issue 4A	Accept
962	7	Marlborough Forest Industry Association Incorporated	Volume 1	4 Use of Natural and Physical Resources	Issue 4A	Accept in part
990	163	Nelson Forests Limited	Volume 1	4 Use of Natural and Physical Resources	Issue 4A	Accept in part
995	1	New Zealand Forest Products Holdings Limited	Volume 1	4 Use of Natural and Physical Resources	Issue 4A	Reject

Submission Number	Submission Point	Submitter	Volume	Chapter	Provision	Recommendation
1238	4	Windermere Forests Limited	Volume 1	4 Use of Natural and Physical Resources	Issue 4A	Accept
14	1	Nicholas Webby	Volume 1	4 Use of Natural and Physical Resources	Objective 4.1	Accept
149	2	PF Olsen Ltd	Volume 1	4 Use of Natural and Physical Resources	Objective 4.1	Reject
401	12	Aquaculture New Zealand	Volume 1	4 Use of Natural and Physical Resources	Objective 4.1	Reject
401	15	Aquaculture New Zealand	Volume 1	4 Use of Natural and Physical Resources	Objective 4.1	Reject
401	17	Aquaculture New Zealand	Volume 1	4 Use of Natural and Physical Resources	Objective 4.1	Reject
401	18	Aquaculture New Zealand	Volume 1	4 Use of Natural and Physical Resources	Objective 4.1	Reject
425	10	Federated Farmers of New Zealand	Volume 1	4 Use of Natural and Physical Resources	Objective 4.1	Accept
426	12	Marine Farming Association Incorporated	Volume 1	4 Use of Natural and Physical Resources	Objective 4.1	Reject
426	15	Marine Farming Association Incorporated	Volume 1	4 Use of Natural and Physical Resources	Objective 4.1	Reject
426	17	Marine Farming Association Incorporated	Volume 1	4 Use of Natural and Physical Resources	Objective 4.1	Reject
426	18	Marine Farming Association Incorporated	Volume 1	4 Use of Natural and Physical Resources	Objective 4.1	Reject
431	1	Wine Marlborough	Volume 1	4 Use of Natural and Physical Resources	Objective 4.1	Accept
454	1	Kevin Francis Loe	Volume 1	4 Use of Natural and Physical Resources	Objective 4.1	Accept
455	2	John Hickman	Volume 1	4 Use of Natural and Physical Resources	Objective 4.1	Accept
456	2	George Mehlhopt	Volume 1	4 Use of Natural and Physical Resources	Objective 4.1	Accept
457	1	Accolade Wines New Zealand Limited	Volume 1	4 Use of Natural and Physical Resources	Objective 4.1	Accept
462	9	Blind River Irrigation Limited	Volume 1	4 Use of Natural and Physical Resources	Objective 4.1	Accept

Submission Number	Submission Point	Submitter	Volume	Chapter	Provision	Recommendation
472	1	ME Taylor Limited	Volume 1	4 Use of Natural and Physical Resources	Objective 4.1	Accept
473	1	Delegat Limited	Volume 1	4 Use of Natural and Physical Resources	Objective 4.1	Accept
484	1	Clintondale Trust, Whyte Trustee Company Limited	Volume 1	4 Use of Natural and Physical Resources	Objective 4.1	Accept
504	5	Queen Charlotte Sound Residents Association	Volume 1	4 Use of Natural and Physical Resources	Objective 4.1	Reject
505	2	Ernslaw One Limited	Volume 1	4 Use of Natural and Physical Resources	Objective 4.1	Accept
509	15	Nelson Marlborough Fish and Game	Volume 1	4 Use of Natural and Physical Resources	Objective 4.1	Reject
548	2	Awatere Water Users Group Incorporated	Volume 1	4 Use of Natural and Physical Resources	Objective 4.1	Accept
640	1	Douglas and Colleen Robbins	Volume 1	4 Use of Natural and Physical Resources	Objective 4.1	Accept
648	2	D C Hemphill	Volume 1	4 Use of Natural and Physical Resources	Objective 4.1	Accept in part
676	3	Dairy NZ	Volume 1	4 Use of Natural and Physical Resources	Objective 4.1	Accept
710	5	The Fishing Industry Submitters	Volume 1	4 Use of Natural and Physical Resources	Objective 4.1	Reject
712	57	Flaxbourne Settlers Association	Volume 1	4 Use of Natural and Physical Resources	Objective 4.1	Accept
769	5	Horticulture New Zealand	Volume 1	4 Use of Natural and Physical Resources	Objective 4.1	Accept
778	4	Irrigation New Zealand Incorporated	Volume 1	4 Use of Natural and Physical Resources	Objective 4.1	Accept
909	1	Longfield Farm Limited	Volume 1	4 Use of Natural and Physical Resources	Objective 4.1	Accept
970	1	Middlehurst Station Limited	Volume 1	4 Use of Natural and Physical Resources	Objective 4.1	Accept
995	2	New Zealand Forest Products Holdings Limited	Volume 1	4 Use of Natural and Physical Resources	Objective 4.1	Reject
1039	1	Pernod Ricard Winemakers New Zealand Limited	Volume 1	4 Use of Natural and Physical Resources	Objective 4.1	Accept

Submission Number	Submission Point	Submitter	Volume	Chapter	Provision	Recommendation
1090	3	Ravensdown Limited	Volume 1	4 Use of Natural and Physical Resources	Objective 4.1	Accept
1124	26	Steve MacKenzie	Volume 1	4 Use of Natural and Physical Resources	Objective 4.1	Accept
1144	10	Scott Foster	Volume 1	4 Use of Natural and Physical Resources	Objective 4.1	Reject
1189	27	Te Runanga o Kaikoura and Te Runanga o Ngai Tahu	Volume 1	4 Use of Natural and Physical Resources	Objective 4.1	Accept
1189	30	Te Runanga o Kaikoura and Te Runanga o Ngai Tahu	Volume 1	4 Use of Natural and Physical Resources	Objective 4.1	Reject
1192	1	The Fertiliser Association of New Zealand	Volume 1	4 Use of Natural and Physical Resources	Objective 4.1	Accept
1218	1	Villa Maria	Volume 1	4 Use of Natural and Physical Resources	Objective 4.1	Accept
1237	7	Willowgrove Dairies Limited	Volume 1	4 Use of Natural and Physical Resources	Objective 4.1	Accept
149	3	PF Olsen Ltd	Volume 1	4 Use of Natural and Physical Resources	Policy 4.1.1	Reject
166	2	Te Runanga o Toa Rangatira	Volume 1	4 Use of Natural and Physical Resources	Policy 4.1.1	Reject
425	9	Federated Farmers of New Zealand	Volume 1	4 Use of Natural and Physical Resources	Policy 4.1.1	Accept in part
431	2	Wine Marlborough	Volume 1	4 Use of Natural and Physical Resources	Policy 4.1.1	Accept
454	2	Kevin Francis Loe	Volume 1	4 Use of Natural and Physical Resources	Policy 4.1.1	Accept
455	3	John Hickman	Volume 1	4 Use of Natural and Physical Resources	Policy 4.1.1	Accept
456	3	George Mehlhopt	Volume 1	4 Use of Natural and Physical Resources	Policy 4.1.1	Accept
457	2	Accolade Wines New Zealand Limited	Volume 1	4 Use of Natural and Physical Resources	Policy 4.1.1	Accept
459	12	Beef and Lamb New Zealand	Volume 1	4 Use of Natural and Physical Resources	Policy 4.1.1	Reject
462	44	Blind River Irrigation Limited	Volume 1	4 Use of Natural and Physical Resources	Policy 4.1.1	Accept

Submission Number	Submission Point	Submitter	Volume	Chapter	Provision	Recommendation
472	2	ME Taylor Limited	Volume 1	4 Use of Natural and Physical Resources	Policy 4.1.1	Accept
473	2	Delegat Limited	Volume 1	4 Use of Natural and Physical Resources	Policy 4.1.1	Accept
484	2	Clintondale Trust, Whyte Trustee Company Limited	Volume 1	4 Use of Natural and Physical Resources	Policy 4.1.1	Reject
505	3	Ernslaw One Limited	Volume 1	4 Use of Natural and Physical Resources	Policy 4.1.1	Accept
509	16	Nelson Marlborough Fish and Game	Volume 1	4 Use of Natural and Physical Resources	Policy 4.1.1	Reject
548	3	Awatere Water Users Group Incorporated	Volume 1	4 Use of Natural and Physical Resources	Policy 4.1.1	Accept
631	1	Constellation Brands New Zealand Limited	Volume 1	4 Use of Natural and Physical Resources	Policy 4.1.1	Accept
648	3	D C Hemphill	Volume 1	4 Use of Natural and Physical Resources	Policy 4.1.1	Accept
676	4	Dairy NZ	Volume 1	4 Use of Natural and Physical Resources	Policy 4.1.1	Accept
712	58	Flaxbourne Settlers Association	Volume 1	4 Use of Natural and Physical Resources	Policy 4.1.1	Accept
716	29	Friends of Nelson Haven and Tasman Bay Incorporated	Volume 1	4 Use of Natural and Physical Resources	Policy 4.1.1	Accept in part
769	6	Horticulture New Zealand	Volume 1	4 Use of Natural and Physical Resources	Policy 4.1.1	Accept in part
778	5	Irrigation New Zealand Incorporated	Volume 1	4 Use of Natural and Physical Resources	Policy 4.1.1	Accept
845	1	Kenneth R and Sara M Roush	Volume 1	4 Use of Natural and Physical Resources	Policy 4.1.1	Accept in part
909	2	Longfield Farm Limited	Volume 1	4 Use of Natural and Physical Resources	Policy 4.1.1	Accept
962	8	Marlborough Forest Industry Association Incorporated	Volume 1	4 Use of Natural and Physical Resources	Policy 4.1.1	Reject
970	2	Middlehurst Station Limited	Volume 1	4 Use of Natural and Physical Resources	Policy 4.1.1	Accept
990	164	Nelson Forests Limited	Volume 1	4 Use of Natural and Physical Resources	Policy 4.1.1	Accept in part

