

Re-notification of Summary of Submissions (by submitter number)

Variation 1: Marine Farming and Variation 1A to the proposed Marlborough Environment Plan

The enclosed submission summaries provide a summary of each submitter's relief requested. Please refer to the original submissions for full details.

All submissions can be viewed via the Council website.

<https://www.marlborough.govt.nz/your-council/resource-management-policy-and-plans/proposed-marlborough-environment-plan/variations/variation-1-and-1a/submissions-and-further-submissions>

| Sub# | Name/Organisation | Contact |
|------|--|--|
| 1. | Steve Dawson | |
| 2. | Neil McLennan | |
| 3. | Marg Pidgeon | |
| 4. | Waikawa Boating Club | Lisa Delaveau |
| 5. | Tory Channel Aquaculture Limited | Michael Norton |
| 6. | Peter Allen Mansfield | |
| 7. | Phil Green | |
| 8. | Christine Simpson | |
| 9. | Rod Littlefield | |
| 10. | Nelson City Council | Sue Robb, Senior Planning Officer |
| 11. | Okiwi Bay Ratepayers Association | Tim Greenhough |
| 12. | The Council of Outdoor Recreation Associations of New Zealand Inc (CORANZ) | Andi Cockroft (Chairman) |
| 13. | Peter John Bigley | |
| 14. | James Maurice Goulding | Jim Goulding & Julian Goulding |
| 15. | Shellfish Marine Farms Limited | Jim Goulding & Julian Goulding |
| 16. | Sea Investments Limited | Jim Goulding & Julian Goulding |
| 17. | Marlborough Oysters Ltd | Aaron Pannell |
| 18. | Richard and Christine Wright | |
| 19. | Brian & Nanette Bunting | |
| 20. | Poneke Rene | |
| 21. | Philip Anthony Black | |
| 22. | Te Runanga o Toa Rangatira | Naomi Solomon |
| 23. | Poneke Rene | |
| 24. | Marlborough District Council | Louise Walker |
| 25. | David Hogg | |
| 26. | AJ King Family Trust & SA King Family Trust | Bruce Cardwell |
| 27. | Ayakulik Limited | Peter Radich |
| 28. | Beryl Archer & John Hebbard | Bruce Cardwell |
| 29. | Bryan Skeggs | |
| 30. | Canantor Mussels Limited | Q A M Davies, A L Hills and E L Deason |
| 31. | Chris Womersley | |
| 32. | The NZ Rock Lobster Industry Council (NZRLIC) and The Pāua Industry Council (PIC). | Mark Edwards |
| 33. | KiwiRail Holdings Limited (KiwiRail) | Rebecca Beals |
| 34. | Clifford Bay Marine Farms Ltd | Quentin Davies and Kerry Moor |
| 35. | David Muir McLaren & Lenore Mary McLaren | Bruce Cardwell |
| 36. | David Jones | |
| 37. | Frank Burns | |

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| 38. | Gary Brown and Nanette Buchanan-Brown | Bruce Cardwell |
| 39. | Chance Bay Marine Farms Limited | Colleen Buchanan |
| 40. | Jonathon Tester | |
| 41. | Kevin Bonnington | |
| 42. | Koata Limited | Hemi Toia |
| 43. | KPF Investments Limited and United Fisheries Limited | Q A M Davies, A L Hills and E L Deason |
| 44. | Lindsay and Jane Stuart | Bruce Cardwell |
| 45. | Michael and Anna Richards | Bruce Cardwell |
| 46. | PB Partnership (Wainui Green Limited & Two MF Limited) | Bruce Cardwell |
| 47. | Okiwi Bay Aquaculture Ltd | Margaret Hippolite |
| 48. | PH Redwood & Company Ltd | Quentin Muir Davies and Kerry Moor |
| 49. | PHR Processing Ltd | Quentin Muir Davies and Kerry Moor |
| 50. | Robert and Simon Pooley | Bruce Cardwell |
| 51. | Scott Anstis | |
| 52. | Scott Madsen Family Trust | Scott Madsen |
| 53. | Te Ohu Kaimoana | Laws Lawson |
| 54. | Wairangi Bay Marine Farms Ltd | Margaret Hippolite |
| 55. | Waitui Holdings Limited | Noel Moleta |
| 56. | Worlds End Enterprises Limited | Brian & Nanette Bunting |
| 57. | The New Zealand King Salmon Co. Limited | Q A M Davies, A L Hills and E L Deason |
| 58. | Vincent Smith | |
| 59. | Port Underwood Association | Ken Roush |
| 60. | Port Gore Partnership & Slade King & King Ltd | Darryl Slade |
| 61. | Wakatu Incorporation and Kono NZ LP | Riki Kotua |
| 62. | The Marlborough Environment Centre | Tim Newsham |
| 63. | Parkhurst Enterprises Ltd | Jim Jessep |
| 64. | Juniper Trust | Anna Jocelyn Greig |
| 65. | Gordan Brian & Gaye Eleanor Waide | |
| 66. | Tu Jaes Trust | Jean Hadley and Alice Behan |
| 67. | Peter Martin | |
| 68. | Ministry for Primary Industries (MPI) | Michael Nielsen |
| 69. | Carl Elkington | |
| 70. | Nelson Marlborough Conservation Board | Kath Inwood |
| 71. | Arthur John Reader | |
| 72. | Marine Farming Association Incorporated and Aquaculture New Zealand | Q A M Davies, A L Hills and E L Deason |
| 73. | Ian Williams | |
| 74. | Aroma (N.Z.) Limited and Aroma Aquaculture Limited | Q A M Davies, A L Hills and E L Deason |
| 75. | Clearwater Mussels Limited | R D Sutherland |
| 76. | Marlborough Aquaculture Limited | David Clark |

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| 77. | - | - |
| 78. | Ciaran Hughes | |
| 79. | Minister of Conservation (the Minister) - Hon. Kiritapu Allan | Murray Brass |
| 80. | Steffan Browning | |
| 81. | Allan Roy Tester, Ronald Dennis Bothwell and Rosemary Joy Bothwell | Jonathon Tester |
| 82. | Environmental Defence Society Incorporated | Cordelia Woodhouse |
| 83. | Friends of Nelson Haven and Tasman Bay Inc | Rob Schuckard |
| 84. | J & A Seggie Family Trust | Bruce Cardwell |
| 85. | Te Rūnanga o Kaikōura and Te Rūnanga o Ngāi Tahu (collectively referred to as Ngāi Tahu). | Trudy Heath |
| 86. | Te Rūnanga o Ngāti Kuia Trust | Julia Eason |
| 87. | Red Sky Trust | Kevin Oldham |
| 88. | New Zealand Sports Fishing Council | Helen Pastor |
| 89. | Queen Charlotte Sound Residents Association | Monyeen Wedge |
| 90. | Clova Bay Residents Association Incorporated | Trevor Offen |
| 91. | Kenepuru & Central Sounds Residents Association Incorporated | Andrew Caddie |
| 92. | Sanford Limited | Alison Undorf-Lay |
| 93. | Ngāti Apa ki te Rā Tō Charitable Trust | Simon Karipa |
| 94. | Mark Pearson | |
| 95. | Te Rūnanga o Ngāi Tahu | Rakihia Tau |
| 96. | Beleve Limited, R J Davidson Family Trust, and Treble Tree Holdings Limited | R D Sutherland |
| 97. | Kapua Marine Farms Limited | R D Sutherland |
| 98. | Kuku Holdings Limited | R D Sutherland |
| 99. | Ngati Rarua Atiawa Trust Board | R D Sutherland |
| 100. | Goulding Trustees Limited | Jim Goulding & Julian Goulding |
| 101. | - | - |
| 102. | McGuinness Institute | Wendy McGuinness |
| 103. | S.G.T McCarthy | |
| 104. | Elkington and McCarthy | T.R. Elkington and S.G.T. McCarthy Elkington and McCarthy |
| 105. | Bridget and Tony Orman | |
| 106. | - | - |
| 107. | Ngāi Tahu Seafood | Thomas Hildebrand |
| 108. | Marlborough Recreational Fishers Association | John Leader, Des Boyce and Lawrence Stevenson |
| 109. | Guardians of the Sounds Inc | Clare Pinder and William Foster |
| 110. | Kenepuru and Central Sounds Residents' Association | Andrew Caddie |

