

Proposed Marlborough Environment Plan

Section 42A Hearings Report for Hearing Commencing

Monday 26 February 2018

Report dated 20 November 2017

**Report on submissions and further submissions Topic
5: Natural Character – Issues, Objectives, Policies, and
Methods**

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List of Abbreviations

DOC	Department of Conservation.
EDS	Environmental Defence Society.
MEP	Proposed Marlborough Environment Plan.
NZCPS	New Zealand Coastal Policy Statement.
NES-PF	National Environmental Standard on Plantation Forestry.
NPSET	National Policy Statement on Electricity Transmission.
NPSFM	National Policy Statement for Freshwater Management.
NPSREG	National Policy Statement on Renewable Energy.
NZTA	New Zealand Transport Agency.
RMA	Resource Management Act 1991.

1. Introduction

My name is Maurice Dale. I am an Associate Principal / Senior Planner from Boffa Miskell Ltd, based in Christchurch. I hold a Bachelor of Resource and Environmental Planning from Massey University (1998). I am also a full member of the New Zealand Planning Institute (NZPI), and a member of the Resource Management Law Association (RMLA). I have 19 years' experience in planning and resource management, gained both in New Zealand and the United Kingdom.

I have provided advice on a broad range of developments and resource management issues to Council's, government agencies, and a range of private clients, a number involving presenting evidence before both regional and district Councils, and the Environment Court. I have extensive experience in the preparation and evaluation of resource management plans under the RMA, including in respect of matters relating to management of natural character in coastal and freshwater environments.

I am familiar with the Marlborough environment, having assisted both the Council and private interests with proposals for marine farming in the Marlborough Sounds, as well as worked on winery developments.

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.

In preparing this report, I have read the relevant chapters of the MEP, the related section 32 RMA reports, and the supporting technical reports identifying the natural character values of the District. This includes the natural character assessment reports titled, the *Natural Character of the Marlborough Coast*, and *Natural Character of Selected Marlborough Rivers and their Margins*, prepared by Boffa Miskell.

1.1 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.

2. 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 Topic 5 – Natural Character, and specifically submissions made on the issues, objectives, policies, and methods of implementation contained in the MEP relating to natural character.

In particular, this report contains my assessment of submissions on the following aspects of the MEP as they relate to natural character:

- Volume 1 – Chapter 6 – Natural Character – Issues, Objectives, Policies, Methods of Implementation, and Anticipated Environmental Results;
- Volume 2, Chapter 3 – Rural Environment Zone – Rules for setbacks from Riparian Natural Character Management Area.
- Volume 2, Chapter 4 – Coastal Environment Zone – Rules for setbacks from Riparian Natural Character Management Area.

- Volume 2, Chapter 16 – Coastal Marine Zone – Rules for setbacks from Riparian Natural Character Management Area.
- Volume 2, Chapter 19 – Open Space 3 Zone – Rules for setbacks from Riparian Natural Character Management Area.

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.

This report also relies on, and is intended to be read in conjunction with, the related section 42A report of Mr James Bentley on Topic 5 – Natural Character. Mr Bentley's report specifically outlines the methodology used to assess the degree of natural character in the coastal environment, and lakes, and rivers of Marlborough, and evaluates submissions on the assessment of natural character values, and the mapping of areas of high, very high and outstanding natural character in the MEP.

3. Overview of Provisions

Natural Character Context

'Natural character' is the term used to describe the degree of naturalness that is present in an area taking into account any human-induced modification. Natural character includes the natural elements, patterns, processes, and experiential qualities of the environment. In the context of coastal and freshwater environments, the key attributes of natural character are listed in the introduction to Chapter 6 and Policy 6.1.1. as being:

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

Collectively these attributes combine to create the overall natural character of the environment. The degree of natural character present in an area is commonly described on a continuum. Some environments have very high natural character due to the lack of human induced modification and may even be in a natural state. In other areas, there may be little natural character remaining due to extensive human modification.

The natural character provisions of the MEP primarily stem from the statutory requirements in section 6(a) of the RMA, and supporting objectives and policies set out in the New Zealand Coastal Policy Statement (NZCPS), and National Policy Statement for Freshwater Management (NPSFM). Section 6(a) of the RMA requires as a 'matter of national importance', the preservation of the natural character of the coastal environment, wetlands, and lakes, rivers and their margins, and the protection of them from inappropriate subdivision, use, and development. The statutory requirements are described further in section 4 of this report below.

Given these statutory requirements, Chapter 6 of the MEP provides overall direction for management of natural character, which is supported by provisions elsewhere the MEP. The exception is the direction for managing the natural character values of wetlands, which is addressed separately in Chapter 8 – Indigenous Biodiversity.

Chapter 6 Issues and Objectives

The identified resource management issue relating to the management of natural character in Marlborough is set out in Volume 1, Chapter 6, Issue 6A, which recognises:

- *'Resource use and changes in resource use can result in the degradation of the natural character of the coastal environment, and of lakes, rivers and their margins.'*

This issue recognises that the entire coastal environment and all freshwater bodies all have a degree of natural character. Further human induced modification within the coastal environment, and lakes, rivers, and their margins will have adverse effects on remaining natural character, with the risk greatest in unmodified environments.

Chapter 6 includes two objectives in addressing Issue 6A:

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

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

The focus of Objective 6.1 is on assessing and identifying the natural character values of Marlborough’s coastal environment, and lakes, rivers, and their margins. The focus of Objective 6.2 is then on ensuring the preservation of natural character, and the protection of the identified natural character values from inappropriate subdivision, use, and development to assist achieve the direction in section 6(a) of the RMA.

Chapter 6 Policies

The objectives are to be implemented through applying a number of specific policies and methods. Broadly, Policies 6.1.1 – 6.1.6 set out the methodology for assessing and identifying the natural character values present in the coastal environment, and lakes, and rivers to assist achieve Objective 6.1. Specifically:

- Policy 6.1.1 identifies the natural elements, patterns, processes and experiential qualities (attributes) which contribute to natural character, including landforms, physical processes, biota, and experiential attributes. It is intended to provide resource users with a clear meaning of the attributes that make up *‘natural character’*.
- Policy 6.1.2 requires the extent of the *‘coastal environment’* to be identified in the MEP to establish the areas where management of the coastal environment may be needed to give effect to the NZCPS, including in order to protect its natural character. Identification of the coastal environment under this policy also has a relationship to other provisions in the MEP, and in particular those in Volume 1, Chapter 13 – Use of the Coastal Environment.
- Policy 6.1.3 requires the degree of natural character of the coastal environment to be determined by assessing the degree of human-induced modification to a range of natural elements, patterns, processes and experiential attributes. This assessment is intended to assist map areas of high, very high, and outstanding natural character, and assist resource users in determining the effects of activities on the natural character values of an area.
- Policy 6.1.4 requires identification of those areas of the coastal environment that have high, very high, or outstanding natural character, based on the assessment of the degree of natural character under Policy 6.1.3. This policy gives effect to Policy 13 of the NZCPS that requires areas of at least high natural character be mapped or otherwise identified.
- Policy 6.1.5 requires the degree of natural character of lakes and rivers, and their margins to be determined by assessing the degree of human-induced modification to a range of natural elements, patterns, processes and experiential attributes. This assessment is intended to assist map areas of high and very high natural character, and assist resource users in determining the effects of activities on the natural character values of an area.
- Policy 6.1.6 requires identification of those parts of rivers that have high or very high natural character.

Assessment of the natural character values within the coastal environment, and selected rivers and their margins, has been undertaken to support the development of the MEP. The results of that assessment are found in the following two reports, prepared by Boffa Miskell Ltd:

- *Natural Character of the Marlborough Coast – Defining and Mapping the Marlborough Coastal Environment, June 2014.*
- *Natural Character of Selected Marlborough Rivers and their Margins, May 2014.*

Mr Bentley’s section 42A report provides an overview of the methodology used to assess and identify natural character values, and the identification and mapping of areas of natural character. Areas of high, very high, and outstanding natural character identified in these reports have been mapped in Volume 4 of the MEP. The values that contribute to the high, very high, or outstanding natural character in the coastal environment

identified in these reports have been incorporated in Appendix 2 of the MEP, and the values of rivers including natural character values have been recognised in Appendix 5.

Policies 6.2.1 – 6.2.9 set out the means by which subdivision, use, and development will be managed based on the identified natural character values, so as to assist achieve Objective 6.2. This management approach is summarised in **Figure 1** below:

Figure 1 – MEP Natural Character Policy Approach for Managing Subdivision, Use, and Development.

Natural Character Area	Environment	
	Coastal Environment	Lakes, Rivers, and Margins
Area with Outstanding Natural Character values	<p><u>Avoid</u> adverse effects of subdivision, use, and development (Policy 6.2.1)</p> <p><u>Have regard to</u> the potential adverse effects on the elements, patterns, and experiential qualities that contribute to natural character (Policy 6.2.4)</p> <p><u>Require</u> land use activities to setback from the coastal marine area (Policy 6.2.8)</p>	n/a
Area with Very High or High Natural Character values	<p><u>Avoid significant</u> adverse effects of subdivision, use, and development, having regard to the assessment criteria in Appendix 4 (Policy 6.2.2)</p> <p><u>Avoid any reduction</u> in the degree of natural character (Policy 6.2.3)</p> <p><u>Have regard to</u> the potential adverse effects on the elements, patterns, and experiential qualities that contribute to natural character (Policy 6.2.4)</p> <p><u>Require</u> land use activities to setback from the coastal marine area (Policy 6.2.8)</p>	<p><u>Avoid</u> adverse effects of subdivision, use, and development (Policy 6.2.1)</p> <p><u>Avoid any reduction</u> in the degree of natural character (Policy 6.2.3)</p> <p><u>Have regard to</u> the potential adverse effects on the elements, patterns, and experiential qualities that contribute to natural character (Policy 6.2.4)</p> <p><u>Require</u> land use activities to setback from rivers and lakes (Policy 6.2.8)</p>
Other Areas	<p><u>Avoid significant</u> adverse effects of subdivision, use, and development, having regard to the assessment criteria in Appendix 4 (Policy 6.2.2)</p> <p><u>Require</u> land use activities to setback from the coastal marine area (Policy 6.2.8)</p>	<u>Require</u> land use activities to setback from rivers and lakes (Policy 6.2.8)

Under the above management approach, activities are to be assessed as to whether they will adversely affect the natural character values of that area. Where the natural character of the coastal environment is outstanding, any adverse effects on the natural character values of the area are to be avoided. In other areas of the coastal environment, significant adverse effects on the natural character values of the area are to be avoided. The same management approach is applied to rivers and lakes with high or very high natural character values.

In addition, other related policies provide:

- Policy 6.2.5 requires recognition that development in those areas that have already been modified by past and present resource use activities, is less likely to result in adverse effects on natural character. This is intended to assist preserve natural character in less modified areas.
- Policy 6.2.6 requires in assessing the appropriateness of subdivision, use, and development, that regard be given to the potential to enhance natural character. Within the coastal environment, this approach gives effect to Policy 14 of the NZCPS, which seeks to promote the restoration or rehabilitation of natural character.
- Policy 6.2.7 requires consideration of cumulative adverse effects of activities on natural character, in recognition that the cumulative combination of activities in an area may impact on natural character.
- Policy 6.2.9 provides for Council encouragement and support of private landowners, community groups, and others in their efforts to restore natural character.

Methods of Implementation

Regional and district rules provide the primary means to implement Policies 6.2.1 – 6.2.9. Activities have been subscribed an activity status based on the severity of the threat to natural character values. In addition, specific rules require setbacks from lakes and rivers with high or very high natural character which are identified by a Riparian Natural Character Management Area on the planning maps in Volume 4. Where the status of an activity requires resource consent to be obtained, or where resource consent is required for an activity within the minimum setbacks from rivers, lakes, and the coastal marine area, the adverse effects on natural character are to be assessed against the policies contained in Chapter 6.

In addition to identifying areas of natural character and administering rules, the Council will also make information available to the public on the natural character of Marlborough's coastal and freshwater environments, including on potential actions that can be taken to restore natural character.

The overall anticipated environmental results of the management framework of the MEP is that the natural character of Marlborough's coastal environment and of lakes, rivers and their margins is retained, including the intactness of individual areas of the Marlborough Sounds. Effectiveness of the framework in achieving these anticipated results is to be determined by reassessing the degree of natural character in Marlborough over the life of the MEP.

4. 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 assessment in section 5 of this report.

4.1 Resource Management Act 1991 (RMA)

The RMA sets out a number of obligations on the Council that it must address in preparing the MEP, with regard to managing natural character.

Section 6(a) of the RMA requires the Council to recognise and provide for, as a *'matter of national importance'*, *'the preservation of the natural character of the coastal environment (including the coastal marine area), wetlands, and lakes and rivers and their margins, and the protection of them from inappropriate subdivision, use, and development.'*

Although not as significant as section 6 matters, there are two section 7 matters also relevant to the consideration of natural character values. Specifically, sections 7(c) and (f), require particular regard must to be given to the *'maintenance and enhancement of amenity values'* and to the *'maintenance and enhancement of the quality of the environment'*, respectively.

4.2 New Zealand Coastal Policy Statement (NZCPS)

The NZCPS has specific requirements which support the achievement of sections 6 and 7 of the RMA with respect to managing natural character within the coastal environment, for which the MEP is then required to give effect to.

Policy 13 of the NZCPS directs that in order to preserve the natural character of the coastal environment and to protect it from inappropriate subdivision, use and development, the following should occur:

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

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

including by:

(c) assessing the natural character of the coastal environment of the region or district, by mapping or otherwise identifying at least areas of high natural character; and

(d) ensuring that regional policy statements, and plans, identify areas where preserving natural character requires objectives, policies and rules, and include those provisions.'

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

The Supreme Court in *EDS v NZ King Salmon (SC82/2013)* noted that where the term *'inappropriate'* is used in the context of protecting areas from inappropriate, subdivision, use, and development, the natural meaning is that *'inappropriateness'* should be assessed by reference to what is sought to be protected. Accordingly, subdivision, use, and development which degrades the values which contribute to the landscapes significance, is more likely to be inappropriate.

In addition to Policy 13, Policy 6(i) of the NZCPS requires development to be setback from the coastal marine area and other water bodies in the coastal environment where practicable and reasonable, to protect natural character.

Policy 7 of the NZCPS requires inclusion of provisions in plans to manage cumulative adverse effects, and *'where practicable set thresholds, or specify acceptable limits to change, to assist in determining when activities causing adverse cumulative effects are to be avoided.'*

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

4.3 National Policy Statement for Freshwater Management (NPSFM)

The NPSFM contains objectives concerning the protection of the significant values of outstanding freshwater which the MEP must then give effect to. The definition of *'outstanding freshwater bodies'* included in the NPSFM does reference ecological and landscape values, which are elements that contribute to natural character.

Objective A2 of the NPSFM directs that the overall quality of freshwater within a freshwater management unit is maintained or improved, while protecting the significant values of outstanding freshwater bodies. Objective B4 directs protection of the significant values of outstanding freshwater bodies.

The MEP to date has not identified any outstanding freshwater bodies, however these could be identified and incorporated in the future, subject to completing further assessment.

4.4 National Policy Statement on Electricity Transmission (NPSET)

The NPSET contains objectives and policies addressing the operating, maintenance, development, and upgrade of the electricity transmission network. Policy 8 of the NPSET directs that in rural environments, planning and development of the transmission system should seek to avoid adverse effects on outstanding natural landscapes, areas of high natural character, and areas of high amenity.

4.5 National Environmental Standard on Plantation Forestry (NES-PF)

Since the notification of the MEP, a National Environment Standard for Plantation Forestry (NES-PF) has been introduced which puts in place nationally consistent rules for the management of commercial plantation forestry. The objectives of the NES-PF are:

- To maintain or improve the environmental outcomes associated with plantation forestry activities nationally; and
- To increase certainty and efficiency in the management of plantation forestry activities.

The regulations apply to any commercial forest greater than 1 hectare in size. The NES-PF includes rules covering eight core commercial plantation forestry activities, including afforestation, pruning, and thinning to waste, earthworks, river crossings, forest quarrying, harvesting, mechanical land preparation, and replanting. The NES-PF sets out conditions for these activities, which where they are not met, require resource consent to be obtained.

Regulation 6 of the NES-PF sets out the circumstances where a rule in an RMA plan may be more stringent than the regulations. These circumstances include when the rule gives effect to a freshwater objective in the NPSFM or Policies 11, 13, 15, and 22 of the NZCPS for the coastal environment, or provides for the protection of section 6 RMA outstanding natural features and landscapes, or significant natural areas.

5. Analysis of submissions

There were approximately 685 submission points received on the issues, objectives, policies, and methods of implementation relevant to the Natural Character topic. A number of these were in common formats and have been grouped as a single entry per relevant matter assessed in this report to avoid unnecessary repetition and duplication.

5.1 Key issues

I have set out my analysis of the submission points under each relevant provision or related group of provisions in the MEP. General submissions which relate to the topic but are not specific to any particular provision of the MEP have been grouped and addressed together. Similarly, submissions that request the addition of new provisions have been grouped and addressed together.

5.2 Pre-hearing meetings

There has been no pre-hearing meeting for this topic.

5.3 General Submissions on Chapter 6 Natural Character

Submissions

A range of general submissions have been received on Chapter 6 which addresses the chapter as a whole generally. It includes a large number of pro-forma submissions which all seek the same relief.

These general submissions include:

- Support/retain Chapter 6 as notified (**Pinder Family Trust (578/7), Guardians of the Sounds (752/7), Sea Sheppard NZ (1146/7), Marlborough Environment Centre (1193/47), Marlborough Chamber of Commerce (961/9), The Bay of Many Coves Residents and Ratepayers Association (1190/38), Judy and John Hellstrom (688/45)**).
- Delete Chapter 6 in its entirety, with references to natural character instead being included in the indigenous biodiversity chapter and in the landscape chapter, or consider whether natural character, landscape, and indigenous biodiversity could be dealt with under one category of Natural Heritage (**Marine Farming Association (462/63)**).
- Add an appropriate definition of natural character, revise the methodologies and maps, recognise existing use of and appropriate ongoing use and development in areas of natural character (**A J King Family Trust and S A King Family Trust (514/6), Bryan Skeggs (574/6), Canator Mussels Ltd (726/6), Jim Jessop (809/6), Wainui Green 2015 Ltd (926/16), Michael Jessop (936/6), Marlborough Oysters Ltd (964/6), Southern Crown Ltd (1157/6)**).
- Amend Issue 6A, Objective 6.1, and flow on policies to recognise and provide for the existing and changing land and seascapes, of use of aquaculture, vineyards, and pastoral farming. (**Anne Allison (510/9, 10), Adele Riddle (535/9, 10), Andre Smith (538/9, 10), Allen Steele (539/9, 10), Arthur Stewart (540/9, 10), Akiwa Te Uatuku (541/9, 10), Alistair Willis (543/9, 10), Bryan Albrey (549/9, 10), Ben Armstrong (551/9, 10), Blair Glover (555/9, 10), Belinda Jones (559/9, 10), Brian Lee (560/9, 10), Brendon Lucas (562/9, 10), Belinda Materoa (564/9, 10), Brent Mathews (565/9, 10), Chee Ong Chin (576/9, 10), Cory Burnett (582/9, 10), Carmay Cheong (583/9, 10), Corey Dixon (584/9, 10), Christopher Hall (588/9, 10), Cameron Harvey (590/9, 10), Chang-Seog Jeon (593/9, 10), Clayton McIntyre (595/9, 10), Connor Rangī (600/9, 10), Chee Song Chin (603/9, 10), Cindy Steele (606/9, 10), Cadeena Tepu (607/9, 10), Cara Velez (611/9, 10), Brad Lewis (618/9, 10), Brook Lines (620/9, 10), Becki Findlayson (621/9, 10), Carol-Ann Herbert (624/9, 10), Cheryl Harris (625/9, 10), Carl Scholefield (627/9, 10), Clinton Nott (628/9, 10), Dan McCall (641/8, 9), Dave Herbert (649/9, 10), David Jones (654/9, 10), Dhaneshkar Karunakaran (655/9, 10), David King (656/9,10), Dan Lawrence (658/9, 10), Donald Curie (659/9, 10), Daniel**

Manson (660/9, 10), Denis Marfell (661/9, 10), Dion McCauley (663/9, 10), Dellae McKenzie (664/9, 10), Dorothy McManaway (665/9, 10), Daniel Paget (667/9, 10), Daniel Walker (677/9, 10), David Horton (678/9, 10), Delwynne Horton (680/9), Elin Shin (694/9, 10), Faye Fosbender (703/9, 10), Febe Jones (704/9, 10), Fay Mathews (705/9, 10), Filisita Tuese (708/9, 10), Ian Dunlop (709/9, 10), Grant Boyd (721/9, 10), Gaik Choo Tan (722/9, 10), Graham Hayter (729/9, 10), Grace Jones (731/9, 10), Gail Learmonth (734/9, 10), Gareth McIlroy (737/9, 10), Glen Slipper (741/9, 10), Graeme Tregidga (745/9, 10), Hope Lagden (753/9, 10), Hye Sug Ha (756/9, 10), Holly Stanford (758/9, 10), Hudson Steele (759/9, 10), Hui Ting Ng (760/9, 10), Hilda Timoti (761/9, 10), Iosua Kaisara (773/9, 10), Johann Adam (781/9, 10), Jackie Biggs (784/9, 10), Jo Braven (787/9, 10), John Cleal (793/9, 10), John Craddick (796/9, 10), June Ethel Epere (799/9, 10), John Healy (803/9, 10), Jordan Herbert (804/9, 10), James Higgin (805/9, 10), Jeremy Hunter (807/9, 10), Jungmin Ko (812/9, 10), Jeong Lye Jeon (814/9, 10), Jemma McCowan (817/9, 10), Jo-Ann Rickard (825/9, 10), John McKee (477/8, 9), Jade Piri (826/9, 10), Jason Smith (829/9, 10), Jim Taylor (831/9, 10), Jarod Udy (834/9, 10), James Epere (836/9, 10), Kevin Hawkins (851/9, 10), Karen Mant (856/9, 10), Kowhai Millan (857/9, 10), Karen Soloman (863/9, 10), Lynette Ashby (877/9, 10), Lyndon Daymond (878/9, 10), Laisa Gibbins (881/9, 10), Laura Moleta-Bentham (884/9, 10), Les McClung (885/9, 10), Linda McGee (886/9, 10), Lauren Mitchell (887/9, 10), Pang Lily (888/9, 10), Lavina Rickard (889/9, 10), Lynda Simpson (892/9, 10), Lo Wai Wing (901/9, 10), Lewis Ward (902/9, 10), Myken Augustine (912/9, 10), Michael Burne (914/9, 10), Maree Cleal (918/9, 10), Wainui Green 2015 Limited (926/9, 10), Mark Gillard (927/9, 10), Mandy Hargood (929/9, 10), Marion Marfell (941/9, 10), Marie Mitchell (942/9, 10), Martina Naplawa (943/9, 10), Melissa Smith (948/9, 10), Michael Wallace (951/9, 10), Mark Whittall (953/9, 10), Moira Winter (955/9, 10), Norazizah Abu Yazid (976/9, 10), Nathan Grey (982/10), Niki McCulloch (985/9, 10), Nathan Wallace (988/9, 10), Natasha Watts (989/9, 10), Philip Hawke (1008/9, 10), Patricia Riri (1026/9, 10), Peter Shirley (1029/9, 10), Peter Snape (1031/9, 10), Roger Bee (1053/9, 10), Rory Bryant (1055/9, 10), Roger Dippie (1057/9, 10), Riley MacPherson (1063/9, 10), Renee Heta (1067/9, 10), Rob MacGibbon (1072/9, 10), Robert Murdoch (1073/9, 10), Rodney Roberts (1077/6, 7), Rachel Stanford (1079/9, 10), Rata Steele (1080/9, 10), Sonya Ferguson (1097/9, 10), Stuart Barnes (1103/9, 10), Shane Bray (1108/9, 10), Sarah Cumming (1112/2, 3), Sivanathan Devaraj (1113/9, 10), Steve Dyer (1115/9, 10), Stuart Borrie (1116/9, 10), Sharon Hill (1119/9, 10), Stewart Holdem (1120/9, 10), Steven Bickley (1122/9, 10), Soon Ng (1127/9, 10), Sam Oliver (1128/9, 10), Sook Peng Lim (1130/9, 10), Susana Pereyra (1131/9, 10), Shane Turnbull (1138/9, 10), Sarah Williams (1139/9, 10), Scott Foster (1144/9), Tony Jones (1168/9, 10), Tama Lindsay (1170/9, 10), Tyler Materoa (1172/9, 10), Tracy O'Grady (1175/9, 10), Thien Soong Wong (1177/9, 10), Teresa Shaw (1178/9, 10), Tiare Tautari (1181/9, 10), Vaughan Hall (1211/9, 10), Wayne de Joux (1221/9, 10), P Wood (1224/9, 10), Wayne Hollis (1225/9, 10), William Kingi (1226/9, 10), Warwick Neame (1227/9, 10), Yong Hee Son (1241/9, 10), Zane Charman (1243/9, 10), Robert Walker (1247/9, 10), Frank Prendeville (1252/9, 10)).

- Add a new Policy to read 'Recognise existing and legally established uses such as marine farms are significant investments which are reversible' (Sanford Ltd (1140/12), Ted and Shirley Cully (447/2)).
- General comment on chapter – Recognise existing uses of the coastal marine area and do not seek that those change. Recognise that minor or transient effects do not need to be avoided, and that avoidance can be achieved through restoration and enhancement, rather than simply preventing an application from occurring. Only require avoidance where practicable, rather than complete avoidance (A J King Family Trust and S A King Family Trust (514/10), Bryan Skeggs (574/10), Canator Mussels Ltd (726/10), Jim Jessop (809/10), Wainui Green 2015 Ltd (926/20), Michael Jessop (936/10), Marlborough Oysters Ltd (964/10), Southern Crown (1157/10)).
- General comment on chapter/no relief requested – Emphasis on Outstanding Natural character, landscapes and features, coastal occupation charges and significant marine buffers whilst downplaying the need for water transfer regime issues, sedimentation, does not promote sustainability (Te Runanga o Ngati Rarua (1188/2)).

Assessment

Included in these general submissions, are those that support retention of Chapter 6 unchanged, or its deletion, with natural character instead being incorporated in other related parts of the MEP (such as under the landscape and biodiversity chapters). Other submissions focus on ensuring provision for existing and future uses within the natural character overlays, and in particular exiting marine farming activity in the coastal environment. This includes by recognising that minor or transient adverse effects on natural character do not need to be avoided; that avoidance can be achieved through restoration and enhancement; and to only require avoidance where practicable. The basis for those submissions, is partly to provide comfort to both industry and the community that an appropriate balance is being achieved within the coastal area without re-litigating sustainable use and development on a case by case basis.

There are a range of valid formats in which management of natural character can be incorporated into RMA Policy statements and plans. The approach within the MEP has been to separately provide the policy context for managing natural character within Chapter 6. The advantage of this approach is that it clearly demonstrates holistically how the MEP aligns with and recognises and provides for the statutory obligations in section 6(a) of the RMA, and gives effect to the national policy direction in the NZCPS and NPSFW. The policy context in Chapter 6 then flows through to the relevant Volume 2 rules to manage natural character. In this way, the MEP ensures integrated management of natural character across the District. Including reference to natural character only within the indigenous biodiversity and landscape chapters of Volume 1 is unlikely to capture all of the key attributes of natural character which are not limited to just biodiversity and landscape aspects. No change is therefore recommended to the structure of the MEP. No change to the structure of the MEP is therefore recommended.

In regard to those submissions addressing the recognition or enablement of existing and future uses in areas of natural character, the management of subdivision, use, and development, including existing uses with regard to natural character is directed by section 6(a) of the RMA, Policies 13 and 14 of the NZCPS as it relates to the coastal environment, and Objectives A2 and B4 of the NPSFM. The focus of the statute and national policy direction is on ensuring natural character be protected from inappropriate subdivision, use, and development. More specifically within the coastal environment, Policy 13 of the NZCPS requires adverse effects of activities in areas within outstanding natural character to be avoided, and in all other areas the significant adverse effects of activities to be avoided, and all other effects avoided, remedied, or mitigated. These policies are very directive on the way on which the MEP is required to address management of natural character the coastal environment. Avoidance of adverse effects of inappropriate subdivision, use, and development in this context means preventing an adverse effect from occurring, rather than enabling offsetting of effects through restoration and enhancement.

Providing certainty for continuation of existing uses, and new use and development in areas with natural character values is complicated by natural character values varying between different locations. This is recognised in the natural character assessment reports that have been completed to identify the degree of natural character. Accordingly, a balance in providing certainty of use and development is required whereby those activities deemed appropriate regardless natural character values present are permitted, and other activities are required to obtain resource consent to allow consideration of the effects on the values that are present in a particular location.

In regard to the coastal environment, this balance is reflected in the MEP in providing for use and development to occur within the identified natural character overlays as permitted activities where they are generally either transient (e.g. ship movements/temporary structures in the coastal marine zone), provide for enhancement of natural character (e.g. removal of existing structures), are of a character, scale, and intensity that is unlikely to adversely affect natural character values (e.g. taking of coastal water), or relates to some regionally significant infrastructure or natural hazard management (e.g. navigational aids, stormwater outfall clearance).