Submission Number	Submission Point	Submitter	Volume	Chapter	Provision	Recommendation
995	3	New Zealand Forest Products Holdings Limited	Volume 1	4 Use of Natural and Physical Resources	Policy 4.1.1	Reject
1039	2	Pernod Ricard Winemakers New Zealand Limited	Volume 1	4 Use of Natural and Physical Resources	Policy 4.1.1	Accept
1042	1	Port Underwood Association	Volume 1	4 Use of Natural and Physical Resources	Policy 4.1.1	Accept in part
1090	4	Ravensdown Limited	Volume 1	4 Use of Natural and Physical Resources	Policy 4.1.1	Accept in part
1124	27	Steve MacKenzie	Volume 1	4 Use of Natural and Physical Resources	Policy 4.1.1	Accept
1189	28	Te Runanga o Kaikoura and Te Runanga o Ngai Tahu	Volume 1	4 Use of Natural and Physical Resources	Policy 4.1.1	Accept in part
1192	2	The Fertiliser Association of New Zealand	Volume 1	4 Use of Natural and Physical Resources	Policy 4.1.1	Reject
1201	9	Trustpower Limited	Volume 1	4 Use of Natural and Physical Resources	Policy 4.1.1	Accept
1218	2	Villa Maria	Volume 1	4 Use of Natural and Physical Resources	Policy 4.1.1	Accept
1237	8	Willowgrove Dairies Limited	Volume 1	4 Use of Natural and Physical Resources	Policy 4.1.1	Accept
1238	5	Windermere Forests Limited	Volume 1	4 Use of Natural and Physical Resources	Policy 4.1.1	Accept
1242	1	Yealands Estate Limited	Volume 1	4 Use of Natural and Physical Resources	Policy 4.1.1	Accept
14	2	Nicholas Webby	Volume 1	4 Use of Natural and Physical Resources	Policy 4.1.2	Accept
401	16	Aquaculture New Zealand	Volume 1	4 Use of Natural and Physical Resources	Policy 4.1.2	Accept
425	11	Federated Farmers of New Zealand	Volume 1	4 Use of Natural and Physical Resources	Policy 4.1.2	Accept
426	16	Marine Farming Association Incorporated	Volume 1	4 Use of Natural and Physical Resources	Policy 4.1.2	Accept
431	3	Wine Marlborough	Volume 1	4 Use of Natural and Physical Resources	Policy 4.1.2	Accept
454	3	Kevin Francis Loe	Volume 1	4 Use of Natural and Physical Resources	Policy 4.1.2	Accept

Submission Number	Submission Point	Submitter	Volume	Chapter	Provision	Recommendation
455	4	John Hickman	Volume 1	4 Use of Natural and Physical Resources	Policy 4.1.2	Accept
456	4	George Mehlhopt	Volume 1	4 Use of Natural and Physical Resources	Policy 4.1.2	Accept
457	3	Accolade Wines New Zealand Limited	Volume 1	4 Use of Natural and Physical Resources	Policy 4.1.2	Accept
462	45	Blind River Irrigation Limited	Volume 1	4 Use of Natural and Physical Resources	Policy 4.1.2	Accept
484	3	Clintondale Trust, Whyte Trustee Company Limited	Volume 1	4 Use of Natural and Physical Resources	Policy 4.1.2	Accept
509	17	Nelson Marlborough Fish and Game	Volume 1	4 Use of Natural and Physical Resources	Policy 4.1.2	Accept in part
548	4	Awatere Water Users Group Incorporated	Volume 1	4 Use of Natural and Physical Resources	Policy 4.1.2	Accept
631	2	Constellation Brands New Zealand Limited	Volume 1	4 Use of Natural and Physical Resources	Policy 4.1.2	Accept
648	4	D C Hemphill	Volume 1	4 Use of Natural and Physical Resources	Policy 4.1.2	Accept
676	5	Dairy NZ	Volume 1	4 Use of Natural and Physical Resources	Policy 4.1.2	Reject
716	30	Friends of Nelson Haven and Tasman Bay Incorporated	Volume 1	4 Use of Natural and Physical Resources	Policy 4.1.2	Accept in part
717	13	Fulton Hogan Limited	Volume 1	4 Use of Natural and Physical Resources	Policy 4.1.2	Accept
778	6	Irrigation New Zealand Incorporated	Volume 1	4 Use of Natural and Physical Resources	Policy 4.1.2	Accept
909	3	Longfield Farm Limited	Volume 1	4 Use of Natural and Physical Resources	Policy 4.1.2	Accept
962	11	Marlborough Forest Industry Association Incorporated	Volume 1	4 Use of Natural and Physical Resources	Policy 4.1.2	Accept in part
995	4	New Zealand Forest Products Holdings Limited	Volume 1	4 Use of Natural and Physical Resources	Policy 4.1.2	Reject
1002	7	New Zealand Transport Agency	Volume 1	4 Use of Natural and Physical Resources	Policy 4.1.2	Accept
1039	3	Pernod Ricard Winemakers New Zealand Limited	Volume 1	4 Use of Natural and Physical Resources	Policy 4.1.2	Reject

Submission Number	Submission Point	Submitter	Volume	Chapter	Provision	Recommendation
1042	2	Port Underwood Association	Volume 1	4 Use of Natural and Physical Resources	Policy 4.1.2	Reject
1090	5	Ravensdown Limited	Volume 1	4 Use of Natural and Physical Resources	Policy 4.1.2	Accept in part
1192	3	The Fertiliser Association of New Zealand	Volume 1	4 Use of Natural and Physical Resources	Policy 4.1.2	Accept
1201	13	Trustpower Limited	Volume 1	4 Use of Natural and Physical Resources	Policy 4.1.2	Reject
1218	3	Villa Maria	Volume 1	4 Use of Natural and Physical Resources	Policy 4.1.2	Accept
1242	2	Yealands Estate Limited	Volume 1	4 Use of Natural and Physical Resources	Policy 4.1.2	Accept
233	8	Totaranui Limited	Volume 1	4 Use of Natural and Physical Resources	Policy 4.1.3	Reject
401	19	Aquaculture New Zealand	Volume 1	4 Use of Natural and Physical Resources	Policy 4.1.3	Reject
425	12	Federated Farmers of New Zealand	Volume 1	4 Use of Natural and Physical Resources	Policy 4.1.3	Reject
426	19	Marine Farming Association Incorporated	Volume 1	4 Use of Natural and Physical Resources	Policy 4.1.3	Reject
433	4	Port Marlborough New Zealand Limited	Volume 1	4 Use of Natural and Physical Resources	Policy 4.1.3	Accept
455	5	John Hickman	Volume 1	4 Use of Natural and Physical Resources	Policy 4.1.3	Accept
456	5	George Mehlhopt	Volume 1	4 Use of Natural and Physical Resources	Policy 4.1.3	Accept
509	18	Nelson Marlborough Fish and Game	Volume 1	4 Use of Natural and Physical Resources	Policy 4.1.3	Reject
548	5	Awatere Water Users Group Incorporated	Volume 1	4 Use of Natural and Physical Resources	Policy 4.1.3	Accept
648	5	D C Hemphill	Volume 1	4 Use of Natural and Physical Resources	Policy 4.1.3	Accept
676	17	Dairy NZ	Volume 1	4 Use of Natural and Physical Resources	Policy 4.1.3	Accept
716	31	Friends of Nelson Haven and Tasman Bay Incorporated	Volume 1	4 Use of Natural and Physical Resources	Policy 4.1.3	Accept

Submission Number	Submission Point	Submitter	Volume	Chapter	Provision	Recommendation
778	7	Irrigation New Zealand Incorporated	Volume 1	4 Use of Natural and Physical Resources	Policy 4.1.3	Accept
1090	6	Ravensdown Limited	Volume 1	4 Use of Natural and Physical Resources	Policy 4.1.3	Accept in part
1189	29	Te Runanga o Kaikoura and Te Runanga o Ngai Tahu	Volume 1	4 Use of Natural and Physical Resources	Policy 4.1.3	Reject
1192	4	The Fertiliser Association of New Zealand	Volume 1	4 Use of Natural and Physical Resources	Policy 4.1.3	Accept in part
1201	10	Trustpower Limited	Volume 1	4 Use of Natural and Physical Resources	Policy 4.1.3	Accept
401	27	Aquaculture New Zealand	Volume 1	4 Use of Natural and Physical Resources	4.M.1	Accept
426	27	Marine Farming Association Incorporated	Volume 1	4 Use of Natural and Physical Resources	4.M.1	Accept
455	6	John Hickman	Volume 1	4 Use of Natural and Physical Resources	4.M.1	Accept
456	6	George Mehlhopt	Volume 1	4 Use of Natural and Physical Resources	4.M.1	Accept
504	6	Queen Charlotte Sound Residents Association	Volume 1	4 Use of Natural and Physical Resources	4.M.1	Reject
648	6	D C Hemphill	Volume 1	4 Use of Natural and Physical Resources	4.M.1	Accept
401	28	Aquaculture New Zealand	Volume 1	4 Use of Natural and Physical Resources	4.M.2	Accept
426	28	Marine Farming Association Incorporated	Volume 1	4 Use of Natural and Physical Resources	4.M.2	Accept
455	7	John Hickman	Volume 1	4 Use of Natural and Physical Resources	4.M.2	Accept
456	7	George Mehlhopt	Volume 1	4 Use of Natural and Physical Resources	4.M.2	Accept
401	29	Aquaculture New Zealand	Volume 1	4 Use of Natural and Physical Resources	4.M.3	Accept
426	29	Marine Farming Association Incorporated	Volume 1	4 Use of Natural and Physical Resources	4.M.3	Accept
455	8	John Hickman	Volume 1	4 Use of Natural and Physical Resources	4.M.3	Accept