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| 111. | Te Ātiawa Manawhenua Ki Te Tau Ihu Trust | Ian Shapcott |
| 112. | Apex Marine Farm Limited | Amanda Hills/ Emma Deason/ Bruce Hearn |
| 113. | Talley's Group Limited | R D Sutherland |
| 114. | Darryl Slade | |
| 115. | Darryl Slade, William King & Evelyn King (Estate) | Darryl Slade |

| Sub# | Lastname/Organisation | Name/Contact | Point | Volume | Chapter/CMU/Appendix | Provision | Support/Oppose | Summary - decision requested |
|------|-----------------------|---------------|-------|------------|----------------------|---------------------------------------|----------------|--|
| 1 | Dawson | Steve Dawson | 1.1 | Volume One | Chapter: 13 | Provision: Policy 13.22.6 | Oppose | To strengthen Policy 13.22.6 to prohibit the discharge of nonorganic debris from marine farms |
| 2 | McLennan | Neil McLennan | 2.1 | Volume One | Chapter: 13 | Provision: Policy 13.21.3 | Oppose | AMAs should be 100-250m offshore, and support monitoring - and assessing - cumulative effects. Farms should not extend more than 250m offshore to preserve existing MDC navigation and scenery protection rules |
| | | | 2.2 | Volume One | Chapter: 13 | Provision: Policy 13.22.1 | Oppose | Increased monitoring to assess on-farm environmental effects associated with marine farming is welcome. Although it will be difficult to isolate the effects of pre-2020 mussel farming from other coastal area changes, general issues ought to be studied to fulfill Council's precautionary planning role |
| | | | 2.3 | Volume One | Chapter: 13 | Provision: Policy 13.21.3 | Oppose | CMUs and AMAs may need further consideration. Provide for experimental and onshore aquaculture. |
| | | | 2.4 | Volume One | Chapter: 13 | Provision: Policy 13.21.4 | Oppose | CMUs and AMAs may need further consideration. Provide for experimental and onshore aquaculture. |
| | | | 2.5 | Volume One | Chapter: 13 | Provision: Policy 13.21.5 | Oppose | CMUs and AMAs may need further consideration. Provide for experimental and onshore aquaculture. |
| | | | 2.6 | Volume One | Chapter: 13 | Provision: Policy 13.21.6 | Oppose | CMUs and AMAs may need further consideration. Provide for experimental and onshore aquaculture. |
| | | | 2.7 | Volume One | Chapter: 13 | Provision: Policy 13.21.7 | Oppose | CMUs and AMAs may need further consideration. Provide for experimental and onshore aquaculture. |
| | | | 2.8 | Volume One | Chapter: 13 | Provision: Policy 13.22.2 | Oppose | CMUs and AMAs may need further consideration. Provide for experimental and onshore aquaculture. |
| | | | 2.9 | Volume One | Chapter: 13 | Provision: Policy 13.21.5 | Oppose | Assess pre-2020 and post-2020 cumulative effects, support additional monitoring, e.g arm productivity, bacterial loads. Consider monitoring and scientific limits. |
| | | | 2.10 | Volume One | Chapter: 13 | Provision: Policy 13.22.1 | Oppose | Assess pre-2020 and post-2020 cumulative effects, support additional monitoring, e.g arm productivity, bacterial loads. Consider monitoring and scientific limits. |
| | | | 2.11 | Volume One | Chapter: 13 | Provision: Policy 13.22.3 | Oppose | Assess pre-2020 and post-2020 cumulative effects, support additional monitoring, e.g arm productivity, bacterial loads. Consider monitoring and scientific limits. |
| | | | 2.12 | Volume One | Chapter: 13 | Provision: Policy 13.22.5 | Oppose | Assess pre-2020 and post-2020 cumulative effects, support additional monitoring, e.g arm productivity, bacterial loads. Consider monitoring and scientific limits. |
| | | | 2.13 | Volume One | Chapter: 13 | Provision: Policy 13.22.6 | Oppose | Assess pre-2020 and post-2020 cumulative effects, support additional monitoring, e.g arm productivity, bacterial loads. Consider monitoring and scientific limits. |
| | | | 2.14 | Volume One | Chapter: 13 | Provision: Policy 13.22.7 | Oppose | Assess pre-2020 and post-2020 cumulative effects, support additional monitoring, e.g arm productivity, bacterial loads. Consider monitoring and scientific limits. |
| | | | 2.15 | Volume One | Chapter: 13 | Provision: Policy 13.22.8 | Oppose | Assess pre-2020 and post-2020 cumulative effects, support additional monitoring, e.g arm productivity, bacterial loads. Consider monitoring and scientific limits. |
| | | | 2.16 | Volume One | Chapter: 13 | Provision: Policy 13.22.9 | Oppose | Assess pre-2020 and post-2020 cumulative effects, support additional monitoring, e.g arm productivity, bacterial loads. Consider monitoring and scientific limits. |
| | | | 2.17 | Volume One | Chapter: 13 | Provision: Policy 13.22.10 | Oppose | Assess pre-2020 and post-2020 cumulative effects, support additional monitoring, e.g arm productivity, bacterial loads. Consider monitoring and scientific limits. |
| | | | 2.18 | Volume One | Chapter: 13 | Provision: Policy 13.22.11 | Oppose | Assess pre-2020 and post-2020 cumulative effects, support additional monitoring, e.g arm productivity, bacterial loads. Consider monitoring and scientific limits. |
| | | | 2.19 | Volume One | Chapter: 13 | Provision: Policy 13.22.1 | Oppose | Need progressive, responsible management, cumulative assessment. |
| | | | 2.20 | Volume One | Chapter: 13 | Provision: Policy 13.22.3 | Oppose | Need progressive, responsible management, cumulative assessment. |
| | | | 2.21 | Volume One | Chapter: 13 | Provision: Policy 13.22.5 | Oppose | Need progressive, responsible management, cumulative assessment. |
| | | | 2.22 | Volume One | Chapter: 13 | Provision: Policy 13.21.7 | Oppose | No entitlement for an alternative area for inappropriate farms |
| | | | 2.23 | Volume Two | Chapter: 16 | Provision: 16.4.3 | Oppose | Re-consenting farms in AMAs should be a discretionary activity. |
| | | | 2.24 | Volume Two | Chapter: 16 | Provision: 16.4.4 | Oppose | Re-consenting farms in AMAs should be a discretionary activity. |
| | | | 2.25 | Volume Two | Chapter: 16 | Provision: 16.4.5 | Oppose | Re-consenting farms in AMAs should be a discretionary activity. |
| | | | 2.26 | Volume One | Chapter: 13 | Provision: Policy 13.22.10 | Oppose | Variation 1A Oppose new sites within the Sounds. Preference for new sites to be in the outer embayments and offshore (Cook Strait.) Recognize landowners. |
| | | | 2.27 | Volume One | Chapter: 13 | Provision: Policy 13.22.5 | Neutral | Advocates for greater local community involvement in aquaculture management, a review of MDC environmental standards and monitoring. |
| | | | 2.28 | Volume One | Chapter: 13 | Provision: Policy 13.22.6 | Neutral | Advocates for greater local community involvement in aquaculture management, a review of MDC environmental standards and monitoring. |
| | | | 2.29 | Volume One | Chapter: 13 | Provision: Policy 13.22.7 | Neutral | Advocates for greater local community involvement in aquaculture management, a review of MDC environmental standards and monitoring. |
| | | | 2.30 | Volume One | Chapter: 13 | Provision: Policy 13.22.8 | Neutral | Advocates for greater local community involvement in aquaculture management, a review of MDC environmental standards and monitoring. |
| | | | 2.31 | Volume One | Chapter: 13 | Provision: Policy 13.22.9 | Neutral | Advocates for greater local community involvement in aquaculture management, a review of MDC environmental standards and monitoring. |
| | | | 2.32 | Volume One | Chapter: 13 | Provision: Policy 13.22.10 | Neutral | Advocates for greater local community involvement in aquaculture management, a review of MDC environmental standards and monitoring. |
| | | | 2.33 | Volume One | Chapter: 13 | Provision: Policy 13.22.11 | Neutral | Advocates for greater local community involvement in aquaculture management, a review of MDC environmental standards and monitoring. |
| | | | 2.34 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Oppose | Variation 1A: Wording of variation Guidance document 1A - it is misleading to state that the consented salmon farms in Beatrix Bay, Clay Point and Te Pangu "have not been identified as having adverse effects on the environment". It would be better to state that these farms "comply with current MDC environmental standards". |