Outside of such permitted activities, the MEP requires activities to apply for resource consent to enable consideration of the effects of the activity on the values present, and therefore the appropriateness of the activity with respect to preserving those values. This also applies to the continuation of existing activities where the existing consent has expired. Existing activities may be located in areas with outstanding, very high, or high natural character, and therefore the consenting process enables consideration of the continued appropriateness of those activities in such areas in light of the values present in those areas. Such an approach is consistent with section 6(a) of the RMA, and NZCPS.

Many of the submissions are in particular concerned about a lack of certainty for the continuation of existing marine farms, where they are located within the natural character overlays. That concern is heightened by the fact that the consents for a large proportion of existing marine farms expire in 2024 and will require re-consenting around that time. In this regard the aquaculture provisions of the MEP have yet to be notified, and the Council is continuing to work with stakeholders as to the form of those provisions. Furthermore, the Government has released a proposed National Environmental Standard for Marine Aquaculture, specifically targeted at providing a nationally consistent approach to the re-consenting of existing marine farms. The finalisation of these proposals may assist address the concerns of submitters.

No changes are therefore recommended in response to the general submissions made. Specific changes to provisions of the MEP are addressed in assessing specific submissions later in this report.

Recommendation

Retain Chapter 6 as notified, except as otherwise recommended to be modified in response to other submissions on the Chapter considered in this report.

5.4 Introduction to Chapter 6 Natural Character

The introduction to Chapter 6 introduces the concept of natural character, and sets out the attributes which make up natural character and the statutory context directing the management of natural character in the MEP. The listed attributes of natural character in the chapter introduction are as follows:

'Natural character includes the natural elements, patterns, processes and experiential qualities of an environment. The natural character of the coastal environment, and freshwater bodies and their margins, is comprised of a number of key components which include:

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

Submissions

The submissions on the introduction include:

- Amend the introduction to delete the description of the components that contribute to natural character (**EDS (698/37)**).
- Amend the description of the components that make up natural character to include the components listed in Policy 13(2) of the NZCPS (**Friends of Nelson Haven and Tasman Bay (716/55)**).
- Amend the introduction to provide a clear outline and explanation of what is addressed in the chapter with reference to section 6(a) RMA and Policies 13 and 14 of the NZCPS (**Forest and Bird (715/120)**).

Assessment

The submissions either seek deletion of the list of attributes of natural character in the introduction on the basis that they are more appropriately located in the policies, or amendment to achieve better alignment with those attributes listed in Policy 13(2) of the NZCPS. Greater explanation of what is addressed in the chapter is also sought.

It is acknowledged that the list of attributes does not fully align with those attributes of the coastal environment set out in Policy 13(2) of the NZCPS. Furthermore, they are inconsistent with those attributes considered in the natural character assessment reports for Marlborough's coastal environment and rivers, and which capture the attributes in Policy 13(2). Accordingly, it is recommended that the definition and listed attributes are amended to achieve appropriate alignment with the attributes used for the basis of the completed natural character assessment reports, and which are consistent with Policy 13(2) of the NZCPS (changes detailed below). While the attributes of natural character are also listed in Policy 6.1.1 of the MEP, it is recommended they are also retained in the introduction to provide clarity for plan users at the start of the chapter.

In regard to the submission of Forest and Bird seeking greater clarity is provided as to what is addressed in the chapter, it is acknowledged that the description in the introduction could be expanded and made clearer. Changes are therefore recommended accordingly (changes detailed below).

Recommendation

Amend the introduction to Chapter 6 as follows. Recommended additions or new provisions to be shown underlined. Deleted text or provisions to be shown ~~struckthrough~~.

Natural character is the term used to describe the degree of naturalness in an area, and¹ includes the natural elements, patterns, processes and experiential qualities of an environment. The natural character of the coastal environment, and freshwater bodies and their margins, is comprised of a number of ~~key components~~ attributes² which include:

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

- Abiotic systems - physical processes, geomorphology, topography, landform, and water quantity/quality;
- Biotic systems - species, communities, habitats, and ecological processes;
- Experiential qualities - the ways in which people experience the natural environment.³

Collectively, these combine to create the overall natural character of the environment. The degree of natural character present in an area is commonly described on a continuum. Some environments have very high natural character due to the lack of human induced modification and may even be in a natural state. In other areas, there may be little natural character remaining due to extensive human modification.

*This chapter provides the basis to determine the degree of natural character present, the classification of areas of natural character, and management of natural character to recognise and provide for section 6(a) of the Resource Management Act 1991, and give effect to policies 13 and 14 of the New Zealand Coastal Policy Statement 2010 (NZCPS), and National Policy Statement for Freshwater Management 2017 (NPSFM). The chapter includes objectives, policies, and methods to guide activities within both coastal and river environments. The natural character values that have been identified are included in Appendix 2 (coastal), Appendix 5 (freshwater) and specific areas of high, very high, and outstanding natural character are identified on the planning maps in Volume 4.*⁴

¹ Submission 715/120 – Forest and Bird.

² Submission 715/120 – Forest and Bird.

³ Submission 716/55 – Friends of Nelson Haven and Tasman Bay.

⁴ Submission 715/120 – Forest and Bird.

Provisions included elsewhere in the Marlborough Environment Plan (MEP) ~~target address~~⁵ the individual components of natural character and provide direction on how adverse effects on particular values can be managed. These include:

- Chapter 5 - Allocation of Public Resources
- Chapter 7 - Landscape
- Chapter 8 - Indigenous Biodiversity
- Chapter 9 - Public Access and Open Space
- Chapter 13 - Use of the Coastal Environment
- Chapter 15 - Resource Quality (Water, Air, Soil)

This chapter does not address the natural character of wetlands. The natural character of wetlands has been established through an integrated process of assessing wetland values. Provisions to preserve the natural character of wetlands are included in Chapter 8 – Indigenous Biodiversity.⁶

~~However, there is a need for this management to be integrated in order to preserve natural character in coastal and freshwater environments. This ensures that the management of the individual components of natural character is co-ordinated to achieve a common end in the context of Section 6(a) of the Resource Management Act 1991 (RMA), of the New Zealand Coastal Policy Statement 2010 (NZCPS) and of the National Policy Statement for Freshwater Management 2014 (NPSFM).~~⁷

5.5 Issue 6A – Degradation of Natural Character through Resource Use

Issue 6A sets out the resource management issue relating to natural character in Marlborough. Issue 6A reads:

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

Submissions

The submissions on the issue include:

- Support/retain Issue 6A as notified (**East Bay Conservation Society (100/15)**).
- Amend the issue to read *'~~Resource use and change sin resource use~~ Inappropriate subdivision, use and development can result in the degradation of the natural character of the coastal environment, and of lakes, rivers and their margins'*, and ensure the associated description provides a precise and valid definition of natural character (**The Friends of Nelson Haven and Tasman Bay (716/56)**).
- Amend the issue to specifically recognise the natural character of wetlands (**Fish and Game (509/105)**).
- Amend the issue to replace the word *'degradation'* with *'modification'*, and reflect this change throughout the chapter **Aquaculture NZ (401/44)**, **Marine Farming Association (426/44)**, **Ted and Shirley Cully (447/2)**, **Sanford Ltd (1140/10)**).
- Amend the description for the issue to clarify that NZCPS Policies 13 and 14 provide further direction and guidance and restoration of natural character within the coastal environment (**Forest and Bird (715/121)**).

⁵ Submission 715/120 – Forest and Bird.

⁶ Submission 715/120 – Forest and Bird.

⁷ Submission 715/120 – Forest and Bird.

Assessment

The submissions include those that seek the issue and its description better align with the wording of section 6(a) RMA, by recognising that *'inappropriate subdivision, use, and development'* is what causes degradation of natural character, and by recognising the natural character values of wetlands. Furthermore, other submissions seek replacement of the term *'degradation'* with *'modification'* on the basis that resource use does not automatically constitute degradation and that degradation implies a value judgement or negative attitude towards change. Submissions also seek addition of references in the description for the issue to Policies 13 and 14 of the NZCPS to provide some statutory context.

In regard to the Friends of Nelson Haven and Tasman Bay's request for greater alignment with the wording used in section 6(a) of the RMA, resource management issues in Regional and District Plans are not required to restate the RMA's provisions. Rather they are intended to identify a local problem that must be resolved to promote the purpose and principles of the RMA. It is considered that the issue provides an appropriate description of what may impact on natural character. The inclusion of reference to *'inappropriate subdivision, use, and development'* resulting in degradation of natural character is therefore considered unnecessary. No change is therefore recommended.

Chapter 6 is intended to provide the policy context for managing natural character across all coastal and freshwater environments in the District, with the exception of wetlands. The natural character values of wetlands have been separately determined as part of an integrated process of addressing wetland values. Provisions to preserve the natural character of wetlands are instead addressed in Chapter 8 – Indigenous Biodiversity. No change is therefore recommended to recognise wetlands as sought by Fish and Game.

In regard to the submissions seeking replacement of the word *'degradation'* with *'modification'* in Issue 6A and elsewhere in Chapter 6, it is acknowledged that *'modification'* is the term typically applied to describe change in natural character (including any degradation), and is used widely elsewhere within Chapter 6, including its policies. Modification is also the term used in Policy 13(2) of the NZCPS which recognises that natural character can range from pristine to *'modified'*. It is therefore recommended that Issue 6A be amended to replace *'degradation'* with *'modification'* as proposed by Aquaculture NZ, Marine Farming Association, and others (changes detailed below).

Policies 13 and 14 of the NZCPS provide further direction and guidance on the preservation of natural character within the coastal environment. It would therefore be appropriate to recognise the national policy context more explicitly in the description of Issue 6A, as sought by Forest and Bird. Changes are recommended accordingly (changes detailed below).

Recommendation

Amend Issue 6A and the associated description as follows. Recommended additions or new provisions to be shown underlined. Deleted text or provisions to be shown ~~struck through~~.

Issue 6A – Resource use and changes in resource use can result in the ~~degradation~~ modification⁸ of the natural character of the coastal environment, and of lakes, rivers and their margins.

Section 6(a) of the RMA requires the Council to ~~preserve~~ recognise and provide for the preservation the natural character of the coastal environment, wetlands, and lakes, rivers and their margins and to protect this natural character from inappropriate subdivision, use and development. ~~The NZCPS sets a similar Objective for the coastal environment. Policies 13 and 14 of the NZCPS and the NPSFM provide more specific direction on the preservation and restoration of natural character in the coastal environment, and lakes and rivers respectively.~~⁹

The entire coastal environment and all freshwater bodies possess some or all of the ~~components~~ attributes¹⁰ of natural character (natural elements, patterns, processes and experiential qualities) and therefore all hold some degree of natural character. The extent of human-induced modification has a significant influence on the level of natural character that exists in the coastal environment and

⁸ Submissions 401/44 Aquaculture NZ, 426/44 Marine Farming Association, 447/2 Ted and Shirley Cully, 1140/10 Sanford Ltd.

⁹ Submissions 715/121 Forest and Bird, 716/56 The Friends of Nelson Haven and Tasman Bay.

¹⁰ Submission 716/56 The Friends of Nelson Haven and Tasman Bay.

in and adjacent to freshwater bodies. Some environments will have high natural character due to the lack of human-induced modification and may even be in a natural state. In other areas, there will be little remaining natural character due to extensive human-induced modification of the environment.

Preservation of natural character is a matter of national importance and there is a real risk that further human-induced modification within coastal or freshwater environments will have adverse effects. This risk is greatest in unmodified environments, as it is more likely that subdivision, use and development will change the existing natural elements, patterns, processes and experiential qualities. As the degree of existing human-induced modification in the coastal or freshwater environment increases, so too does the ability of the environment to assimilate change into the components that contribute to natural character.

Even in areas with low overall natural character, components of high natural character may remain and the protection of this natural character from inappropriate subdivision, use and development may still be important to the local community, wider public and intrinsically. These areas could also become the focus of restoration efforts.

5.6 Objective 6.1 – Establishing the Degree of Natural Character

Objective 6.1 sets out the objective of the MEP with regard to the identification of the degree of natural character in Marlborough, in addressing Issue 6A. Objective 6.1 reads:

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

Submissions

The submissions on the objective include:

- Support/retain objective as notified (**Federated Farmers (425/80), DOC (479/51), Queen Charlotte Sound Residents Association (504/18), Kiwirail (873/13), Trustpower (1201/63), Judy and John Hellstrom (688/37)**).
- Define what is meant by the *'Degree of natural character'* (**Marguerete Osborne (243/2)**).
- Amend the objective to read *'~~Establish the degree of natural character~~ Assess natural character and evaluate its degree in the coastal environment, and in lakes, rivers and their margins'* (**EDS (698/38)**).
- Amend the objective to read *'Identify areas and values of Natural Character which require preservation in the coastal environment, and in wetlands, lakes and rivers and their margins'* (**Forest and Bird (715/122)**).
- Amend the objective to read *'~~Establish the degree of~~ Identify areas of high natural character in the coastal environment, and in lakes and rivers and their margins'* or similar (**Nelson Forests Ltd (990/175)**).
- Amend the objective to refer to a 7 range scale for rating natural character (**Friends of Nelson Haven and Tasman Bay (716/57)**).
- Apply the objective only to identified rivers which are at risk or have particular characteristics (**Marlborough Forest Industry Association (962/40)**).
- Apply the objective only to selected rivers, lakes, and the coastal environment (**Nelson Forests Ltd (990/175)**).

- Amend the objective to specifically recognise the natural character of wetlands (**Fish and Game (509/106)**).
- Amend objective to include reference to 'Establish the extent of acceptable modification' (**Aquaculture NZ (401/45), Marine Farming Association (426/45)**).
- Amend the objective to read 'Describe the biological features that contribute to natural character and the community's level of acceptance to modification' (**Sanford (1140/11)**).

Assessment

The submissions include a number which seek the objective be amended to further describe the way in which the degree of natural character is to be established and identified in the MEP. In the case of the Friends of Nelson Haven and Tasman Bay, this extends to including reference to a 7 range scale for rating natural character. Other submissions seek that the scope of the objective expanded to recognise wetlands, and require establishment of the extent of acceptable modification of natural character, including the communities level of acceptance to modification.

In regard to those submissions seeking greater prescription of the way by which the degree of natural character is to be established and identified, resource management objectives in Regional and District Plans are intended to be a statement of what is to be achieved through the resolution of a particular issue. Objectives however are not intended to state how the objective should be achieved, which is the role of supporting policies. Objective 6.1 provides a clear statement of what is to be achieved in response to Issue 6A. It would be inappropriate to further describe the process for establishing the degree of natural character, including the identification of natural character areas, which would introduce specificity as to how the objective is to be achieved, and which would therefore be more appropriately addressed in the supporting policies. No changes are therefore recommended to Objective 6.1. The process for establishing the degree of natural character, and the identification of specific areas, is further considered as part of addressing the submissions made on the policies in latter sections of this report.

As noted in the discussion on submissions on Issue 6A above, Chapter 6 does not address the natural character of wetlands which have been separately determined and are addressed in Chapter 8 – Indigenous Biodiversity. No change is therefore recommended in response to Fish and Game's request to include recognition of wetlands.

It is acknowledged, that inclusion in policy of the degree of acceptable modification or change to natural character, could provide an acceptable threshold of modification and provide greater certainty as to the appropriateness of development at the time of consenting new or re-consenting existing activities. Such an approach could assist the appropriateness of existing and new activities within these areas in responding to sections 6(a) of the RMA, and Policies 7 and 13 of the NZCPS.

The DOC guidance note on Policy 7 of the NZCPS recognises that cumulative effects in the coastal environment are better addressed through a strategic planning approach, including the identification of environmental limits and integrated management of the impact of different and/or numerous similar activities. It also however recognises that addressing cumulative adverse effects can be challenging, as they can arise from direct and indirect influences. Management responses need to consider all sources, and an approach that tackles only a fraction of the problem will be ineffective and lack credibility. The guidance notes that the management responses need to be practicable and will vary according to the significance of the issue and resources available.

While there is merit seen in the approach proposed by Aquaculture NZ and the Marine Farming Association, significant work would be required to develop this approach. It would require ensuring that there is sufficient information as to the nature scale of all cumulative effects sources, and require development of policy or guidelines to occur collaboratively with all relevant stakeholders to achieve a comprehensive approach that can be effectively implemented. In regard to the coastal environment for example, such an approach could be best delivered through first undertaking holistic coastal spatial planning approach. Given the amount of work required to deliver a robust and workable management approach, including consultation, it is not recommended to change the policy to require the extent of acceptable modification to be established at this time.

In regard to Sanford's request to amend the wording of the objective, natural character is not restricted to biological features, and the communities level of acceptance to modification is not a relevant factor in determining the natural character values that exist. Amending the objective to recognise this would therefore not be consistent with section 6(a) of the RMA, and Policy 13 of the NZCPS. No changes are therefore recommended.

Recommendation

Retain Objective 6.1 as notified.

5.7 Policy 6.1.1 – Attributes that Contribute to Natural Character

Policy 6.1.1 sets out the attributes to be assessed in determining the degree of natural character to implement Objective 6.1. It captures the same attributes outlined in the introductory section to Chapter 6 (discussed earlier). Policy 6.1.1 reads:

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

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

Submissions

The submissions on this Policy include:

- Support/retain the policy as notified (**DOC (479/52), D C Hemphill (648/13), Forest and Bird (715/123), Trustpower Ltd (1201/64)**).
- Amend the policy to recognise that the specified qualities 'may' contribute to natural character, but is not exclusive (**Federated Farmers (425/81)**).
- Amend the policy so that it focuses only on natural, physical and biological processes, and how those processes are perceived (**Aquaculture NZ (401/46), Marine Farming Association (426/46)**).
- Amend clause (e) of the policy to include ecological, biological, and morphological patterns and processes (**Fish and Game (509/107)**).
- Amend the policy to better recognise the range of elements that contribute to natural character, including to give effect to Policy 13 NZCPS, and the range of elements incorporated in other MEP policies (**EDS (698/39)**).
- Amend the policy to address all the matters in NZCPS Policy 13(2), and additional matters to cover lakes, rivers, and wetlands (**Friends of Nelson Haven and Tasman Bay (716/58)**).
- Amend the policy to read *'Recognise the natural elements, patterns and processes which contribute to natural character and the communities' responses to these'* (**Sanford (1140/13)**).
- Amend the policy to include cultural and spiritual values (**Te Atiawa o Te Waka-a-Maui (1186/51)**).

Assessment

The submissions all seek various changes to the list of attributes that contribute to natural character. They include those that seek greater alignment with the list of attributes in Policy 13(2) of the NZCPS; limiting the scope of the attributes to only natural, physical, and biological processes, and how they are perceived; or expanding the list to include additional attributes, including cultural and spiritual values.

It is acknowledged that the list of attributes does not fully align with those attributes of the coastal environment set out in Policy 13(2) of the NZCPS. Furthermore, they are inconsistent with those attributes considered in the natural character assessment reports for Marlborough's coastal environment and rivers, and which capture the attributes in Policy 13(2). Accordingly, it is recommended that the listed attributes are amended to achieve appropriate alignment with the attributes used for the basis of the completed natural character assessment reports, and which are consistent with Policy 13(2) of the NZCPS (changes detailed below). This will ensure they are also consistent with the recommended amendments to the introduction to Chapter 6 discussed earlier in this report.

Cultural and spiritual values are not an attribute of natural character, which is term used to describe the degree of naturalness that exists. Cultural and spiritual values are instead an associative attribute of landscape character, and have therefore been captured in the assessment of Marlborough's landscape values, and identification of outstanding and significant landscapes in the MEP. No changes are therefore recommended to the policy in response to the submission of Te Atiawa. It is noted that the submission of Te Atiawa was supported by a further submission of Elkington whanau and Ngati Koata landowners. The further submission expanded the scope of that original submission by seeking a range of additional amendments throughout the MEP. Under RMA, further submissions cannot extend the scope of an original submission, and therefore the specific changes sought in this further submission have not been considered.

Recommendation

Amend Policy 6.1.1 and the associated description as follows. Recommended additions or new provisions to be shown underlined. Deleted text or provisions to be shown ~~struckthrough~~.

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

- ~~(a) areas or water bodies in their natural state or close to their natural state;~~
- ~~(b) coastal or freshwater landforms and landscapes (including seascape);~~
- ~~(c) coastal or freshwater physical processes (including the natural movement of water and sediments);~~
- ~~(d) biodiversity (including individual indigenous species, their habitats and communities they form);~~
- ~~(e) biological processes and patterns;~~
- ~~(f) water flows and levels and water quality; and~~
- ~~(g) the experience of the above elements, patterns and processes, including unmodified, scenic and wilderness qualities.~~
- (a) Abiotic systems - physical processes, geomorphology, topography, landform, and water quantity/quality;
- (b) Biotic systems - species, communities, and habitats, and ecological processes;
- (c) Experiential qualities - the ways in which people experience the natural environment.

This Policy describes those ~~matters~~ attributes which ~~considered to~~ contribute to the natural character of coastal and river environments. This provides MEP users with a clear understanding of the meaning of natural character.¹¹

¹¹ Submissions 425/81 Federated Farmers, 401/46 Aquaculture NZ, 426/46 Marine Farming Association, 698/39 EDS, 716/58 Friends of Nelson Haven and Tasman Bay.

5.8 Policy 6.1.2 – Identification of the Coastal Environment

Policy 6.1.2 addresses the identification of the extent of the coastal environment in the MEP within which management may need to be applied, including to protect the natural character of the coastal environment from inappropriate, subdivision, and use. The coastal environment identified under this policy also has application through other provisions in the MEP. Policy 6.1.2 reads:

'Policy 6.1.2 – The extent of the coastal environment is identified in the Marlborough Environment Plan to establish the areas of land and coastal marine area to which management may need to be applied in order to protect the natural character of the coastal environment from inappropriate subdivision, use and development.'

Submissions

The submissions on this Policy include:

- Support/retain the Policy as notified (**East Bay Conservation Society (100/16), DOC (479/53)**).
- Amend the policy to provide certainty as to when management will be applied and ensure it is not applied to existing commercial forest, or amend the coastal environment zone to exclude NFL's commercial forestry blocks (**Nelson Forests Ltd (990/176)**).
- Amend the policy to recognise mapping of the coastal environment should also in consultation with landowners, the community, and tangata whenua, and move the Policy to the coastal environment chapter (**Federated Farmers (425/82)**).
- Move policy to the coastal environment zone chapter, and amend the description to clearly explain how the identification of the extent of the coastal environment is necessary for implementing the NZCPS, not just section 6(a) of the RMA (**Forest and Bird (715/124)**).
- Amend the last sentence of the explanation to the Policy to add reference to it being more difficult to define the extent of the coastal environment on the south coast, and that there needs to be consistent approach to identifying the coastal environment to that adopted in adjoining regions. (**Friends of Nelson Haven and Tasman Bay (716/59)**).

Assessment

The submissions include those that seek to either provide certainty as to when management of commercial forestry will be applied, or exclude commercial forestry from the coastal environment. Submissions also seek that references be included to mapping of the coastal environment being done in consultation with the community, and that the policy be moved to Chapter 13 which provides much of the policy context for use of the coastal environment. Including a reference to achieving inter-regional consistency in the identification of the coastal environment is also sought to be included in the description to the policy.

The objective does not address the management of subdivision, use, and development within the coastal environment, which in regard to natural character is instead addressed by Objective 6.2 and its associated policies, and the objectives and policies within Chapter 13 – Use of the Coastal Environment. Inclusion of reference to the management of commercial forestry within Policy 6.1.2 would therefore not align with the intended purpose of Policy 6.1.2, and therefore no change is recommended. The exclusion of commercial forestry from the identified extent of the coastal environment would also not be appropriate. The extent of the coastal environment over land reflects those areas of Marlborough which either has an interface with or is influenced by coastal processes, irrespective of the use of that land. Exclusion of commercial forestry in areas identified as part of the coastal environment would therefore be contrary to that approach. No change to the identified extent of the coastal environment is therefore recommended in response to the submission of Nelson Forests Ltd.

In regard to Federated Farmers request that reference be included to consultation with landowners, the community, and tangata whenua in mapping the coastal environment, the RMA first schedule process for District Plan reviews allows for consultation and public participation. This provides for appropriate input into

decision making on the final form of the MEP provisions. Given that consultation is a required step in the plan review process, specific reference to consultation in the policy is considered unnecessary. No change is therefore recommended.

It is acknowledged that the identification of the coastal environment under Policy 6.1.2 also has a relationship to provisions in Chapter 13 of the MEP which are focussed on the use of the coastal environment. Policy 6.1.2 however directly relates to the implementation of Objective 6.1 concerning the establishment of the degree of natural character in the coastal environment, and therefore the policy appropriately sits within Chapter 6 rather than Chapter 13. Relocation of Policy 6.1.2 to Chapter 13 is therefore not recommended.

Inter-regional consistency in the identification of the extent of the coastal environment is a desirable outcome. The DOC Guidance Note on Policy 1 of the NZCPS, and influential Environment Court decisions have assisted in defining consistent practice, however achieving consistency is still dependent on how it is applied by each Council. Given the above, including reference within the explanation to Policy 6.1.2 to achieving regional consistency is unlikely to assist achieve that goal. It is however relevant to note that the practice used to identify the coastal environment in the MEP aligns with that used in the adjoining Canterbury Region and Tasman District (all undertaken by Boffa Miskell Ltd).

Forest and Bird's request to amend the description to clearly explain that identification of the extent of the coastal environment is necessary for implementing the NZCPS is accepted as appropriate. Changes are recommended accordingly (changes detailed below).

Recommendation

Amend the description for Policy 6.1.2 as follows. Recommended additions or new provisions to be shown underlined. Deleted text or provisions to be shown ~~struckthrough~~.

...

The landward extent of Marlborough's coastal environment is mapped in the MEP. Establishing the extent of the coastal environment defines the areas in which activities may need to be managed in a particular way to preserve the natural character of this environment in accordance with Section 6(a) of the RMA, and policies of the NZCPS.¹² This will provide resource users and the community with certainty as to the spatial area to which the natural character and other provisions of the NZCPS apply.

5.9 Policy 6.1.3 – Determining the Degree of Natural Character of the Coastal Environment

Policy 6.1.3 addresses how the degree of natural character of the coastal environment is to be determined, to implement Objective 6.1. Policy 6.1.3 reads:

'Policy 6.1.3 – Determine the degree of natural character in both the coastal marine and coastal terrestrial components of the coastal environment by assessing:

- (a) the degree of human-induced modification on abiotic systems and landforms, marine and terrestrial biotic systems and experiential qualities; and*
- (b) natural character at a range of scales.'*

Submissions

The submissions on this Policy include:

- Support/retain as notified (**DOC (479/54), NZ Forest Products Holdings Ltd (996/12)**).

¹² Submission 715/124 Forest and Bird.

- Amend the policy to read '~~Determine the degree of natural character in both the coastal marine and coastal terrestrial components of the coastal environment by (a) assessing the degree of human-induced modification on abiotic systems and landforms, marine and coastal terrestrial biotic systems and experiential qualities; and (b) categorising natural character at a range of scales~~' (**Aquaculture NZ (401/48), Marine Farming Association (426/48)**).
- Amend policy to read: '~~Determine~~ Evaluate the degree of natural character in both the coastal marine and coastal terrestrial components of the coastal environment by (a) assessing the degree of human-induced modification on ~~abiotic systems and landforms, marine and coastal terrestrial biotic systems and experiential qualities~~ the factors in Policy 6.1.1; and (b) categorising natural character at a range of scales' (**EDS (698/40)**).
- Amend policy (or add a new Policy) to include guidance on the values that contribute to natural character and establishing which areas have high and very high natural character (**Forest and Bird (716/125)**).
- Amend policy to read '~~Determine the degree of natural character in both the coastal marine and coastal terrestrial components of the coastal environment by assessing: (a) the degree of human-induced modification on abiotic systems and landforms, marine and coastal terrestrial biotic systems and experiential qualities~~ natural elements, natural patterns and natural processes; and (b) ~~natural character at a range of scales~~ the seven-range scale range of natural character' (**Friends of Nelson Haven and Tasman Bay (716/60)**).
- General comment - Clarify the assessment criteria (**Marlborough Forest Industry Association (962/42)**).
- General comment - Manage the coastal marine area as one area and recognise existing uses (modifications) to the natural character i.e. marine farming and forestry (**Sanford Ltd (1140/14)**).

Assessment

The submissions largely relate to the matters (a) and (b) in the policy which are required to be assessed to determine the degree of natural character of the coastal environment. Many of the submissions consider that the requirement to assess '*abiotic systems and landforms, marine and terrestrial biotic systems and experiential qualities*' is inconsistent with the components which make up natural character which are defined in Policy 6.1.1. The submissions of Aquaculture NZ, and the Marine Farming Association also consider that the reference to assessing '*natural character at a range of scales*' should reflect that the mapping in the MEP has been done at the detailed level 5 part of the scale, while the Friends of Nelson Haven and Tasman Bay seek inclusion of reference to using a 7 range scale for assessing natural character. Sanford oppose the Policy on the basis the coastal marine area should be managed as one, with existing uses (modifications of natural character) recognised.