Submission Number	Submission Point	Submitter	Volume	Chapter	Provision	Recommendation
456	8	George Mehlhopt	Volume 1	4 Use of Natural and Physical Resources	4.M.3	Accept
401	30	Aquaculture New Zealand	Volume 1	4 Use of Natural and Physical Resources	4.M.4	Accept
425	13	Federated Farmers of New Zealand	Volume 1	4 Use of Natural and Physical Resources	4.M.4	Accept
426	30	Marine Farming Association Incorporated	Volume 1	4 Use of Natural and Physical Resources	4.M.4	Accept
455	9	John Hickman	Volume 1	4 Use of Natural and Physical Resources	4.M.4	Accept
456	9	George Mehlhopt	Volume 1	4 Use of Natural and Physical Resources	4.M.4	Accept
548	6	Awatere Water Users Group Incorporated	Volume 1	4 Use of Natural and Physical Resources	4.M.4	Accept
688	2	Judy and John Hellstrom	Volume 1	4 Use of Natural and Physical Resources	4.M.4	Accept
778	8	Irrigation New Zealand Incorporated	Volume 1	4 Use of Natural and Physical Resources	4.M.4	Accept in part
401	31	Aquaculture New Zealand	Volume 1	4 Use of Natural and Physical Resources	4.M.5	Accept
455	10	John Hickman	Volume 1	4 Use of Natural and Physical Resources	4.M.5	Accept
456	10	George Mehlhopt	Volume 1	4 Use of Natural and Physical Resources	4.M.5	Accept
280	6	Nelson Marlborough District Health Board	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
401	10	Aquaculture New Zealand	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
426	10	Marine Farming Association Incorporated	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
433	5	Port Marlborough New Zealand Limited	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Accept
464	4	Chorus New Zealand limited	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Accept in part
477	2	John Malcolm McKee	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject

Submission Number	Submission Point	Submitter	Volume	Chapter	Provision	Recommendation
500	3	Ben Clarke	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
510	2	Anne Allison	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
530	3	AM and LM Campbell Family Trust	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
535	2	Adele Riddle	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
538	2	Andre Smith	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
539	2	Allen Steele	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
540	2	Arthur Stewart	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
541	2	Akiwa Te Uatuku	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
543	2	Alistair Willis	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
549	2	Bryan Albrey	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
551	2	Ben Armstrong	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
555	2	Blair Glover	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
559	2	Belinda Jones	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
560	2	Brian Lee	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
562	2	Brendon Lucas	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
564	2	Belinda Materoa	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
565	2	Brent Mathews	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
576	2	Chee Ong Chin	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject

Submission Number	Submission Point	Submitter	Volume	Chapter	Provision	Recommendation
582	2	Cory Burnett	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
583	2	Carmay Cheong	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
584	2	Corey Dixon	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
588	2	Christopher Hall	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
590	2	Cameron Harvey	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
593	2	Chang-Seog Jeon	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
595	2	Clayton McIntyre	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
600	2	Connor Rangi	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
603	2	Chee Song Chin	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
606	2	Cindy Steele	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
607	2	Cadeena Tepu	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
611	2	Carla Velez	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
618	2	Brad Lewis	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
620	2	Brook Lines	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
621	2	Becki Findlayson	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
624	2	Carol-Ann Herbert	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
625	2	Cheryl Harris	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
627	2	Carl Scholefield	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject

Submission Number	Submission Point	Submitter	Volume	Chapter	Provision	Recommendation
628	2	Clinton Nott	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
641	2	Dan McCall	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
649	2	Dave Herbert	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
654	2	David Jones	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
655	2	Dhaneshkar Karunakaran	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
656	2	David King	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
658	2	Dan Lawrence	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
659	2	Donald M Curie	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
660	2	Daniel Manson	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
661	2	Denis Marfell	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
663	2	Dion McCauley	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
664	2	Dellae McKenzie	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
665	2	Dorothy McManaway	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
667	2	Daniel Paget	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
677	2	Daniel Walker	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
678	2	David Horton	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
680	2	Delwynne Horton	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
694	2	Elin Shin	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject

Submission Number	Submission Point	Submitter	Volume	Chapter	Provision	Recommendation
703	2	Faye Fosbender	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
704	2	Febe Jones	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
705	2	Fay Mathews	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
708	2	Filisita Tuese	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
709	2	Ian Dunlop	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
715	3	Royal Forest and Bird Protection Society NZ (Forest and Bird)	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
716	32	Friends of Nelson Haven and Tasman Bay Incorporated	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Accept
717	14	Fulton Hogan Limited	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
717	15	Fulton Hogan Limited	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
721	2	Grant Boyd	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
722	2	Gaik Choo Tan	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
729	2	Graham Hayter	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
731	2	Grace Jones	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
734	2	Gail Learmonth	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
737	2	Gareth McIlroy	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
741	2	Glen Slipper	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
745	2	Graeme Tregidga	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
753	2	Hope Lagden	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject

Submission Number	Submission Point	Submitter	Volume	Chapter	Provision	Recommendation
756	2	Hye Sug Ha	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
758	2	Holly Stanford	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
759	2	Hudson Steele	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
760	2	Hui Ting Ng	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
761	2	Hilda Timoti	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
773	2	Iosua Kaisara	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
781	2	Johann Adam	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
784	2	Jackie Biggs	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
787	2	Jo Braven	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
787	3	Jo Braven	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
793	2	John Cleal	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
796	2	John Craddock	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
799	2	June Ethel Epere	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
803	2	John Healy	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
804	2	Jordan Herbert	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
805	2	James Higgin	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
807	2	Jeremy Hunter	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
812	2	Jungmin Ko	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject

Submission Number	Submission Point	Submitter	Volume	Chapter	Provision	Recommendation
814	2	Jeong Lye Jeon	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
817	2	Jemma McCowan	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
825	2	Jo-Ann Rickard	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
826	2	Jade Riri	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
829	2	Jason Smith	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
831	2	Jim Taylor	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
834	2	Jarod Udy	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
836	2	James William Epere	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
851	2	Kevin Hawkins	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
856	2	Karen Mant	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
857	2	Kowhai Millan	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
863	2	Karen Soloman	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
873	4	KiwiRail Holdings Limited	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Accept
877	2	Lynette Ashby	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
878	1	Lyndon Daymond	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
878	2	Lyndon Daymond	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
881	2	Laisa Gibbins	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
884	2	Laura Jillian Moleta-Bentham	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject

Submission Number	Submission Point	Submitter	Volume	Chapter	Provision	Recommendation
885	2	Les McClung	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
886	2	Linda McGee	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
887	2	Lauren Mitchell	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
888	2	Pang Lily	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
889	2	Lavina Rickard	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
892	2	Lynda Simpson	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
901	2	Lo Wai Wing	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
902	2	Lewis Ward	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
912	2	Myken Augustine	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
914	2	Michael Burne	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
918	2	Maree Cleal	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
926	2	Wainui Green 2015 Limited	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
927	2	Mark Gillard	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
929	2	Mandy Hargood	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
941	2	Marion Marfell	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
942	2	Marie Mitchell	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
943	2	Martina Naplawa	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
948	2	Melissa Smith	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject

Submission Number	Submission Point	Submitter	Volume	Chapter	Provision	Recommendation
951	2	Michael Wallace	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
953	2	Mark Whittall	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
955	2	Moira Winter	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
967	2	Marlborough Roads	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
976	2	Norazizah Abu Yazid	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
982	2	Nathan Grey	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
985	2	Niki McCulloch	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
988	2	Nathan Wallace	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
989	2	Natasha Watts	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
992	2	New Zealand Defence Force	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Accept
993	1	New Zealand Fire Service Commission	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
1002	5	New Zealand Transport Agency	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
1008	2	Philip Anthony Hawke	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
1026	2	Patricia Riri	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
1029	2	Peter Shirley	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
1031	2	Peter Snape	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
1053	2	Roger Bee	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
1055	2	Rory Bryant	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject

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1057	2	Roger Dippie	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
1063	2	Riley George Barnes MacPherson	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
1067	2	Renee Heta	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
1072	2	Rob MacGibbon	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
1073	2	Robert Murdoch	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
1077	9	Rodney Roberts	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
1079	2	Rachel Stanford	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
1080	2	Rata Steele	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
1097	2	Sonya Ferguson	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
1103	2	Stuart Barnes	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
1108	2	Shane Bray	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
1112	9	Sarah Cumming	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
1113	2	Sivanathan Devaraj	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
1115	2	Steve Dyer	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
1116	2	Stuart Edward Borrie	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
1119	2	Sharon Hill	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
1120	2	Stewart Holdem	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
1122	2	Steven John Bickley	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject

Submission Number	Submission Point	Submitter	Volume	Chapter	Provision	Recommendation
1127	2	Soon Ng	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
1128	2	Sam Oliver	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
1130	2	Sook Peng Lim	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
1131	2	Susana Pereyra	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
1138	2	Shane Turnbull	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
1139	2	Sarah Williams	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
1144	2	Scott Foster	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
1158	2	Spark New Zealand Trading Limited	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Accept in part
1168	2	Tony Jones	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
1170	2	Tama Lindsay	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
1172	2	Tyler Materoa	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
1175	2	Tracy O'Grady	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
1177	2	Thien Soong Wong	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
1178	2	Teresa Shaw	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
1181	2	Tiare Tautari	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
1198	2	Transpower New Zealand Limited	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Accept in part
1198	3	Transpower New Zealand Limited	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Accept in part
1211	2	Vaughan Hall	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject