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| | | | 2.35 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Oppose | MARWG focus on Policy 8 in NZCPS, exclusively aquaculture. It down-plays the multi-purpose aim of the NZ Coastal Policy Statement by focusing on Policy 8. Hopefully the MEP will adequately consider the NZCPS in its entirety - especially policies 1, 3, 4, 5, 6, 7, 11, 13, 15 and 21. |
| | | | 2.36 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Oppose | Oppose propose to create three new finfish farm sites (in Tio Point, Richmond Bay and Horseshoe Bay) to replace three existing ones (Waihinau, Otanarau and Ruakaka). It is misleading and inappropriate to site the MPI salmon farm relocation proposal and Relocation Advisory Panel recommendations as they were not 'fait-accompli' and the current government has not adopted the Advisory Panel's recommendations. |
| | | | 2.37 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Oppose | It is important to realise that the ecology of the area is constantly changing. The marine environment is dynamic. We generally recognize and accept natural changes associated with tidal, seasonal and storm-related events, but we need to know what effects are likely to result from introduced industries and species. Mussel farming may reduce (and/or change) algae feed supplies to 'natural shellfish' populations, change zooplankton concentrations and species, affect larval fish survival, and alter water quality parameters (affecting jellyfish numbers, seaweed distribution, biofouling and toxic algae occurrence). Scientists have great difficulty predicting sea life changes and isolating specific causes. Multi-factor changes do not have specific causes ... that's life. As a society we are better to focus on general trends, encourage environmental health (e.g. increased biodiversity, reduced toxic algae occurrence, etc.), promote abundant fisheries, protect fish spawning and nursery areas (where larval fish are particularly sensitive and vulnerable), proceed cautiously, and recognize changing public values. |
| 3 | Pidgeon | Marg Pidgeon | 3.1 | Volume One | Chapter: 13 | Provision: Policy 13.22.6 | Oppose | To prohibit the discharge of non-organic debris from marine farms and make it mandatory for marine farming operations to monitor and collect debris from the shoreline. |
| 4 | Waikawa Boating Club | Lisa Delaveau | 4.1 | Volume One | Chapter: 13 | Provision: Policy 13.22.6 | Oppose | Recommend the Policy should read: Policy 13.22.6 – Marine farm owners/occupiers are prohibited from discharging in-organic marine farming related debris and litter from their marine farming operation. Marine farm owners/occupiers shall monitor and collect marine farming related debris and litter from the adjoining shoreline and surrounding coastal marine area and dispose of it at an appropriate facility for the duration of any coastal permit issued for a marine farm. |
| 5 | Tory Channel Aquaculture Limited | Michael Norton | 5.1 | Volume Four | CMU 42: Tory Channel | CMU item: CMU 42 Aquaculture Management Area - AMA 1 | Oppose | Marine farm 8405 Marine farm 8405 stay in the present area. |
| 6 | Mansfield | Peter Allen Mansfield | 6.1 | Volume Four | CMU 43: Waitata Bay | CMU item: CMU 43 Aquaculture Management Area - AMA 8 | Oppose | Marine farms 8090, 8091, 8092, 8093, 8094 & 8095 Rezone the coastal marine area fronting Lot 3 DP 19539 and Lot 1 DP 20420 as Coastal Marine Zone 1 to preserve the significant natural character and recreational value of the area. [Inferred] |
| | | | 6.2 | Volume Two | Chapter: 16 | Provision: 16.7 | Neutral | Marine farms 8090, 8091, 8092, 8093, 8094 & 8095 Rezone the coastal marine area fronting Lot 3 DP 19539 and Lot 1 DP 20420 as Coastal Marine Zone 1 to preserve the significant natural character and recreational value of the area. [Inferred] |
| 7 | Green | Phil Green | 7.1 | Volume One | Chapter: 13 | Provision: 13.AER.18 | Support | To include a provision in the variations in variation 1 section 32 5.2.7 best practice, 6.2.71, policy 8.2.1 environmental effects, obj 15.1 aquaculture pol 13.2.2 that states to the effect: "that all mussel spat brought into the Marlborough sounds from outside areas are certified free of any algae cyst's" |
| 8 | Simpson | Christine Simpson | 8.1 | Volume One | Chapter: 4 | Provision: Objective 4.1 | Support | Variations 1 & 1A Support all provisions |
| | | | 8.2 | Volume Two | Chapter: 16 | Provision: 16.4 | Support | Variations 1 & 1A |
| | | | 8.3 | Volume Three | Appendix: 11 | Appendix item: Species authorised to be farmed within the Marlborough region's coastal waters | Support | Variations 1 & 1A Support all provisions |
| | | | 8.4 | Volume Four | CMU 1: Admiralty Bay | CMU item: CMU 1 Aquaculture Management Area - AMA 1 | Support | Variations 1 & 1A Support all provisions |
| 9 | Littlefield | Rod Littlefield | 9.1 | Volume One | Chapter: 13 | Provision: Policy 13.21.7 | Oppose | Variation 1A Oppose finfish farming in the Marlborough sounds |
| | | | 9.2 | Volume Two | Chapter: 16 | Provision: 16.5.5 | Oppose | Variation 1A Oppose finfish farming in the Marlborough sounds |
| 10 | Nelson City Council | Sue Robb, Senior Planning Officer | 10.1 | Volume One | Chapter: 13 | Provision: New provision | Support | The inclusion of an explicit integration method specifically addressing future aquaculture growth and changes in technology. This would include for example sharing of monitoring data, advice on consent conditions and past experiences, methodologies relating to adaptive management, etc. To achieve this we propose the following wording: Methods of Implementation: 13.M.36A Integrated management - The Council will work collaboratively with Nelson City Council to ensure that future aquaculture growth is managed effectively between the two regions. This would include, but not be limited to sharing monitoring data, sharing advice on consent matters, discussing methodologies relating to adaptive management and monitoring. |
| 11 | Okiwi Bay Ratepayers Association | Tim Greenhough | 11.1 | Volume One | Chapter: 13 | Provision: Objective 13.21 | Support | The Okiwi Bay Ratepayers Association is in agreement in general with the above Aquaculture CMU and AMA variations. We agree with the principal with shifting the Marine Farms that affect the visual impact of the Croisilles Harbour, and Sounds area. We further agree that natural land values have been given effective consideration within the document. |