Policy 6.1.3 sets how out the natural character of the coastal environment will be determined to assist implement Objective 6.1. It is apparent from many of the submissions, that the use of different terminology in part (a) of the Policy from that used in Policy 6.1.1 to describe the attributes which are to be assessed to determine the degree of natural character, has created confusion as to what attributes form the basis for assessment. The natural character assessment report that has been completed for the coastal environment of Marlborough has considered the degree of human modification on abiotic and marine biotic systems, and experiential qualities as is currently recognised in Policy 6.1.3. Recognising the confusion, and the recommended changes to Policy 6.1.1 (described earlier), it is recommended that Policy 6.1.3 be amended to cross refer to the attributes in Policy 6.1.1 as is proposed in the submission of EDS (changes detailed below).

The reference in part (b) of the policy requiring assessment of '*natural character at a range of scales*', reflects the methodology used in the natural character assessment report, and which is further described in Mr Bentley's s42A report. Specifically, that methodology involved using a land systems approach which utilises different scales of reference which steadily zoom in from the broad regional scale to the detailed local scale. This recognises that the coastal environment can be perceived as having different levels of natural character at different scales. The intent of the reference in part (b) of the policy is to recognise that

hierarchical methodology, and not at which scale natural character has been mapped in the MEP which is as the detailed level 5 part of the scale. No change to part (b) of the policy is therefore recommended.

In regard to the Friends of Nelson Haven and Tasman Bay's request to include reference to the 7 scale range of natural character assessment, Mr Bentley has addressed the methodology used to determine the degree of natural character. On the basis of his conclusions, no change is therefore recommended.

In regard to Sanfords's request to manage the coastal marine area as one area and recognise existing uses, management of the coastal marine area as one area without regard to areas of at least high natural character would not be consistent with Policy 13 of the NZCPS. No change is therefore recommended. It is however relevant to note that the assessment of the degree of natural character in the natural character assessment report, and identification of areas with high, very high, and outstanding, natural character in the MEP has taken into account existing uses and modifications present.

Recommendation

Amend Policy 6.1.3 and the associated description as follows. Recommended additions or new provisions to be shown underlined. Deleted text or provisions to be shown ~~struck through~~.

Policy 6.1.3 – Determine the degree of natural character in both the coastal marine and coastal terrestrial ~~components~~ areas of the coastal environment by assessing:

- (a) the degree of human-induced modification on abiotic and biotic systems ~~and landforms, marine and terrestrial biotic systems~~ and experiential qualities, including those listed in Policy 6.1.1;¹³ and*
- (b) natural character at a range of scales.*

The natural character of the coastal environment can vary significantly from place to place. An evaluation of the degree of natural character in Marlborough's coastal environment has been undertaken. This comprised an assessment of the extent of human-induced modification in the coastal marine area and on land within the coastal environment. To assist this process, Marlborough's coastal environment was divided into nine distinct coastal marine areas and 17 distinct coastal terrestrial areas based on land typology. For each area, abiotic systems and landforms, biotic systems and experiential attributes were assessed. Freshwater values within the coastal environment were identified in the coastal terrestrial areas.

The analysis of natural character was undertaken at a range of scales from broad (i.e. at the Marlborough Sounds or South Marlborough level) through to a more detailed scale which in some cases was bay-level assessment. As a result, natural character can be perceived at different levels and different scales, depending on the level of information that is available. The scales at which the assessments have been undertaken can be seen in Figure 6.2.

Appendix 2 identifies the values that contribute to high and very high coastal natural character in each of the discrete natural character areas (reaching Levels 4 to 5 on the assessment scale). The values for areas with outstanding coastal natural character are also included within Appendix 2.

¹³ Submission 698/40 EDS, 401/48 Aquaculture NZ, 426/48 Marine Farming Association, 716/60 Friends of Nelson Haven and Tasman Bay.

5.10 Policy 6.1.4 – Identifying Areas with High, Very High, or Outstanding Natural Character in the Coastal Environment

Policy 6.1.4 addresses the identification of areas of natural character in the coastal environment to implement Objective 6.1. Policy 6.1.4 reads:

'Policy 6.1.4 – Identify those areas of the coastal environment that have high, very high or outstanding natural character.'

Submissions

The submissions on this Policy include:

- Support/retain policy as notified (**Michael and Kristen Gerard (424/14), DOC (479/55), D C Hemphill (648/14), Flaxbourne Settlers Association (712/101), Forest and Bird (715/126)**).
- Delete policy 6.1.4 (**Aquaculture NZ (401/49), Marine Farming Association (426/49)**).
- Amend policy to read *'Identify and map those areas of the coastal environment that have high, very high or outstanding natural character'* (**EDS 698/41**).
- Amend policy to make it clear that areas classified below high are only excluded from the MEP maps on practicality grounds and that policies on natural character in the MEP also apply to these areas. (**Clova Bay Residents Association (152/1)**).
- Amend the policy to read *'Identify those areas of the coastal environment that ~~have high, very high or outstanding natural character~~ are valued by the community as high and outstanding natural character'* (**Sanford 1140/15**).
- Amend the second paragraph of the explanation to refer to a 7 range scale of natural character (**Friends of Nelson Haven and Tasman Bay (716/61)**).

Assessment

The submissions on this Policy include those that seek it be deleted on the basis that it duplicates Policy 6.1.3 which addresses determining the degree of natural character, or amended to make it clear that areas below the threshold of having high natural character are still subject to the management objectives and policies of Chapter 6. The Friends of Nelson Haven and Tasman Bay seek inclusion of reference to using a 7 range scale for assessing natural character. Sanford seek the identification of areas of high and outstanding natural character be limited to those valued by the community, with existing lawful modifications being recognised.

Policy 6.1.4 builds on the evaluation of the degree of natural character undertaken under Policy 6.1.3, by then requiring identification of those areas which exhibit high, very high, or outstanding natural character. As such it does not duplicate Policy 6.1.3. Deletion of the policy would mean areas of at least high natural character are not identified, which would not be consistent with Policy 13(1)(c) of the NZCPS. It is therefore not recommended to delete the Policy.

In regards to the Clova Bay Residents Associations request to make it clear that the management policies of Chapter 6 apply to areas not identified as high, very high, or outstanding natural character, Policy 13 of the NZCPS does not require mapping of areas which fall below the threshold of having high natural character. Furthermore, it is considered sufficiently clear that other Chapter 6 objectives and policies apply more broadly beyond just those areas identified as having outstanding, very high, or high natural character. In particular Policy 6.2.2 requires significant adverse effects of subdivision, use, and development on coastal natural character to be avoided so as to give effect to Policy 13(1)(b) of the NZCPS. As such amendment of

the policy to make it clear that other natural character policies apply to areas which have less than high natural character, is unnecessary.

Sanford's request that identification of areas of outstanding and high natural character only include those are 'valued by the community' would not be consistent with section 6(a) of the RMA, or Policy 13 of the NZCPS. No change is therefore recommended to the policy. Again it relevant to note that the assessment of the degree of natural character present, and identification of areas with outstanding, very high, and high outstanding natural character in the MEP has taken into account existing uses and modifications present.

In regard to the Friends of Nelson Haven and Tasman Bay's request to include reference to the 7 scale range of natural character assessment, Mr Bentley has addressed the methodology used to determine the degree of natural character. On the basis of his conclusions, no change is therefore recommended.

The minor wording change sought by EDS that the identified areas be 'mapped' in the MEP is appropriate and recommended to be included (change detailed below).

Recommendation

Amend Policy 6.1.4 as follows. Recommended additions or new provisions to be shown underlined. Deleted text or provisions to be shown ~~struckthrough~~.

Policy 6.1.4 – Identify and map¹⁴ those areas of the coastal environment that have high, very high or outstanding natural character.

5.11 Policy 6.1.5 – Determining the Degree of Natural Character of Lakes and Rivers

Policy 6.1.5 addresses how the degree of natural character of lakes and rivers is to be determined to implement Objective 6.1. Policy 6.1.5 reads:

'Policy 6.1.5 – Determine the degree of natural character in and adjacent to lakes and rivers by assessing the degree of human-induced modification to the following:

- (a) channel shape and bed morphology;*
- (b) flow regime and water levels;*
- (c) water quality;*
- (d) presence of indigenous flora and fauna in the river channel;*
- (e) absence of exotic flora and fauna;*
- (f) absence of structures and other human modification in the river channel/lake;*
- (g) vegetation cover in the riparian margin;*
- (h) absence of structures and other human modification in the riparian margin; and*
- (i) the experience of the above elements, patterns and processes including unmodified, scenic and wilderness qualities.'*

Submissions

The submissions on this Policy include:

- Support/retain as notified (**DOC (479/56), Kiwirail (873/14), NZ Forest Product Holdings Ltd (996/12)**).
- Delete the policy (**Coatbridge Ltd (356/7), Federated Farmers (425/83)**).

¹⁴ Submission 698/41 EDS

- Amend the policy to read '~~Determine~~ Evaluate the degree of natural character in and adjacent to lakes and rivers by assessing the degree of human-induced modification to the factors in Policy 6.1.1' (EDS (698/42)).
- Amend the policy to include reference to 'the level of Mauri, assessed through a cultural health assessment' (Te Runanga O Ngati Kuia (501/22)).
- Amend the policy to include reference to 'streams that would normally flow all year if not adversely affected by high take during the peak summer period' (Queen Charlotte Sound Residents Association (504/19)).
- Amend the policy to improve readability of clauses (f) and (h) (Trustpower Ltd (1201/57)).
- Amend the policy to include those areas assessed as being threatened environments within Volume 1 Chapter 6 (Judy and John Hellstrom (688/55)).
- Amend the policy to ensure that natural character is determined by firstly identification of the elements, patterns and processes that exist to contribute to natural character in wetlands, lakes and rivers and then establish the degree to which these have been modified by human activity (Fish and Game 509/108)).
- Ensure the limitations only apply to a set of identified rivers, and clarify what is meant by '*adjacent to*' in the policy or delete it (Marlborough Forest Industry Association (962/43)).
- Amend the policy to provide certainty as to extent (replace '*adjacent*') and focus on a list of rivers rather than all watercourses. (Nelson Forests Ltd (990/178)).
- Amend the explanation to clarify if the list of matters in the policy are guidance on the values, as identified in Appendix 5, clarify whether the policy provides guidance on determining areas of outstanding natural character, or add a new policy to guide determination of outstanding natural character (Forest and Bird (715/128)).

Assessment

The submissions include those that seek it be deleted or amended on the basis that it duplicates or is inconsistent with the components of natural character listed in Policy 6.1.1. Other submissions seek various changes to the list of matters to be used to determine the degree of natural character of lakes and rivers, including addition of reference to the level of Mauri, streams with year round flow, and threatened environments. Clarity is also sought as to what is meant by '*adjacent*' to lakes and rivers. Other submissions seek the policy focus only on a list of rivers rather than all waterways.

Policy 6.1.5 sets out how the natural character of lakes, rivers, and their margins will be determined to assist implement Objective 6.1. As is the case for Policy 6.1.3, it is apparent from the submissions that the use of different terminology to describe the attributes which are assessed to determine the degree of natural character in Policies 6.1.5 and 6.1.1 respectively has created confusion as to what attributes form the basis for assessment. Recognising the confusion, and the recommended changes to Policy 6.1.1 (described earlier), it is recommended that Policy 6.1.5 be amended to cross refer to the attributes in Policy 6.1.1 as is proposed in the submission of EDS (changes detailed below).

Cultural and spiritual values, including Mauri are not an attribute of natural character which is a term used to describe the level of naturalness that exists. Cultural and spiritual values are instead an associative attribute of landscape character, and have therefore been captured in assessment of Marlborough's landscape values, and identification of outstanding and high amenity landscapes in the MEP. No changes are therefore recommended to the policy in response to the submission of Ngati Kuia.

In regards to those submissions seeking clarification of what is meant in the policy by '*adjacent to lakes and rivers*', it is acknowledged that this is unclear and introduces uncertainty. It is therefore recommended that the wording be changed to refer to the '*margins of rivers*' so as to align with standard RMA terminology, and the wording of Objective 6.1 (changes detailed below).

In regards to Marlborough Forest Industry Association, and Nelson Forests Ltd restrict the scope of the policy to a list of selected rivers, the approach within Policy 6.1.5 is to assess the natural character values of a broad spectrum of rivers to determine the values present and identify those rivers that have high or very high natural character. Restricting the determination of the natural character values of rivers under the policy to a selected list of rivers would not be consistent with section 6(a) of the RMA as it would predetermine what rivers should be assessed, without first understanding the natural character values that are present. No changes are therefore recommended.

Forest and Bird's submission notes there is a lack of clarity as to whether the matters in the policy are guidance on the values of rivers in Appendix 5, and whether the policy provides guidance on determining areas of outstanding natural character. As noted above, the matters in Policy 6.1.5 are a list of attributes for determining the degree of natural character. Appendix 5 includes a broader range of values, which includes reference to the degree of assessed natural character. The scope of Policy 6.1.5 extends to determining the degree of natural character, which could include for the purposes of identifying areas of outstanding natural character, although no assessment with a view to identifying areas with outstanding natural character has been undertaken to date. Notwithstanding, it is acknowledged that the purpose of Policy 6.1.5 could be clearer and changes to the description of Policy 6.1.5 are recommended accordingly (changes detailed below).

Recommendation

Amend Policy 6.1.5 and the associated description as follows. Recommended additions or new provisions to be shown underlined. Deleted text or provisions to be shown ~~struck through~~.

Policy 6.1.5 – Determine the degree of natural character in and ~~adjacent to~~ within the margins of¹⁵ lakes and rivers by assessing the degree of human-induced modification on abiotic and biotic systems, and experiential qualities, including those listed in Policy 6.1.1 ~~to the following:~~

- ~~(a) channel shape and bed morphology;~~
- ~~(b) flow regime and water levels;~~
- ~~(c) water quality;~~
- ~~(d) presence of indigenous flora and fauna in the river channel;~~
- ~~(e) absence of exotic flora and fauna;~~
- ~~(f) absence of structures and other human modification in the river channel/lake;~~
- ~~(g) vegetation cover in the riparian margin;~~
- ~~(h) absence of structures and other human modification in the riparian margin; and~~
- ~~(i) the experience of the above elements, patterns and processes including unmodified, scenic and wilderness qualities.~~¹⁶

*The natural character of rivers can vary significantly from place to place. An evaluation of the degree of natural character in Marlborough's rivers has been undertaken, involving the assessment of a range of natural elements, patterns, processes, and experiential qualities ~~The matters identified in (a) to (i) are those elements, patterns, processes and experiential qualities that contribute to the natural character of Marlborough's lakes and rivers and their margins. The extent to which these have been modified by human activities will determine the degree of natural character. Where the matters in (a) to (i) have not been modified or have been only been slightly modified, then the natural character will be assessed as being very high. As the degree of human-induced modification of the river and its margins increases, the degree of natural character will reduce from high, through moderate, low and finally, very low (where the river environment has been heavily modified). The degree of natural character is identified as part of the range of values identified for Marlborough's rivers in Appendix 5.~~*¹⁷

¹⁵ Submissions 962/43 Marlborough Forest Industry Association, 990/178 Nelson Forests Ltd

¹⁶ Submission 698/42 EDS

¹⁷ Submission 715/128 Forest and Bird

5.12 Policy 6.1.6 – Identifying Rivers with High or Very High Natural Character

Policy 6.1.6 addresses the identification of natural character in rivers to implement Objective 6.1. Policy 6.1.6 reads:

'Policy 6.1.6 – Identify those rivers or parts of rivers that have high or very high natural character.'

Submissions

The submissions on this Policy include:

- Support/retain as notified (**DOC (489/57), Forest and Bird (496/1)**).
- Delete the policy (**Coatbridge Ltd (356/6), Federated Farmers (425/84)**).
- Amend policy to read *'Identify and map those rivers or parts of rivers that have high or very high natural character'* (**EDS 698/43**).
- Amend the policy to ensure that wetlands with high and very high natural character are also identified, and add an additional Policy in the plan to recognise the natural character of wetlands, lakes and rivers and their margins that have natural character values considered to be less than high (**Fish and Game (509/109)**).
- Amend the policy to include a requirement that weeds on conservation estate/reserves need to be controlled (**Murray Chapman (348/2)**).
- Amend the explanation to the policy to recognise that this policy applies *'outside the coastal environment'* as Policy 13 and 14 NZCPS would capture any rivers, wetland within the coastal environment, and amend the policy or add a complementary Policy to provide guidance on the values used to determine the areas identified in Appendix 5, and retain the approach of identifying natural character areas on maps (**Forest and Bird (715/129)**).
- Amend the explanation to the policy to refer to a 7 range scale of natural character (**Friends of Nelson Haven and Tasman Bay (716/62)**).
- General Comment/no relief requested – MDC has gone beyond what the RMA is requiring (**Marlborough Chamber of Commerce (961/10)**).

Assessment

The submissions on the policy include those that seek it be deleted, including on the basis that there is no requirement for Council to identify rivers that have high or very high natural character. Other submissions seek inclusion of reference to wetlands, and clarification that the policy only applies to lakes and rivers outside of the coastal environment. The Friends of Nelson Haven and Tasman Bay request inclusion of a reference to a 7 range scale of natural character.

Policy 6.1.6 requires identification of those rivers that have high or very high natural character to implement Objective 6.2. Whilst there is no explicit requirement to identify rivers with high or very high natural character, identifying such rivers enables a more targeted management regime to be applied to those rivers and their margins in recognition of their relative higher degree of naturalness and lesser human modification so as to recognise and provide for the preservation intentions of section 6(a) of the RMA. In so doing it avoids the implementation of a generic management regime across all rivers which may place too high a regulatory burden with respect to those rivers which have a lesser degree of naturalness, or have been heavily modified by human intervention. It is therefore not recommended to delete Policy 6.1.6 as sought by Coatbridge Ltd and Federated Farmers. Furthermore, for the same reasons it is not recommended to identify lakes and rivers with values that are less than high as sought by Fish and Game.

Policy 6.1.6 is focussed on the identification of areas of high or very high natural character to assist implement Objective 6.1. The management mechanisms that apply are instead captured under Objective 6.2 and related policies. Inclusion of reference to the control of weeds on the conservation estate in Policy 6.1.6 would therefore not align with the intended purpose of the policy, and therefore no change is recommended in response to the submission of Murray Chapman. Management of exotic weeds is also more effectively addressed through regulatory mechanisms separate to the MEP, specifically the Regional Pest Management Plan, prepared under the Biosecurity Act 1993.

The policy is intended to apply to rivers both inside and outside of the coastal environment. This recognises that the assessment of natural character values of rivers supporting the MEP has assessed those reaches of rivers that fall within the coastal environment. No change is therefore recommended to limit the application of the policy to outside of the coastal environment, as requested by Forest and Bird.

As previously noted Chapter 6 does not address the natural character of wetlands which have been separately determined and are addressed in Chapter 8 – Indigenous Biodiversity. No change is therefore recommended to the policy in response to the submission of Fish and Game.

In regard to the Friends of Nelson Haven and Tasman Bay's request to include reference to the 7 scale range of natural character assessment, Mr Bentley has addressed the methodology used to determine the degree of natural character. On the basis of his conclusions, no change is therefore recommended.

The minor wording change sought by EDS that the identified areas be '*mapped*' in the MEP is appropriate and recommended to be included (change detailed below).

Recommendation

Amend Policy 6.1.6 as follows. Recommended additions or new provisions to be shown underlined. Deleted text or provisions to be shown ~~struckthrough~~.

*Policy 6.1.6 – Identify and map those rivers or parts of rivers that have high or very high natural character.*¹⁸

5.13 Objective 6.2 – Preservation of Natural Character

Objective 6.2 sets out the objective of the MEP with regard to the preservation of natural character in addressing Issue 6A. Objective 6.2 reads:

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

Submissions

The submissions on the Policy include:

- Support/retain the objective as notified (**DOC 479/58**), **D C Hemphill (648/15)**, **Forest and Bird (715/130)**).
- Delete and replace the objective to incorporate separate place based Objectives for Queen Charlotte Sound, Pelorus Sound, South Marlborough, and Eastern Tasman Bay (**Friends of Nelson Haven and Tasman Bay (716/63)**).
- Amend the objective to read '*Preserve the characteristics and qualities that contribute to the natural character of the coastal environment, and lakes and rivers and their margins, and protect them from inappropriate subdivision, use and development*' (**Trustpower Ltd (1201/59)**).

¹⁸ Submission 698/43 EDS

- Amend the objective to reference preserving the values of the natural character, rather than avoiding changes to the character, recognising ongoing use and developments that are lawfully established (**Sanford Ltd (1140/16)**).
- Amend the objective to recognise the natural character of wetlands (**Fish and Game (509/110)**).
- Amend the objective to recognise that some essential activities need to be located in the coastal environment by necessity (**Port Clifford Ltd (1041/10)**).
- Amend the explanation for the objective to include reference to 'activities that are consistent with underlying zoning and existing land uses will be considered appropriate' (**Federated Farmers 525/85**).
- Amend the objective to apply to rivers that have natural character, not all rivers, as well as the coastal environment and lake (**Nelson Forests Ltd (990/179)**).
- Apply the objective to a set of identified rivers, and not all rivers (**Marlborough Forest Industry Association (962/44)**).
- Delete the explanation for the objective (**Port Marlborough NZ Ltd (433/15)**).

Assessment

The submissions on the objective include those that seek it be deleted and replaced with place based objectives on the basis that it merely repeats the requirement of section 6(a) of the RMA, and others which seek that it be amended to require the characteristics and qualities/values that contribute to the natural character to be preserved to better align with the wording of objective 2 of the NZCPS. Fish and Game seek inclusion of reference to wetlands. Several submissions seek the objective and/or its explanation be amended to recognise the continuation of existing lawful development including marine farming and ports, or applying the objective only to a limited set of rivers.

Objective 6.2 is intended to set out the aim of the MEP as result of managing subdivision, use, and development within the identified natural character overlays and more generally outside those areas, in addressing Issue 6A. The wording of the objective largely mirrors section 6(a) of the RMA, and in this regard does not further articulate how the RMA is to be applied in managing matters at the local level.

In regard to the Friends of Nelson Haven and Tasman Bay's request to replace the objective with place based objectives for Queen Charlotte Sound, Pelorus Sound, South Marlborough, and Eastern Tasman Bay, no detail has been provided of what would be included in such objectives, and the differences between these areas that would necessitate different objectives applying. It is therefore difficult to determine whether there would be any merits in setting different objectives for each area in terms of addressing the identified resource management issue. No change is therefore recommended.

It is recognised that the preservation of natural character should be linked to the natural character values that are present rather than require the absolute preservation of natural character in a more generic sense. It is therefore recommended that the objective be qualified to require the preservation of the values that contribute to the natural character of an area as per the submissions of Trustpower, and Sanford Ltd (changes detailed below).

As previously noted Chapter 6 does not address the natural character of wetlands which have been separately determined and are addressed in Chapter 8 – Indigenous Biodiversity. No change is therefore recommended to the objective in response to the submission Fish and Game.

In regard to those submissions seeking recognition of the continuation of existing lawful development in the objective, it is acknowledged there are many existing lawful activities located within the coastal environment and lakes, rivers, and their margins which have modified the natural character values present, and that some activities have a functional need to be located in these areas. Resource management objectives in Regional and District Plans are intended to be a statement of what is intended to be achieved through the resolution of a particular issue. Objectives however are not intended to state how the objective should be achieved, which

is the role of supporting policies. Objective 6.2 provides a clear statement of what is to be achieved in response to Issue 6A. It would be inappropriate to include recognition of existing modification in the objective, which would introduce specificity as to how the objective is to be achieved, and which would therefore be more appropriately addressed in the supporting policies. No changes are therefore recommended to the objective. Recognition of existing activities is further considered as part of addressing the submissions made on the policies that follows in this report.

Recommendation

Amend objective 6.2 as follows. Recommended additions or new provisions to be shown underlined. Deleted text or provisions to be shown ~~struckthrough~~.

*Objective 6.2 – Preserve the values that contribute to the natural character of the coastal environment, and lakes and rivers and their margins, and protect them from inappropriate subdivision, use and development.*¹⁹

5.14 Policy 6.2.1 – Avoiding Adverse Effects on Natural Character

Policy 6.2.1 addresses the management of subdivision, use, and development in areas of the coastal environment with outstanding natural character, and lakes and rivers with high or very high natural character, to implement objective 6.2. Policy 6.2.1 reads:

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

Submissions

The submissions received on this policy include:

- Support/retain policy as proposed (**DOC (479/59), Forest and Bird (496(2) and (715/131), Queen Charlotte Sound Residents Association (504/20), Judy and John Hellstrom (688/39), Forest and Bird (496/2)**).
- Delete and replace with new policy to read:

'a) Avoid adverse effects of subdivision use, and development on the characteristics and qualities which make up the outstanding values of areas of outstanding natural character.

b) Where (a) does not apply, avoid significant adverse effects and avoid, remedy or mitigate other adverse effects of subdivision use and development on natural character.

Methods which may achieve this include:

- Ensuring the location, intensity, scale and form of subdivision and built development is appropriate having regard to natural elements, landforms and processes, including vegetation patterns, ridgelines, headlands, peninsulas, dune systems, reefs and freshwater bodies and their margins; and*
- In areas of high natural character, minimising to the extent practicable indigenous vegetation clearance and modification (including earthworks/ disturbance, structures, discharges and extraction of water) to natural wetlands, the beds of lakes, rivers and the coastal marine area and their margins; and*
- Encouraging any new subdivision and built development to consolidate within and around existing settlements or where natural character has already been compromised'*

¹⁹ Submissions 1201/59 Trustpower, 1140/16 Sanford.

(Aquaculture NZ (401/51), Marine Farming Association (426/51)).

- Amend policy to read ‘Avoid the adverse effects of inappropriate subdivision, use or development on areas of the coastal environment with outstanding natural character values and on lakes and rivers and their margins with high and very high natural character values’, and make associated changes to the explanation **(Transpower NZ Ltd (1198/13))**.
- Amend policy to read: ‘Avoid the adverse effects of inappropriate subdivision, use or development on areas of the coastal environment with outstanding natural character values and on lakes and rivers and their margins with high and very high natural character values’ **(Port Marlborough Ltd (433/16))**.
- Amend policy 6.2.1 to reflect that some essential activities need to be located in the coastal environment by necessity, and that avoidance of adverse effects is not always possible **(Port Clifford Ltd (1041/11))**.
- Amend the policy to read ‘Avoid the adverse effects of subdivision, use or development on areas of the coastal environment with outstanding natural character values and on lakes and rivers and their margins with high and very high natural character values, except where it is necessary to enable the maintenance, construction, operation and upgrade of regionally significant infrastructure’ **(NZTA (1002/22))**.
- Amend the policy to read ‘Enable subdivision, use or development on areas of the coastal environment with outstanding natural character values where the activity is consistent with underlying zoning and existing land uses, and where significant adverse effects of inappropriate activities can be avoided, remedied or mitigated’ **(Federated Farmers (425/86))**.
- Review the riparian natural character overlay and ensure provision is made for the appropriate use of natural and physical resources **(Marlborough Forest Industry Association (962/45))**.
- Amend the explanation to the Policy to specify how ‘avoid’ is to be applied to rivers with high or very high natural character values where they are part of a working rural environment. Avoid in this context should still provide for access, crossings and minor adverse effects associated with these uses and adjacent land use activities **(Nelson Forests Ltd (990/180))**.
- Amend the policy allow adverse effects to be remedied or mitigated **(NZ Forest Product Holdings Ltd (995/12))**.
- Amend the policy to read ‘Avoid the adverse effects of subdivision, use or development on areas of the coastal environment with outstanding natural character values ~~and on lakes and rivers and their margins with high and very high natural character values~~’ **(Trustpower Ltd (1201/60))**.
- Amend the policy to read ‘Avoid the adverse effects of subdivision, use or development on areas of the coastal environment with outstanding natural character values and avoid significant effects on lakes and rivers and their margins with high and very high natural character values’ **(Pernod Ricard Winemakers New Zealand Ltd (1039/75))**.
- Amend the policy to include reference to avoiding adverse effects on wetlands **(Fish and Game (509/111))**.
- Amend the policy to read ‘Avoid the adverse effects of subdivision, use or development on areas of the coastal environment with outstanding natural character and on lakes and rivers and their margins with high and very high natural character values by managing the effects of activities within the coastal marine area, that involve the removal of intact or regenerating indigenous vegetation and managing the effects of residential, commercial and industrial development’ **(Friends of Nelson Haven and Tasman Bay (716/64))**.

Assessment

These submissions seek a wide range of changes to Policy 6.2.1, and include those that seek qualification that the *'avoidance'* of adverse effects required by the policy only extends to those characteristics and qualities which contribute to the values of areas of outstanding natural character, or be limited to *'inappropriate'* subdivision, use, and development. Others seek to include more explicit exemptions for regionally significant infrastructure or essential activities, or more enablement of activities consistent with the underlying zoning and existing land uses, or enable effects to be remedied or mitigated rather than avoided. Several submissions seek that the reference to lakes, rivers, and their margins with high and very high natural character values, either be removed, or qualified, including by requiring only *'significant'* effects be avoided. Finally, other submissions seek amendment to include reference to wetlands, or be more specific as to the activities requiring to be managed.

Policy 6.2.1 is intended to provide the basis for the management of subdivision, use, and development in those areas of the coastal environment with outstanding natural character, and on lakes, rivers, and their margins with high or very high natural character, in implementing Objective 6.2. It requires the adverse effects of subdivision, use, or development in such areas to be avoided.