Submission Number	Submission Point	Submitter	Volume	Chapter	Provision	Recommendation
1221	2	Wayne de Joux	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
1224	2	P Wood	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
1225	2	Wayne Hollis	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
1226	2	William Kingi	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
1227	2	Warwick Neame	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
1241	2	Yong Hee Son	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
1243	2	Zane Charman	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
1247	2	Robert Walker	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
1252	2	Frank Prendeville	Volume 1	4 Use of Natural and Physical Resources	Issue 4B	Reject
66	3	Karen and John Wills	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
149	4	PF Olsen Ltd	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
280	7	Nelson Marlborough District Health Board	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Accept in part
433	6	Port Marlborough New Zealand Limited	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Accept
464	5	Chorus New Zealand limited	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
477	3	John Malcolm McKee	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
500	2	Ben Clarke	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
510	3	Anne Allison	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
535	3	Adele Riddle	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject

Submission Number	Submission Point	Submitter	Volume	Chapter	Provision	Recommendation
538	3	Andre Smith	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
539	3	Allen Steele	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
540	3	Arthur Stewart	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
541	3	Akiwa Te Uatuku	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
543	3	Alistair Willis	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
549	3	Bryan Albrey	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
551	3	Ben Armstrong	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
555	3	Blair Glover	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
559	3	Belinda Jones	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
560	3	Brian Lee	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
562	3	Brendon Lucas	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
564	3	Belinda Materoa	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
565	3	Brent Mathews	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
576	3	Chee Ong Chin	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
582	3	Cory Burnett	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
583	3	Carmay Cheong	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
584	3	Corey Dixon	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
588	3	Christopher Hall	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject

Submission Number	Submission Point	Submitter	Volume	Chapter	Provision	Recommendation
590	3	Cameron Harvey	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
593	3	Chang-Seog Jeon	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
595	3	Clayton McIntyre	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
600	3	Connor Rangi	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
603	3	Chee Song Chin	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
606	3	Cindy Steele	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
607	3	Cadeena Tepu	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
611	3	Carla Velez	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
618	3	Brad Lewis	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
620	3	Brook Lines	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
621	3	Becki Findlayson	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
624	3	Carol-Ann Herbert	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
625	3	Cheryl Harris	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
627	3	Carl Scholefield	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
628	3	Clinton Nott	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
641	3	Dan McCall	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
649	3	Dave Herbert	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
654	3	David Jones	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject

Submission Number	Submission Point	Submitter	Volume	Chapter	Provision	Recommendation
655	3	Dhaneshkar Karunakaran	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
656	3	David King	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
658	3	Dan Lawrence	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
659	3	Donald M Curie	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
660	3	Daniel Manson	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
661	3	Denis Marfell	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
663	3	Dion McCauley	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
664	3	Dellae McKenzie	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
664	8	Dellae McKenzie	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Accept in part
665	3	Dorothy McManaway	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
667	3	Daniel Paget	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
677	3	Daniel Walker	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
678	3	David Horton	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
680	3	Delwynne Horton	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
694	3	Elin Shin	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
694	4	Elin Shin	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
703	3	Faye Fosbender	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
704	3	Febe Jones	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject

Submission Number	Submission Point	Submitter	Volume	Chapter	Provision	Recommendation
705	3	Fay Mathews	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
708	3	Filisita Tuese	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
709	3	Ian Dunlop	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
717	16	Fulton Hogan Limited	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
721	3	Grant Boyd	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
722	3	Gaik Choo Tan	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
729	3	Graham Hayter	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
731	3	Grace Jones	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
734	3	Gail Learmonth	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
737	3	Gareth McIlroy	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
741	3	Glen Slipper	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
745	3	Graeme Tregidga	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
753	3	Hope Lagden	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
756	3	Hye Sug Ha	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
758	3	Holly Stanford	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
759	3	Hudson Steele	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
760	3	Hui Ting Ng	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
761	3	Hilda Timoti	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject

Submission Number	Submission Point	Submitter	Volume	Chapter	Provision	Recommendation
773	3	Iosua Kaisara	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
781	3	Johann Adam	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
784	3	Jackie Biggs	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
787	4	Jo Braven	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
793	3	John Cleal	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
796	3	John Craddock	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
799	3	June Ethel Epere	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
803	3	John Healy	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
804	3	Jordan Herbert	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
805	3	James Higgin	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
807	3	Jeremy Hunter	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
812	3	Jungmin Ko	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
814	3	Jeong Lye Jeon	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
817	3	Jemma McCowan	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
825	3	Jo-Ann Rickard	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
826	3	Jade Riri	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
829	3	Jason Smith	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
831	3	Jim Taylor	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject

Submission Number	Submission Point	Submitter	Volume	Chapter	Provision	Recommendation
834	3	Jarod Udy	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
836	3	James William Epere	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
851	3	Kevin Hawkins	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
856	3	Karen Mant	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
857	3	Kowhai Millan	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
863	3	Karen Soloman	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
873	5	KiwiRail Holdings Limited	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Accept
877	3	Lynette Ashby	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
878	3	Lyndon Daymond	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
881	3	Laisa Gibbins	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
884	3	Laura Jillian Moleta-Bentham	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
885	3	Les McClung	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
886	3	Linda McGee	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
887	3	Lauren Mitchell	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
888	3	Pang Lily	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
889	3	Lavina Rickard	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
892	3	Lynda Simpson	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
901	3	Lo Wai Wing	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject

Submission Number	Submission Point	Submitter	Volume	Chapter	Provision	Recommendation
902	3	Lewis Ward	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
912	3	Myken Augustine	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
912	4	Myken Augustine	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
914	3	Michael Burne	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
918	3	Maree Cleal	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
926	3	Wainui Green 2015 Limited	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
927	3	Mark Gillard	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
929	3	Mandy Hargood	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
941	3	Marion Marfell	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
942	3	Marie Mitchell	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
943	3	Martina Naplawa	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
948	3	Melissa Smith	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
951	3	Michael Wallace	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
953	3	Mark Whittall	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
955	3	Moira Winter	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
967	3	Marlborough Roads	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
976	3	Norazizah Abu Yazid	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
982	3	Nathan Grey	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject

Submission Number	Submission Point	Submitter	Volume	Chapter	Provision	Recommendation
985	3	Niki McCulloch	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
988	3	Nathan Wallace	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
989	3	Natasha Watts	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
992	3	New Zealand Defence Force	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Accept
993	2	New Zealand Fire Service Commission	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
1002	8	New Zealand Transport Agency	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
1008	3	Philip Anthony Hawke	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
1026	3	Patricia Riri	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
1029	3	Peter Shirley	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
1031	3	Peter Snape	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
1041	2	Port Clifford Limited	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Accept
1053	3	Roger Bee	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
1055	3	Rory Bryant	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
1057	3	Roger Dippie	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
1063	3	Riley George Barnes MacPherson	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
1067	3	Renee Heta	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
1072	3	Rob MacGibbon	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
1073	3	Robert Murdoch	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject

Submission Number	Submission Point	Submitter	Volume	Chapter	Provision	Recommendation
1077	10	Rodney Roberts	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
1079	3	Rachel Stanford	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
1080	3	Rata Steele	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
1097	3	Sonya Ferguson	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
1103	3	Stuart Barnes	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
1108	3	Shane Bray	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
1112	8	Sarah Cumming	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
1113	3	Sivanathan Devaraj	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
1115	3	Steve Dyer	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
1116	3	Stuart Edward Borrie	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
1119	3	Sharon Hill	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
1120	3	Stewart Holdem	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
1122	3	Steven John Bickley	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
1127	3	Soon Ng	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
1128	3	Sam Oliver	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
1130	3	Sook Peng Lim	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
1131	3	Susana Pereyra	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
1138	3	Shane Turnbull	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject

Submission Number	Submission Point	Submitter	Volume	Chapter	Provision	Recommendation
1139	3	Sarah Williams	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
1144	3	Scott Foster	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
1158	3	Spark New Zealand Trading Limited	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
1168	3	Tony Jones	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
1170	3	Tama Lindsay	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
1172	3	Tyler Materoa	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
1175	3	Tracy O'Grady	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
1177	3	Thien Soong Wong	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
1178	3	Teresa Shaw	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
1181	3	Tiare Tautari	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
1198	4	Transpower New Zealand Limited	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
1198	7	Transpower New Zealand Limited	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
1198	8	Transpower New Zealand Limited	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Accept in part
1201	11	Trustpower Limited	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Accept
1211	3	Vaughan Hall	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
1221	3	Wayne de Joux	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
1224	3	P Wood	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
1225	3	Wayne Hollis	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject

Submission Number	Submission Point	Submitter	Volume	Chapter	Provision	Recommendation
1226	3	William Kingi	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
1227	3	Warwick Neame	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
1241	3	Yong Hee Son	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
1243	3	Zane Charman	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
1247	3	Robert Walker	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
1252	3	Frank Prendeville	Volume 1	4 Use of Natural and Physical Resources	Objective 4.2	Reject
280	8	Nelson Marlborough District Health Board	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
401	20	Aquaculture New Zealand	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
425	15	Federated Farmers of New Zealand	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
426	20	Marine Farming Association Incorporated	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
433	7	Port Marlborough New Zealand Limited	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Accept in part
464	6	Chorus New Zealand limited	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Accept in part
474	1	Marlborough Aero Club Incorporated	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Accept
477	4	John Malcolm McKee	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
510	4	Anne Allison	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
535	4	Adele Riddle	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
538	4	Andre Smith	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
539	4	Allen Steele	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject