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| | | | 11.2 | Volume Four | All CMU | | Support | We agree with the principal with shifting the Marine Farms that affect the visual impact of the Croisilles Harbour, and Sounds area. |
| 12 | The Council of Outdoor Recreation Associations of New Zealand Inc (CORANZ) | Andi Cockroft (Chairman) | 12.1 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Oppose | CORANZ calls for stricter controls on aquaculture. Rather than "rolling over" aquaculture renewals, a positive move should be made to relate mussel farms and salmon farms into open water as is done in other parts of New Zealand, e.g. Coromandel. In a nutshell, there are aspects of aquaculture which need addressing. (a) re-location offshore (b) No more aquaculture in the Sounds. Growth rates of farmed mussels have declined strongly suggesting the carrying capacity for mussel farms has been exceeded. (c) The aquaculture which continues to occupy the public's space of the seabed, pays no rates. It is logical that they pay rates and at amounts that cover environmental policing and compliance (d) MDC needs to jettison the "industrial use" policy and focus on the public's environment, outdoor recreation, and tourism which generates regional economic activity. |
| 13 | Bigley | Peter John Bigley | 13.1 | Volume One | Chapter: 13 | Provision: Policy 13.21.1 | Oppose | With regards to Policy 13.21.1(e): Replace "existing marine farms are provided for at their existing size." with "existing marine farms are provided for at their existing size and an equivalent amount of viable and farmable space." Decision sought with regards to the farm reconfiguration: "That Council consults with the Mussel Farmers before deciding on the final form of the AMA in order to achieve viable/affordable and logical solutions in terms of the implementation, and take into consideration farm productivity, efficiency and a simplification of the farm structure to achieve affordable implementation and transition. |
| 14 | James Maurice Goulding | Jim Goulding & Julian Goulding | 14.1 | Volume Four | CMU 17: Forsyth Bay | CMU item: CMU 17 Aquaculture Management Area - AMA 20 | Support | To place the AMA around the consented and/or actual space as per MDC notified plan. |
| | | | 14.2 | Volume Two | Chapter: 16 | Provision: 16.4 | Support | Existing marine farms should be 'renewed' as a controlled activity without notification |
| | | | 14.3 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Neutral | At a high level, (a) Existing marine farms should be 'renewed' as a controlled activity without notification; and (b) AMAs should be drawn in the way set out in this submission, provided that no existing marine farm loses area, total backbone length and if the farm is shifting from its existing space it is moved into equivalent space; or (c) The existing marine farm(s) should stay where they are currently installed (including when they are offsite); or (d) The existing marine farm(s) should shift into new space as long as they do not lose area, total backbone length and the move is into equivalent space. If someone makes a submission that any existing marine farm should be removed from its current location, and that submission is accepted, then that farm(s) should move into new space in bays where there is currently marine farming. That is consistent with the principle of no loss of marine farming space and no loss of longline length. |
| 15 | Shellfish Marine Farms Limited | Jim Goulding & Julian Goulding | 15.1 | Volume Four | CMU 28: Maud Island | CMU item: CMU 28 Aquaculture Management Area - AMA 7 | Oppose | Three options presented for relief sought. (a) Draw the AMA as per the MFA/AQNZ submission [Cregoe Point, Tawhitinui Reach] except for a change at the southern end of the AMA. The alternative proposal set out in the attached map [8301 Proposed AMA Map.jpg] (proposed changes ref 'Adjusted MFA AMA' in legend).; OR (b) Draw the AMA as per the MFA/AQNZ submission [Cregoe Point, Tawhitinui Reach]; OR (c) Place the AMA around the consented and/or actual space. |
| | | | 15.2 | Volume Four | CMU 43: Waitata Bay | CMU item: CMU 43 Aquaculture Management Area - AMA 8 | Oppose | Two options presented for the relief sought: (a) Draw the AMA as per the MFA/AQNZ submission [Rat Point, Waitata Bay]; OR (b) Place the AMA around the consented and/or actual space. |
| | | | 15.3 | Volume Four | CMU 36: Port Ligar | CMU item: CMU 36 Aquaculture Management Area - AMA 8 | Oppose | Two options presented for relief sought: (a) Draw the AMA as per the MFA/AQNZ submission [Maori Point, Port Ligar]; OR (b) Place the AMA around the consented and/or actual space. |
| | | | 15.4 | Volume Two | Chapter: 16 | Provision: 16.4 | Support | Existing marine farms should be 'renewed' as a controlled activity without notification |
| | | | 15.5 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Neutral | At a high level: (a) Existing marine farms should be 'renewed' as a controlled activity without notification; and (b) AMAs should be drawn in the way set out in this submission, provided that no existing marine farm loses area, total backbone length and if the farm is shifting from its existing space it is moved into equivalent space; or (c) The existing marine farm(s) should stay where they are currently installed (including when they are offsite); or (d) The existing marine farm(s) should shift into new space as long as they do not lose area, total backbone length and the move is into equivalent space. If someone makes a submission that any existing marine farm should be removed from its current location, and that submission is accepted, then that farm(s) should move into new space in bays where there is currently marine farming. That is consistent with the principle of no loss of marine farming space and no loss of longline length. |
| 16 | Sea Investments Limited | Jim Goulding & Julian Goulding | 16.1 | Volume Four | CMU 36: Port Ligar | CMU item: CMU 36 Aquaculture Management Area - AMA 4 | Oppose | Two options presented for relief sought: (a) Draw the AMA as per the MFA/AQNZ submission [Cape Horn, Port Ligar] OR (b) Place the AMA around the consented and/or actual space. |
| | | | 16.2 | Volume Four | CMU 36: Port Ligar | CMU item: CMU 36 Aquaculture Management Area - AMA 5 | Oppose | Two options presented for relief sought: (a) Draw the AMA as per the MFA/AQNZ submission [Cape Horn, Port Ligar] OR (b) Place the AMA around the consented and/or actual space. |
| | | | 16.3 | Volume Two | Chapter: 16 | Provision: 16.4 | Support | Existing marine farms should be 'renewed' as a controlled activity without notification |