In regard to those submissions that request that the *'avoidance'* of adverse effects only extends to those characteristics and qualities which contribute to areas of outstanding natural character, or be limited to *'inappropriate'* subdivision, use, and development, it is recognised that the avoidance of adverse effects in Policy 6.2.1 should be linked to the natural character values that are present rather than require the avoidance of effects in a more generic sense. It is therefore recommended that the objective be qualified to require the avoidance of adverse effects on the values that contribute to the natural character on an area as per the submissions of Aquaculture NZ, and the Marine Farming Association (changes detailed below). It is not considered necessary to include reference to avoiding adverse effects of *'inappropriate'* subdivision, use, and development, as this instead forms part of the overall Objective 6.2 to be achieved in implementing Policy 6.2.1.

In regard to those submissions seeking that the reference to lakes, rivers, and their margins in the policy, either be removed, or qualified by requiring only *'significant'* effects be avoided, the requirement within Policy 6.1.6 to avoid adverse effects on those rivers that have high or very high natural character reflects their relative higher degree of naturalness and lesser human modification. Requiring effects to be avoided in such areas recognises and provides for section 6(a) of the RMA. The requirement to avoid all effects however is a high threshold, and may place too high a regulatory requirement for such lakes and rivers, given that there is no national policy direction which requires adverse effects to be avoided on lakes and rivers with high and very high naturalness. It is therefore recommended to only require the *'significant'* adverse effects on lakes and rivers with high natural character to be avoided, rather than all effects, as proposed by Pernod Ricard Winemakers New Zealand Ltd.

This approach would place the management of lakes and rivers with high and very high natural character on a par with areas of high and very high natural character in the coastal environment under Policy 13(1)(b) of the NZCPS. It is recommended that this change is addressed by way of deleting reference to lakes, rivers, and their margins in Policy 6.2.1, and their inclusion within Policy 6.2.2 which currently addresses areas of high and very high natural character in the coastal environment. Changes to Policies 6.2.1 are detailed below, and changes to Policy 6.2.2 detailed under the discussion of submissions on that policy.

Specific enablement of regionally significant infrastructure in Policy 6.2.1 would not be consistent with section 6(a) or the national policy direction in the NZCPS. Specifically, Policy 13 of the NZCPS is particularly directive that adverse effects are to be avoided in areas of outstanding natural character in the coastal environment. Conversely there are no policies in the NZCPS which are as equally enabling of infrastructure activity, and the NPSET and NPSREG do not provide countering directive policy which enable electricity transmission and renewable electricity generation in areas of outstanding natural character in the coastal environment. No changes are therefore recommended to the policy to enable regionally significant infrastructure. It should be noted however that on the basis of the change recommended above, that the functional needs of regionally significant infrastructure within lakes, rivers, and their margins will be better enabled.

It is acknowledged that activities consistent with underlying zonings and existing land uses within the coastal marine area are located within the identified natural character areas. Other policies in the MEP directed at

enablement of activities, provide direction as to the extent to which such activities are appropriate within the coastal environment, and within lakes, rivers, and their margins, in ensuring the MEP in overall sense supports the achievement of the sustainable management purpose of the RMA. For these reasons no changes are recommended to the policy to provide for activities consistent with underlying zoning and existing land uses, or to enable effects to be remedied or mitigated.

As previously noted Chapter 6 does not address the natural character of wetlands which have been separately determined and are addressed in Chapter 8 – Indigenous Biodiversity. No change is therefore recommended to the policy in response to the submission of Fish and Game.

The request of the Friends of Nelson Haven and Tasman Bay to add additional specificity in the policy as to the activities that are to be managed is unnecessary, and would inappropriately limit the scope of the policy to only the consideration of the effects of residential, commercial, and industrial development. No change is therefore recommended.

Recommendation

Amend Policy 6.2.1 and the associated description as follows. Recommended additions or new provisions to be shown underlined. Deleted text or provisions to be shown ~~struckthrough~~.

Policy 6.2.1 – Avoid the adverse effects of subdivision, use or development on ~~areas of the coastal environment with outstanding natural character values and on lakes and rivers and their margins with high and very high natural character values~~ the values that contribute to of the coastal environment with outstanding natural character.²⁰

Where the natural character of the coastal environment is outstanding, Section 6(a) of the RMA indicates that this level of preservation should be retained, particularly when coupled with the similar direction in Policy 13 of the NZCPS. This means that any adverse effects on natural character values should be avoided. That is not to say that no subdivision, use or development can occur within the coastal environment - activities may not adversely affect the natural character of the surrounding environment, or may include features or benefits that maintain the existing levels of natural character.

~~For freshwater bodies there is also a requirement in Section 6(a) to preserve the natural character of wetlands, lakes and rivers and their margins and to protect this natural character from inappropriate subdivision, use and development. Having regard to Policy 6.1.5, the Council has assessed the values of rivers and lakes and their level of significance in order to give effect to Section 6(a). In undertaking this assessment, the Council has determined that where the freshwater values are high or very high, then adverse effects on these values should be avoided.~~²¹

5.15 Policy 6.2.2 – Avoiding Significant Adverse Effects on Natural Character

Policy 6.2.2 addresses the management of subdivision, use, and development in other areas of the coastal environment outside of areas with outstanding natural character, to implement Objective 6.2. This includes areas with high and very high natural character values. Policy 6.2.2 reads:

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

Submissions

The submissions received on this policy include:

²⁰ Submissions 1039/75 Pernod Ricard Winemakers Ltd, 401/51 Aquaculture NZ, 425/51 Marine Farming Association, 1201/60 Trustpower.

²¹ Submission 1039/75 Pernod Ricard Winemakers Ltd.

- **Support/retain Policy as notified (DOC (479/60), Forest and Bird (496/3), Judy and John Hellstrom (688/40), Forest and Bird (715/132)).**
- Delete the Policy (**Federated Farmers (425/88)**).
- Delete and add a new Policy to read: *'Outside the coastal environment avoid significant adverse effects and avoid, remedy or mitigate other adverse effects (including cumulative adverse effects) of subdivision, use and development on the characteristics and qualities of the natural character of freshwater bodies. A method which may achieve this includes minimising indigenous vegetation clearance and modification (including earthworks / disturbance and structures) to natural wetlands, the beds of lakes, rivers and their margins'* (**Aquaculture NZ (401/52), Marine Farming Association (426/52)**).
- Amend the Policy to read *'Where natural character is assessed as being very high (VH) or high (H) avoid adverse effects of subdivision, use and development that would result in a lower level of natural character. Elsewhere avoid, remedy or mitigate significant adverse effects of subdivision, use or development on natural character'* (**Friends of Nelson Haven and Tasman Bay (716/65)**).
- Amend the Policy allow adverse effects to be remedied or mitigated (**NZ Forest Product Holdings Ltd (995/12)**).
- Amend the Policy to read *'Avoid significant adverse effects of inappropriate subdivision, use or development on coastal natural character, having regard to the significance criteria in Appendix 4'*. (**Port Marlborough NZ Ltd (433/17), Transpower NZ (1198/14)**).
- Amend the Policy to read *'Avoid significant adverse effects of subdivision, use or development on coastal natural character, having regard to the significance criteria in Appendix 4, except where the activity is necessary to enable the maintenance, construction, operation and upgrade of regionally significant infrastructure'* (**NZTA (1002/23)**).
- Amend Policy 6.2.2 to reflect that some essential activities need to be located in the coastal environment by necessity, and that avoidance of adverse effects is not possible (**Port Clifford Ltd (1041/12)**).
- Amend the Policy to read to clarify that cumulative adverse effects must be considered (**Kenepuru and Central Sounds Residents Association (868/4)**).

Assessment

These submissions include those that seek its deletion on the basis that it replicates Policy 6.2.1, or that it be amended to only apply to freshwater bodies rather than the coastal environment, or areas of high or very high natural character. Other submissions seek qualification that the 'avoidance' of significant adverse effects required by the policy only extends to the characteristics and qualities of the natural character, or be limited to 'inappropriate' subdivision, use, and development. Other submissions seek to include more explicit exemptions for regionally significant infrastructure, or enable effects to be remedied or mitigated rather than avoided. Finally, submissions seek that it be made clear that the avoidance of significant effects, includes avoidance of significant cumulative effects.

Policy 6.2.2 is intended to provide the basis for the management of subdivision, use, and development in areas of the coastal environment, other than those addressed by Policy 6.1.1. In such areas, significant adverse effects are to be avoided, having regard to a list of significance criteria in Appendix 4. Policy 6.2.3 (discussed later), builds on policy 6.2.2 in setting a threshold as to what is deemed to be a significant adverse effect for the purposes of Policy 6.2.2.

In regard to those submissions requesting the policy be deleted or limited in scope, it is apparent that there is confusion as to the scope of Policy 6.2.2 and its relationship with Policy 6.1.1. Policy 6.1.2 is intended to give effect to the requirement in Policy 13(1)(b) of the NZCPS to avoid significant adverse effects outside of areas with outstanding natural character values. It is acknowledged that the current wording makes this unclear. It is also acknowledged that the requirement to otherwise avoid, remedy, and mitigate other adverse effects in

Policy 13(1)(b) of the NZCPS is not reflected in Policy 6.1.2. Given the above, changes are therefore recommended to Policy 6.1.2 (changes detailed below).

It is recognised that the avoidance of significant adverse effects in Policy 6.2.2 should be linked to the natural character values that are present rather than require the avoidance of effects in a more generic sense. It is therefore recommended that the policy be qualified accordingly as per the submissions of Aquaculture NZ, and the Marine Farming Association (changes detailed below). It is not considered necessary to include reference to avoiding adverse effects of 'inappropriate' subdivision, use, and development, as this instead forms part of the overall Objective 6.2 to be achieved in implementing Policy 6.2.2.

Specific enablement of regionally significant infrastructure in Policy 6.2.2 would not be consistent with section 6(a) or the national policy direction in the NZCPS. Specifically, Policy 13 of the NZCPS is particularly directive that significant adverse effects are to be avoided on natural character in the coastal environment, outside those areas of outstanding natural character. Conversely there are no policies in the NZCPS which are as equally enabling of infrastructure activity, and the NPSET and NPSREG do not provide countering directive policy which enable electricity transmission and renewable electricity generation in the coastal environment. No changes are therefore recommended to the policy to enable regionally significant infrastructure.

Inclusion of explicit reference to cumulative effects in Policy 6.2.2 as requested by the Kenepuru and Central Sounds Residents Association is considered unnecessary. The term 'adverse effects' encapsulates any adverse cumulative effects, and no change is therefore recommended.

Recommendation

Amend Policy 6.2.2 and the associated description as follows. Recommended additions or new provisions to be shown underlined. Deleted text or provisions to be shown ~~struckthrough~~. Note changes include those recommended in response to submissions on Policy 6.2.1 covered in this report.

Policy 6.2.2 - Avoid the significant adverse effects of subdivision, use or development, and otherwise avoid, remedy, or mitigate adverse effects, on the values that contribute to coastal-natural character, having regard to the significance criteria in Appendix 4 within:

*(a) All areas of the coastal environment outside of areas of outstanding natural character;*²²

*(b) Lakes and rivers, and their margins of high and very high natural character.*²³

The degree of adverse effects on coastal natural character is an important consideration under Policy 13(1)(b) of the NZCPS. Where the extent of change in the coastal environment from subdivision, use or development causes significant adverse effects on natural character, the NZCPS states those effects should be avoided.

*For freshwater bodies there is also a requirement in Section 6(a) to preserve the natural character of wetlands, lakes and rivers and their margins and to protect this natural character from inappropriate subdivision, use and development. Having regard to Policy 6.1.5, the Council has assessed the values of rivers and lakes and their level of significance in order to give effect to Section 6(a). In undertaking this assessment, the Council has determined that where the freshwater values are high or very high, then significant adverse effects on these values should also be avoided.*²⁴

There is therefore a threshold in these areas beyond which remediation and/or mitigation of ~~these~~ adverse effects is not an appropriate management option. That threshold will be determined on a case-by-case basis through the resource consent or plan change process. The significance of the adverse effect will depend on the nature of the proposal, the natural character context within which the activity is proposed to occur and the degree of change to the attributes that contribute to natural

²² Submissions 425/87 Federated Farmers, 401/52 Aquaculture NZ, 426/52 Marine Farming Association, 716/65 Friends of Nelson Haven and Tasman Bay, 996/12 NZ Forest Product Holdings Ltd.

²³ Submission 1039/75 Pernod Ricard Winemakers Ltd.

²⁴ Submission 1039/75 Pernod Ricard Winemakers Ltd.

character in that context. Where adverse effects are not assessed as significant, then adverse effects can otherwise be avoided, remedied, or mitigated.²⁵

In addition to using information in the appendices on the degree of natural character at particular locations, consideration should also be given to other chapters of the MEP, which help to inform how adverse effects can be avoided. For example, the Policies in Chapter 7 - Landscape, Chapter 8 - Indigenous Biodiversity and Chapter 13 - Use of the Coastal Environment, target the individual components of natural character and therefore provide a framework on how to avoid significant adverse effects on natural character values.

5.16 Policy 6.2.3 – Avoiding Reduction in the Degree of Natural Character

Policy 6.2.3 addresses the reduction in the degree of natural character where natural character is identified as high or very high, to implement Objective 6.2. Policy 6.2.3 reads:

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

Submissions

The submissions received on this policy include:

- Support/retain the policy as notified (**Kevin Loe (454/4), DOC (479/61), Forest and Bird (496/4) and 715/133), A J King Family Trust and S A King Family Trust (514/28), Judy and John Hellstrom(688/41), Flaxbourne Settlers Association (712/67), Friends of Nelson Haven and Tasman Bay (716/66)**).
- Delete the policy (**Aquaculture NZ (401/55), Marine Farming Association (426/54), Federated Farmers (425/88), Te Runanga O Ngati Kuia (501/23), D C Hemphill (648/16)**).
- Amend the policy to read *'Where natural character is classified as high or very high, avoid any significant reduction in the degree of natural character of the coastal environment or freshwater bodies'* (**Pernod Ricard Winemakers NZ Ltd (1039/76)**).
- Amend the policy to read *'Where natural character is classified as high or very high, significant avoid, remedy or mitigate any reduction in the degree of natural character of the coastal environment or freshwater bodies'* (**Totaranui Ltd (223/15)**).
- Amend the policy to read *'Where natural character is classified as high or very high, avoid, remedy or mitigate any adverse effects on the natural character of the coastal environment and freshwater bodies', and delete the explanation* (**Port Marlborough NZ Ltd (433/18), Port Clifford Ltd (1041/13), NZ Forest Product Holdings Ltd (996/12)**).
- Amend the policy to read *'Where natural character is classified as high or very high, avoid, where practicable, adverse effects on the characteristics and qualities that contribute to the natural character of lakes and rivers and their margins. Where adverse effects cannot be avoided, ensure that the adverse effects are remedied or mitigated'* (**Trustpower Ltd (1201/61)**).
- Amend the policy to (a) the adverse effects of activities on natural character in areas of the coastal environment with outstanding natural character are avoided; and (b) the significant values of outstanding freshwater bodies are protected from adverse effects by those effects being avoided, remedied, or mitigated. (**Fonterra (1251/27)**).

²⁵ Submissions 425/87 Federated Farmers, 401/52 Aquaculture NZ, 426/52 Marine Farming Association, 716/65 Friends of Nelson Haven and Tasman Bay, 996/12 NZ Forest Product Holdings Ltd.

- Review the riparian natural character overlay and ensure provision is made for the appropriate use of natural and physical resources (**Marlborough Forest Industry Association (962/46)**).
- Amend the policy to remove all references to freshwater bodies from the policy (**Nelson Forests Ltd (990/181)**).
- Amend the policy to read *'Where natural character is classified as high or very high, avoid any reduction in the degree of natural character of the coastal environment or freshwater bodies, except where the activity is necessary to enable the maintenance, construction, operation and upgrade of regionally significant infrastructure'* (**NZTA (1002/24)**).
- Amend the policy to give effect to section 6(a) of the RMA to ensure that the natural character of all wetlands, lakes rivers and their margins be preserved and protected from inappropriate subdivision, use and development (**Fish and Game (509/112)**).
- Apply policy to the coastal marine area irrespective of existing classification of natural character (**Clova Bay Residents Association (152/19)**).
- Amend the policy to define what is meant by *'classification'*, and apply the policy to all areas of natural character, and clarify that cumulative adverse effects must be considered. (**Kenepuru and Central Sounds Residents Association (868/4)**).

Assessment

The submissions on this policy include those that seek it be deleted on the basis that it does not assist achieve section 6(a) of the RMA, align with the NZCPS, or overlaps with the requirements in Policy 6.2.1. Other submissions seek qualification of the policy so that it applies to only significant reductions in the degree of natural character, enables reductions to also be remedied or mitigated, or otherwise seeks exemptions for regionally significant infrastructure. Other submissions seek that the policy apply more widely, including wetlands, and to all areas irrespective of the classification of natural character.

The intent of Policy 6.2.3 is to establish a threshold for the extent of further change that can be made in areas of the coastal environment, and lakes, rivers, and their margins with high or very high natural character. Any activity that would reduce the natural character to a classification below that existing, is to be considered a *'significant'* adverse effect which is required to be avoided under the policy.

In regard to those submissions requesting the policy be deleted or qualified, it acknowledged that Policy 6.2.3 has some overlap with Policy 6.2.1 and 6.2.2 which specify how adverse effects are to be managed based on the classification of natural character areas in the MEP. As noted, the intent of the policy is that it provides a threshold by which any activity that causes a reduction in the *'classification'* of an area of high or very high natural character, is considered to be a significant adverse effect which is to be avoided both under Policy 6.2.1. and 6.2.2. That intent however is not accurately reflected in the wording of the policy, where the use of the term *'avoid any reduction in the degree of natural character'* promotes a higher threshold where any reduction in natural character is considered a significant adverse effect, rather than any reduction in the *'classification'* of natural character. As currently worded, the policy would therefore essentially require any reduction in natural character to be avoided, which would elevate areas of high and very high natural character to the same status as areas of outstanding natural character. This would place too high a test on activities in areas of high or very high natural character which would not be consistent with section 6(a) of the RMA, or Policy 13(1)(b) of the NZCPS in respect of the coastal environment. Given the above it is recommended that Policy 6.2.3 be amended so that any reduction in the *'classification'* of natural character (e.g. from very high to high, or high to moderate etc) is to be avoided (changes detailed below). This will provide an appropriate threshold as to what is considered a significant adverse effect for the purposes of policy 6.2.2.

Specific enablement of regionally significant infrastructure in Policy 6.2.3 would not be consistent with section 6(a) or the national policy direction in the NZCPS. Specifically, Policy 13 of the NZCPS is particularly directive that significant adverse effects are to be avoided on natural character in the coastal environment, outside those areas of outstanding natural character. Conversely there are no policies in the NZCPS which are as equally enabling of infrastructure activity, and the NPSET and NPSREG do not provide countering directive policy which enable electricity transmission and renewable electricity generation in

the coastal environment. No changes are therefore recommended to the policy to enable regionally significant infrastructure.

In regards to the request of Fish and Game to include reference to wetlands, as previously noted Chapter 6 does not address the natural character of wetlands which have been separately determined and are addressed in Chapter 8 – Indigenous Biodiversity. No change is therefore recommended to the policy.

Broadening the application of the policy to areas to all classifications of natural character as requested by the Clova Bay Residents Association and Kenepuru and Central Sounds Residents Association is considered unnecessary, as areas less than high or very high natural character have not been mapped in MEP, and their inclusion would place too high a regulatory burden on activities in areas which have a lesser degree of naturalness, or have been heavily modified by human intervention. No change is therefore recommended.

Recommendation

Delete Policy 6.2.3 and the associated discription as follows. Recommended additions or new provisions to be shown underlined. Deleted text or provisions to be shown ~~struckthrough~~.

*Policy 6.2.3 – Where natural character is classified as high or very high, avoid any reduction in the degree classification of natural character of the coastal environment or freshwater bodies to a lower classification.*²⁶

The degree of adverse effects on coastal natural character is an important consideration under Policy 13 of the NZCPS. This Policy establishes a threshold for the extent of further change that can be made in coastal environments that have high or very high natural character. Any activity that would have the effect of reducing the natural character at or near the site to a classification below that which exists at the time of making a resource consent application or plan change request, will be considered a significant adverse effect in the context of Policy 13(1)(b) of the NZCPS and should therefore be avoided. Although there is no equivalent direction in a statutory sense for freshwater bodies that reflects Policy 13(1)(b) of the NZCPS, the Council considers that the same Policy approach is relevant given that freshwater bodies are included within the direction in Section 6(a).

The extent of change in natural character at or near a site will be determined on a case-by-case basis through the resource consent or plan change process. The change will depend on the nature of the proposal, the natural character context within which the activity is proposed to occur and the degree of change to the attributes that contribute to natural character in that context. For the coastal environment specifically, Appendix 2 contains information on the elements, patterns, processes and experiential qualities that give discrete areas high or very high natural character. For freshwater environments, information on a range of values for Marlborough's rivers, including natural character values, is set out in Appendix 5. This will help to inform any assessment of environmental effects on natural character of Marlborough's rivers and the coastal environment.

5.17 Policy 6.2.4 – Consideration of Attributes of Natural Character through Resource Consents

Policy 6.2.4 addresses the consideration of the potential adverse effects on the attributes that contribute to natural character where resource consent is required, to implement Objective 6.2. Policy 6.2.4 reads:

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

²⁶ Submission 1039/76 Pernod Ricard Winemakers.

Submissions

The submissions received on this policy includes:

- Support/retain the policy as notified (**Kevin Loe (454/5), DOC (479/62), Flaxbourne Settlers Association (712/68), NZTA (1002/25), Z Energy Ltd (1244/19)**).
- Delete the policy (**Aquaculture NZ (401/54), Marine Farming Association (426/55), Forest and Bird (469/5)**).
- Amend the policy to read '*Where resource consent is required to undertake an activity within coastal or freshwater environments with high, very high or outstanding natural character, regard will be had to the potential adverse effects of the proposal on the elements, patterns, processes and experiential qualities that contribute to natural character*' (**Federated Farmers 425/89**).
- Amend the policy to read '*Where resource consent is required to undertake an activity, excluding plantation forestry, within coastal or freshwater environments with high, very high or outstanding natural character, regard will be had to the potential adverse effects of the proposal on the elements, patterns, processes and experiential qualities that contribute to natural character*' (**D C Hemphill (648/22)**).
- Amend the policy to include reference to '*the necessity of the activity to locate in the coastal and freshwater environment*' (**Port Clifford Ltd (1041/14)**).
- Review the riparian natural character overlay and ensure provision is made for appropriate use of natural and physical resources (**Marlborough Forest Industry Association (962/47)**).
- Review the policy direction to enable non-regulatory methods to be used primarily, and only use regulatory methods where the adverse effects will be significant and long term (**Nelson Forests Ltd (990/182)**).
- Amend the policy to give effect to Section 6(a) of the Act to ensure that the natural character of all wetlands, lakes rivers and their margins be preserved and protected from inappropriate subdivision, use and development (**Fish and Game 509/113**).
- Amend the policy to apply it to all areas of natural character (**Kenepuru and Central Sounds Residents Association (868/7)**).
- Amend the policy to refer to Policies 6.2.1 and 6.2.2 (**Forest and Bird (715/134)**).
- Amend the policy to include a list of requirements that must be included an application for resource in an area of high, very high, or outstanding natural character (**EDS (698/44)**).

The submissions on this policy include those that seek it be deleted on the basis it is unnecessary, limit its application to areas of very high or outstanding natural character, or the coastal environment, or provide exemptions for activities such as plantation forestry. Conversely other submissions seek to broaden its application to all areas of natural character. EDS seeks inclusion of list of information requirements for resource consent applications in the policy.

Policy 6.2.4 is a process related policy which requires that the adverse effects on the attributes that contribute to natural character to be had regard to when resource consent for a new activity is applied for.

In regard to those submissions seeking that it be deleted or qualified, applying the policy enables the extent to which an activity is consistent with the overall natural character management approach in Policies 6.2.1 to 6.2.3 to be determined. On this basis the policy is considered appropriate and is recommended to be retained. Limiting the policy to areas of very high or outstanding natural character or the coastal environment, providing exemptions for certain activities, or broadening its application to all areas of natural character would not align with the management approach in Policies 6.2.1 and 6.2.3 and would not be consistent with section 6(a) of the RMA, or the national policy direction of the NZCPS and NPSFW. No change is therefore recommended.

Whilst there would be some merit in having a list of information requirements for applications for resource consent in natural character areas as proposed by EDS, this would more appropriately sit as guidance outside of the MEP, rather than within a policy. No change is therefore recommended.

Recommendation

Retain Policy 6.2.4 and the associated description as notified.

5.18 Policy 6.2.5 – Recognition of Existing Modifications

Policy 6.2.5 addresses activities in those areas that have already been modified by past and present resource use, to implement Objective 6.2. Policy 6.2.5 reads:

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

Submissions

The submissions received on this policy include:

- Support/retain the policy as notified (**Aquaculture NZ (401/56), Marine Farming Association (426/56), Kevin Loe (454/6), John Hickman (455/25), George Mehlhopt (456/25), DOC (579/63), A J King Family Trust and S A King Family Trust (514/27), Judy and John Hellstrom (688/42), Flaxbourne Settlers Association (712/69), Forest and Bird (715/135), Fulton Hogan Ltd (717/37), Kiwirail Holdings Ltd (873/15), NZTA (1002/26), Pernod Ricard Winemakers NZ Ltd (1039/77), Port Clifford Ltd (1041/15), Trustpower Ltd (1201/65)**).
- Support the policy, and ensure that the Plan allows for the loading of log barges in the coastal marine area as a permitted activity (**Ernslaw One Ltd (505/6)**).
- Oppose/delete the policy (**Clova Bay Residents Association (152/18), M & K Gerard (424/15), Te Runanga O Ngati Kuia (501/24), Pinder Family Trust (578/8), Friends of Nelson Haven and Tasman Bay (716/67), Guardians of the Sounds (725/8), Kenepuru and Central Sounds Residents Association (868/8), Laurence Etheredge (879/1), Sea Sheppard NZ (1146/8), The Bay of Many Coves Residents and Ratepayers Association (1190/39), the Marlborough Environment Centre (1193/48)**).
- Amend the policy to give effect to Section 6(a) of the RMA to ensure that the natural character of all wetlands, lakes rivers and their margins be preserved and protected from inappropriate subdivision, use and development (**Fish and Game (509/114)**).
- Amend the policy to include reference that modified landscapes include any past and present farming land use activities (**Federated Farmers (425/90)**).
- Amend the policy to read *‘Recognise that development in parts of the coastal environment and in those rivers and lakes and their margins that have already been modified by past and present resource use activities, and those areas which are zoned for certain activities, such as the Port, Port Landing and Marina zones, are is less likely to result in adverse effects on natural character’* (**Port Marlborough (433/20)**).
- Amend the policy to enable the ongoing use of primary production activities (**NZ Forest Product Holdings Ltd (996/12)**).

Assessment

The submissions on this policy include many which seek that it be deleted on the basis that recognition of development in areas that have been modified does not take into account the cumulative effects that would result from focussing development in such areas, or the ability to restore natural character. Submissions in opposition also consider the policy contrary to Policy 13 of the NZCPS, and section 6(a) of the RMA. Several submissions in support also seek amendment of the policy to include more specific reference to enabling existing activities, including ports, marina's, and primary production activities.

As part of the overall natural character management approach under Objective 6.2, Policies 6.2.1, and 6.2.2 primarily establish the way in which adverse effects of subdivision, use, and development are to be managed. As part of that consideration, Policy 6.2.5 recognises that development in those areas that have been modified is likely to result in less effects on natural character. This recognises standard natural character assessment practice that areas which are modified, generally have greater potential to absorb additional change than those that are less modified.

The concern expressed by many submissions seeking its deletion, is that the policy will promote new development being directed to areas which are already modified by past and present activities, without any due consideration of the cumulative adverse effects on natural character from such change, and that in doing so would also not promote restoration of degraded natural character in such areas. Policy 6.2.5 does not stand alone and must be considered in light of other policies under Objective 6.2, including Policies 6.2.1 to 6.2.3 as to the scale of acceptable effects, Policy 6.2.7 which requires the consideration of cumulative effects, and Policy 6.2.6 which requires consideration of the potential to enhance natural character in considering the appropriateness of subdivision, use, and development. While Policy 6.2.5 provides some direction for where new development may be considered more appropriate, it is not an unfettered enablement of such development, and cumulative effects and restoration considerations must also be considered. In regard to the coastal environment, this overall approach is consistent with the NZCPS, including Policy 13, and section 6(a) of the RMA. Specifically, providing an acknowledgement that activities are less likely to result in adverse effects in areas that are modified, will assist to preserve the natural character of the coastal environment as a whole. Given the above, it is recommended that the policy be retained.

Inclusion of references to specific port, marine, or primary production land uses in the policy as sought by Federated Farmers, Port Marlborough, and NZ Forest Product Holdings, would introduce an unnecessary level of specificity in the policy. No change is therefore recommended.

The request of Ernslaw One Ltd seeking that the loading of log barges in the coastal marine area be a permitted activity is not directly related to Chapter 6 Natural Character. The relief requested in that submission will be addressed as part of the hearing for Topic 11, Coastal Environments.

Recommendation

Retain Policy 6.2.5 and the associated description as notified.