Submission Number	Submission Point	Submitter	Volume	Chapter	Provision	Recommendation
540	4	Arthur Stewart	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
541	4	Akiwa Te Uatuku	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
543	4	Alistair Willis	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
549	4	Bryan Albrey	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
551	4	Ben Armstrong	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
555	4	Blair Glover	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
559	4	Belinda Jones	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
560	4	Brian Lee	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
562	4	Brendon Lucas	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
564	4	Belinda Materoa	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
565	4	Brent Mathews	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
576	4	Chee Ong Chin	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
582	4	Cory Burnett	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
583	4	Carmay Cheong	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
584	4	Corey Dixon	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
588	4	Christopher Hall	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
590	4	Cameron Harvey	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
593	4	Chang-Seog Jeon	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject

Submission Number	Submission Point	Submitter	Volume	Chapter	Provision	Recommendation
595	4	Clayton McIntyre	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
600	4	Connor Rangı	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
603	4	Chee Song Chin	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
606	4	Cindy Steele	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
607	4	Cadeena Tepu	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
618	4	Brad Lewis	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
620	4	Brook Lines	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
621	4	Becki Findlayson	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
624	4	Carol-Ann Herbert	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
625	4	Cheryl Harris	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
627	4	Carl Scholefield	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
628	4	Clinton Nott	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
641	4	Dan McCall	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
649	4	Dave Herbert	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
654	4	David Jones	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
655	4	Dhaneshkar Karunakaran	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
656	4	David King	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
658	4	Dan Lawrence	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject

Submission Number	Submission Point	Submitter	Volume	Chapter	Provision	Recommendation
659	4	Donald M Curie	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
660	4	Daniel Manson	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
661	4	Denis Marfell	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
663	4	Dion McCauley	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
664	4	Dellae McKenzie	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
665	4	Dorothy McManaway	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
667	4	Daniel Paget	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
677	4	Daniel Walker	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
678	4	David Horton	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
680	4	Delwynne Horton	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
703	4	Faye Fosbender	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
704	4	Febe Jones	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
705	4	Fay Mathews	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
708	4	Filisita Tuese	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
709	4	Ian Dunlop	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
721	4	Grant Boyd	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
722	4	Gaik Choo Tan	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
729	4	Graham Hayter	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject

Submission Number	Submission Point	Submitter	Volume	Chapter	Provision	Recommendation
731	4	Grace Jones	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
734	4	Gail Learmonth	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
737	4	Gareth McIlroy	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
741	4	Glen Slipper	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
745	4	Graeme Tregidga	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
753	4	Hope Lagden	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
756	4	Hye Sug Ha	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
758	4	Holly Stanford	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
759	4	Hudson Steele	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
760	4	Hui Ting Ng	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
761	4	Hilda Timoti	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
769	7	Horticulture New Zealand	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
773	4	Iosua Kaisara	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
778	9	Irrigation New Zealand Incorporated	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
781	4	Johann Adam	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
784	4	Jackie Biggs	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
793	4	John Cleal	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
796	4	John Craddock	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject

Submission Number	Submission Point	Submitter	Volume	Chapter	Provision	Recommendation
799	4	June Ethel Epere	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
803	4	John Healy	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
804	4	Jordan Herbert	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
805	4	James Higgin	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
807	4	Jeremy Hunter	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
812	4	Jungmin Ko	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
814	4	Jeong Lye Jeon	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
817	4	Jemma McCowan	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
825	4	Jo-Ann Rickard	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
826	4	Jade Riri	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
829	4	Jason Smith	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
831	4	Jim Taylor	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
834	4	Jarod Udy	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
836	4	James William Epere	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
851	4	Kevin Hawkins	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
856	4	Karen Mant	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
857	4	Kowhai Millan	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
863	4	Karen Soloman	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject

Submission Number	Submission Point	Submitter	Volume	Chapter	Provision	Recommendation
873	6	KiwiRail Holdings Limited	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
877	4	Lynette Ashby	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
878	4	Lyndon Daymond	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
881	4	Laisa Gibbins	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
884	4	Laura Jillian Moleta-Bentham	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
885	4	Les McClung	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
886	4	Linda McGee	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
887	4	Lauren Mitchell	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
888	4	Pang Lily	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
889	4	Lavina Rickard	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
892	4	Lynda Simpson	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
901	4	Lo Wai Wing	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
902	4	Lewis Ward	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
914	4	Michael Burne	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
918	4	Maree Cleal	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
926	4	Wainui Green 2015 Limited	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
927	4	Mark Gillard	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
929	4	Mandy Hargood	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject

Submission Number	Submission Point	Submitter	Volume	Chapter	Provision	Recommendation
941	4	Marion Marfell	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
942	4	Marie Mitchell	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
943	4	Martina Naplawa	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
948	4	Melissa Smith	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
951	4	Michael Wallace	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
953	4	Mark Whittall	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
955	4	Moira Winter	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
967	4	Marlborough Roads	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Accept in part
976	4	Norazizah Abu Yazid	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
982	4	Nathan Grey	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
985	4	Niki McCulloch	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
988	4	Nathan Wallace	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
989	4	Natasha Watts	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
992	4	New Zealand Defence Force	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Accept in part
995	8	New Zealand Forest Products Holdings Limited	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
1002	9	New Zealand Transport Agency	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Accept in part
1008	4	Philip Anthony Hawke	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
1026	4	Patricia Riri	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject

Submission Number	Submission Point	Submitter	Volume	Chapter	Provision	Recommendation
1029	4	Peter Shirley	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
1031	4	Peter Snape	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
1053	4	Roger Bee	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
1055	4	Rory Bryant	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
1057	4	Roger Dippie	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
1063	4	Riley George Barnes MacPherson	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
1067	4	Renee Heta	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
1072	4	Rob MacGibbon	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
1073	4	Robert Murdoch	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
1077	2	Rodney Roberts	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
1079	4	Rachel Stanford	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
1080	4	Rata Steele	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
1097	4	Sonya Ferguson	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
1103	4	Stuart Barnes	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
1108	4	Shane Bray	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
1112	7	Sarah Cumming	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
1113	4	Sivanathan Devaraj	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
1115	4	Steve Dyer	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject

Submission Number	Submission Point	Submitter	Volume	Chapter	Provision	Recommendation
1116	4	Stuart Edward Borrie	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
1119	4	Sharon Hill	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
1120	4	Stewart Holdem	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
1122	4	Steven John Bickley	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
1127	4	Soon Ng	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
1128	4	Sam Oliver	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
1130	4	Sook Peng Lim	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
1131	4	Susana Pereyra	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
1138	4	Shane Turnbull	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
1139	4	Sarah Williams	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
1144	4	Scott Foster	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
1151	1	Simcox Construction Limited	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
1158	4	Spark New Zealand Trading Limited	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Accept in part
1168	4	Tony Jones	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
1170	4	Tama Lindsay	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
1172	4	Tyler Materoa	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
1175	4	Tracy O'Grady	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
1177	4	Thien Soong Wong	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject

Submission Number	Submission Point	Submitter	Volume	Chapter	Provision	Recommendation
1178	4	Teresa Shaw	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
1181	4	Tiare Tautari	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
1198	5	Transpower New Zealand Limited	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Accept in part
1201	12	Trustpower Limited	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Accept
1211	4	Vaughan Hall	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
1221	4	Wayne de Joux	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
1224	4	P Wood	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
1225	4	Wayne Hollis	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
1226	4	William Kingi	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
1227	4	Warwick Neame	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
1241	4	Yong Hee Son	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
1243	4	Zane Charman	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
1247	4	Robert Walker	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
1252	4	Frank Prendeville	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.1	Reject
280	9	Nelson Marlborough District Health Board	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.2	Accept in part
425	16	Federated Farmers of New Zealand	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.2	Accept in part
433	8	Port Marlborough New Zealand Limited	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.2	Accept
464	7	Chorus New Zealand limited	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.2	Reject

Submission Number	Submission Point	Submitter	Volume	Chapter	Provision	Recommendation
873	7	KiwiRail Holdings Limited	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.2	Accept
967	5	Marlborough Roads	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.2	Reject
992	5	New Zealand Defence Force	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.2	Accept
1002	10	New Zealand Transport Agency	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.2	Reject
1041	3	Port Clifford Limited	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.2	Accept
1158	5	Spark New Zealand Trading Limited	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.2	Reject
1198	6	Transpower New Zealand Limited	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.2	Accept
1201	14	Trustpower Limited	Volume 1	4 Use of Natural and Physical Resources	Policy 4.2.2	Reject
1002	11	New Zealand Transport Agency	Volume 1	4 Use of Natural and Physical Resources	4.M.6	Reject
1198	9	Transpower New Zealand Limited	Volume 1	4 Use of Natural and Physical Resources	4.M.6	Accept
464	8	Chorus New Zealand limited	Volume 1	4 Use of Natural and Physical Resources	4.M.7	Accept in part
1002	12	New Zealand Transport Agency	Volume 1	4 Use of Natural and Physical Resources	4.M.7	Accept in part
1158	6	Spark New Zealand Trading Limited	Volume 1	4 Use of Natural and Physical Resources	4.M.7	Accept in part
464	9	Chorus New Zealand limited	Volume 1	4 Use of Natural and Physical Resources	4.M.8	Reject
992	6	New Zealand Defence Force	Volume 1	4 Use of Natural and Physical Resources	4.M.8	Accept
1002	13	New Zealand Transport Agency	Volume 1	4 Use of Natural and Physical Resources	4.M.8	Accept
1158	7	Spark New Zealand Trading Limited	Volume 1	4 Use of Natural and Physical Resources	4.M.8	Reject
1198	10	Transpower New Zealand Limited	Volume 1	4 Use of Natural and Physical Resources	4.M.8	Accept