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| | | | 16.4 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Neutral | At a high level, (a) Existing marine farms should be 'renewed' as a controlled activity without notification; and (b) AMAs should be drawn in the way set out in this submission, provided that no existing marine farm loses area, total backbone length and if the farm is shifting from its existing space it is moved into equivalent space; or (c) The existing marine farm(s) should stay where they are currently installed (including when they are offsite); or (d) The existing marine farm(s) should shift into new space as long as they do not lose area, total backbone length and the move is into equivalent space. If someone makes a submission that any existing marine farm should be removed from its current location, and that submission is accepted, then that farm(s) should move into new space in bays where there is currently marine farming. That is consistent with the principle of no loss of marine farming space and no loss of longline length. |
| 17 | Marlborough Oysters Ltd | Aaron Pannell | 17.1 | Volume Two | Chapter: 16 | Provision: 16.4 | Support | Existing marine farms should be 'renewed' as a controlled activity without notification |
| | | | 17.2 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Neutral | At a high level; (a) AMAs should be drawn in the way set out in this submission, provided that no existing marine farm loses area, total backbone length and if the farm is shifting from its existing space it is moved into equivalent space; or (b) The existing marine farm(s) should stay where they are currently installed (including when they are offsite); or (c) The existing marine farm(s) should shift into new space as long as they do not lose area, total backbone length and the move is into equivalent space. If someone makes a submission that any existing marine farm should be removed from its current location, and that submission is accepted, then that farm(s) should move into new space in bays where there is currently marine farming. That is consistent with the principle of no loss of marine farming space and no loss of longline length. |
| | | | 17.3 | Volume Four | CMU 39: Squally Cove | CMU item: CMU 39 Aquaculture Management Area - AMA12 | Neutral | Place the AMA around the consented and/or actual space (Marine Farms 8283, 8285) |
| | | | 17.4 | Volume Four | CMU 39: Squally Cove | CMU item: CMU 39 Aquaculture Management Area - AMA11 | Neutral | Place the AMA around the consented and/or actual space (Marine Farms 8505, 8286, 8287) |
| | | | 17.5 | Volume Four | CMU 39: Squally Cove | CMU item: CMU 39 Aquaculture Management Area - AMA14 | Neutral | Place the AMA around the consented and/or actual space (Marine farms 8279, 8281) |
| | | | 17.6 | Volume Four | CMU 39: Squally Cove | CMU item: CMU 39 Aquaculture Management Area - AMA14 | Neutral | Move the AMA out by 30m from the consented space (Marine Farm 8280) |
| | | | 17.7 | Volume Four | CMU 39: Squally Cove | CMU item: CMU 39 Aquaculture Management Area - AMA19 | Neutral | Place the AMA around the consented and/or actual space (Marine farm 8627) |
| | | | 17.8 | Volume Four | CMU 39: Squally Cove | CMU item: CMU 39 Aquaculture Management Area - AMA17 | Support | Retain AMA as proposed for marine farms 8273 [inferred] |
| | | | 17.9 | Volume Four | CMU 39: Squally Cove | CMU item: CMU 39 Aquaculture Management Area - AMA16 | Support | Retain AMA as proposed for marine farms 8275, 8276, 8277, 8504 [inferred] |
| | | | 17.10 | Volume Four | CMU 39: Squally Cove | CMU item: CMU 39 Aquaculture Management Area - AMA10 | Support | Retain AMA as proposed for marine farm 8288 [inferred] |
| 18 | Wright | Richard and Christine Wright | 18.1 | Volume One | Chapter: 13 | Provision: Policy 13.21.7 | Oppose | Variation 1A - Proposed Fin Fish - AMA Finfish 6 Opposes the proposed fin fish farm location. (Inferred) |
| 19 | Bunting | Brian & Nanette Bunting | 19.1 | Volume Four | CMU 11: Crail Bay | CMU item: CMU 11 Aquaculture Management Area - AMA 13 | Oppose | Farm 8518 Two options presented for relief sought: (a) Place the AMA around the newly consented space; OR (b) Draw the AMA as per the MFA/AQNZ submission (Map ref 013, Crail Bay Central, Crail Bay) |
| 20 | Rene | Poneke Rene | 20.1 | Volume Four | CMU 13: D'Urville Island | CMU item: CMU 13 Aquaculture Management Area - New AMA | Neutral | Variation 1 & 1A (1) The potential to create new marine farms/AMAs within CMU13 not be allowed. (2) The relocation of existing marine farms to CMU 13 not be allowed. (3) Where new space is to be created for marine farming, it should be allocated to locals rather than used for export purposes. (Inferred) |
| 21 | Black | Philip Anthony Black | 21.1 | Volume Four | CMU 44: Waitata Reach | CMU item: CMU 44 Aquaculture Management Area - AMA 10 | Oppose | Drop the proposal to create AMA10 and allow neither aquaculture nor finfish farming in the space that would then be free from aquacultural or finfish management. |
| 22 | Te Runanga o Toa Rangatira | Naomi Solomon | 22.1 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Oppose | The decision we seek from Council is to discontinue Variation 1 and 1A until mana whenua/tangatawhenua has had an opportunity to engage with council on this subject. We ask that council fulfil their role as Treaty Partners and be inclusive of mana whenua/tangatawhenua values and principles. |