5.19 Policy 6.2.6 – Enhancement of Natural Character

Policy 6.2.6 addresses the potential to enhance natural character in considering the appropriateness of subdivision, use, and development, in implementing Objective 6.2. Policy 6.2.6 reads:

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

Submissions

The submissions received on this policy include:

- Support/retain the policy as notified (**Aquaculture NZ (401/57) Marine Farming Association (426/57), DOC (479/64), Port Clifford Ltd (1041/16)**).
- Oppose/delete the policy (**Marlborough Chamber of Commerce (961/11), Marlborough Forest Industry Association (962/48)**).
- Amend the policy to read '*In assessing the appropriateness of subdivision, use or development in coastal or freshwater environments, where appropriate regard shall be given to the potential to enhance natural character in the area subject to the proposal*' (**Federated Farmers (425/91)**).
- Amend the policy to read '*In assessing the appropriateness of subdivision, use or development in coastal or freshwater environments with Outstanding Natural Features or Landscapes, regard shall be given to the potential to enhance natural character in the affected area*' (**Nelson Forests Ltd (990/183)**).
- Amend the policy to recognise existing uses in an area (**Sanford Ltd (1140/17)**).
- Amend the policy to make it clear that opportunities for restoration or rehabilitation of natural character, include the declining of applications for resource consent renewals in locations where significant cumulative effects on natural character exist (**Clova Bay Residents Association (152/17), Judy and John Hellstrom (688/43), Forest and Bird (715/136), Kenepuru and Central Sounds Residents Association (868/9)**).
- Amend the policy to recognise commercial forestry has the potential to enhance the natural character in area (**NZ Forest Products Holdings Ltd (996/12)**).
- Amend the policy to include reference to '*restoration*' of natural character (**Fish and Game 509/115**).
- Amend the explanation to the policy to remove reference to '*landscapes*' (**Friends of Nelson Haven and Tasman Bay (716/68)**).

Assessment

The submissions on this policy include those seeking the policy be deleted, or qualified to only require regard to be had to enhancement of natural character '*where appropriate*' on the basis that enhancement is not always practicable, or require consideration of enhancement only within outstanding natural features or landscapes. Conversely other submissions seek amendment to make it clear that opportunities to restore or enhance natural character include declining applications for resource consent renewals where significant cumulative adverse effects exist so as to give effect to Policy 14 of the NZCPS. Other submissions seek amendment of the policy to recognise that commercial forestry has the potential to enhance natural character, or seek other minor wording changes.

As part of the overall natural character management approach under Objective 6.2, Policies 6.2.1 to 6.2.3 primarily establish the way in which adverse effects of subdivision, use, and development are to be managed. As part of that consideration, Policy 6.2.6 provides that regard is to be given to the potential to enhance or restore natural character as a result of a subdivision, use, and development proposal. This enables the beneficial effects of proposals to be considered in determining whether overall a proposal will preserve natural character to achieve Objective 6.2.

In regards to those submissions requesting deletion of the policy; limiting the application of the policy to '*where practicable*' or to outstanding natural features and landscapes; or recognising existing activities, would not be consistent with section 6(a) of the RMA, or Policies 13 and 14 of the NZCPS. No changes are therefore recommended.

Several submissions consider that Policy 6.2.6 should include reference to declining applications for resource consent renewals in areas where significant cumulative adverse effects exist. Policy 6.2.6 does not stand alone and must be considered in light of other policies under Objective 6.2, including Policies 6.2.1 to 6.2.3 as to the scale of acceptable effects, and Policy 6.2.7 which requires the consideration of cumulative effects. Consequently, any applications for resource consent renewals must be considered against all of these policy requirements, and consent may be declined where these policies overall are not met.

Recognising this overall approach, inclusion of a specific reference to declining applications for consent renewals within Policy 6.2.6 is not considered necessary.

Inclusion of references to particular activities (e.g. commercial forestry) which enhance natural character as requested by NZ Forest Product Holdings Ltd would introduce an unnecessary level of specificity in the policy. No changes are therefore recommended.

The scope of Policy 6.2.6 is intended to include 'restoration' as a subset of 'enhancement' of natural character so as to give effect to Policy 14 of the NZCPS, and it is therefore not considered necessary to include specific reference to 'restoration' in the policy as sought by Fish and Game. It is however acknowledged that the description to the policy does not accurately define the attributes that comprise natural character, and it is recommended that the description therefore be amended in response to the submission of the Friends of Nelson Haven and Tasman Bay (changes detailed below).

Recommendation

Amend Policy 6.2.6 and the associated description as follows. Recommended additions or new provisions to be shown underlined. Deleted text or provisions to be shown ~~struck through~~.

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

It may be possible to improve the natural character of coastal environments and freshwater bodies through appropriate subdivision, use and development of natural resources. Any improvement to the ~~landscape, natural processes, biodiversity, water flows or quality~~ natural elements, patterns, processes and experiential qualities²⁷ incorporated into the proposal will be considered in this regard. Enhancement of natural character is particularly desirable where the coastal environment and freshwater bodies have been substantially modified by past resource use activities. Enhancement in this context is to be used in its broadest term and can include restoration and rehabilitation. However, for the purposes of this Policy it does not include addressing the effects of a proposal. Any actions proposed by an applicant or imposed by the consent authority (through consent conditions) begin the process of remedying past resource use impacts on natural character. The Policy also implements Policy 14 of the NZCPS.

5.20 Policy 6.2.7 – Assessing Cumulative Adverse Effects

Policy 6.2.7 addresses the assessment of cumulative effects on natural character from activities, in implementing Objective 6.2. Policy 6.2.7 reads:

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

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

Submissions

The submissions received on this policy include:

- Support/retain the policy as notified (**Michael and Kristen Gerard (424/16), DOC (479/65), Fish and Game (509/116), Judy and John Hellstrom (688/46), Port Clifford Ltd (1041/17)**).

²⁷ Submission 716/68 Friends of Nelson Haven and Tasman Bay.

- Oppose/delete the policy (**Marlborough Forest Industry Association (962/49), Nelson Forests Ltd (990/184)**).
- Amend the policy to read *'Recognition should be given to the extent of cumulative effects from existing modifications in the environment'* (**Aquaculture NZ Ltd (401/58), Marine Farming Association (426/58)**).
- Amend the policy to include reference to acceptable limits of cumulative effects based on thresholds identified in policy or guidelines developed by stakeholders; make it clear that the Policy applies to re-consenting existing activities; and make it clear the Policy is to be applied when considering other policies in the MEP (**Clova Bay Residents Association (152/16), Kenepuru and Central Sounds Residents Association (868/10)**).
- Amend the policy to refer to wetlands (**Forest and Bird (715/137)**).
- Amend the description to the policy to refer to cumulative 'adverse' effects (**EDS (698/45)**).

Assessment

The submissions on this policy include those that seek it be deleted on the basis that it is unnecessary or open to interpretation, or seek that it be substantially amended so that recognition is given to the ability of the existing environment to absorb further modification. Other submissions seek inclusion of reference to cumulative effects on wetlands, or reference to acceptable limits of cumulative effects to give effect to policy 7 of the NZCPS as follows:

'Acceptable limits of cumulative effects will be determined by reference to the thresholds specified in a particular Policy or through guidelines developed with stakeholders and with reference to best practice and international assessment standards.

Where a retraction of consented activities is required to meet acceptable cumulative effect thresholds then this may occur by default through re-consenting attrition until acceptable levels of cumulative effects are reached or through the application of activity retraction guidelines developed and agreed with stakeholder'

As part of the overall natural character management approach under Objective 6.2, Policies 6.2.1 to 6.2.3 primarily establish the way in which adverse effects of subdivision, use, and development are to be managed. As part of that consideration, Policy 6.2.7 provides that in assessing cumulative adverse effects in accordance with those policies that consideration be given to the effect of allowing more of a same or similar activity, and more of a particular effect, and the combined effects of all activities. It is intended to provide clarity for plan users as to the scope of cumulative effects and how they will be considered in determining whether overall a proposal will preserve the natural the natural character to achieve Objective 6.2.

Deletion of the policy as requested by Marlborough Forest Industry Association and Nelson Forests Ltd would not be consistent with section 6(a) of the RMA or Policy 13 of the NZCPS. Furthermore, while the reworded policy promoted by Aquaculture NZ and the Marine Farming Association more simplistically sets out how cumulative effects are to be addressed, it does not provide the same degree of clarity for plan users as the notified policy as to how cumulative effects should be considered. It is therefore not recommended to delete or amend the policy as a result.

The Clova Bay Residents Association and Kenepuru and Central Sounds Residents Association have requested the inclusion of reference to acceptable limits of cumulative effects established through policy or guidelines to give effect to Policy 7 of the NZCPS. It is acknowledged, that inclusion in the MEP of acceptable limits of cumulative effects established through policy or guidelines, could provide an acceptable threshold of modification and provide greater certainty as to the appropriateness of development at the time of consenting new or re-consenting existing activities. Given the submitters primary concern around cumulative effects of activities in the coastal environment, in theory, such an approach could provide an acceptable threshold of modification when considering the appropriateness of existing and new activities within these areas in responding to sections 6(b) and 7(c) of the RMA, and Policies 7 and 15 of the NZCPS.

The DOC guidance note on Policy 7 of the NZCPS recognises that cumulative effects in the coastal environment are better addressed through a strategic planning approach, including the identification of environmental limits and integrated management of the impact of different and/or numerous similar activities. It also however recognises that addressing cumulative adverse effects can be challenging, as they can arise from direct and indirect influences. Management responses need to consider all sources, and an approach that tackles only a fraction of the problem will be ineffective and lack credibility. The guidance notes that the management responses need to be practicable and will vary according to the significance of the issue and resources available.

While there is merit seen in the approach proposed by the Clova Bay Residents Association and Kenepuru and Central Sounds Residents Association, significant work would be required to develop this approach. It would require ensuring that there is sufficient information as to the nature scale of all cumulative effects sources, and require development of policy or guidelines to occur collaboratively with all relevant stakeholders to achieve a comprehensive approach that can be effectively implemented. In regard to the coastal environment for example, such an approach could be best delivered through first undertaking holistic coastal spatial planning approach. Given the amount of work required to deliver a robust and workable management approach, including consultation, it is not recommended to include policy or guidance in the MEP at this time.

In regards to the request of Forest and Bird to include reference to wetlands, as previously noted Chapter 6 does not address the natural character of wetlands which have been separately determined and are addressed in Chapter 8 – Indigenous Biodiversity. No change is therefore recommended to the policy.

The minor wording change to the description for the policy sought by EDS is considered appropriate, and is recommended (changes detailed below).

Recommendation

Amend the description to Policy 6.2.7 as follows. Recommended additions or new provisions to be shown underlined. Deleted text or provisions to be shown ~~struckthrough~~.

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

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

Although individual activities may not adversely affect the natural character of the coastal environment or freshwater bodies, when combined with the effects of similar activities or other activities with similar effects, the activities may collectively have cumulative adverse²⁸ effects on natural character. This Policy describes how the cumulative effects of activities on the natural character of the coastal environment or freshwater bodies will be considered. For the coastal environment specifically, any consideration of cumulative effects should take into account scale and may need to include consideration of the intactness of the coastal terrestrial and coastal marine natural character areas.

5.21 Policy 6.2.8 – Setback of Land Use Activities

Policy 6.2.8 addresses the setback of activities from rivers, lakes, and the coastal marine area in order to preserve natural character, in implementing Objective 6.2. Policy 6.2.8 reads:

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

²⁸ Submission 698/45 EDS.

Submissions

The submissions received on this policy include:

- Support/retain the policy as notified (**DOC (479/66), Te Runanga O Ngati Kuia (501/25), Fish and Game (509/117) Judy and John Hellstrom (688/47)**).
- Oppose/delete the policy (**Federated Farmers (425/92), Tempello Partnership (429/9), D C Hemphill (648/24), Marlborough Forest Industry Association (962/50), Nelson Forests Ltd (990/185), Sally and Tim Wadworth (1221/7)**).
- Amend the policy to clearly state what land use activities need to be setback from rivers, lakes, and the coastal marine area (**Michael and Kristen Gerard (424/17)**).
- Amend the policy to read '*Require land use activities to be set back from rivers, lakes and the coastal marine area in order to preserve high, very high or significant natural character*' (**Fonterra (1251/28)**).
- Amend the policy to read '*Require new land use activities to be set back from rivers, lakes and the coastal marine area in order to preserve natural character*'. (**Kiwirail Holdings Ltd (873/16)**).
- Amend the policy to read '*Require land use activities that do not have a functional or operational need to be located adjacent to such features to be set back from rivers, lakes and the coastal marine area in order to preserve natural character*' (**Port Marlborough NZ Ltd (433/21)**).
- Amend the policy to read '*Require land use activities to be set back from rivers, lakes and the coastal marine area in order to preserve natural character except where the land use activity is in support of an activity that is by necessity required to be located in a river lake or coastal marine area*' (**Port Clifford Ltd (1041/18)**).
- Amend the policy to read '*Require land use activities to be set back from rivers, lakes and the coastal marine area in order to preserve natural character, except where nationally significant infrastructure has a locational, technical or operational need to traverse rivers, lakes and the coastal marine area*' (**Transpower NZ Ltd (1198/15)**).
- Amend the policy to read '*To define inappropriate land use activities that should be set back from certain rivers, lakes or the coastal marine area unless such a location is required for operational or technical reasons*' **Trustpower Ltd (1201/62)**).
- Amend the policy to refer to wetlands (**Forest and Bird (715/138)**).

Assessment

The submissions on this policy includes those that seek it be deleted on the basis that it is unnecessary, has no justification, and will burden landowners in undertaking legitimate daily activities, including those associated with farming. Other submissions seek that it be limited to apply only to areas of high, very high, or significant natural character, or specify which activities need to be setback. A number of submissions seek specific exemptions for regionally significant infrastructure on the basis that they have a functional need to be located within such setbacks.

Policy 6.2.8 is intended to support the implementation of Objective 7.2 by requiring land use activities to be setback from rivers, lakes, and the coastal marine area in recognition of the closer the activity, the greater the potential for modification of the values that contribute to natural character. It provides the supporting basis for the setback rules in Volume 2, including those requiring setback of buildings and structures from the Riparian Natural Character Management Area.

The policy responds to the requirement in section 6(a) of the RMA to preserve natural character, and the supporting national policy direction in Policies 13 and 6(1)(i) of the NZCPS in respect to the coastal environment. Specifically, Policy 6(1)(i) requires set back of development from the coastal marine areas and other water bodies where practicable and reasonable, to protect the natural character open space, public access, and amenity values of the coastal environment. Given that statutory consent, Policy 6.2.8 is considered appropriate. It is however recognised that any associated setback controls need to be practicable and not present an unreasonable regulatory burden on land use, including in relation regionally significant infrastructure. In that regard it is recognised that some activities have a functional need to be located within, on, or over the beds and margins of rivers, lakes, and the coastal marine area. Recognising that, it is considered that the current wording of Policy 6.2.8 does not reasonably provide for such land use, and changes are recommended accordingly (changes detailed below).

In regards to the request of Forest and Bird to include reference to wetlands, as previously noted Chapter 6 does not address the natural character of wetlands which have been separately determined and are addressed in Chapter 8 – Indigenous Biodiversity. No change is therefore recommended to the policy.

Recommendation

Delete Policy 6.2.8 and the associated description as follows. Recommended additions or new provisions to be shown underlined. Deleted text or provisions to be shown ~~struckthrough~~.

*Policy 6.2.8 – Require land use activities to be set back from rivers, lakes and the coastal marine area in order to preserve natural character, other than the extent that land use activities have a functional need to be located in those areas.*²⁹

The proximity of land use activity to rivers, lakes and the coastal marine area has a significant influence on the potential for adverse effects on natural character. The closer the activity, the greater the potential for modification to the elements, patterns, processes and experiential qualities that contribute to natural character. For this reason, land use activities will be required to be set back from rivers, lakes and the coastal marine area. The setback will be implemented through permitted activity standards and application can be made for resource consent to undertake an activity within the setback. The adverse effects of any such proposal will be assessed against the provisions of this chapter.

5.22 Policy 6.2.9 – Support Initiatives to Restore Natural Character

Policy 6.2.9 addresses supporting private land owners, community groups, and others in their efforts to restore the natural character, in implementing Objective 6.2. Policy 6.2.9 reads:

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

Submissions

The submissions received on this policy include:

- Support/retain the policy as notified (**Michael and Kristen Gerard (424/18), Federated Farmers (425/93), John Hickman (455/26), George Mehlhopt (456/26), DOC (479/67), Judy and John Hellstrom (688/49), Forest and Bird (715/139)**).
- Oppose the policy (**Marlborough Chamber of Commerce (961/12)**).

²⁹ Submissions 433/21 Port Marlborough NZ Ltd, 1041/18 Port Clifford Ltd, 1198/15 Transpower, 1201/62 Trustpower.

- Amend the policy to read ‘*Encourage and support private landowners, community groups, businesses, and others in their efforts to restore the natural character of the coastal environment, wetlands, lakes and rivers*’ (**Aquaculture NZ (401/59), Marine Farming Association (426/59)**).
- Amend the policy to include reference to ‘*enhancement*’ of natural character (**Fish and Game (509/118)**).
- Amend the policy to include reference to Policy 14 of the NZCPS (**Friends of Nelson Haven and Tasman Bay (716/69)**).

Assessment

The submissions on this policy seek minor amendments to include references to business groups, enhancement in addition to restoration of natural character, and reference to supporting Policy 14 of the NZCPS. The requested minor amendments are considered appropriate and are recommended to be included (changes detailed below).

Recommendation

Amend Policy 6.2.9 and the associated explanation as follows. Recommended additions or new provisions to be shown underlined. Deleted text or provisions to be shown ~~struckthrough~~.

Policy 6.2.9 – Encourage and support private landowners, community groups, businesses,³⁰ and others in their efforts to restore and enhance³¹ the natural character of the coastal environment, wetlands, lakes and rivers.

Not all of the responses to preserving natural character need to be achieved through regulatory methods, particularly when restoring and enhancing³² natural character in parts of the coastal environment and in wetlands, lakes and rivers already significantly modified by historic human activity. This Policy acknowledges the significant efforts of private landowners, community groups, businesses, and others to restore and enhance³³ natural character in modified coastal and aquatic environments. The Council will seek to support existing restoration and enhancement³⁴ initiatives and will encourage new ~~restoration~~³⁵ initiatives to be established, in part response to Policy 14 of the NZCPS.³⁶ Given that natural character consists of a range of abiotic, biotic and experiential attributes, methods elsewhere in the MEP targeting an improvement in the quality of the environment will also contribute to the restoration and enhancement³⁷ of natural character.

5.23 General Submissions on Chapter 6 Policies

Submissions

A range of general submissions have been received on the Chapter 6 Policies which addresses the policies as a whole generally or request the addition of new policies. These general submissions request:

- Amend the policies to make it clear the use of the word ‘*degree*’ throughout the policies refers to the magnitude of change, and not the natural character classification from outstanding – very low (**Marine Farming Association (426/62)**).

³⁰ Submissions 401/59 Aquaculture NZ, 426/59 Marine Farming Association.

³¹ Submission 509/118 Fish and Game.

³² Submission 509/118 Fish and Game.

³³ Submission 509/118 Fish and Game.

³⁴ Submission 509/118 Fish and Game.

³⁵ Submission 509/118 Fish and Game.

³⁶ Submission 716/69 Friends of Nelson Haven and Tasman Bay.

³⁷ Submission 509/118 Fish and Game.

- Add a new policy to read 'Identify the biological characteristics and the values inherent in the perception of those biological characteristics for each area mapped under Policy 6.1.3' (Aquaculture NZ (401/50), Marine Farming Association (426/50)).
- Add a new policy setting out the criteria or values used to assess the natural character of wetlands **(Forest and Bird (715/122))**.
- Add a new policy to guide the determination of outstanding natural areas **(Royal Forest and Bird Protection Society (715/127))**.
- Add a new policy to read 'Recognise and provide for environmental compensation or offsets including but not restricted to biodiversity offsets for effects that result in beneficial outcomes in regard to the resource being affected or utilised' (Totaranui Ltd (233/13 and 16)).
- Add a new policy to read 'In evaluating applications for resource consent, recognise the efforts of private landowners, community groups and others to maintain, protect and restore the natural character of the coastal environment, wetlands, lakes and rivers' (Federated Farmers (525/94)).
- Add a new policy to read 'Recognise the importance of facilitating practicable access to Maori owned land that is freehold or otherwise or land leased in perpetuity to Maori or Maori organisations and that this often requires establishment of a mooring or other forms of access facility or structures which may include the need to located with within areas identified as being sensitive, requiring protection or being of natural, high or outstanding natural character' (Totaranui Ltd (233/14)).
- Include new policies which recognise that where land containing commercial forestry is identified as having natural character, the effects of forestry and the intensification and development of forestry is not an adverse effect, but is inherent to the character of the area, otherwise areas of land which are currently commercial forestry should not be recognised as having natural character **(NZ Forest Product Holdings Ltd (995/12))**.
- Add a new policy 6.2.10 to read 'Promote the integration of subdivision, use or development with the protection, enhancement or establishment of natural features, landscape, vegetation and open space' (Marlborough Chamber of Commerce (961/13)).
- Add a new policy 6.2.11 to read 'Ensure that any development also takes into account the welfare and wellbeing of the community' (Marlborough Chamber of Commerce (961/14)).
- Add a new policy to read 'Recognise that there may be locations within areas identified as having natural character of either a high, very high or outstanding quality within any of the levels prescribed in Policy 6.1.3 that result in development being potentially appropriate within a specific defined location despite being within a wider area identified as having of high, very high or outstanding natural character' (Totaranui Ltd (233/17)).
- Add a new policy to read

'When considering whether there are any adverse effects on the characteristics and qualities of the natural character values in terms of 6.2.1(a), whether there are any significant adverse effects and the scale of any adverse effects in terms of 6.2.1(b) and 6.2.2, and in determining the character, intensity and scale of the adverse effects:

(a) Recognise that a minor or transitory effect may not be an adverse effect;

(b) Recognise that many areas contain ongoing use and development that:

(i) Were present when the area was identified as high or outstanding or have subsequently been lawfully established

(ii) May be dynamic, diverse or seasonal;

(c) Recognise that there may be more than minor cumulative adverse effects from minor or transitory adverse effects;

- (d) Have regard to any restoration and enhancement on the characteristics and qualities of that area of natural character;
- (e) Recognise it may be appropriate to offset significant residual adverse effects on natural character to result in no net loss and preferably a net natural character gain. A natural character offset should be developed in a manner consistent with the principles contained in Policy 6.2.6;
- (f) Recognise that where adverse effects cannot be practicably avoided, adverse effects could be minimised; and
- (g) Acknowledge that a future adverse effect may be avoided where the effect is temporary and is authorised for a finite term'

(Aquaculture NZ (401/53), Marine Farming Association (426/53))

Assessment

These submissions can be broadly grouped into four categories as follows:

- Changes to existing policies or new policies addressing the assessment and determination of natural character.
- New policies addressing enhancement and restoration of natural character, including those that recognise environmental compensation or offsets.
- New policies seeking greater enablement of development, including by facilitating access to Maori owned land, requiring the welfare and wellbeing of the community to be taken into account, and recognising forestry does not constitute an adverse effect on natural character.
- New policy addressing the evaluation of adverse effects of subdivision, use, and development within areas of natural character.

Each of these submission groupings are addressed in the following sections.

Requested Changes to Existing Policies and New Policies Addressing the Assessment and Determination of Natural Character

The request of Aquaculture NZ and the Marine Farming Association to amend the policies to make it clear the use of the word 'degree' throughout the Policies refers to the magnitude of change, and not the natural character classification from outstanding – very low, is not considered necessary. It is considered sufficiently clear that the use of the term 'degree' of natural character in Policies 6.1.3 and 6.1.5 refers to the magnitude of change and not the classification and mapping of specific areas in response to the assessed degree of natural character, which are instead addressed through Policies 6.1.4 and 6.1.6. No change is therefore recommended.

Aquaculture NZ's and the Marine Farming Association's request for a new policy requiring identification of the biological characteristics and the values inherent in the perception of those characteristics for each area mapped in the MEP is considered unnecessary. Policies 6.1.1 and 6.1.3 (with the amendments recommended in this report) provides an appropriate basis for determining the degree of natural character in coastal environments, and which is consistent with the approach taken in the natural character assessment report for the coastal environment, and resulting mapping of natural character areas in Volume 4. No change is therefore recommended.

The inclusion of a new policy in Chapter 6 setting out the criteria or values used to assess the natural character of wetlands as requested by Forest and Bird is unconsidered unnecessary. As previously noted Chapter 6 does not address the natural character of wetlands which have been separately determined and are addressed in Chapter 8 – Indigenous Biodiversity. No change is therefore recommended.

The inclusion a new policy to guide the determination of outstanding natural areas as requested by Forest and Bird is also considered unnecessary. Policies 6.1.3 and 6.1.5 provide the basis for determining the degree of natural character within the coastal environment, and of lakes, rivers, and their margins, including areas with outstanding natural character values. These policies provide the basis for the more detailed methodology used within the natural character assessment reports. Those reports are cross referenced

within the plan, and consequently it is considered unnecessary to further define in policy the methodology by which the natural character of areas will be determined. No changes are therefore recommended.

Requested New Policies Addressing Enhancement and Restoration of Natural Character

Totaranui Ltd and Federated Farmers have both requested the inclusion of additional policies requiring recognition of environmental compensation, offsets, or other efforts to maintain, protect, and restore natural character, including as part of the evaluation of resource consent applications.

Consideration of restoration and enhancement of natural character proposed as part of a proposal is addressed by Policy 6.2.6 which enables the beneficial effects of proposals to be considered in determining whether overall a proposal will preserve the natural the natural character to achieve Objective 6.2. The scope of that policy is considered appropriate to address the relief sought by these submissions. It would not be appropriate to broaden that policy or require a new policy that would allow consideration of wider landowner or community restoration or enhancement activities beyond those that can be reasonably linked to a particular resource consent proposal as it would promote a form of compensation or offsetting which would not replicate or address the natural character values that are being lost as a result of a proposal, and therefore would not be consistent with section 6(a) of the RMA. No changes are therefore recommended.

Requested New Policies Addressing Enablement of Subdivision, Use, and Development

Facilitating access to Maori owned land by way of moorings or structures as identify by Totaranui Ltd, including within areas of high, very high, or outstanding natural character is acknowledged, however inclusion of an enabling Policy in Chapter 6 would undermine the overall approach to managing natural character in the MEP and would not be consistent with section 6(a) of the RMA, or Policy 13 of the NZCPS. No changes are therefore recommended. It is further noted that Chapter 13 includes specific objectives and policies addressing the management of anchoring, moorings, and foreshore structures, and that under Policy 13.2.1 for example, the relationship of Maori and their culture and traditions with ancestral lands, water, sites, waahi tapu and other taonga is a relevant consideration in determining the appropriate locations, forms, and limits of subdivision, use, and development.

NZ Forest Product Holdings Ltd has requested the inclusion of a policy to recognise that where land containing commercial forestry is identified as having natural character, the effects of forestry is not an adverse effect, but is inherent to the character of an area. The requested policy is premised on the basis that commercial forestry contributes to rather than degrades natural character, however this does not accord with established practice. Commercial forestry is considered to degrade natural character as it comprises exotic species, interferes with natural processes, can impact on sedimentation and water quality, and introduces incongruous patterns into the landform. Inclusion of such a policy would therefore be contrary to proper natural character assessment practice, and would not be consistent with section 6(a) of the RMA, or Policy 13 of the NZCPS. No change is therefore recommended.

The purpose and merit of the policies sought by the Marlborough Chamber of Commerce to ensure any development takes into account the welfare and wellbeing of the community, and to promote the integration of subdivision, use or development with the protection, enhancement or establishment of natural features, landscape, vegetation and open space are unclear. In absence of further evidence, it is considered that including these policies within Chapter 6 would also undermine the overall approach to managing natural character in the MEP and would not be consistent with section 6(a) of the RMA, or Policy 13 of the NZCPS. No changes are therefore recommended.

Requested New Policies Addressing Evaluation of Adverse Effects of Subdivision, Use, and Development

Totaranui Ltd's request to add a policy which recognises that there may be locations within areas with high, very high, and outstanding natural character that many be appropriate for development is considered unnecessary. Policies 6.2.1 – 6.1.8 provide the management approach for managing development within natural character areas. Those policies are premised on the basis that the appropriateness of development is to be determined with respect to the character, scale, and intensity of adverse effects (including

cumulative adverse effects) that will result from any proposal. Accordingly, those policies provide sufficient scope to enable any development within areas with high, very high, or outstanding natural character where the effects of that proposal have been managed in line with those policies, and in light of the natural character values that are present. No changes are therefore recommended.

Aquaculture NZ and the Marine Farming Association have proposed a new policy providing further direction in determining the character, intensity, and scale of adverse effects on natural character values. In particular, the policy wording would direct recognition of the following:

- Minor transitory effects may not be an adverse effect.
- Many areas contain ongoing use and development present at the time of identifying the area as high or outstanding natural character, and that such use may be dynamic, diverse, or seasonal.
- There may be more than minor cumulative adverse effects from minor or transitory adverse effects.
- Have regard to restoration and enhancement of natural character.
- That it may be appropriate to offset residual adverse effects.
- That where adverse effects cannot be practicably avoided, adverse effects should be minimised.
- That a future adverse effect may be avoided where the effect is temporary and authorised for a finite term.