Submission Number	Submission Point	Submitter	Volume	Chapter	Provision	Recommendation
464	10	Chorus New Zealand limited	Volume 1	4 Use of Natural and Physical Resources	4.M.9	Accept in part
717	17	Fulton Hogan Limited	Volume 1	4 Use of Natural and Physical Resources	4.M.9	Accept
967	6	Marlborough Roads	Volume 1	4 Use of Natural and Physical Resources	4.M.9	Reject
993	3	New Zealand Fire Service Commission	Volume 1	4 Use of Natural and Physical Resources	4.M.9	Reject
1002	14	New Zealand Transport Agency	Volume 1	4 Use of Natural and Physical Resources	4.M.9	Reject
1158	8	Spark New Zealand Trading Limited	Volume 1	4 Use of Natural and Physical Resources	4.M.9	Accept in part
1198	11	Transpower New Zealand Limited	Volume 1	4 Use of Natural and Physical Resources	4.M.9	Accept in part
425	17	Federated Farmers of New Zealand	Volume 1	4 Use of Natural and Physical Resources	4.M.10	Reject
873	8	KiwiRail Holdings Limited	Volume 1	4 Use of Natural and Physical Resources	4.M.10	Accept
1002	15	New Zealand Transport Agency	Volume 1	4 Use of Natural and Physical Resources	4.M.10	Accept in part
1198	12	Transpower New Zealand Limited	Volume 1	4 Use of Natural and Physical Resources	4.M.10	Accept
100	11	East Bay Conservation Society	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Reject
149	5	PF Olsen Ltd	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Reject
351	37	Helen Mary Ballinger	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Reject
368	1	Kate and Shane Ponder-West	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Reject
425	18	Federated Farmers of New Zealand	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Reject
426	14	Marine Farming Association Incorporated	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
433	9	Port Marlborough New Zealand Limited	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Reject

Submission Number	Submission Point	Submitter	Volume	Chapter	Provision	Recommendation
477	5	John Malcolm McKee	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
505	4	Ernslaw One Limited	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Reject
509	19	Nelson Marlborough Fish and Game	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept
510	7	Anne Allison	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
535	7	Adele Riddle	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
538	7	Andre Smith	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
539	7	Allen Steele	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
540	7	Arthur Stewart	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
541	7	Akiwa Te Uatuku	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
543	7	Alistair Willis	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
549	7	Bryan Albrey	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
551	7	Ben Armstrong	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
555	7	Blair Glover	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
559	7	Belinda Jones	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
560	7	Brian Lee	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
562	7	Brendon Lucas	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
564	7	Belinda Materoa	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
565	7	Brent Mathews	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part

Submission Number	Submission Point	Submitter	Volume	Chapter	Provision	Recommendation
576	7	Chee Ong Chin	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
582	7	Cory Burnett	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
583	7	Carmay Cheong	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
584	7	Corey Dixon	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
588	7	Christopher Hall	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
590	7	Cameron Harvey	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
593	7	Chang-Seog Jeon	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
595	7	Clayton McIntyre	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
600	7	Connor Rangi	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
603	7	Chee Song Chin	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
606	7	Cindy Steele	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
607	7	Cadeena Tepu	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
611	4	Carla Velez	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Reject
611	7	Carla Velez	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
618	6	Brad Lewis	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Reject
620	7	Brook Lines	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
621	7	Becki Findlayson	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
624	7	Carol-Ann Herbert	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part

Submission Number	Submission Point	Submitter	Volume	Chapter	Provision	Recommendation
625	7	Cheryl Harris	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
627	7	Carl Scholefield	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
628	7	Clinton Nott	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
640	2	Douglas and Colleen Robbins	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept
641	6	Dan McCall	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
648	7	D C Hemphill	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
649	7	Dave Herbert	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
654	7	David Jones	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
655	7	Dhaneshkar Karunakaran	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
656	7	David King	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
658	7	Dan Lawrence	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
659	7	Donald M Curie	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
660	7	Daniel Manson	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
661	7	Denis Marfell	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
663	7	Dion McCauley	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
664	7	Dellae McKenzie	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
665	7	Dorothy McManaway	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
667	7	Daniel Paget	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part

Submission Number	Submission Point	Submitter	Volume	Chapter	Provision	Recommendation
677	7	Daniel Walker	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
678	7	David Horton	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
680	7	Delwynne Horton	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
694	7	Elin Shin	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
698	8	Environmental Defence Society Incorporated	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Reject
698	9	Environmental Defence Society Incorporated	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Reject
703	7	Faye Fosbender	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
704	7	Febe Jones	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
705	7	Fay Mathews	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
708	7	Filisita Tuese	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
709	7	Ian Dunlop	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
715	4	Royal Forest and Bird Protection Society NZ (Forest and Bird)	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Reject
716	33	Friends of Nelson Haven and Tasman Bay Incorporated	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Reject
721	7	Grant Boyd	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
722	7	Gaik Choo Tan	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
729	7	Graham Hayter	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
731	7	Grace Jones	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
734	7	Gail Learmonth	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part

Submission Number	Submission Point	Submitter	Volume	Chapter	Provision	Recommendation
737	7	Gareth McIlroy	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
738	5	Glenda Vera Robb	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept
741	7	Glen Slipper	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
745	7	Graeme Tregidga	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
753	7	Hope Lagden	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
756	7	Hye Sug Ha	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
758	7	Holly Stanford	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
759	7	Hudson Steele	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
760	7	Hui Ting Ng	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
761	7	Hilda Timoti	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
773	7	Iosua Kaisara	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
781	7	Johann Adam	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
784	7	Jackie Biggs	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
787	7	Jo Braven	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
793	7	John Cleal	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
796	7	John Craddock	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
799	7	June Ethel Epere	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
803	7	John Healy	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part

Submission Number	Submission Point	Submitter	Volume	Chapter	Provision	Recommendation
804	7	Jordan Herbert	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
805	7	James Higgin	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
807	7	Jeremy Hunter	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
807	8	Jeremy Hunter	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
812	7	Jungmin Ko	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
814	7	Jeong Lye Jeon	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
817	7	Jemma McCowan	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
825	7	Jo-Ann Rickard	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
826	7	Jade Riri	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
829	7	Jason Smith	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
831	7	Jim Taylor	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
834	7	Jarod Udy	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
836	7	James William Epere	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
851	7	Kevin Hawkins	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
856	7	Karen Mant	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
857	7	Kowhai Millan	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
863	7	Karen Soloman	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
869	1	Kenepuru and Central Sounds Residents Association Incorporated	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Reject

Submission Number	Submission Point	Submitter	Volume	Chapter	Provision	Recommendation
873	9	KiwiRail Holdings Limited	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept
877	7	Lynette Ashby	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
878	7	Lyndon Daymond	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
881	7	Laisa Gibbins	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
884	7	Laura Jillian Moleta-Bentham	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
885	7	Les McClung	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
886	7	Linda McGee	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
887	7	Lauren Mitchell	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
888	7	Pang Lily	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
889	7	Lavina Rickard	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
892	7	Lynda Simpson	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
901	7	Lo Wai Wing	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
902	7	Lewis Ward	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
912	7	Myken Augustine	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
914	7	Michael Burne	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
918	7	Maree Cleal	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
926	7	Wainui Green 2015 Limited	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
927	7	Mark Gillard	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part

Submission Number	Submission Point	Submitter	Volume	Chapter	Provision	Recommendation
929	7	Mandy Hargood	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
935	2	Melva Joy Robb	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept
941	7	Marion Marfell	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
942	7	Marie Mitchell	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
943	7	Martina Naplawa	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
948	7	Melissa Smith	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
951	7	Michael Wallace	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
953	7	Mark Whittall	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
955	7	Moira Winter	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
976	7	Norazizah Abu Yazid	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
982	7	Nathan Grey	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
985	7	Niki McCulloch	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
988	7	Nathan Wallace	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
989	7	Natasha Watts	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
990	165	Nelson Forests Limited	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Reject
1008	7	Philip Anthony Hawke	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
1026	7	Patricia Riri	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
1029	7	Peter Shirley	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part

Submission Number	Submission Point	Submitter	Volume	Chapter	Provision	Recommendation
1031	7	Peter Snape	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
1053	7	Roger Bee	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
1055	7	Rory Bryant	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
1057	7	Roger Dippie	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
1063	7	Riley George Barnes MacPherson	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
1067	7	Renee Heta	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
1072	7	Rob MacGibbon	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
1073	7	Robert Murdoch	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
1077	4	Rodney Roberts	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
1079	7	Rachel Stanford	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
1080	7	Rata Steele	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
1097	7	Sonya Ferguson	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
1103	7	Stuart Barnes	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
1108	7	Shane Bray	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
1112	5	Sarah Cumming	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
1113	7	Sivanathan Devaraj	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
1115	7	Steve Dyer	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
1116	7	Stuart Edward Borrie	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part

Submission Number	Submission Point	Submitter	Volume	Chapter	Provision	Recommendation
1119	7	Sharon Hill	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
1120	7	Stewart Holdem	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
1122	7	Steven John Bickley	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
1127	7	Soon Ng	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
1128	7	Sam Oliver	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
1130	7	Sook Peng Lim	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
1131	7	Susana Pereyra	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
1138	7	Shane Turnbull	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
1139	7	Sarah Williams	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
1144	7	Scott Foster	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
1168	7	Tony Jones	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
1170	7	Tama Lindsay	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
1172	7	Tyler Materoa	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
1175	7	Tracy O'Grady	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
1177	7	Thien Soong Wong	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
1178	7	Teresa Shaw	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
1181	7	Tiare Tautari	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
1211	7	Vaughan Hall	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part