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| 23 | Rene | Poneke Rene | 23.1 | Volume Four | CMU 38: South Marlborough | CMU item: CMU 38 Aquaculture Management Area - New AMA | Neutral | There is a need for provisions that do ensure that any water allocation regime for CMU 38, has sufficient capacity to be able to resource the domestic needs of the Wairau Block XII (as any new potential for affecting water allocation rights could be of a sensitive nature for existing current landowners of Maori block Wairau XII), as existing within CMU 38 'use space' and any water allocation NOT be allocated for export purposes |
| 24 | Marlborough District Council | Louise Walker | 24.1 | Volume One | Chapter: 13 | Provision: Introduction | Support | Amend the penultimate paragraph in the Introduction text for Chapter 13 to read (new text between **): The Council has decided to be more lenient for replacement resource consents for existing marine farms inside AMAs, **not including FAMAs**, and have provided for them as a controlled activity. |
| | | | 24.2 | Volume One | Chapter: 13 | Provision: Policy 13.22.9 | Support | Add a new clause to 13.22.9 as follows: (g) The species to be added have the potential to escape and cause a detrimental genetic effect on wild populations. |
| | | | 24.3 | Volume Two | Chapter: 16 | Provision: 16.4.5 | Support | Add a new 'Matters over which the Council has reserved control' as follows: 16.4.5.17 the genetic effect on wild populations of farmed species escaping. |
| | | | 24.4 | Volume One | Chapter: 13 | Provision: Policy 13.21.1 | Support | Amend policy or add a new policy stating that finfish farming at the Otanerau Bay (MF 8396) and at Waihinu Bay (MF 8085) is an inappropriate aquaculture activity and FAMAs have therefore not been provided for these sites. However, these sites are not deemed inappropriate for other forms of aquaculture activity so have been provided as AMAs. Text sought to amend Policy 13.21.1 (d) to include the following (new text between **): (d) new and existing aquaculture activities are inappropriate in the following zones: (i) Coastal marine zone (ii) Port zone (iii) Marina zone (iv) Port landing area zone except for aquaculture, **other than finfish farming**, in an AMA overlay or the open water CMU** and for finfish farming in a FAMA or the open water CMU** |
| | | | 24.5 | Volume Two | Chapter: 16 | Provision: 16.7 | Support | Amend 16.7.9 as follows (new text between **): 16.7.9 Marine farming, **other than finfish farming**, inside an Enclosed Waters CMU or a Near-shore CMU, and not within an AMA, including the associated occupation of space in the coastal marine area, the erection, placement, use of structures, disturbance of the seabed and ancillary discharges to water, and the discharge of feed or medicinal or therapeutic compounds, associated with a marine farm. And add new rule to read: **16.7.9A Finfish farming inside an Enclosed Waters CMU or a Near-shore CMU, and not within an FAMA, including the associated occupation of space in the coastal marine area, the erection, placement, use of structures, disturbance of the seabed and ancillary discharges to water, and the discharge of feed or medicinal or therapeutic compounds, associated with a marine farm.** |
| | | | 24.6 | Volume Two | Chapter: 16 | Provision: 16.6.13 | Support | To amend Rule 16.6.13 to only reference 'new' marine farms and to add a note directing plan users to the NESMA when considering a replacement consent. Amend rule to read (new text between **): 16.6.13 tA **new** marine farming in an Offshore CMU, including the associated occupation of space in the coastal marine area, the erection, placement, use of structures, disturbance of the seabed and ancillary discharges to water. **Note: Rule 16.6.13 does not apply to replacement consents for existing marine farms in the Offshore CMU that are managed under the National Environment Standards for Marine Aquaculture.** |
| | | | 24.7 | Volume Two | Chapter: 25 | Provision: Near-shore CMU | Support | The Coastal Section – Outer Pelorus and Chetwode Islands/Titi Island/Forsyth Island CMUs constitute part of the 'Near-shore CMU' group and should be included in the definition as follows (new text between **): Near-shore CMU means any of the following CMUs: South Marlborough, **Coastal Section – Outer Pelorus,** Coastal Section - Cook Strait, D'Urville Island, **Chetwode Islands/Titi Island/Forsyth Island**. |
| | | | 24.8 | Volume One | Chapter: 13 | Provision: Policy 13.21.5 | Support | Remove reference to 'Values Report' and associated wording, as shown below (text to be deleted between []): To create a new additional AMA, a plan change or variation is required. This policy provides additional guidance on when a new AMA may be considered appropriate. This includes key considerations of the natural and human use values of the Marlborough Sounds and consideration of monitoring of cumulative adverse effects. [Many of these values are identified in the Values Report prepared in 2018 as part of the development of these provisions]. |
| | | | 24.9 | Volume One | Chapter: 13 | Provision: Policy 13.21.6 | Support | Remove reference to 'Values Report' and associated wording, as shown below (text to be deleted between []): The appropriateness of marine farms within the offshore CMU will be assessed considering adverse effects on any of the natural and human use values of the coastal marine area [including those identified in the Values Report 2018] and may be provided for when they are located ... |
| | | | 24.10 | Volume One | Chapter: 13 | Provision: Policy 13.21.1 | Support | Amend policy to read: Amend policy 13.21.1 as follows: (d) new and existing aquaculture activities are inappropriate in the following zones: (i) Coastal marine zone (ii) Port zone (iii) Marina zone (iv) Port landing area zone except in an AMA overlay or the open water CMU; (e) where possible, ... (Please note there is another submission lodged by Council seeking a change to this policy) |

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| | | | 24.11 | Volume One | Chapter: 13 | Provision: Policy 13.21.7 | Support | Amend 13.21.7 to remove the word 'within' to read: (ii) monitoring in accordance with Policy 13.22.1 shows that the current scale of marine farming in the CMU is not having a significant effect on the natural and human use values of the CMU and that additional marine farming activities can be undertaken without creating a significant adverse effects on the natural and human use values of the CMU. |
| | | | 24.12 | Volume One | Chapter: 13 | Provision: Policy 13.22.2 | Support | Amend the formatting of Policy 13.22.2 as follows: Policy 13.22.2 Consent holders for marine farms in the coastal marine area will be required to remove marine farm structures from the site: a) on expiry or surrender of the coastal permit, unless continued operation is allowed by s124 or 165ZH of the RMA or a new coastal permit is granted to allow marine farming to continue using the same structures; or b) if marine farming activity ceases for a period of 5 years or greater (other than for operational reasons such as periodic fallowing of a site) on the site and structures are derelict, unused or obsolete, whether or not the coastal permit has expired or been surrendered. An exception may be made to the requirement to remove all structures for anchoring structures in the following circumstances: (i) the anchoring structure is a screw anchor, and the screw anchor is cut off at sea floor level and the part of the screw anchor previously protruding from the seafloor is removed; or (ii) the anchoring structure is a block anchor, and the block anchor cannot practicably be removed or reused and the remaining block anchor will not be an impediment to navigation or safe anchoring. |
| | | | 24.13 | Volume Two | Chapter: 16 | Provision: 16.4.3.5 | Support | Amend Matters over which the Council has reserved control 16.4.3.5 to read (new text between **): Layout and design of the farm, including the number and length of backbone lines and droppers, and the arrangement of those lines including separation distances between lines *and between farms*. |
| | | | 24.14 | Volume One | Chapter: 13 | Provision: Policy 13.22.9 | Support | Amend 13.22.9 (b) to read: is one of the species listed in Appendix 11; |
| | | | 24.15 | Volume Three | Appendix: 11 | Appendix item: Species authorised to be farmed within the Marlborough region's coastal waters | Support | Typographic error in the appendix. Amend spelling as follows: Lessonia variegata |
| | | | 24.16 | Volume One | Chapter: 13 | Provision: Policy 13.22.4 | Support | Restart provision lettering for Policy 13.22.4 at (a) |
| | | | 24.17 | Volume Four | CMU 37: Port Underwood | CMU item: CMU 37 Aquaculture Management Area - AMA 38 | Support | Council seeks that the AMA 38 (CMU 37) identified in Kingfish Bay, Port Underwood in Variation 1 for the now withdrawn application U160860 be removed. |
| | | | 24.18 | Volume Four | CMU 37: Port Underwood | CMU item: CMU 37 Aquaculture Management Area - AMA 13 | Support | Council seeks that the AMA identified in Kaikoura Bay as AMA 13 (CMU 37), Port Underwood in Variation 1 for the now closed application U160067 be removed. |
| | | | 24.19 | Volume Four | CMU 22: Inner Pelorus Sound | CMU item: CMU 22 Aquaculture Management Area - AMA 15 | Support | AMA 15 be reduced to match the current consented boundary of the marine farm (8328) at this site. An attachment has been provided to show the farm. Council seeks the AMA (shown in red) is reduced to match the granted area (shown in blue). |
| | | | 24.20 | Volume Four | CMU 28: Maud Island | CMU item: CMU 28 Aquaculture Management Area - AMA 6 | Support | Remove the areas of AMA 6 that overlap with ESMS 3.6 and ESMS 3.23. |
| | | | 24.21 | Volume Four | CMU 16: Fitzroy Bay | CMU item: CMU 16 Aquaculture Management Area - AMA 5 | Support | Remove the section of AMA 5, CMU 16 that overlaps with ESMS 3.8. |
| | | | 24.22 | Volume Four | CMU 42: Tory Channel | CMU item: CMU 42 Aquaculture Management Area - AMA 2 | Support | The area of AMA 2 that overlaps with ESMS 5.11B (whose ESMS number has subsequently been amended to 5.12B) amended to be at Tory Channel – Ngaruru Bay be removed as an aquaculture management area. |
| | | | 24.23 | Volume Four | CMU 43: Waitata Bay | CMU item: CMU 43 Aquaculture Management Area - AMA 8 | Support | The area of AMA 8 that overlaps with ESMS 3.31 at Rat Point Reef be removed as an aquaculture management area. |
| | | | 24.24 | Volume Four | CMU 28: Maud Island | CMU item: CMU 28 Aquaculture Management Area - AMA 9 | Support | The area of AMA 9 that overlaps with ESMS 3.6 on the southern side of Tawhitinui Reach be removed as an aquaculture management area. |
| | | | 24.25 | Volume Four | CMU 14: East Bay QCS | CMU item: CMU 14 Aquaculture Management Area - AMA 9 | Support | On the northern side of Easy Bay (Onauku Bay), the area of AMA 9 i that overlaps with ESMS 4.24 be removed as an aquaculture management area. |
| | | | 24.26 | Volume Four | CMU 42: Tory Channel | CMU item: CMU 42 Aquaculture Management Area - AMA 1 | Support | The area of AMA 1 in CMU 42 that overlaps with ESMS 5.3 (In Tory Channel) be removed as an aquaculture management area. |
| 25 | Hogg | David Hogg | 25.1 | Volume Four | CMU 6: Clova Bay | CMU item: CMU 6 Aquaculture Management Area - AMA 2 | Neutral | Either: a) Draw the AMA as per the MFA/AQNZ submission (Indicative Map ref 012, Clova Bay West, Pelorus Sound); OR b) Retain the AMA as proposed; OR c) Draw an AMA around marine farm 8551 as installed/consented. |
| | | | 25.2 | Volume Four | CMU 6: Clova Bay | CMU item: CMU 6 Aquaculture Management Area - AMA 3 | Neutral | Either: a) Draw the AMA as per the MFA/AQNZ submission (Map ref 051, Clova Bay West, Pelorus Sound); OR b) Retain the AMA as proposed; [Farm 8560] |
| | | | 25.3 | Volume Four | CMU 39: Squally Cove | CMU item: CMU 39 Aquaculture Management Area - AMA20 | Neutral | Either: a) Draw the AMA as per the MFA/AQNZ submission (Map ref 066, Matarau Point, Squally Cove); OR b) Retain the AMA as proposed; [Farm 8629] |
| | | | 25.4 | Volume Two | Chapter: 16 | Provision: 16.4 | Support | Existing marine farms should be 'renewed' as a controlled activity without notification |