The policy appears intended to provide greater clarity and certainty as to how adverse effects will be determined. The policy would however to some extent introduce a level of specificity in the MEP which is unnecessary, duplicate other policy, is contrary to proper effects assessment practice, or would undermine national policy direction and section 6(a) of the RMA.

In particular, it is considered reasonably understood that many areas contain use and development that existed when the areas of high, very high, and outstanding natural character were identified, and that such use can be dynamic, diverse, or seasonal. It is similarly well understood that there can be more than minor cumulative adverse effects from minor or transitory adverse effects, and that some effects can be reversible. Inclusion of such policy references is therefore considered unnecessary specificity. Furthermore, recognition of restoration and enhancement of natural character in assessing the adverse effects of subdivision, use, and development is considered to sufficiently captured by Policy 6.2.6, and therefore additional policy references would not serve any useful purpose.

Including reference to minor transitory effects not being an adverse effect, does not align with proper resource management practice. Transitory effects can be an adverse effect, with the relevant question then being the scale, character, and intensity of that effect. Inclusion of a reference specifying that where adverse effects cannot be practicably avoided, adverse effects should instead be minimised, would undermine the overall approach to managing natural character in the MEP and would not be consistent with section 6(a) of the RMA, or Policy 13 of the NZCPS. The NZCPS in particular requires that in the coastal environment, adverse effects are to be avoided in areas with outstanding natural character, and significant adverse effects be avoided elsewhere.

Recognising the above, it is not recommended to include the requested new policy.

Recommendation

Retain Chapter 6 as notified, except as otherwise recommended to be modified in response to other submissions on the Chapter considered in this report.

5.24 Methods of Implementation

The methods of implementation in Chapter 6 set out the means by which the objectives and policies of Chapter 6 are to be implemented. Four methods are listed, including:

- 6.M.1 Regional and district rules.
- 6.M.2 Identifying natural character within Marlborough's freshwater and coastal environments
- 6.M.3 Information.

- 6.M.4 Restoration of natural character.

Submissions

The submissions received on the methods of implementation include:

- Support/retain method 6.M.1 as notified – Regional and district rules (**Judy and John Hellstrom (688/50), NZTA 1002/27**)).
- Oppose method 6.M.1 – Regional and district rules (**Marlborough Forest Industry Association (962/51), Nelson Forests Ltd (990/186)**)).
- Amend method 6.M.2 to ensure a precautionary view is adopted in the Marlborough Sounds (**Queen Charlotte Sound Residents Association (504/21)**)).
- Support/retain method 6.M.2 – Identifying natural character within Marlborough's freshwater and coastal environments, as notified (**Judy and John Hellstrom (688/51), NZTA (1002/28)**)).
- Support/retain method 6.M.3 – Information, as notified (**Judy and John Hellstrom (688/52)**)).
- Support/retain method 6.M.4 – Restoration of natural character, as notified (**Judy and John Hellstrom (688/53)**)).
- Add a new method of implementation setting out a detailed method for natural character assessment to encourage consistency of approach between landscape architects (**Marine Farming Association (426/60), Aquaculture NZ (401/60)**)).
- Add a new method of implementation to indicate financial or staff resource support towards implementation (**Forest and Bird (715/140)**)).
- Add a new method of implementation to read *'The Council is required to work cooperatively with land occupiers, community and industry groups whom are undertaking voluntary stewardship activities'* (**Federated Farmers (425/95)**)).
- General comment – ensure more monitoring of the Wairau Lagoon, putting systems in place to replenish (**Te Runanga a Rangitane o Wairau (1187/2)**)).

Assessment

The submissions on the methods include those that oppose regional and district rules as a method on the basis of inequitable regulation being applied between land use activities, and in particular the setback requirements for commercial forestry. Other submissions seek recognition in the methods of a precautionary approach being adopted to management given gaps in the understanding of the Marlborough environment, and the addition of new methods encouraging consistency in the methodology used in the assessment of natural character; provision of Council resourcing to support implementation; and Council co-operation for community efforts to restore natural character. A request for greater monitoring of the Wairau Lagoon is also sought.

Method 6.M.1 covers the application of District and Regional rules. The extent to which commercial forestry will be enabled in the MEP will be first determined through the Council completing a process in accordance with Section 44A of the RMA, to identify and make the required changes to the MEP to align with the National Environmental Standard on Plantation Forestry (NES-PF) requirements. The completion of that process will be followed by the Hearings Panel considering the specific submissions on the MEP relating to the management of commercial/plantation forestry at a latter hearing. No recommendations in response to the submissions of the Marlborough Forest Industry Association, and Nelson Forests Ltd on Method 6.M.1 are therefore made at this time.

Method 6.M.2 addresses identification of natural character with specific reference to the natural character assessments that have been completed and informed preparation of the MEP. While adoption of a

precautionary approach in identifying natural character is appropriate, and gives effect to Policy 3 of the NZCPS, it is considered that inclusion of a reference to such an approach in method of implementation 6.M.2 as requested by the Queen Charlotte Sound Residents Association would represent a level of specificity that is unnecessary in that method. No changes are therefore recommended.

Achieving consistency in the assessment of natural character between landscape architects, as noted by the submissions of Aquaculture NZ and the Marine Farming Association, is a desirable outcome. However, establishing a consistent detailed methodology is problematic given the wide variation in assessment methodologies used, the lack of national level guidance, and continued evolution of landscape planning practice in response to Environment Court case law. Inclusion of a methodology in the MEP at this time could result in a methodology which is inconsistent with evolving practice, and it is considered that achieving a consistent methodology is best led by the landscape planning profession, to achieve consistency nationally and not just within Marlborough. No changes are therefore recommended to the methods of implementation.

Inclusion of methods in the MEP addressing provision of Council resourcing to support implementation, Council co-operation for community efforts to restore natural character, and monitoring and replenishing the Wairau Lagoon are unlikely to be of any practical benefit. Council resourcing decisions are made separate of the District Plan, including under the Long Term and Annual Plan processes. Those processes allow the Council to determine holistically desired community outcomes and resourcing priorities. It is acknowledged that co-ordination between the Council and community groups undertaking restoration activities is desirable, however inclusion of a specific method would represent a level of specific unnecessary in the MEP. No changes are therefore recommended.

Recommendation

Retain the Chapter 6 methods of implementation as notified.

5.25 Anticipated Environmental Results

The anticipated environmental results in Chapter 6 set out the outcome expected through the implementation of the objectives, policies and rules relating to natural character in the MEP, and the way effectiveness in achieving that outcome will be monitored.

A single anticipated environmental result is included in Chapter 6 which reads:

'The natural character of Marlborough's coastal environment and of lakes, rivers and their margins is retained.'

'The intactness of the individual coastal marine and coastal terrestrial areas of the Marlborough Sounds is retained in order to preserve the natural character of the Sounds.'

Submissions

The submissions received on the anticipated environmental results include:

- Support/retain the anticipated environmental results as notified (**Aquaculture NZ (401/61), Marine Farming Association (426/61), Judy and John Hellstrom (688/54), Forest and Bird (715/141)**).
- Amend the anticipated environmental result to read *'The natural character of Marlborough's coastal environment and of lakes, rivers and their margins is ~~retained~~ restored. Removal of wilding pines in the Marlborough Sounds'* (**Pinder Family Trust (578/9), Guardians of the Sounds (752/9), Sea Sheppard NZ (1146/9), Bay of May Coves Residents and Ratepayers Association (1190/31), Marlborough Environment Centre (1193/17)**).

Assessment

The submissions on the anticipated environmental results are generally supportive however a number seek that the expected outcome of implementation of the MEP should be the *'restoration'* of natural character, rather than just its *'retention'*. Submissions also seek the inclusion of the removal of wilding pines in the Marlborough Sounds as an anticipated result of implementation.

The management approach of Chapter 6, and in particular Objective 6.2 and related policies is to preserve natural character, and protect it from inappropriate subdivision, use, and development. It essentially seeks that natural character be retained, with enhancement of natural character instead only be encouraged under Policy 6.2.9. Given that focus, it is considered that the current wording of the anticipated environmental results accurately recognises the outcomes intended through the application of the objectives, policies and rules relating to natural character in the MEP. No change is therefore recommended.

Removal of wilding pines is a desirable environmental outcome. Management of wilding pines is not specifically addressed through the Chapter 6 provisions, and is instead addressed in Chapter 7 - Landscape to the extent that the MEP addresses wildings. Other mechanisms outside of the MEP, and in particular the Regional Pest Management Plan prepared under the Biosecurity Act 1993 also provide measures to control wilding trees. No changes are therefore recommended to the anticipated environmental results.

Recommendation

Retain the Chapter 6 anticipated environmental results as notified.

5.26 Riparian Setback Rules

The MEP includes riparian setback rules to assist implementation of the Chapter 6 objectives, policies and rules relating to natural character of lakes, rivers, and their margins with high or very high natural character. These areas are identified as a Riparian Natural Character Management Area in the MEP. The rules for that area include:

- Permitted activity standard 3.2.1.9 which requires that buildings or structures in the Rural Environment Zone, must not be sited within 20 metres of a Riparian Natural Character Management Area.
- Permitted activity standard 4.2.1.7 which requires that buildings or structures in the Coastal Environment Zone must not be sited within 20 metres of a Riparian Natural Character Management Area.
- Permitted Activity standard 16.2.2.6 which requires that the maintenance, repair, or replacement of any building or structure in the Coastal Marine Zone must not be sited within 20 metres of a Riparian Natural Character Management Area.
- Permitted Activity standard 19.2.1.2 which requires that buildings or structures in the Open Space 3 Zone must not be sited within 20 metres of a Riparian Natural Character Management Area.

Submissions

The submissions received on the riparian setback rules include:

- Oppose/delete rule 3.2.1.9 (**Federated Farmers (425/504)**).
- Amend rule 3.2.1.9 to exclude fences (**Spencer and Susan White (93/6)**, **Peter Brown (281/1)**)
- Amend rule 3.2.1.9 to delete reference to structures (**Murray Chapman (348/41)**).

- Oppose/delete rule 4.2.1.7 (**Federated Farmers (425/627)**).
- Oppose/delete rule 16.2.2.6 (**Federated Farmers (425/816)**).
- Support/retain rule 19.2.1.2 as notified (**Port Marlborough NZ Ltd (433/187)**).
- Oppose/delete rule 19.2.1.2 (**Federated Farmers (425/713)**).
- Add new stock exclusion rules requiring that a vegetated strip is maintained, and stock excluded from, the outer edge of the bed of any river, wetland, modified or artificial watercourse. Also require maintenance of a vegetated strip from the boundary of the coastal marine area and all land use activities (**Ernslaw One Ltd (505/7)**).

Assessment

These submissions generally oppose the 20 metre setback rules for buildings and structures from the Riparian Natural Character Management Area, on the basis that the rule will not enable fences to be erected or maintained within that area as a permitted activity, and as such would not facilitate keeping stock out of waterways.

The definition of structure within the MEP relies on the equivalent definition in section 2 of the RMA, which captures any equipment or device fixed to land. The definition therefore would include a fence, and as a result fences would be captured by the Riparian Natural Character Management Area setback rules. The intention of the proposed rules is to control structures which have the potential to degrade the high and very high natural character values that exist in these areas.

Fencing typically is of a character and intensity that would not lead to significant inference of the attributes which contribute to natural character and therefore controlling fencing through the plan rules in this context is potentially unnecessary. Furthermore, not facilitating the erection of fencing has the potential to result in perverse outcomes with regard to managing natural character. In particular, it would not promote the exclusion of intensively farmed stock from rivers that could result in degradation of high and very high natural character values, as intended by other rules of the MEP. Controlling fencing also would appear at odds with other rules of the MEP which otherwise enable a wide range of activities within 20 metres of the Riparian Character Management Area that do not necessarily support retention of natural character values such as cultivation, woodlot forestry, clearance of indigenous vegetation, and excavation. Given the above, it is therefore recommended that the setback rules be amended to exclude stock fencing (changes detailed below).

The request of Ernslaw One Ltd seeking new stock exclusion rules relates to provisions not directly related to Chapter 6 Natural Character. The relief requested in these submissions will be addressed as part of the hearing for Topic 13 – Resource Quality, specifically policies 15.1.23 and 15.1.27.

Recommendation

Amend Rule 3.2.1.9 as follows and the associated explanation as follows. Recommended additions or new provisions to be shown underlined. Deleted text or provisions to be shown ~~struckthrough~~.

*3.2.1.9 – A building or structure must not be sited within 20m of a Riparian Natural Character Management Area, excluding stock fences.*³⁸

Amend Rule 4.2.1.7 as follows and the associated explanation as follows. Recommended additions or new provisions to be shown underlined. Deleted text or provisions to be shown ~~struckthrough~~.

*4.2.1.7 – A building or structure must not be sited within 20m of a Riparian Natural Character Management Area, excluding stock fences.*³⁹

³⁸ Submissions 425/504 Federated Farmers, 93/6 Spencer and Susan White, 281/1 Peter Brown, 348/41 Murray Brown.

³⁹ Submission 425/627 Federated Farmers.

Amend Rule 16.2.2.6 as follows and the associated explanation as follows. Recommended additions or new provisions to be shown underlined. Deleted text or provisions to be shown ~~struckthrough~~.

*16.2.2.6 – A building or structure must not be sited within 20m of a Riparian Natural Character Management Area, excluding stock fences.*⁴⁰

Amend Rule 19.2.1.2 as follows and the associated explanation as follows. Recommended additions or new provisions to be shown underlined. Deleted text or provisions to be shown ~~struckthrough~~.

*19.2.1.2 – A building or structure must not be sited within 20m of a Riparian Natural Character Management Area, excluding stock fences.*⁴¹

5.27 Volume 3 – Appendix 4 – Criteria for Determining Significant Adverse Effects

Appendix 4 of the MEP sets out criteria to assist with a subdivision, use, or development will have 'significant' adverse effects, and in so doing supports the implementation of Policy 6.2.2 which requires the avoidance of significant adverse effects.

The criteria in Appendix 4 read:

- 1. Character and degree of modification, damage, loss or destruction;*
- 2. Duration and frequency of effect (for example long-term or recurring effects)*
- 3. Magnitude or scale of effect (for example number of sites affected, spatial distribution, landscape context);*
- 4. Irreversibility of effect (for example loss of unique or rare features, limited opportunity for remediation, the costs and technical feasibility of remediation or mitigation);*
- 5. Resilience of heritage value or place to change (for example ability of feature to assimilate change, vulnerability of feature to external effects).'*

Submissions

The submissions on Appendix 4 include:

- Support/retain Appendix 4 as notified (**NZTA (1002/267)**).
- Oppose/delete Appendix 4 (**Aquaculture NZ (401/248)**, **Marine Farming Association (426/243)**, **Fertiliser Association of NZ (1192/97)**).
- Amend Appendix 4 to make it a more robust decision making tool (**Federated Farmers (425/771)**).
- Amend Appendix 4 to refer to the effects of the proposal on natural character within the natural character unit is located (**Friends of Nelson Haven and Tasman Bay (716/213)**).
- Amend Appendix 4 to make specific reference to the need to assess cumulative adverse effects (**EDS (698/110)**).

⁴⁰ Submission 425/816 Federated Farmers.

⁴¹ Submission 425/713 Federated Farmers.

Assessment

The submissions on Appendix 4 include those that seek it be deleted on the basis that it is too vague and provides little guidance for assessing effects, and other submissions seeking amendment to make it a more robust decision making tool. Those amendments include adding quantitative measures to define significance, and criteria addressing areas that are more modified, or addressing cumulative adverse effects.

In regards to those submissions seeking deletion of the policy, or inclusion of qualitative or quantitative measures to define significance, Appendix 4 is intended to support the implementation of policy 6.2.2 which requires significant adverse effects on natural character to be avoided. It essentially provides a list of those matters that should be considered, but does not provide qualitative or quantitative thresholds to determine the significance of effects on natural character. Instead Policy 6.2.3 provides the threshold for determining significant adverse effects, and therefore the effects requiring to be avoided under policy 6.2.2. Specifically, Policy 6.2.3 (as is recommended to be amended in this report) provides that any reduction in the classification of natural character (e.g. from very high or high to a lower classification) is to be considered a 'significant' adverse effect. Inclusion of qualitative or quantitative measures in the appendix to determine significance would therefore duplicate or potentially conflict with Policy 6.2.3.

It is however acknowledged that the relationship between Appendix 4 and policies 6.2.2 and 6.2.3 is unclear in reading the Appendix. Accordingly, changes to the title and inclusion of a cross reference within the appendix is recommended. Furthermore, it is considered that the 5th criteria should be amended to delete reference to heritage value, as such values are not an attribute of natural character. (changes detailed below).

Inclusion of explicit reference to cumulative effects in Policy 6.2.2 as requested by EDS is considered unnecessary. The term 'adverse effects' in the appendix encapsulates any adverse cumulative effects, and no change is therefore recommended.

Recommendation

Amend Volume 3, Appendix 4 as follows. Recommended additions or new provisions to be shown underlined. Deleted text or provisions to be shown ~~struckthrough~~.

Appendix 4 Criteria for Determining Significant Adverse Effects on Natural Character

The criteria below assists in determining whether a subdivision, use or development proposal will have significant adverse effects for the purposes of implementing policies 6.2.2 and 6.2.3.⁴² The criteria shall be applied by the decision maker in resource consents or plan changes.

1. *Character and degree of modification, damage, loss or destruction;*
2. *Duration and frequency of effect (for example long-term or recurring effects)*
3. *Magnitude or scale of effect (for example number of sites affected, spatial distribution, landscape context);*
4. *Irreversibility of effect (for example loss of unique or rare features, limited opportunity for remediation, the costs and technical feasibility of remediation or mitigation);*
5. *Resilience ~~of heritage value or place~~ to change (for example ability of feature to assimilate change, vulnerability of feature to external effects).*

⁴² Submissions 401/248 Aquaculture NZ, 426/243 Marine Farming Association, 1192/97 Fertiliser Association of NZ.

Appendix 1: Recommended decisions on decisions requested

Submission Number	Submission Point	Submitter	Volume	Chapter	Provision	Recommendation
426	60	Marine Farming Association Incorporated	Volume 1	6 Natural Character	6.	Reject
426	61	Marine Farming Association Incorporated	Volume 1	6 Natural Character	6.	Accept
426	62	Marine Farming Association Incorporated	Volume 1	6 Natural Character	6.	Reject
426	63	Marine Farming Association Incorporated	Volume 1	6 Natural Character	6.	Reject
514	6	A J King Family Trust and S A King Family Trust	Volume 1	6 Natural Character	6.	Reject
514	10	A J King Family Trust and S A King Family Trust	Volume 1	6 Natural Character	6.	Reject
574	6	Bryan Skeggs	Volume 1	6 Natural Character	6.	Reject
574	10	Bryan Skeggs	Volume 1	6 Natural Character	6.	Reject
578	7	Pinder Family Trust	Volume 1	6 Natural Character	6.	Accept in part
688	45	Judy and John Hellstrom	Volume 1	6 Natural Character	6.	Accept in part
698	37	Environmental Defence Society Incorporated	Volume 1	6 Natural Character	6.	Reject
715	120	Royal Forest and Bird Protection Society NZ (Forest and Bird)	Volume 1	6 Natural Character	6.	Accept in part
715	127	Royal Forest and Bird Protection Society NZ (Forest and Bird)	Volume 1	6 Natural Character	6.	Reject
715	140	Royal Forest and Bird Protection Society NZ (Forest and Bird)	Volume 1	6 Natural Character	6.	Reject
716	55	Friends of Nelson Haven and Tasman Bay Incorporated	Volume 1	6 Natural Character	6.	Accept in part
726	6	Canantor Mussels Limited and N. I Buchanan-Brown	Volume 1	6 Natural Character	6.	Reject
726	10	Canantor Mussels Limited and N. I Buchanan-Brown	Volume 1	6 Natural Character	6.	Reject
752	7	Guardians of the Sounds	Volume 1	6 Natural Character	6.	Accept in part
809	6	Jim Jessep	Volume 1	6 Natural Character	6.	Reject
809	10	Jim Jessep	Volume 1	6 Natural Character	6.	Reject
868	1	Kenepuru and Central Sounds Residents Association Incorporated	Volume 1	6 Natural Character	6.	Reject
926	16	Wainui Green 2015 Limited	Volume 1	6 Natural Character	6.	Reject
926	20	Wainui Green 2015 Limited	Volume 1	6 Natural Character	6.	Reject
936	6	Michael Jessep	Volume 1	6 Natural Character	6.	Reject
936	10	Michael Jessep	Volume 1	6 Natural Character	6.	Reject

961	9	Marlborough Chamber of Commerce	Volume 1	6 Natural Character	6.	Accept in part
964	6	Marlborough Oysters Limited	Volume 1	6 Natural Character	6.	Reject
964	10	Marlborough Oysters Limited	Volume 1	6 Natural Character	6.	Reject
1084	9	Raeburn Property Partnership	Volume 1	6 Natural Character	6.	Reject
1140	12	Sanford Limited	Volume 1	6 Natural Character	6.	Reject
1146	7	Sea Shepherd New Zealand	Volume 1	6 Natural Character	6.	Accept in part
1157	6	Southern Crown Limited	Volume 1	6 Natural Character	6.	Reject
1157	10	Southern Crown Limited	Volume 1	6 Natural Character	6.	Reject
1188	2	Te Runanga o Ngati Rarua	Volume 1	6 Natural Character	6.	Accept in part
1190	38	The Bay of Many Coves Residents and Ratepayers Association Incorporated	Volume 1	6 Natural Character	6.	Accept in part
1193	47	The Marlborough Environment Centre Incorporated	Volume 1	6 Natural Character	6.	Accept in part
100	15	East Bay Conservation Society	Volume 1	6 Natural Character	Issue 6A	Reject
233	13	Totaranui Limited	Volume 1	6 Natural Character	Issue 6A	Reject
233	14	Totaranui Limited	Volume 1	6 Natural Character	Issue 6A	Reject
401	44	Aquaculture New Zealand	Volume 1	6 Natural Character	Issue 6A	Accept
425	95	Federated Farmers of New Zealand	Volume 1	6 Natural Character	Issue 6A	Reject
426	44	Marine Farming Association Incorporated	Volume 1	6 Natural Character	Issue 6A	Accept
447	2	Ted and Shirley Culley	Volume 1	6 Natural Character	Issue 6A	Accept in part
477	8	John Malcolm McKee	Volume 1	6 Natural Character	Issue 6A	Reject
509	105	Nelson Marlborough Fish and Game	Volume 1	6 Natural Character	Issue 6A	Reject
510	9	Anne Allison	Volume 1	6 Natural Character	Issue 6A	Reject
535	9	Adele Riddle	Volume 1	6 Natural Character	Issue 6A	Reject
538	9	Andre Smith	Volume 1	6 Natural Character	Issue 6A	Reject
539	9	Allen Steele	Volume 1	6 Natural Character	Issue 6A	Reject
540	9	Arthur Stewart	Volume 1	6 Natural Character	Issue 6A	Reject
541	9	Akiwa Te Uatuku	Volume 1	6 Natural Character	Issue 6A	Reject
543	9	Alistair Willis	Volume 1	6 Natural Character	Issue 6A	Reject
549	9	Bryan Albrey	Volume 1	6 Natural Character	Issue 6A	Reject
551	9	Ben Armstrong	Volume 1	6 Natural Character	Issue 6A	Reject
555	9	Blair Glover	Volume 1	6 Natural Character	Issue 6A	Reject
559	9	Belinda Jones	Volume 1	6 Natural Character	Issue 6A	Reject

560	9	Brian Lee	Volume 1	6 Natural Character	Issue 6A	Reject
562	9	Brendon Lucas	Volume 1	6 Natural Character	Issue 6A	Reject
564	9	Belinda Materoa	Volume 1	6 Natural Character	Issue 6A	Reject
565	9	Brent Mathews	Volume 1	6 Natural Character	Issue 6A	Reject
576	9	Chee Ong Chin	Volume 1	6 Natural Character	Issue 6A	Reject
582	9	Cory Burnett	Volume 1	6 Natural Character	Issue 6A	Reject
583	9	Carmay Cheong	Volume 1	6 Natural Character	Issue 6A	Reject
584	9	Corey Dixon	Volume 1	6 Natural Character	Issue 6A	Reject
588	9	Christopher Hall	Volume 1	6 Natural Character	Issue 6A	Reject
590	9	Cameron Harvey	Volume 1	6 Natural Character	Issue 6A	Reject
593	9	Chang-Seog Jeon	Volume 1	6 Natural Character	Issue 6A	Reject
595	9	Clayton McIntyre	Volume 1	6 Natural Character	Issue 6A	Reject
600	9	Connor Rangi	Volume 1	6 Natural Character	Issue 6A	Reject
603	9	Chee Song Chin	Volume 1	6 Natural Character	Issue 6A	Reject
606	9	Cindy Steele	Volume 1	6 Natural Character	Issue 6A	Reject
607	9	Cadeena Tepu	Volume 1	6 Natural Character	Issue 6A	Reject
611	9	Carla Velez	Volume 1	6 Natural Character	Issue 6A	Reject
618	9	Brad Lewis	Volume 1	6 Natural Character	Issue 6A	Reject
620	9	Brook Lines	Volume 1	6 Natural Character	Issue 6A	Reject
621	9	Becki Findlayson	Volume 1	6 Natural Character	Issue 6A	Reject
624	9	Carol-Ann Herbert	Volume 1	6 Natural Character	Issue 6A	Reject
625	9	Cheryl Harris	Volume 1	6 Natural Character	Issue 6A	Reject
627	9	Carl Scholefield	Volume 1	6 Natural Character	Issue 6A	Reject
628	9	Clinton Nott	Volume 1	6 Natural Character	Issue 6A	Reject
641	8	Dan McCall	Volume 1	6 Natural Character	Issue 6A	Reject
649	9	Dave Herbert	Volume 1	6 Natural Character	Issue 6A	Reject
654	9	David Jones	Volume 1	6 Natural Character	Issue 6A	Reject
655	9	Dhaneshkar Karunakaran	Volume 1	6 Natural Character	Issue 6A	Reject
655	10	Dhaneshkar Karunakaran	Volume 1	6 Natural Character	Issue 6A	Reject
656	9	David King	Volume 1	6 Natural Character	Issue 6A	Reject
658	9	Dan Lawrence	Volume 1	6 Natural Character	Issue 6A	Reject
659	9	Donald M Curie	Volume 1	6 Natural Character	Issue 6A	Reject

660	9	Daniel Manson	Volume 1	6 Natural Character	Issue 6A	Reject
661	9	Denis Marfell	Volume 1	6 Natural Character	Issue 6A	Reject
663	9	Dion McCauley	Volume 1	6 Natural Character	Issue 6A	Reject
664	9	Dellae McKenzie	Volume 1	6 Natural Character	Issue 6A	Reject
665	9	Dorothy McManaway	Volume 1	6 Natural Character	Issue 6A	Reject
667	9	Daniel Paget	Volume 1	6 Natural Character	Issue 6A	Reject
677	9	Daniel Walker	Volume 1	6 Natural Character	Issue 6A	Reject
678	9	David Horton	Volume 1	6 Natural Character	Issue 6A	Reject
680	9	Delwynne Horton	Volume 1	6 Natural Character	Issue 6A	Reject
694	9	Elin Shin	Volume 1	6 Natural Character	Issue 6A	Reject
694	10	Elin Shin	Volume 1	6 Natural Character	Issue 6A	Reject
703	9	Faye Fosbender	Volume 1	6 Natural Character	Issue 6A	Reject
704	9	Febe Jones	Volume 1	6 Natural Character	Issue 6A	Reject
705	9	Fay Mathews	Volume 1	6 Natural Character	Issue 6A	Reject
708	9	Filisita Tuese	Volume 1	6 Natural Character	Issue 6A	Reject
709	9	Ian Dunlop	Volume 1	6 Natural Character	Issue 6A	Reject
715	121	Royal Forest and Bird Protection Society NZ (Forest and Bird)	Volume 1	6 Natural Character	Issue 6A	Accept
716	56	Friends of Nelson Haven and Tasman Bay Incorporated	Volume 1	6 Natural Character	Issue 6A	Reject
721	9	Grant Boyd	Volume 1	6 Natural Character	Issue 6A	Reject
722	9	Gaik Choo Tan	Volume 1	6 Natural Character	Issue 6A	Reject
729	9	Graham Hayter	Volume 1	6 Natural Character	Issue 6A	Reject
731	9	Grace Jones	Volume 1	6 Natural Character	Issue 6A	Reject
734	9	Gail Learmonth	Volume 1	6 Natural Character	Issue 6A	Reject
737	9	Gareth McIlroy	Volume 1	6 Natural Character	Issue 6A	Reject
741	9	Glen Slipper	Volume 1	6 Natural Character	Issue 6A	Reject
745	9	Graeme Tregidga	Volume 1	6 Natural Character	Issue 6A	Reject
753	9	Hope Lagden	Volume 1	6 Natural Character	Issue 6A	Reject
756	9	Hye Sug Ha	Volume 1	6 Natural Character	Issue 6A	Reject
758	9	Holly Stanford	Volume 1	6 Natural Character	Issue 6A	Reject
759	9	Hudson Steele	Volume 1	6 Natural Character	Issue 6A	Reject
760	9	Hui Ting Ng	Volume 1	6 Natural Character	Issue 6A	Reject