Submission Number	Submission Point	Submitter	Volume	Chapter	Provision	Recommendation
1221	7	Wayne de Joux	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
1224	7	P Wood	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
1225	7	Wayne Hollis	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
1226	7	William Kingi	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
1227	7	Warwick Neame	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
1238	29	Windermere Forests Limited	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Reject
1241	7	Yong Hee Son	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
1243	7	Zane Charman	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
1247	7	Robert Walker	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
1252	7	Frank Prendeville	Volume 1	4 Use of Natural and Physical Resources	Issue 4C	Accept in part
149	6	PF Olsen Ltd	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
401	13	Aquaculture New Zealand	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
401	26	Aquaculture New Zealand	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Reject
425	19	Federated Farmers of New Zealand	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
426	13	Marine Farming Association Incorporated	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
426	26	Marine Farming Association Incorporated	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Reject
433	10	Port Marlborough New Zealand Limited	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Reject
477	7	John Malcolm McKee	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part

Submission Number	Submission Point	Submitter	Volume	Chapter	Provision	Recommendation
479	1	Department of Conservation	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept
504	7	Queen Charlotte Sound Residents Association	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept
505	5	Ernslaw One Limited	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
509	20	Nelson Marlborough Fish and Game	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept
510	8	Anne Allison	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
535	8	Adele Riddle	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
538	8	Andre Smith	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
539	8	Allen Steele	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
540	8	Arthur Stewart	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
541	8	Akiwa Te Uatuku	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
543	8	Alistair Willis	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
549	8	Bryan Albrey	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
551	8	Ben Armstrong	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
555	8	Blair Glover	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
559	8	Belinda Jones	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
560	8	Brian Lee	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
562	8	Brendon Lucas	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
564	8	Belinda Materoa	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part

Submission Number	Submission Point	Submitter	Volume	Chapter	Provision	Recommendation
565	8	Brent Mathews	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
574	4	Bryan Skeggs	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
576	8	Chee Ong Chin	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
582	8	Cory Burnett	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
583	8	Carmay Cheong	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
584	8	Corey Dixon	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
588	8	Christopher Hall	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
590	8	Cameron Harvey	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
593	8	Chang-Seog Jeon	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
595	8	Clayton McIntyre	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
600	8	Connor Rangi	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
603	8	Chee Song Chin	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
606	8	Cindy Steele	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
607	8	Cadeena Tepu	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
611	8	Carla Velez	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
618	7	Brad Lewis	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
618	8	Brad Lewis	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
620	8	Brook Lines	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part

Submission Number	Submission Point	Submitter	Volume	Chapter	Provision	Recommendation
621	8	Becki Findlayson	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
624	8	Carol-Ann Herbert	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
625	8	Cheryl Harris	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
627	8	Carl Scholefield	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
628	8	Clinton Nott	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
641	7	Dan McCall	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
648	8	D C Hemphill	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
649	8	Dave Herbert	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
654	8	David Jones	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
655	8	Dhaneshkar Karunakaran	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
656	8	David King	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
658	8	Dan Lawrence	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
659	8	Donald M Curie	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
660	8	Daniel Manson	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
661	8	Denis Marfell	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
663	8	Dion McCauley	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
665	8	Dorothy McManaway	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
667	8	Daniel Paget	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part

Submission Number	Submission Point	Submitter	Volume	Chapter	Provision	Recommendation
677	8	Daniel Walker	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
678	8	David Horton	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
680	8	Delwynne Horton	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
688	3	Judy and John Hellstrom	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept
694	8	Elin Shin	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
703	8	Faye Fosbender	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
704	8	Febe Jones	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
705	8	Fay Mathews	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
708	8	Filisita Tuese	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
709	8	Ian Dunlop	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
716	34	Friends of Nelson Haven and Tasman Bay Incorporated	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept
721	8	Grant Boyd	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
722	8	Gaik Choo Tan	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
726	4	Canantor Mussels Limited and N. I Buchanan-Brown	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
729	8	Graham Hayter	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
731	8	Grace Jones	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
734	8	Gail Learmonth	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
737	8	Gareth McIlroy	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part

Submission Number	Submission Point	Submitter	Volume	Chapter	Provision	Recommendation
741	8	Glen Slipper	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
745	8	Graeme Tregidga	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
753	8	Hope Lagden	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
756	8	Hye Sug Ha	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
758	8	Holly Stanford	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
759	8	Hudson Steele	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
760	8	Hui Ting Ng	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
761	8	Hilda Timoti	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
768	13	Heritage New Zealand Pouhere Taonga	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Reject
773	8	Iosua Kaisara	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
781	8	Johann Adam	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
784	8	Jackie Biggs	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
787	8	Jo Braven	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
793	8	John Cleal	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
796	8	John Craddock	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
799	8	June Ethel Epere	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
803	8	John Healy	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
804	8	Jordan Herbert	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part

Submission Number	Submission Point	Submitter	Volume	Chapter	Provision	Recommendation
805	8	James Higgin	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
809	4	Jim Jessep	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
812	8	Jungmin Ko	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
814	8	Jeong Lye Jeon	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
817	8	Jemma McCowan	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
825	8	Jo-Ann Rickard	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
826	8	Jade Riri	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
829	8	Jason Smith	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
831	8	Jim Taylor	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
834	8	Jarod Udy	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
836	8	James William Epere	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
851	8	Kevin Hawkins	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
856	8	Karen Mant	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
857	8	Kowhai Millan	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
863	8	Karen Soloman	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
869	2	Kenepuru and Central Sounds Residents Association Incorporated	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Reject
877	8	Lynette Ashby	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
878	8	Lyndon Daymond	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part

Submission Number	Submission Point	Submitter	Volume	Chapter	Provision	Recommendation
881	8	Laisa Gibbins	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
884	8	Laura Jillian Moleta-Bentham	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
885	8	Les McClung	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
886	8	Linda McGee	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
887	8	Lauren Mitchell	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
888	8	Pang Lily	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
889	8	Lavina Rickard	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
892	8	Lynda Simpson	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
901	8	Lo Wai Wing	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
902	8	Lewis Ward	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
912	8	Myken Augustine	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
914	8	Michael Burne	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
918	8	Maree Cleal	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
926	8	Wainui Green 2015 Limited	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
927	8	Mark Gillard	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
929	8	Mandy Hargood	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
936	4	Michael Jessep	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
941	8	Marion Marfell	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part

Submission Number	Submission Point	Submitter	Volume	Chapter	Provision	Recommendation
942	8	Marie Mitchell	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
943	8	Martina Naplawa	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
948	8	Melissa Smith	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
951	8	Michael Wallace	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
953	8	Mark Whittall	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
955	8	Moira Winter	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
964	4	Marlborough Oysters Limited	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
976	8	Norazizah Abu Yazid	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
982	8	Nathan Grey	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
985	8	Niki McCulloch	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
988	8	Nathan Wallace	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
989	8	Natasha Watts	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
995	5	New Zealand Forest Products Holdings Limited	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Reject
1008	8	Philip Anthony Hawke	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
1026	8	Patricia Riri	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
1029	8	Peter Shirley	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
1031	8	Peter Snape	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
1041	4	Port Clifford Limited	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept

Submission Number	Submission Point	Submitter	Volume	Chapter	Provision	Recommendation
1053	8	Roger Bee	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
1055	8	Rory Bryant	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
1057	8	Roger Dippie	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
1063	8	Riley George Barnes MacPherson	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
1067	8	Renee Heta	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
1072	8	Rob MacGibbon	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
1073	8	Robert Murdoch	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
1077	5	Rodney Roberts	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
1079	8	Rachel Stanford	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
1080	8	Rata Steele	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
1097	8	Sonya Ferguson	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
1103	8	Stuart Barnes	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
1108	8	Shane Bray	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
1112	4	Sarah Cumming	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
1113	8	Sivanathan Devaraj	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
1115	8	Steve Dyer	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
1116	8	Stuart Edward Borrie	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
1119	8	Sharon Hill	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part

Submission Number	Submission Point	Submitter	Volume	Chapter	Provision	Recommendation
1120	8	Stewart Holdem	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
1122	8	Steven John Bickley	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
1127	8	Soon Ng	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
1128	8	Sam Oliver	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
1130	8	Sook Peng Lim	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
1131	8	Susana Pereyra	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
1138	8	Shane Turnbull	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
1139	8	Sarah Williams	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
1144	8	Scott Foster	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
1157	4	Southern Crown Limited	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
1168	8	Tony Jones	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
1170	8	Tama Lindsay	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
1172	8	Tyler Materoa	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
1175	8	Tracy O'Grady	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
1177	8	Thien Soong Wong	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
1178	8	Teresa Shaw	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
1181	8	Tiare Tautari	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
1186	38	Te Atiawa o Te Waka-a-Maui	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Reject

Submission Number	Submission Point	Submitter	Volume	Chapter	Provision	Recommendation
1211	8	Vaughan Hall	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
1221	8	Wayne de Joux	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
1224	8	P Wood	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
1225	8	Wayne Hollis	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
1226	8	William Kingi	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
1227	8	Warwick Neame	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
1241	8	Yong Hee Son	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
1243	8	Zane Charman	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
1247	8	Robert Walker	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
1252	8	Frank Prendeville	Volume 1	4 Use of Natural and Physical Resources	Objective 4.3	Accept in part
401	21	Aquaculture New Zealand	Volume 1	4 Use of Natural and Physical Resources	Policy 4.3.1	Accept in part
404	2	Eric Jorgensen	Volume 1	4 Use of Natural and Physical Resources	Policy 4.3.1	Accept in part
424	1	Michael and Kristen Gerard	Volume 1	4 Use of Natural and Physical Resources	Policy 4.3.1	Accept
426	21	Marine Farming Association Incorporated	Volume 1	4 Use of Natural and Physical Resources	Policy 4.3.1	Accept in part
479	2	Department of Conservation	Volume 1	4 Use of Natural and Physical Resources	Policy 4.3.1	Accept
509	21	Nelson Marlborough Fish and Game	Volume 1	4 Use of Natural and Physical Resources	Policy 4.3.1	Accept
688	4	Judy and John Hellstrom	Volume 1	4 Use of Natural and Physical Resources	Policy 4.3.1	Accept
716	35	Friends of Nelson Haven and Tasman Bay Incorporated	Volume 1	4 Use of Natural and Physical Resources	Policy 4.3.1	Accept