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| | | | 25.5 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Neutral | (a) Existing marine farms should be 'renewed' as a controlled activity without notification; and (b) AMAs should be drawn in the way set out in this submission, provided that no existing marine farm loses area, total backbone length and if the farm is shifting from its existing space it is moved into equivalent space; or (c) The existing marine farm(s) should stay where they are currently installed (including when they are offsite); or (d) The existing marine farm(s) should shift into new space as long as they do not lose area, total backbone length and the move is into equivalent space. If someone makes a submission that any existing marine farm should be removed from its current location, and that submission is accepted, then that farm(s) should move into new space in bays where there is currently marine farming. That is consistent with the principle of no loss of marine farming space and no loss of longline length. |
| 26 | AJ King Family Trust & SA King Family Trust | Bruce Cardwell | 26.1 | Volume Four | CMU 1: Admiralty Bay | CMU item: CMU 1 Aquaculture Management Area - AMA 31 | Oppose | Marine Farm 8043 Place AMA 31 around the consented space |
| | | | 26.2 | Volume Four | CMU 17: Forsyth Bay | CMU item: CMU 17 Aquaculture Management Area - AMA 22 | Support | Retain the proposed AMA (Inferred) [farm 8130] |
| | | | 26.3 | Volume Four | CMU 2: Anakoha Bay | CMU item: CMU 2 Aquaculture Management Area - AMA 1 | Oppose | a) Draw the AMA as per the MFA/AQNZ submission (map ref 088, Anakoha Bay) [Farm 8148] |
| | | | 26.4 | Volume Four | CMU 20: Hallam Cove | CMU item: CMU 20 Aquaculture Management Area - New AMA | Oppose | a) Relocate 4 x 150m lines to our Beatrix Bay farm 8260 (AMA2, CMU 3, Map 9, Volume 4); OR b) If relocation to 8260 is not possible then relocate 4 x 150m lines to our Richmond Bay farm 8204 (AMA 6, CMU 44, Map 4, Volume 4); OR c) Place an AMA over the existing site and retain 8188 as consented. [Farm 8188] |
| | | | 26.5 | Volume Four | CMU 44: Waitata Reach | CMU item: CMU 44 Aquaculture Management Area - New AMA | Oppose | a) Draw the AMA as per the MFA/AQNZ submission (map ref 090, Richmond Bay, Pelorus Sound) (if lines are not being relocated from Hallam Cove farm 8188); OR b) Draw the AMA so that it encompasses the existing lines/structures as well as the 4 x 150m lines being relocated from 8188) [Farm 8204] |
| | | | 26.6 | Volume Four | CMU 3: Beatrix Bay | CMU item: CMU 3 Aquaculture Management Area - AMA 2 | Neutral | Relocate 4 x 150m lines from our Hallam Cove farm 8188 to the seaward side of 8260 as per the map provided in Schedule 2 [Farm 8260] |
| | | | 26.7 | Volume Four | CMU 22: Inner Pelorus Sound | CMU item: CMU 22 Aquaculture Management Area - AMA 9 | Support | Retain the AMA as proposed. (inferred) [Famr 8338] |
| | | | 26.8 | Volume Four | CMU 11: Crail Bay | CMU item: CMU 11 Aquaculture Management Area - AMA 18 | Support | Retain the AMA as proposed (Inferred) [8544] |
| | | | 26.9 | Volume Four | CMU 16: Fitzroy Bay | CMU item: CMU 16 Aquaculture Management Area - AMA 7 | Support | Retain the AMA as proposed (Inferred) [Farm 8573] |
| | | | 26.10 | Volume Two | Chapter: 16 | Provision: 16.4 | Support | Existing marine farms should be 'renewed' as a controlled activity without notification |
| | | | 26.11 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Neutral | (a) Existing marine farms should be 'renewed' as a controlled activity without notification; and (b) AMAs should be drawn in the way set out in this submission, provided that no existing marine farm loses area, total backbone length and if the farm is shifting from its existing space it is moved into equivalent space; or (c) The existing marine farm(s) should stay where they are currently installed (including when they are offsite); or (d) The existing marine farm(s) should shift into new space as long as they do not lose area, total backbone length and the move is into equivalent space. (e) 'Equivalent space' should be defined in terms of relevant farming characteristics, production potential, and efficiency and viability of farming that space. Relocations should not be undertaken in a manner that reduces the farming characteristics for the farm being relocated, or the adjacent farms. (f) Relocations should be used as an opportunity to gather background water column monitoring data as anticipated by the Technical Advisory Group and to track indicators over time, prior to, and as, the relocated farms are installed and operated. If someone makes a submission that any existing marine farm should be removed from its current location, and that submission is accepted, then that farm(s) should move into new space in bays where there is currently marine farming. That is consistent with the principle of no loss of marine farming space and no loss of longline length. |
| 27 | Ayakulik Limited | Peter Radich | 27.1 | Volume One | Chapter: 13 | Provision: New provision | Oppose | To add a new Policy (perhaps between Proposed Policy 13.21.6 & 13.21.7) as follows: 'To enable the extension of Existing Marine Farms, by providing for such extensions through the resource consent process, as a discretionary activity.' (so that such extensions are able to be applied for by resource consent as a discretionary activity). |
| | | | 27.2 | Volume One | Chapter: 13 | Provision: Policy 13.21.7 | Oppose | To remove the extension of Existing Marine Farms from the allocations processes contemplated by Policy 13.21.7 (so that such extensions are able to be applied for by resource consent as a discretionary activity). |
| | | | 27.3 | Volume Two | Chapter: 16 | Provision: New provision | Oppose | To add a new rule 16.6.15: 'The extension of Existing Marine Farms within an AMA.' (so that such extensions are able to be applied for by resource consent as a discretionary activity). |
| 28 | Beryl Archer & John Heberd | Bruce Cardwell | 28.1 | Volume Four | CMU 2: Anakoha Bay | CMU item: CMU 2 Aquaculture Management Area - AMA 1 | Oppose | Marine Farm 8149 Draw the AMA as per the MFA/AQNZ submission (ie place the AMA around the consented space); (Map ref 080, Anakoha Bay) |