761	9	Hilda Timoti	Volume 1	6 Natural Character	Issue 6A	Reject
773	9	Iosua Kaisara	Volume 1	6 Natural Character	Issue 6A	Reject
781	9	Johann Adam	Volume 1	6 Natural Character	Issue 6A	Reject
784	9	Jackie Biggs	Volume 1	6 Natural Character	Issue 6A	Reject
787	9	Jo Braven	Volume 1	6 Natural Character	Issue 6A	Reject
793	9	John Cleal	Volume 1	6 Natural Character	Issue 6A	Reject
796	9	John Craddock	Volume 1	6 Natural Character	Issue 6A	Reject
799	9	June Ethel Epere	Volume 1	6 Natural Character	Issue 6A	Reject
803	9	John Healy	Volume 1	6 Natural Character	Issue 6A	Reject
804	9	Jordan Herbert	Volume 1	6 Natural Character	Issue 6A	Reject
805	9	James Higgin	Volume 1	6 Natural Character	Issue 6A	Reject
807	9	Jeremy Hunter	Volume 1	6 Natural Character	Issue 6A	Reject
812	9	Jungmin Ko	Volume 1	6 Natural Character	Issue 6A	Reject
814	9	Jeong Lye Jeon	Volume 1	6 Natural Character	Issue 6A	Reject
817	9	Jemma McCowan	Volume 1	6 Natural Character	Issue 6A	Reject
825	9	Jo-Ann Rickard	Volume 1	6 Natural Character	Issue 6A	Reject
826	9	Jade Riri	Volume 1	6 Natural Character	Issue 6A	Reject
829	9	Jason Smith	Volume 1	6 Natural Character	Issue 6A	Reject
831	9	Jim Taylor	Volume 1	6 Natural Character	Issue 6A	Reject
834	9	Jarod Udy	Volume 1	6 Natural Character	Issue 6A	Reject
836	9	James William Epere	Volume 1	6 Natural Character	Issue 6A	Reject
851	9	Kevin Hawkins	Volume 1	6 Natural Character	Issue 6A	Reject
856	9	Karen Mant	Volume 1	6 Natural Character	Issue 6A	Reject
857	9	Kowhai Millan	Volume 1	6 Natural Character	Issue 6A	Reject
863	9	Karen Soloman	Volume 1	6 Natural Character	Issue 6A	Reject
877	9	Lynette Ashby	Volume 1	6 Natural Character	Issue 6A	Reject
878	9	Lyndon Daymond	Volume 1	6 Natural Character	Issue 6A	Reject
881	9	Laisa Gibbins	Volume 1	6 Natural Character	Issue 6A	Reject
884	9	Laura Jillian Moleta-Bentham	Volume 1	6 Natural Character	Issue 6A	Reject
885	9	Les McClung	Volume 1	6 Natural Character	Issue 6A	Reject
886	9	Linda McGee	Volume 1	6 Natural Character	Issue 6A	Reject
887	9	Lauren Mitchell	Volume 1	6 Natural Character	Issue 6A	Reject

888	9	Pang Lily	Volume 1	6 Natural Character	Issue 6A	Reject
889	9	Lavina Rickard	Volume 1	6 Natural Character	Issue 6A	Reject
892	9	Lynda Simpson	Volume 1	6 Natural Character	Issue 6A	Reject
901	9	Lo Wai Wing	Volume 1	6 Natural Character	Issue 6A	Reject
902	9	Lewis Ward	Volume 1	6 Natural Character	Issue 6A	Reject
912	9	Myken Augustine	Volume 1	6 Natural Character	Issue 6A	Reject
914	9	Michael Burne	Volume 1	6 Natural Character	Issue 6A	Reject
918	9	Maree Cleal	Volume 1	6 Natural Character	Issue 6A	Reject
926	9	Wainui Green 2015 Limited	Volume 1	6 Natural Character	Issue 6A	Reject
927	9	Mark Gillard	Volume 1	6 Natural Character	Issue 6A	Reject
929	9	Mandy Hargood	Volume 1	6 Natural Character	Issue 6A	Reject
941	9	Marion Marfell	Volume 1	6 Natural Character	Issue 6A	Reject
942	9	Marie Mitchell	Volume 1	6 Natural Character	Issue 6A	Reject
943	9	Martina Naplawa	Volume 1	6 Natural Character	Issue 6A	Reject
948	9	Melissa Smith	Volume 1	6 Natural Character	Issue 6A	Reject
951	9	Michael Wallace	Volume 1	6 Natural Character	Issue 6A	Reject
953	9	Mark Whittall	Volume 1	6 Natural Character	Issue 6A	Reject
955	9	Moira Winter	Volume 1	6 Natural Character	Issue 6A	Reject
982	9	Nathan Grey	Volume 1	6 Natural Character	Issue 6A	Reject
985	9	Niki McCulloch	Volume 1	6 Natural Character	Issue 6A	Reject
988	9	Nathan Wallace	Volume 1	6 Natural Character	Issue 6A	Reject
989	9	Natasha Watts	Volume 1	6 Natural Character	Issue 6A	Reject
1008	9	Philip Anthony Hawke	Volume 1	6 Natural Character	Issue 6A	Reject
1026	9	Patricia Riri	Volume 1	6 Natural Character	Issue 6A	Reject
1029	9	Peter Shirley	Volume 1	6 Natural Character	Issue 6A	Reject
1031	9	Peter Snape	Volume 1	6 Natural Character	Issue 6A	Reject
1053	9	Roger Bee	Volume 1	6 Natural Character	Issue 6A	Reject
1055	9	Rory Bryant	Volume 1	6 Natural Character	Issue 6A	Reject
1057	9	Roger Dippie	Volume 1	6 Natural Character	Issue 6A	Reject
1063	9	Riley George Barnes MacPherson	Volume 1	6 Natural Character	Issue 6A	Reject
1067	9	Renee Heta	Volume 1	6 Natural Character	Issue 6A	Reject
1072	9	Rob MacGibbon	Volume 1	6 Natural Character	Issue 6A	Reject

1073	9	Robert Murdoch	Volume 1	6 Natural Character	Issue 6A	Reject
1077	6	Rodney Roberts	Volume 1	6 Natural Character	Issue 6A	Reject
1079	9	Rachel Stanford	Volume 1	6 Natural Character	Issue 6A	Reject
1080	9	Rata Steele	Volume 1	6 Natural Character	Issue 6A	Reject
1097	9	Sonya Ferguson	Volume 1	6 Natural Character	Issue 6A	Reject
1103	9	Stuart Barnes	Volume 1	6 Natural Character	Issue 6A	Reject
1108	9	Shane Bray	Volume 1	6 Natural Character	Issue 6A	Reject
1112	3	Sarah Cumming	Volume 1	6 Natural Character	Issue 6A	Reject
1113	9	Sivanathan Devaraj	Volume 1	6 Natural Character	Issue 6A	Reject
1115	9	Steve Dyer	Volume 1	6 Natural Character	Issue 6A	Reject
1116	9	Stuart Edward Borrie	Volume 1	6 Natural Character	Issue 6A	Reject
1119	9	Sharon Hill	Volume 1	6 Natural Character	Issue 6A	Reject
1120	9	Stewart Holdem	Volume 1	6 Natural Character	Issue 6A	Reject
1122	9	Steven John Bickley	Volume 1	6 Natural Character	Issue 6A	Reject
1127	9	Soon Ng	Volume 1	6 Natural Character	Issue 6A	Reject
1128	9	Sam Oliver	Volume 1	6 Natural Character	Issue 6A	Reject
1130	9	Sook Peng Lim	Volume 1	6 Natural Character	Issue 6A	Reject
1131	9	Susana Pereyra	Volume 1	6 Natural Character	Issue 6A	Reject
1138	9	Shane Turnbull	Volume 1	6 Natural Character	Issue 6A	Reject
1139	9	Sarah Williams	Volume 1	6 Natural Character	Issue 6A	Reject
1140	10	Sanford Limited	Volume 1	6 Natural Character	Issue 6A	Accept
1144	9	Scott Foster	Volume 1	6 Natural Character	Issue 6A	Reject
1168	9	Tony Jones	Volume 1	6 Natural Character	Issue 6A	Reject
1170	9	Tama Lindsay	Volume 1	6 Natural Character	Issue 6A	Reject
1172	9	Tyler Materoa	Volume 1	6 Natural Character	Issue 6A	Reject
1175	9	Tracy O'Grady	Volume 1	6 Natural Character	Issue 6A	Reject
1177	9	Thien Soong Wong	Volume 1	6 Natural Character	Issue 6A	Reject
1178	9	Teresa Shaw	Volume 1	6 Natural Character	Issue 6A	Reject
1181	9	Tiare Tautari	Volume 1	6 Natural Character	Issue 6A	Reject
1211	9	Vaughan Hall	Volume 1	6 Natural Character	Issue 6A	Reject
1221	9	Wayne de Joux	Volume 1	6 Natural Character	Issue 6A	Reject
1224	9	P Wood	Volume 1	6 Natural Character	Issue 6A	Reject

1225	9	Wayne Hollis	Volume 1	6 Natural Character	Issue 6A	Reject
1226	9	William Kingi	Volume 1	6 Natural Character	Issue 6A	Reject
1227	9	Warwick Neame	Volume 1	6 Natural Character	Issue 6A	Reject
1241	9	Yong Hee Son	Volume 1	6 Natural Character	Issue 6A	Reject
1243	9	Zane Charman	Volume 1	6 Natural Character	Issue 6A	Reject
1247	9	Robert Walker	Volume 1	6 Natural Character	Issue 6A	Reject
1252	9	Frank Prendeville	Volume 1	6 Natural Character	Issue 6A	Reject
152	20	Clova Bay Residents Association Inc	Volume 1	6 Natural Character	Objective 6.1	Reject
233	16	Totaranui Limited	Volume 1	6 Natural Character	Objective 6.1	Reject
233	17	Totaranui Limited	Volume 1	6 Natural Character	Objective 6.1	Reject
243	2	Marguerete Osborne	Volume 1	6 Natural Character	Objective 6.1	Reject
401	45	Aquaculture New Zealand	Volume 1	6 Natural Character	Objective 6.1	Reject
401	50	Aquaculture New Zealand	Volume 1	6 Natural Character	Objective 6.1	Reject
425	80	Federated Farmers of New Zealand	Volume 1	6 Natural Character	Objective 6.1	Accept
426	45	Marine Farming Association Incorporated	Volume 1	6 Natural Character	Objective 6.1	Reject
477	9	John Malcolm McKee	Volume 1	6 Natural Character	Objective 6.1	Reject
479	51	Department of Conservation	Volume 1	6 Natural Character	Objective 6.1	Accept
504	18	Queen Charlotte Sound Residents Association	Volume 1	6 Natural Character	Objective 6.1	Accept
509	106	Nelson Marlborough Fish and Game	Volume 1	6 Natural Character	Objective 6.1	Reject
510	10	Anne Allison	Volume 1	6 Natural Character	Objective 6.1	Reject
535	10	Adele Riddle	Volume 1	6 Natural Character	Objective 6.1	Reject
538	10	Andre Smith	Volume 1	6 Natural Character	Objective 6.1	Reject
539	10	Allen Steele	Volume 1	6 Natural Character	Objective 6.1	Reject
540	10	Arthur Stewart	Volume 1	6 Natural Character	Objective 6.1	Reject
541	10	Akiwa Te Uatuku	Volume 1	6 Natural Character	Objective 6.1	Reject
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549	10	Bryan Albrey	Volume 1	6 Natural Character	Objective 6.1	Reject
551	10	Ben Armstrong	Volume 1	6 Natural Character	Objective 6.1	Reject
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560	10	Brian Lee	Volume 1	6 Natural Character	Objective 6.1	Reject
562	10	Brendon Lucas	Volume 1	6 Natural Character	Objective 6.1	Reject

564	10	Belinda Materoa	Volume 1	6 Natural Character	Objective 6.1	Reject
565	10	Brent Mathews	Volume 1	6 Natural Character	Objective 6.1	Reject
576	10	Chee Ong Chin	Volume 1	6 Natural Character	Objective 6.1	Reject
582	10	Cory Burnett	Volume 1	6 Natural Character	Objective 6.1	Reject
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584	10	Corey Dixon	Volume 1	6 Natural Character	Objective 6.1	Reject
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593	10	Chang-Seog Jeon	Volume 1	6 Natural Character	Objective 6.1	Reject
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600	10	Connor Rangi	Volume 1	6 Natural Character	Objective 6.1	Reject
603	10	Chee Song Chin	Volume 1	6 Natural Character	Objective 6.1	Reject
606	10	Cindy Steele	Volume 1	6 Natural Character	Objective 6.1	Reject
607	10	Cadeena Tepu	Volume 1	6 Natural Character	Objective 6.1	Reject
611	10	Carla Velez	Volume 1	6 Natural Character	Objective 6.1	Reject
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621	10	Becki Findlayson	Volume 1	6 Natural Character	Objective 6.1	Reject
624	10	Carol-Ann Herbert	Volume 1	6 Natural Character	Objective 6.1	Reject
625	10	Cheryl Harris	Volume 1	6 Natural Character	Objective 6.1	Reject
627	10	Carl Scholefield	Volume 1	6 Natural Character	Objective 6.1	Reject
628	10	Clinton Nott	Volume 1	6 Natural Character	Objective 6.1	Reject
641	9	Dan McCall	Volume 1	6 Natural Character	Objective 6.1	Reject
649	10	Dave Herbert	Volume 1	6 Natural Character	Objective 6.1	Reject
654	10	David Jones	Volume 1	6 Natural Character	Objective 6.1	Reject
656	10	David King	Volume 1	6 Natural Character	Objective 6.1	Reject
658	10	Dan Lawrence	Volume 1	6 Natural Character	Objective 6.1	Reject
659	10	Donald M Curie	Volume 1	6 Natural Character	Objective 6.1	Reject
660	10	Daniel Manson	Volume 1	6 Natural Character	Objective 6.1	Reject
661	10	Denis Marfell	Volume 1	6 Natural Character	Objective 6.1	Reject
663	10	Dion McCauley	Volume 1	6 Natural Character	Objective 6.1	Reject
664	10	Dellae McKenzie	Volume 1	6 Natural Character	Objective 6.1	Reject

665	10	Dorothy McManaway	Volume 1	6 Natural Character	Objective 6.1	Reject
667	10	Daniel Paget	Volume 1	6 Natural Character	Objective 6.1	Reject
677	10	Daniel Walker	Volume 1	6 Natural Character	Objective 6.1	Reject
678	10	David Horton	Volume 1	6 Natural Character	Objective 6.1	Reject
688	37	Judy and John Hellstrom	Volume 1	6 Natural Character	Objective 6.1	Accept
698	38	Environmental Defence Society Incorporated	Volume 1	6 Natural Character	Objective 6.1	Reject
703	10	Faye Fosbender	Volume 1	6 Natural Character	Objective 6.1	Reject
704	10	Febe Jones	Volume 1	6 Natural Character	Objective 6.1	Reject
705	10	Fay Mathews	Volume 1	6 Natural Character	Objective 6.1	Reject
708	10	Filisita Tuese	Volume 1	6 Natural Character	Objective 6.1	Reject
709	10	Ian Dunlop	Volume 1	6 Natural Character	Objective 6.1	Reject
715	122	Royal Forest and Bird Protection Society NZ (Forest and Bird)	Volume 1	6 Natural Character	Objective 6.1	Reject
716	57	Friends of Nelson Haven and Tasman Bay Incorporated	Volume 1	6 Natural Character	Objective 6.1	Reject
721	10	Grant Boyd	Volume 1	6 Natural Character	Objective 6.1	Reject
722	10	Gaik Choo Tan	Volume 1	6 Natural Character	Objective 6.1	Reject
729	10	Graham Hayter	Volume 1	6 Natural Character	Objective 6.1	Reject
731	10	Grace Jones	Volume 1	6 Natural Character	Objective 6.1	Reject
734	10	Gail Learmonth	Volume 1	6 Natural Character	Objective 6.1	Reject
737	10	Gareth McIlroy	Volume 1	6 Natural Character	Objective 6.1	Reject
741	10	Glen Slipper	Volume 1	6 Natural Character	Objective 6.1	Reject
745	10	Graeme Tregidga	Volume 1	6 Natural Character	Objective 6.1	Reject
753	10	Hope Lagden	Volume 1	6 Natural Character	Objective 6.1	Reject
756	10	Hye Sug Ha	Volume 1	6 Natural Character	Objective 6.1	Reject
758	10	Holly Stanford	Volume 1	6 Natural Character	Objective 6.1	Reject
759	10	Hudson Steele	Volume 1	6 Natural Character	Objective 6.1	Reject
760	10	Hui Ting Ng	Volume 1	6 Natural Character	Objective 6.1	Reject
761	10	Hilda Timoti	Volume 1	6 Natural Character	Objective 6.1	Reject
773	10	Iosua Kaisara	Volume 1	6 Natural Character	Objective 6.1	Reject
781	10	Johann Adam	Volume 1	6 Natural Character	Objective 6.1	Reject
784	10	Jackie Biggs	Volume 1	6 Natural Character	Objective 6.1	Reject
787	10	Jo Braven	Volume 1	6 Natural Character	Objective 6.1	Reject

793	10	John Cleal	Volume 1	6 Natural Character	Objective 6.1	Reject
796	10	John Craddock	Volume 1	6 Natural Character	Objective 6.1	Reject
799	10	June Ethel Epere	Volume 1	6 Natural Character	Objective 6.1	Reject
803	10	John Healy	Volume 1	6 Natural Character	Objective 6.1	Reject
804	10	Jordan Herbert	Volume 1	6 Natural Character	Objective 6.1	Reject
805	10	James Higgin	Volume 1	6 Natural Character	Objective 6.1	Reject
807	10	Jeremy Hunter	Volume 1	6 Natural Character	Objective 6.1	Reject
812	10	Jungmin Ko	Volume 1	6 Natural Character	Objective 6.1	Reject
814	10	Jeong Lye Jeon	Volume 1	6 Natural Character	Objective 6.1	Reject
817	10	Jemma McCowan	Volume 1	6 Natural Character	Objective 6.1	Reject
825	10	Jo-Ann Rickard	Volume 1	6 Natural Character	Objective 6.1	Reject
826	10	Jade Riri	Volume 1	6 Natural Character	Objective 6.1	Reject
829	10	Jason Smith	Volume 1	6 Natural Character	Objective 6.1	Reject
831	10	Jim Taylor	Volume 1	6 Natural Character	Objective 6.1	Reject
834	10	Jarod Udy	Volume 1	6 Natural Character	Objective 6.1	Reject
836	10	James William Epere	Volume 1	6 Natural Character	Objective 6.1	Reject
851	10	Kevin Hawkins	Volume 1	6 Natural Character	Objective 6.1	Reject
856	10	Karen Mant	Volume 1	6 Natural Character	Objective 6.1	Reject
857	10	Kowhai Millan	Volume 1	6 Natural Character	Objective 6.1	Reject
863	10	Karen Soloman	Volume 1	6 Natural Character	Objective 6.1	Reject
873	13	KiwiRail Holdings Limited	Volume 1	6 Natural Character	Objective 6.1	Accept
877	10	Lynette Ashby	Volume 1	6 Natural Character	Objective 6.1	Reject
878	10	Lyndon Daymond	Volume 1	6 Natural Character	Objective 6.1	Reject
881	10	Laisa Gibbins	Volume 1	6 Natural Character	Objective 6.1	Reject
884	10	Laura Jillian Moleta-Bentham	Volume 1	6 Natural Character	Objective 6.1	Reject
885	10	Les McClung	Volume 1	6 Natural Character	Objective 6.1	Reject
886	10	Linda McGee	Volume 1	6 Natural Character	Objective 6.1	Reject
887	10	Lauren Mitchell	Volume 1	6 Natural Character	Objective 6.1	Reject
888	10	Pang Lily	Volume 1	6 Natural Character	Objective 6.1	Reject
889	10	Lavina Rickard	Volume 1	6 Natural Character	Objective 6.1	Reject
892	10	Lynda Simpson	Volume 1	6 Natural Character	Objective 6.1	Reject
901	10	Lo Wai Wing	Volume 1	6 Natural Character	Objective 6.1	Reject

902	10	Lewis Ward	Volume 1	6 Natural Character	Objective 6.1	Reject
912	10	Myken Augustine	Volume 1	6 Natural Character	Objective 6.1	Reject
914	10	Michael Burne	Volume 1	6 Natural Character	Objective 6.1	Reject
918	10	Maree Cleal	Volume 1	6 Natural Character	Objective 6.1	Reject
926	10	Wainui Green 2015 Limited	Volume 1	6 Natural Character	Objective 6.1	Reject
927	10	Mark Gillard	Volume 1	6 Natural Character	Objective 6.1	Reject
929	10	Mandy Hargood	Volume 1	6 Natural Character	Objective 6.1	Reject
941	10	Marion Marfell	Volume 1	6 Natural Character	Objective 6.1	Reject
942	10	Marie Mitchell	Volume 1	6 Natural Character	Objective 6.1	Reject
943	10	Martina Naplawa	Volume 1	6 Natural Character	Objective 6.1	Reject
948	10	Melissa Smith	Volume 1	6 Natural Character	Objective 6.1	Reject
951	10	Michael Wallace	Volume 1	6 Natural Character	Objective 6.1	Reject
953	10	Mark Whittall	Volume 1	6 Natural Character	Objective 6.1	Reject
955	10	Moira Winter	Volume 1	6 Natural Character	Objective 6.1	Reject
962	40	Marlborough Forest Industry Association Incorporated	Volume 1	6 Natural Character	Objective 6.1	Reject
976	9	Norazizah Abu Yazid	Volume 1	6 Natural Character	Objective 6.1	Reject
976	10	Norazizah Abu Yazid	Volume 1	6 Natural Character	Objective 6.1	Reject
982	10	Nathan Grey	Volume 1	6 Natural Character	Objective 6.1	Reject
985	10	Niki McCulloch	Volume 1	6 Natural Character	Objective 6.1	Reject
988	10	Nathan Wallace	Volume 1	6 Natural Character	Objective 6.1	Reject
989	10	Natasha Watts	Volume 1	6 Natural Character	Objective 6.1	Reject
990	175	Nelson Forests Limited	Volume 1	6 Natural Character	Objective 6.1	Reject
1008	10	Philip Anthony Hawke	Volume 1	6 Natural Character	Objective 6.1	Reject
1026	10	Patricia Riri	Volume 1	6 Natural Character	Objective 6.1	Reject
1029	10	Peter Shirley	Volume 1	6 Natural Character	Objective 6.1	Reject
1031	10	Peter Snape	Volume 1	6 Natural Character	Objective 6.1	Reject
1053	10	Roger Bee	Volume 1	6 Natural Character	Objective 6.1	Reject
1055	10	Rory Bryant	Volume 1	6 Natural Character	Objective 6.1	Reject
1057	10	Roger Dippie	Volume 1	6 Natural Character	Objective 6.1	Reject
1063	10	Riley George Barnes MacPherson	Volume 1	6 Natural Character	Objective 6.1	Reject
1067	10	Renee Heta	Volume 1	6 Natural Character	Objective 6.1	Reject
1072	10	Rob MacGibbon	Volume 1	6 Natural Character	Objective 6.1	Reject

1073	10	Robert Murdoch	Volume 1	6 Natural Character	Objective 6.1	Reject
1077	7	Rodney Roberts	Volume 1	6 Natural Character	Objective 6.1	Reject
1079	10	Rachel Stanford	Volume 1	6 Natural Character	Objective 6.1	Reject
1080	10	Rata Steele	Volume 1	6 Natural Character	Objective 6.1	Reject
1097	10	Sonya Ferguson	Volume 1	6 Natural Character	Objective 6.1	Reject
1103	10	Stuart Barnes	Volume 1	6 Natural Character	Objective 6.1	Reject
1108	10	Shane Bray	Volume 1	6 Natural Character	Objective 6.1	Reject
1112	2	Sarah Cumming	Volume 1	6 Natural Character	Objective 6.1	Reject
1113	10	Sivanathan Devaraj	Volume 1	6 Natural Character	Objective 6.1	Reject
1115	10	Steve Dyer	Volume 1	6 Natural Character	Objective 6.1	Reject
1116	10	Stuart Edward Borrie	Volume 1	6 Natural Character	Objective 6.1	Reject
1119	10	Sharon Hill	Volume 1	6 Natural Character	Objective 6.1	Reject
1120	10	Stewart Holdem	Volume 1	6 Natural Character	Objective 6.1	Reject
1122	10	Steven John Bickley	Volume 1	6 Natural Character	Objective 6.1	Reject
1127	10	Soon Ng	Volume 1	6 Natural Character	Objective 6.1	Reject
1128	10	Sam Oliver	Volume 1	6 Natural Character	Objective 6.1	Reject
1130	10	Sook Peng Lim	Volume 1	6 Natural Character	Objective 6.1	Reject
1131	10	Susana Pereyra	Volume 1	6 Natural Character	Objective 6.1	Reject
1138	10	Shane Turnbull	Volume 1	6 Natural Character	Objective 6.1	Reject
1139	10	Sarah Williams	Volume 1	6 Natural Character	Objective 6.1	Reject
1140	11	Sanford Limited	Volume 1	6 Natural Character	Objective 6.1	Reject
1168	10	Tony Jones	Volume 1	6 Natural Character	Objective 6.1	Reject
1170	10	Tama Lindsay	Volume 1	6 Natural Character	Objective 6.1	Reject
1172	10	Tyler Materoa	Volume 1	6 Natural Character	Objective 6.1	Reject
1175	10	Tracy O'Grady	Volume 1	6 Natural Character	Objective 6.1	Reject
1177	10	Thien Soong Wong	Volume 1	6 Natural Character	Objective 6.1	Reject
1178	10	Teresa Shaw	Volume 1	6 Natural Character	Objective 6.1	Reject
1181	10	Tiare Tautari	Volume 1	6 Natural Character	Objective 6.1	Reject
1201	63	Trustpower Limited	Volume 1	6 Natural Character	Objective 6.1	Accept
1211	10	Vaughan Hall	Volume 1	6 Natural Character	Objective 6.1	Reject
1221	10	Wayne de Joux	Volume 1	6 Natural Character	Objective 6.1	Reject
1224	10	P Wood	Volume 1	6 Natural Character	Objective 6.1	Reject

1225	10	Wayne Hollis	Volume 1	6 Natural Character	Objective 6.1	Reject
1226	10	William Kingi	Volume 1	6 Natural Character	Objective 6.1	Reject
1227	10	Warwick Neame	Volume 1	6 Natural Character	Objective 6.1	Reject
1241	10	Yong Hee Son	Volume 1	6 Natural Character	Objective 6.1	Reject
1243	10	Zane Charman	Volume 1	6 Natural Character	Objective 6.1	Reject
1247	10	Robert Walker	Volume 1	6 Natural Character	Objective 6.1	Reject
1252	10	Frank Prendeville	Volume 1	6 Natural Character	Objective 6.1	Reject
401	46	Aquaculture New Zealand	Volume 1	6 Natural Character	Policy 6.1.1	Accept
425	81	Federated Farmers of New Zealand	Volume 1	6 Natural Character	Policy 6.1.1	Reject
426	46	Marine Farming Association Incorporated	Volume 1	6 Natural Character	Policy 6.1.1	Accept
479	52	Department of Conservation	Volume 1	6 Natural Character	Policy 6.1.1	Reject
509	107	Nelson Marlborough Fish and Game	Volume 1	6 Natural Character	Policy 6.1.1	Reject
648	13	D C Hemphill	Volume 1	6 Natural Character	Policy 6.1.1	Reject
698	39	Environmental Defence Society Incorporated	Volume 1	6 Natural Character	Policy 6.1.1	Accept in part
715	123	Royal Forest and Bird Protection Society NZ (Forest and Bird)	Volume 1	6 Natural Character	Policy 6.1.1	Reject
716	58	Friends of Nelson Haven and Tasman Bay Incorporated	Volume 1	6 Natural Character	Policy 6.1.1	Accept
1140	13	Sanford Limited	Volume 1	6 Natural Character	Policy 6.1.1	Reject
1186	51	Te Atiawa o Te Waka-a-Maui	Volume 1	6 Natural Character	Policy 6.1.1	Reject
1201	64	Trustpower Limited	Volume 1	6 Natural Character	Policy 6.1.1	Reject
100	16	East Bay Conservation Society	Volume 1	6 Natural Character	Policy 6.1.2	Reject
425	82	Federated Farmers of New Zealand	Volume 1	6 Natural Character	Policy 6.1.2	Reject
426	47	Marine Farming Association Incorporated	Volume 1	6 Natural Character	Policy 6.1.2	Reject
479	53	Department of Conservation	Volume 1	6 Natural Character	Policy 6.1.2	Accept
715	124	Royal Forest and Bird Protection Society NZ (Forest and Bird)	Volume 1	6 Natural Character	Policy 6.1.2	Accept
716	59	Friends of Nelson Haven and Tasman Bay Incorporated	Volume 1	6 Natural Character	Policy 6.1.2	Reject
962	41	Marlborough Forest Industry Association Incorporated	Volume 1	6 Natural Character	Policy 6.1.2	Reject
990	176	Nelson Forests Limited	Volume 1	6 Natural Character	Policy 6.1.2	Reject
401	48	Aquaculture New Zealand	Volume 1	6 Natural Character	Policy 6.1.3	Accept in part
426	48	Marine Farming Association Incorporated	Volume 1	6 Natural Character	Policy 6.1.3	Accept in part
479	54	Department of Conservation	Volume 1	6 Natural Character	Policy 6.1.3	Reject
698	40	Environmental Defence Society Incorporated	Volume 1	6 Natural Character	Policy 6.1.3	Accept in part