Submission Number	Submission Point	Submitter	Volume	Chapter	Provision	Recommendation
869	3	Kenepuru and Central Sounds Residents Association Incorporated	Volume 1	4 Use of Natural and Physical Resources	Policy 4.3.1	Accept
995	6	New Zealand Forest Products Holdings Limited	Volume 1	4 Use of Natural and Physical Resources	Policy 4.3.1	Reject
1041	5	Port Clifford Limited	Volume 1	4 Use of Natural and Physical Resources	Policy 4.3.1	Accept
149	7	PF Olsen Ltd	Volume 1	4 Use of Natural and Physical Resources	Policy 4.3.2	Reject
401	22	Aquaculture New Zealand	Volume 1	4 Use of Natural and Physical Resources	Policy 4.3.2	Accept in part
424	2	Michael and Kristen Gerard	Volume 1	4 Use of Natural and Physical Resources	Policy 4.3.2	Accept
425	20	Federated Farmers of New Zealand	Volume 1	4 Use of Natural and Physical Resources	Policy 4.3.2	Accept in part
426	22	Marine Farming Association Incorporated	Volume 1	4 Use of Natural and Physical Resources	Policy 4.3.2	Accept in part
433	11	Port Marlborough New Zealand Limited	Volume 1	4 Use of Natural and Physical Resources	Policy 4.3.2	Reject
479	3	Department of Conservation	Volume 1	4 Use of Natural and Physical Resources	Policy 4.3.2	Accept
504	8	Queen Charlotte Sound Residents Association	Volume 1	4 Use of Natural and Physical Resources	Policy 4.3.2	Accept in part
509	22	Nelson Marlborough Fish and Game	Volume 1	4 Use of Natural and Physical Resources	Policy 4.3.2	Accept
648	9	D C Hemphill	Volume 1	4 Use of Natural and Physical Resources	Policy 4.3.2	Reject
688	5	Judy and John Hellstrom	Volume 1	4 Use of Natural and Physical Resources	Policy 4.3.2	Accept
716	36	Friends of Nelson Haven and Tasman Bay Incorporated	Volume 1	4 Use of Natural and Physical Resources	Policy 4.3.2	Accept
869	4	Kenepuru and Central Sounds Residents Association Incorporated	Volume 1	4 Use of Natural and Physical Resources	Policy 4.3.2	Accept
1041	6	Port Clifford Limited	Volume 1	4 Use of Natural and Physical Resources	Policy 4.3.2	Accept
401	23	Aquaculture New Zealand	Volume 1	4 Use of Natural and Physical Resources	Policy 4.3.3	Accept in part

Submission Number	Submission Point	Submitter	Volume	Chapter	Provision	Recommendation
424	3	Michael and Kristen Gerard	Volume 1	4 Use of Natural and Physical Resources	Policy 4.3.3	Accept
426	23	Marine Farming Association Incorporated	Volume 1	4 Use of Natural and Physical Resources	Policy 4.3.3	Accept in part
433	12	Port Marlborough New Zealand Limited	Volume 1	4 Use of Natural and Physical Resources	Policy 4.3.3	Reject
479	4	Department of Conservation	Volume 1	4 Use of Natural and Physical Resources	Policy 4.3.3	Accept
509	23	Nelson Marlborough Fish and Game	Volume 1	4 Use of Natural and Physical Resources	Policy 4.3.3	Accept
648	10	D C Hemphill	Volume 1	4 Use of Natural and Physical Resources	Policy 4.3.3	Reject
688	6	Judy and John Hellstrom	Volume 1	4 Use of Natural and Physical Resources	Policy 4.3.3	Accept
716	37	Friends of Nelson Haven and Tasman Bay Incorporated	Volume 1	4 Use of Natural and Physical Resources	Policy 4.3.3	Accept
869	5	Kenepuru and Central Sounds Residents Association Incorporated	Volume 1	4 Use of Natural and Physical Resources	Policy 4.3.3	Reject
995	7	New Zealand Forest Products Holdings Limited	Volume 1	4 Use of Natural and Physical Resources	Policy 4.3.3	Reject
1041	7	Port Clifford Limited	Volume 1	4 Use of Natural and Physical Resources	Policy 4.3.3	Accept
401	24	Aquaculture New Zealand	Volume 1	4 Use of Natural and Physical Resources	Policy 4.3.4	Accept in part
424	4	Michael and Kristen Gerard	Volume 1	4 Use of Natural and Physical Resources	Policy 4.3.4	Accept
425	21	Federated Farmers of New Zealand	Volume 1	4 Use of Natural and Physical Resources	Policy 4.3.4	Accept in part
426	24	Marine Farming Association Incorporated	Volume 1	4 Use of Natural and Physical Resources	Policy 4.3.4	Accept in part
433	13	Port Marlborough New Zealand Limited	Volume 1	4 Use of Natural and Physical Resources	Policy 4.3.4	Accept in part
479	5	Department of Conservation	Volume 1	4 Use of Natural and Physical Resources	Policy 4.3.4	Accept
509	24	Nelson Marlborough Fish and Game	Volume 1	4 Use of Natural and Physical Resources	Policy 4.3.4	Accept

Submission Number	Submission Point	Submitter	Volume	Chapter	Provision	Recommendation
688	7	Judy and John Hellstrom	Volume 1	4 Use of Natural and Physical Resources	Policy 4.3.4	Accept
716	38	Friends of Nelson Haven and Tasman Bay Incorporated	Volume 1	4 Use of Natural and Physical Resources	Policy 4.3.4	Accept
869	6	Kenepuru and Central Sounds Residents Association Incorporated	Volume 1	4 Use of Natural and Physical Resources	Policy 4.3.4	Accept
926	14	Wainui Green 2015 Limited	Volume 1	4 Use of Natural and Physical Resources	Policy 4.3.4	Accept in part
1041	8	Port Clifford Limited	Volume 1	4 Use of Natural and Physical Resources	Policy 4.3.4	Accept
149	8	PF Olsen Ltd	Volume 1	4 Use of Natural and Physical Resources	Policy 4.3.5	Accept
401	25	Aquaculture New Zealand	Volume 1	4 Use of Natural and Physical Resources	Policy 4.3.5	Accept in part
424	5	Michael and Kristen Gerard	Volume 1	4 Use of Natural and Physical Resources	Policy 4.3.5	Accept
425	22	Federated Farmers of New Zealand	Volume 1	4 Use of Natural and Physical Resources	Policy 4.3.5	Reject
426	25	Marine Farming Association Incorporated	Volume 1	4 Use of Natural and Physical Resources	Policy 4.3.5	Accept in part
426	31	Marine Farming Association Incorporated	Volume 1	4 Use of Natural and Physical Resources	Policy 4.3.5	Accept
479	6	Department of Conservation	Volume 1	4 Use of Natural and Physical Resources	Policy 4.3.5	Accept
509	25	Nelson Marlborough Fish and Game	Volume 1	4 Use of Natural and Physical Resources	Policy 4.3.5	Accept
688	8	Judy and John Hellstrom	Volume 1	4 Use of Natural and Physical Resources	Policy 4.3.5	Accept
716	39	Friends of Nelson Haven and Tasman Bay Incorporated	Volume 1	4 Use of Natural and Physical Resources	Policy 4.3.5	Accept
845	2	Kenneth R and Sara M Roush	Volume 1	4 Use of Natural and Physical Resources	Policy 4.3.5	Reject
869	7	Kenepuru and Central Sounds Residents Association Incorporated	Volume 1	4 Use of Natural and Physical Resources	Policy 4.3.5	Accept
873	10	KiwiRail Holdings Limited	Volume 1	4 Use of Natural and Physical Resources	Policy 4.3.5	Accept

Submission Number	Submission Point	Submitter	Volume	Chapter	Provision	Recommendation
1041	9	Port Clifford Limited	Volume 1	4 Use of Natural and Physical Resources	Policy 4.3.5	Accept
1042	3	Port Underwood Association	Volume 1	4 Use of Natural and Physical Resources	Policy 4.3.5	Reject
548	7	Awatere Water Users Group Incorporated	Volume 1	4 Use of Natural and Physical Resources	4.M.11	Accept in part
100	12	East Bay Conservation Society	Volume 1	4 Use of Natural and Physical Resources	4.AER.1	Reject
401	32	Aquaculture New Zealand	Volume 1	4 Use of Natural and Physical Resources	4.AER.1	Accept
425	23	Federated Farmers of New Zealand	Volume 1	4 Use of Natural and Physical Resources	4.AER.1	Reject
426	32	Marine Farming Association Incorporated	Volume 1	4 Use of Natural and Physical Resources	4.AER.1	Accept
504	9	Queen Charlotte Sound Residents Association	Volume 1	4 Use of Natural and Physical Resources	4.AER.1	Reject
676	2	Dairy NZ	Volume 1	4 Use of Natural and Physical Resources	4.AER.1	Accept in part
688	9	Judy and John Hellstrom	Volume 1	4 Use of Natural and Physical Resources	4.AER.1	Reject
710	6	The Fishing Industry Submitters	Volume 1	4 Use of Natural and Physical Resources	4.AER.1	Reject
716	40	Friends of Nelson Haven and Tasman Bay Incorporated	Volume 1	4 Use of Natural and Physical Resources	4.AER.1	Reject
717	18	Fulton Hogan Limited	Volume 1	4 Use of Natural and Physical Resources	4.AER.1	Reject
869	8	Kenepuru and Central Sounds Residents Association Incorporated	Volume 1	4 Use of Natural and Physical Resources	4.AER.1	Reject