715	125	Royal Forest and Bird Protection Society NZ (Forest and Bird)	Volume 1	6 Natural Character	Policy 6.1.3	Reject
716	60	Friends of Nelson Haven and Tasman Bay Incorporated	Volume 1	6 Natural Character	Policy 6.1.3	Accept in part
962	42	Marlborough Forest Industry Association Incorporated	Volume 1	6 Natural Character	Policy 6.1.3	Reject
990	177	Nelson Forests Limited	Volume 1	6 Natural Character	Policy 6.1.3	Reject
1140	14	Sanford Limited	Volume 1	6 Natural Character	Policy 6.1.3	Reject
152	1	Clova Bay Residents Association Inc	Volume 1	6 Natural Character	Policy 6.1.4	Reject
401	49	Aquaculture New Zealand	Volume 1	6 Natural Character	Policy 6.1.4	Reject
424	14	Michael and Kristen Gerard	Volume 1	6 Natural Character	Policy 6.1.4	Reject
426	49	Marine Farming Association Incorporated	Volume 1	6 Natural Character	Policy 6.1.4	Reject
426	50	Marine Farming Association Incorporated	Volume 1	6 Natural Character	Policy 6.1.4	Reject
479	55	Department of Conservation	Volume 1	6 Natural Character	Policy 6.1.4	Reject
648	14	D C Hemphill	Volume 1	6 Natural Character	Policy 6.1.4	Reject
688	38	Judy and John Hellstrom	Volume 1	6 Natural Character	Policy 6.1.4	Reject
698	41	Environmental Defence Society Incorporated	Volume 1	6 Natural Character	Policy 6.1.4	Accept
712	101	Flaxbourne Settlers Association	Volume 1	6 Natural Character	Policy 6.1.4	Reject
715	126	Royal Forest and Bird Protection Society NZ (Forest and Bird)	Volume 1	6 Natural Character	Policy 6.1.4	Reject
716	61	Friends of Nelson Haven and Tasman Bay Incorporated	Volume 1	6 Natural Character	Policy 6.1.4	Reject
868	3	Kenepuru and Central Sounds Residents Association Incorporated	Volume 1	6 Natural Character	Policy 6.1.4	Reject
1140	15	Sanford Limited	Volume 1	6 Natural Character	Policy 6.1.4	Reject
356	7	Coatbridge Limited	Volume 1	6 Natural Character	Policy 6.1.5	Reject
425	83	Federated Farmers of New Zealand	Volume 1	6 Natural Character	Policy 6.1.5	Reject
479	56	Department of Conservation	Volume 1	6 Natural Character	Policy 6.1.5	Reject
501	22	Te Runanga O Ngati Kuia	Volume 1	6 Natural Character	Policy 6.1.5	Reject
504	19	Queen Charlotte Sound Residents Association	Volume 1	6 Natural Character	Policy 6.1.5	Reject
509	108	Nelson Marlborough Fish and Game	Volume 1	6 Natural Character	Policy 6.1.5	Reject
688	55	Judy and John Hellstrom	Volume 1	6 Natural Character	Policy 6.1.5	Reject
698	42	Environmental Defence Society Incorporated	Volume 1	6 Natural Character	Policy 6.1.5	Accept in part
715	128	Royal Forest and Bird Protection Society NZ (Forest and Bird)	Volume 1	6 Natural Character	Policy 6.1.5	Accept in part
873	14	KiwiRail Holdings Limited	Volume 1	6 Natural Character	Policy 6.1.5	Reject

962	43	Marlborough Forest Industry Association Incorporated	Volume 1	6 Natural Character	Policy 6.1.5	Accept
990	178	Nelson Forests Limited	Volume 1	6 Natural Character	Policy 6.1.5	Accept in part
1201	57	Trustpower Limited	Volume 1	6 Natural Character	Policy 6.1.5	Reject
348	2	Murray Chapman	Volume 1	6 Natural Character	Policy 6.1.6	Reject
356	6	Coatbridge Limited	Volume 1	6 Natural Character	Policy 6.1.6	Reject
425	84	Federated Farmers of New Zealand	Volume 1	6 Natural Character	Policy 6.1.6	Reject
479	57	Department of Conservation	Volume 1	6 Natural Character	Policy 6.1.6	Reject
496	1	Royal Forest and Bird Protection Society NZ {Forest & Bird)	Volume 1	6 Natural Character	Policy 6.1.6	Reject
509	109	Nelson Marlborough Fish and Game	Volume 1	6 Natural Character	Policy 6.1.6	Reject
698	43	Environmental Defence Society Incorporated	Volume 1	6 Natural Character	Policy 6.1.6	Accept
715	129	Royal Forest and Bird Protection Society NZ (Forest and Bird)	Volume 1	6 Natural Character	Policy 6.1.6	Reject
716	62	Friends of Nelson Haven and Tasman Bay Incorporated	Volume 1	6 Natural Character	Policy 6.1.6	Reject
961	10	Marlborough Chamber of Commerce	Volume 1	6 Natural Character	Policy 6.1.6	Reject
1201	58	Trustpower Limited	Volume 1	6 Natural Character	Policy 6.1.6	Reject
425	85	Federated Farmers of New Zealand	Volume 1	6 Natural Character	Objective 6.2	Reject
425	94	Federated Farmers of New Zealand	Volume 1	6 Natural Character	Objective 6.2	Reject
433	15	Port Marlborough New Zealand Limited	Volume 1	6 Natural Character	Objective 6.2	Reject
479	58	Department of Conservation	Volume 1	6 Natural Character	Objective 6.2	Reject
509	110	Nelson Marlborough Fish and Game	Volume 1	6 Natural Character	Objective 6.2	Reject
648	15	D C Hemphill	Volume 1	6 Natural Character	Objective 6.2	Reject
715	130	Royal Forest and Bird Protection Society NZ (Forest and Bird)	Volume 1	6 Natural Character	Objective 6.2	Reject
716	63	Friends of Nelson Haven and Tasman Bay Incorporated	Volume 1	6 Natural Character	Objective 6.2	Reject
961	13	Marlborough Chamber of Commerce	Volume 1	6 Natural Character	Objective 6.2	Reject
961	14	Marlborough Chamber of Commerce	Volume 1	6 Natural Character	Objective 6.2	Reject
962	44	Marlborough Forest Industry Association Incorporated	Volume 1	6 Natural Character	Objective 6.2	Reject
990	179	Nelson Forests Limited	Volume 1	6 Natural Character	Objective 6.2	Reject
995	12	New Zealand Forest Products Holdings Limited	Volume 1	6 Natural Character	Objective 6.2	Reject
1041	10	Port Clifford Limited	Volume 1	6 Natural Character	Objective 6.2	Reject
1140	16	Sanford Limited	Volume 1	6 Natural Character	Objective 6.2	Accept in part
1201	59	Trustpower Limited	Volume 1	6 Natural Character	Objective 6.2	Accept in part

401	51	Aquaculture New Zealand	Volume 1	6 Natural Character	Policy 6.2.1	Accept in part
425	86	Federated Farmers of New Zealand	Volume 1	6 Natural Character	Policy 6.2.1	Reject
426	51	Marine Farming Association Incorporated	Volume 1	6 Natural Character	Policy 6.2.1	Accept in part
433	16	Port Marlborough New Zealand Limited	Volume 1	6 Natural Character	Policy 6.2.1	Reject
479	59	Department of Conservation	Volume 1	6 Natural Character	Policy 6.2.1	Reject
496	2	Royal Forest and Bird Protection Society NZ {Forest & Bird)	Volume 1	6 Natural Character	Policy 6.2.1	Reject
504	20	Queen Charlotte Sound Residents Association	Volume 1	6 Natural Character	Policy 6.2.1	Reject
509	111	Nelson Marlborough Fish and Game	Volume 1	6 Natural Character	Policy 6.2.1	Reject
688	39	Judy and John Hellstrom	Volume 1	6 Natural Character	Policy 6.2.1	Reject
715	131	Royal Forest and Bird Protection Society NZ (Forest and Bird)	Volume 1	6 Natural Character	Policy 6.2.1	Reject
716	64	Friends of Nelson Haven and Tasman Bay Incorporated	Volume 1	6 Natural Character	Policy 6.2.1	Reject
962	45	Marlborough Forest Industry Association Incorporated	Volume 1	6 Natural Character	Policy 6.2.1	Reject
990	180	Nelson Forests Limited	Volume 1	6 Natural Character	Policy 6.2.1	Reject
1002	22	New Zealand Transport Agency	Volume 1	6 Natural Character	Policy 6.2.1	Reject
1039	75	Pernod Ricard Winemakers New Zealand Limited	Volume 1	6 Natural Character	Policy 6.2.1	Accept in part
1041	11	Port Clifford Limited	Volume 1	6 Natural Character	Policy 6.2.1	Reject
1198	13	Transpower New Zealand Limited	Volume 1	6 Natural Character	Policy 6.2.1	Reject
1201	60	Trustpower Limited	Volume 1	6 Natural Character	Policy 6.2.1	Accept
401	52	Aquaculture New Zealand	Volume 1	6 Natural Character	Policy 6.2.2	Accept in part
425	87	Federated Farmers of New Zealand	Volume 1	6 Natural Character	Policy 6.2.2	Accept in part
426	52	Marine Farming Association Incorporated	Volume 1	6 Natural Character	Policy 6.2.2	Accept in part
433	17	Port Marlborough New Zealand Limited	Volume 1	6 Natural Character	Policy 6.2.2	Reject
479	60	Department of Conservation	Volume 1	6 Natural Character	Policy 6.2.2	Reject
496	3	Royal Forest and Bird Protection Society NZ {Forest & Bird)	Volume 1	6 Natural Character	Policy 6.2.2	Reject
688	40	Judy and John Hellstrom	Volume 1	6 Natural Character	Policy 6.2.2	Reject
715	132	Royal Forest and Bird Protection Society NZ (Forest and Bird)	Volume 1	6 Natural Character	Policy 6.2.2	Reject
716	65	Friends of Nelson Haven and Tasman Bay Incorporated	Volume 1	6 Natural Character	Policy 6.2.2	Accept in part
868	4	Kenepuru and Central Sounds Residents Association Incorporated	Volume 1	6 Natural Character	Policy 6.2.2	Reject
1002	23	New Zealand Transport Agency	Volume 1	6 Natural Character	Policy 6.2.2	Reject

1041	12	Port Clifford Limited	Volume 1	6 Natural Character	Policy 6.2.2	Reject
1198	14	Transpower New Zealand Limited	Volume 1	6 Natural Character	Policy 6.2.2	Reject
152	19	Clova Bay Residents Association Inc	Volume 1	6 Natural Character	Policy 6.2.3	Reject
233	15	Totaranui Limited	Volume 1	6 Natural Character	Policy 6.2.3	Reject
401	53	Aquaculture New Zealand	Volume 1	6 Natural Character	Policy 6.2.3	Reject
401	55	Aquaculture New Zealand	Volume 1	6 Natural Character	Policy 6.2.3	Reject
425	88	Federated Farmers of New Zealand	Volume 1	6 Natural Character	Policy 6.2.3	Reject
426	53	Marine Farming Association Incorporated	Volume 1	6 Natural Character	Policy 6.2.3	Reject
426	54	Marine Farming Association Incorporated	Volume 1	6 Natural Character	Policy 6.2.3	Reject
433	18	Port Marlborough New Zealand Limited	Volume 1	6 Natural Character	Policy 6.2.3	Reject
454	4	Kevin Francis Loe	Volume 1	6 Natural Character	Policy 6.2.3	Reject
479	61	Department of Conservation	Volume 1	6 Natural Character	Policy 6.2.3	Reject
496	4	Royal Forest and Bird Protection Society NZ {Forest & Bird)	Volume 1	6 Natural Character	Policy 6.2.3	Reject
501	23	Te Runanga O Ngati Kuia	Volume 1	6 Natural Character	Policy 6.2.3	Reject
509	112	Nelson Marlborough Fish and Game	Volume 1	6 Natural Character	Policy 6.2.3	Reject
514	28	A J King Family Trust and S A King Family Trust	Volume 1	6 Natural Character	Policy 6.2.3	Reject
648	16	D C Hemphill	Volume 1	6 Natural Character	Policy 6.2.3	Reject
688	41	Judy and John Hellstrom	Volume 1	6 Natural Character	Policy 6.2.3	Reject
712	67	Flaxbourne Settlers Association	Volume 1	6 Natural Character	Policy 6.2.3	Reject
715	133	Royal Forest and Bird Protection Society NZ (Forest and Bird)	Volume 1	6 Natural Character	Policy 6.2.3	Reject
716	66	Friends of Nelson Haven and Tasman Bay Incorporated	Volume 1	6 Natural Character	Policy 6.2.3	Reject
868	5	Kenepuru and Central Sounds Residents Association Incorporated	Volume 1	6 Natural Character	Policy 6.2.3	Reject
962	46	Marlborough Forest Industry Association Incorporated	Volume 1	6 Natural Character	Policy 6.2.3	Reject
990	181	Nelson Forests Limited	Volume 1	6 Natural Character	Policy 6.2.3	Reject
1002	24	New Zealand Transport Agency	Volume 1	6 Natural Character	Policy 6.2.3	Reject
1039	76	Pernod Ricard Winemakers New Zealand Limited	Volume 1	6 Natural Character	Policy 6.2.3	Accept in part
1041	13	Port Clifford Limited	Volume 1	6 Natural Character	Policy 6.2.3	Reject
1201	61	Trustpower Limited	Volume 1	6 Natural Character	Policy 6.2.3	Reject
1251	27	Fonterra Co-operative Group Limited	Volume 1	6 Natural Character	Policy 6.2.3	Reject
401	54	Aquaculture New Zealand	Volume 1	6 Natural Character	Policy 6.2.4	Reject

425	89	Federated Farmers of New Zealand	Volume 1	6 Natural Character	Policy 6.2.4	Reject
426	55	Marine Farming Association Incorporated	Volume 1	6 Natural Character	Policy 6.2.4	Reject
433	19	Port Marlborough New Zealand Limited	Volume 1	6 Natural Character	Policy 6.2.4	Accept
454	5	Kevin Francis Loe	Volume 1	6 Natural Character	Policy 6.2.4	Accept
479	62	Department of Conservation	Volume 1	6 Natural Character	Policy 6.2.4	Accept
496	5	Royal Forest and Bird Protection Society NZ {Forest & Bird)	Volume 1	6 Natural Character	Policy 6.2.4	Reject
509	113	Nelson Marlborough Fish and Game	Volume 1	6 Natural Character	Policy 6.2.4	Reject
648	22	D C Hemphill	Volume 1	6 Natural Character	Policy 6.2.4	Reject
698	44	Environmental Defence Society Incorporated	Volume 1	6 Natural Character	Policy 6.2.4	Reject
712	68	Flaxbourne Settlers Association	Volume 1	6 Natural Character	Policy 6.2.4	Accept
715	134	Royal Forest and Bird Protection Society NZ (Forest and Bird)	Volume 1	6 Natural Character	Policy 6.2.4	Reject
868	7	Kenepuru and Central Sounds Residents Association Incorporated	Volume 1	6 Natural Character	Policy 6.2.4	Reject
962	47	Marlborough Forest Industry Association Incorporated	Volume 1	6 Natural Character	Policy 6.2.4	Reject
990	182	Nelson Forests Limited	Volume 1	6 Natural Character	Policy 6.2.4	Reject
1002	25	New Zealand Transport Agency	Volume 1	6 Natural Character	Policy 6.2.4	Accept
1041	14	Port Clifford Limited	Volume 1	6 Natural Character	Policy 6.2.4	Reject
1244	19	Z Energy Limited	Volume 1	6 Natural Character	Policy 6.2.4	Accept
152	18	Clova Bay Residents Association Inc	Volume 1	6 Natural Character	Policy 6.2.5	Reject
401	56	Aquaculture New Zealand	Volume 1	6 Natural Character	Policy 6.2.5	Accept
424	15	Michael and Kristen Gerard	Volume 1	6 Natural Character	Policy 6.2.5	Reject
425	90	Federated Farmers of New Zealand	Volume 1	6 Natural Character	Policy 6.2.5	Reject
426	56	Marine Farming Association Incorporated	Volume 1	6 Natural Character	Policy 6.2.5	Accept
433	20	Port Marlborough New Zealand Limited	Volume 1	6 Natural Character	Policy 6.2.5	Reject
454	6	Kevin Francis Loe	Volume 1	6 Natural Character	Policy 6.2.5	Accept
455	25	John Hickman	Volume 1	6 Natural Character	Policy 6.2.5	Accept
456	25	George Mehlhopt	Volume 1	6 Natural Character	Policy 6.2.5	Accept
479	63	Department of Conservation	Volume 1	6 Natural Character	Policy 6.2.5	Accept
501	24	Te Runanga O Ngati Kuia	Volume 1	6 Natural Character	Policy 6.2.5	Reject
505	6	Ernslaw One Limited	Volume 1	6 Natural Character	Policy 6.2.5	Accept in part
509	114	Nelson Marlborough Fish and Game	Volume 1	6 Natural Character	Policy 6.2.5	Reject

514	27	A J King Family Trust and S A King Family Trust	Volume 1	6 Natural Character	Policy 6.2.5	Accept
578	8	Pinder Family Trust	Volume 1	6 Natural Character	Policy 6.2.5	Reject
648	23	D C Hemphill	Volume 1	6 Natural Character	Policy 6.2.5	Reject
688	42	Judy and John Hellstrom	Volume 1	6 Natural Character	Policy 6.2.5	Accept
712	69	Flaxbourne Settlers Association	Volume 1	6 Natural Character	Policy 6.2.5	Accept
715	135	Royal Forest and Bird Protection Society NZ (Forest and Bird)	Volume 1	6 Natural Character	Policy 6.2.5	Accept
716	67	Friends of Nelson Haven and Tasman Bay Incorporated	Volume 1	6 Natural Character	Policy 6.2.5	Reject
717	37	Fulton Hogan Limited	Volume 1	6 Natural Character	Policy 6.2.5	Accept
752	8	Guardians of the Sounds	Volume 1	6 Natural Character	Policy 6.2.5	Reject
868	8	Kenepuru and Central Sounds Residents Association Incorporated	Volume 1	6 Natural Character	Policy 6.2.5	Reject
873	15	KiwiRail Holdings Limited	Volume 1	6 Natural Character	Policy 6.2.5	Accept
879	1	Laurence Etheredge	Volume 1	6 Natural Character	Policy 6.2.5	Reject
1002	26	New Zealand Transport Agency	Volume 1	6 Natural Character	Policy 6.2.5	Accept
1039	77	Pernod Ricard Winemakers New Zealand Limited	Volume 1	6 Natural Character	Policy 6.2.5	Accept
1041	15	Port Clifford Limited	Volume 1	6 Natural Character	Policy 6.2.5	Accept
1146	8	Sea Shepherd New Zealand	Volume 1	6 Natural Character	Policy 6.2.5	Reject
1190	39	The Bay of Many Coves Residents and Ratepayers Association Incorporated	Volume 1	6 Natural Character	Policy 6.2.5	Reject
1193	48	The Marlborough Environment Centre Incorporated	Volume 1	6 Natural Character	Policy 6.2.5	Reject
1201	65	Trustpower Limited	Volume 1	6 Natural Character	Policy 6.2.5	Accept
152	17	Clova Bay Residents Association Inc	Volume 1	6 Natural Character	Policy 6.2.6	Reject
401	57	Aquaculture New Zealand	Volume 1	6 Natural Character	Policy 6.2.6	Reject
425	91	Federated Farmers of New Zealand	Volume 1	6 Natural Character	Policy 6.2.6	Reject
426	57	Marine Farming Association Incorporated	Volume 1	6 Natural Character	Policy 6.2.6	Reject
479	64	Department of Conservation	Volume 1	6 Natural Character	Policy 6.2.6	Reject
509	115	Nelson Marlborough Fish and Game	Volume 1	6 Natural Character	Policy 6.2.6	Reject
688	43	Judy and John Hellstrom	Volume 1	6 Natural Character	Policy 6.2.6	Reject
715	136	Royal Forest and Bird Protection Society NZ (Forest and Bird)	Volume 1	6 Natural Character	Policy 6.2.6	Reject
716	68	Friends of Nelson Haven and Tasman Bay Incorporated	Volume 1	6 Natural Character	Policy 6.2.6	Accept
868	9	Kenepuru and Central Sounds Residents Association Incorporated	Volume 1	6 Natural Character	Policy 6.2.6	Reject

961	11	Marlborough Chamber of Commerce	Volume 1	6 Natural Character	Policy 6.2.6	Reject
962	48	Marlborough Forest Industry Association Incorporated	Volume 1	6 Natural Character	Policy 6.2.6	Reject
990	183	Nelson Forests Limited	Volume 1	6 Natural Character	Policy 6.2.6	Reject
1041	16	Port Clifford Limited	Volume 1	6 Natural Character	Policy 6.2.6	Reject
1140	17	Sanford Limited	Volume 1	6 Natural Character	Policy 6.2.6	Reject
152	16	Clova Bay Residents Association Inc	Volume 1	6 Natural Character	Policy 6.2.7	Reject
401	58	Aquaculture New Zealand	Volume 1	6 Natural Character	Policy 6.2.7	Reject
424	16	Michael and Kristen Gerard	Volume 1	6 Natural Character	Policy 6.2.7	Reject
426	58	Marine Farming Association Incorporated	Volume 1	6 Natural Character	Policy 6.2.7	Reject
479	65	Department of Conservation	Volume 1	6 Natural Character	Policy 6.2.7	Reject
509	116	Nelson Marlborough Fish and Game	Volume 1	6 Natural Character	Policy 6.2.7	Reject
688	46	Judy and John Hellstrom	Volume 1	6 Natural Character	Policy 6.2.7	Reject
698	45	Environmental Defence Society Incorporated	Volume 1	6 Natural Character	Policy 6.2.7	Accept
715	137	Royal Forest and Bird Protection Society NZ (Forest and Bird)	Volume 1	6 Natural Character	Policy 6.2.7	Reject
868	10	Kenepuru and Central Sounds Residents Association Incorporated	Volume 1	6 Natural Character	Policy 6.2.7	Reject
962	49	Marlborough Forest Industry Association Incorporated	Volume 1	6 Natural Character	Policy 6.2.7	Reject
990	184	Nelson Forests Limited	Volume 1	6 Natural Character	Policy 6.2.7	Reject
1041	17	Port Clifford Limited	Volume 1	6 Natural Character	Policy 6.2.7	Reject
424	17	Michael and Kristen Gerard	Volume 1	6 Natural Character	Policy 6.2.8	Reject
425	92	Federated Farmers of New Zealand	Volume 1	6 Natural Character	Policy 6.2.8	Accept
429	9	Tempello Partnership	Volume 1	6 Natural Character	Policy 6.2.8	Accept
433	21	Port Marlborough New Zealand Limited	Volume 1	6 Natural Character	Policy 6.2.8	Reject
479	66	Department of Conservation	Volume 1	6 Natural Character	Policy 6.2.8	Reject
501	25	Te Runanga O Ngati Kuia	Volume 1	6 Natural Character	Policy 6.2.8	Reject
RE	7	Ernslaw One Limited	Volume 1	6 Natural Character	Policy 6.2.8	Reject
509	117	Nelson Marlborough Fish and Game	Volume 1	6 Natural Character	Policy 6.2.8	Reject
648	24	D C Hemphill	Volume 1	6 Natural Character	Policy 6.2.8	Accept
688	47	Judy and John Hellstrom	Volume 1	6 Natural Character	Policy 6.2.8	Reject
715	138	Royal Forest and Bird Protection Society NZ (Forest and Bird)	Volume 1	6 Natural Character	Policy 6.2.8	Reject
873	16	KiwiRail Holdings Limited	Volume 1	6 Natural Character	Policy 6.2.8	Reject

962	50	Marlborough Forest Industry Association Incorporated	Volume 1	6 Natural Character	Policy 6.2.8	Accept
990	185	Nelson Forests Limited	Volume 1	6 Natural Character	Policy 6.2.8	Accept
1041	18	Port Clifford Limited	Volume 1	6 Natural Character	Policy 6.2.8	Reject
1121	7	Sally Jane and Timothy John Wadworth	Volume 1	6 Natural Character	Policy 6.2.8	Accept
1198	15	Transpower New Zealand Limited	Volume 1	6 Natural Character	Policy 6.2.8	Reject
1201	62	Trustpower Limited	Volume 1	6 Natural Character	Policy 6.2.8	Reject
1251	28	Fonterra Co-operative Group Limited	Volume 1	6 Natural Character	Policy 6.2.8	Reject
401	59	Aquaculture New Zealand	Volume 1	6 Natural Character	Policy 6.2.9	Accept
424	18	Michael and Kristen Gerard	Volume 1	6 Natural Character	Policy 6.2.9	Reject
425	93	Federated Farmers of New Zealand	Volume 1	6 Natural Character	Policy 6.2.9	Reject
426	59	Marine Farming Association Incorporated	Volume 1	6 Natural Character	Policy 6.2.9	Accept
455	26	John Hickman	Volume 1	6 Natural Character	Policy 6.2.9	Reject
456	26	George Mehlhopt	Volume 1	6 Natural Character	Policy 6.2.9	Reject
479	67	Department of Conservation	Volume 1	6 Natural Character	Policy 6.2.9	Reject
509	118	Nelson Marlborough Fish and Game	Volume 1	6 Natural Character	Policy 6.2.9	Accept
688	49	Judy and John Hellstrom	Volume 1	6 Natural Character	Policy 6.2.9	Reject
715	139	Royal Forest and Bird Protection Society NZ (Forest and Bird)	Volume 1	6 Natural Character	Policy 6.2.9	Reject
716	69	Friends of Nelson Haven and Tasman Bay Incorporated	Volume 1	6 Natural Character	Policy 6.2.9	Accept
961	12	Marlborough Chamber of Commerce	Volume 1	6 Natural Character	Policy 6.2.9	Reject
504	21	Queen Charlotte Sound Residents Association	Volume 1	6 Natural Character	6.M.1	Reject
688	50	Judy and John Hellstrom	Volume 1	6 Natural Character	6.M.1	Accept
962	51	Marlborough Forest Industry Association Incorporated	Volume 1	6 Natural Character	6.M.1	No recommendation
990	186	Nelson Forests Limited	Volume 1	6 Natural Character	6.M.1	No recommendation
1002	27	New Zealand Transport Agency	Volume 1	6 Natural Character	6.M.1	Accept
401	60	Aquaculture New Zealand	Volume 1	6 Natural Character	6.M.2	Reject
648	25	D C Hemphill	Volume 1	6 Natural Character	6.M.2	Reject
688	51	Judy and John Hellstrom	Volume 1	6 Natural Character	6.M.2	Accept
1002	28	New Zealand Transport Agency	Volume 1	6 Natural Character	6.M.2	Accept
1187	2	Te Runanga a Rangitane o Wairau	Volume 1	6 Natural Character	6.M.2	Reject
688	52	Judy and John Hellstrom	Volume 1	6 Natural Character	6.M.3	Accept
688	53	Judy and John Hellstrom	Volume 1	6 Natural Character	6.M.4	Accept

401	61	Aquaculture New Zealand	Volume 1	6 Natural Character	6.AER.1	Accept
578	9	Pinder Family Trust	Volume 1	6 Natural Character	6.AER.1	Reject
688	54	Judy and John Hellstrom	Volume 1	6 Natural Character	6.AER.1	Accept
715	141	Royal Forest and Bird Protection Society NZ (Forest and Bird)	Volume 1	6 Natural Character	6.AER.1	Accept
752	9	Guardians of the Sounds	Volume 1	6 Natural Character	6.AER.1	Reject
1146	9	Sea Shepherd New Zealand	Volume 1	6 Natural Character	6.AER.1	Reject
1190	31	The Bay of Many Coves Residents and Ratepayers Association Incorporated	Volume 1	6 Natural Character	6.AER.1	Reject
1193	17	The Marlborough Environment Centre Incorporated	Volume 1	6 Natural Character	6.AER.1	Reject
93	6	Spencer & Susan White	Volume 2	3 Rural Environment Zone	3.2.1.9.	Accept
281	1	Peter Bown	Volume 2	3 Rural Environment Zone	3.2.1.9.	Accept
348	41	Murray Chapman	Volume 2	3 Rural Environment Zone	3.2.1.9.	Reject
425	504	Federated Farmers of New Zealand	Volume 2	3 Rural Environment Zone	3.2.1.9.	Accept in part
425	627	Federated Farmers of New Zealand	Volume 2	4 Coastal Environment Zone	4.2.1.7.	Accept in part
425	816	Federated Farmers of New Zealand	Volume 2	16 Coastal Marine Zone	16.2.2.6.	Accept in part
425	713	Federated Farmers of New Zealand	Volume 2	19 Open Space 3 Zone	19.2.1.2.	Accept in part
433	187	Port Marlborough New Zealand Limited	Volume 2	19 Open Space 3 Zone	19.2.1.2.	Reject