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| | | | 28.2 | Volume Two | Chapter: 16 | Provision: 16.4 | Support | Existing marine farms should be 'renewed' as a controlled activity without notification |
| | | | 28.3 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Neutral | (a) Existing marine farms should be 'renewed' as a controlled activity without notification; and (b) AMAs should be drawn in the way set out in this submission, provided that no existing marine farm loses area, total backbone length and if the farm is shifting from its existing space it is moved into equivalent space; or (c) The existing marine farm(s) should stay where they are currently installed (including when they are offsite); or (d) The existing marine farm(s) should shift into new space as long as they do not lose area, total backbone length and the move is into equivalent space. If someone makes a submission that any existing marine farm should be removed from its current location, and that submission is accepted, then that farm(s) should move into new space in bays where there is currently marine farming. That is consistent with the principle of no loss of marine farming space and no loss of longline length. |
| 29 | Skeggs | Bryan Skeggs | 29.1 | Volume Four | CMU 44: Waitata Reach | CMU item: CMU 44 Aquaculture Management Area - AMA 2 | Oppose | a) Draw the AMA as per the MFA/AQNZ submission (map ref 090, Richmond Bay, Pelorus Sound); OR b) Ensure that the AMA is drawn in such a way that the consented layout can be incorporated, and the perimeter of the consented area does not change [Farm 8205] |
| | | | 29.2 | Volume Two | Chapter: 16 | Provision: 16.4 | Support | Existing marine farms should be 'renewed' as a controlled activity without notification |
| | | | 29.3 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Neutral | (a) Existing marine farms should be 'renewed' as a controlled activity without notification; and (b) AMAs should be drawn in the way set out in this submission, provided that no existing marine farm loses area, total backbone length and if the farm is shifting from its existing space it is moved into equivalent space; or (c) The existing marine farm(s) should stay where they are currently installed (including when they are offsite); or (d) The existing marine farm(s) should shift into new space as long as they do not lose area, total backbone length and the move is into equivalent space. If someone makes a submission that any existing marine farm should be removed from its current location, and that submission is accepted, then that farm(s) should move into new space in bays where there is currently marine farming. That is consistent with the principle of no loss of marine farming space and no loss of longline length. |
| 30 | Canantor Mussels Limited | Q A M Davies, A L Hills and E | 30.1 | Volume Four | CMU 22: Inner Pelorus | CMU item: CMU 22 Aquaculture Management | Oppose | (a) Include existing marine farm site 8326 within an AMA, by creating an AMA around the consented and/or |
| | | | 30.2 | Volume Two | Chapter: 16 | Provision: 16.4 | Support | Existing marine farms should be 'renewed' as a controlled activity without notification |
| | | | 30.3 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Neutral | At a high level; |
| 31 | Womersley | Chris Womersley | 31.1 | Volume Four | CMU 28: Maud Island | CMU item: CMU 28 Aquaculture Management Area - AMA 5 | Oppose | a) Draw the AMA as per the map provided in Schedule 2; OR b) Draw the AMA as per the MFA/AQNZ submission (map ref 053, Picnic Bay West, Tawhitinui Reach); [Farm 8181] |
| | | | 31.2 | Volume Four | CMU 28: Maud Island | CMU item: CMU 28 Aquaculture Management Area - AMA 6 | Oppose | a) Place the AMA around the consented/actual space; [Farm 8179] |
| | | | 31.3 | Volume Two | Chapter: 16 | Provision: 16.4 | Support | Existing marine farms should be 'renewed' as a controlled activity without notification |
| | | | 31.4 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Neutral | (a) Existing marine farms should be 'renewed' as a controlled activity without notification; and (b) AMAs should be drawn in the way set out in this submission, provided that no existing marine farm loses area, total backbone length and if the farm is shifting from its existing space it is moved into equivalent space; or (c) The existing marine farm(s) should stay where they are currently installed (including when they are offsite); or (d) The existing marine farm(s) should shift into new space as long as they do not lose area, total backbone length and the move is into equivalent space. If someone makes a submission that any existing marine farm should be removed from its current location, and that submission is accepted, then that farm(s) should move into new space in bays where there is currently marine farming. That is consistent with the principle of no loss of marine farming space and no loss of longline length. |
| 32 | The NZ Rock Lobster Industry | Mark Edwards | 32.1 | Volume One | Chapter: 13 | Provision: Policy 13.21.3 | Oppose | a) Policy 13.21.3(e) should be amended to read – Outside areas known to provide significant feeding or |
| | | | 32.2 | Volume One | Chapter: 13 | Provision: Policy 13.21.5 | Oppose | Policy 13.21.5(b)(ii) should be amended to read – no reefs, biogenic habitats, cobble habitats or algae beds |
| | | | 32.3 | Volume One | Chapter: 13 | Provision: Policy 13.21.6 | Oppose | Policy 13.21.6(g)(ii) should be amended to read – reefs, biogenic habitats, cobble habitats or algae beds or |
| | | | 32.4 | Volume One | Chapter: 13 | Provision: Policy 13.22.9 | Oppose | Policy 13.22.9 should be amended to read – Enable the change or addition of species able to be farmed in a |
| | | | 32.5 | Volume One | Chapter: 13 | Provision: Objective 13.21 | Neutral | In the interests of facilitating 'integrated management' (a core responsibility for the Council under the RMA), |
| 33 | KiwiRail Holdings Limited (KiwiRail) | Rebecca Beals | 33.1 | Volume One | Chapter: 13 | Provision: Policy 13.21.4 | Support | Retain policy as proposed |
| | | | 33.2 | Volume One | Chapter: 13 | Provision: Policy 13.22.2 | Support | Retain policy as proposed |
| | | | 33.3 | Volume One | Chapter: 13 | Provision: Policy 13.22.4 | Support | Retain policy as proposed |

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| | | | 33.4 | Volume Two | Chapter: 16 | Provision: 16.4.3.6 | Support | Retain matter over which the Council has reserved control as proposed |
| | | | 33.5 | Volume Two | Chapter: 16 | Provision: 16.4.5.7 | Support | Retain matter over which the Council has reserved control as proposed |
| | | | 33.6 | Volume Two | Chapter: 16 | Provision: 16.4.3.9 | Support | Retain matter over which the Council has reserved control as proposed |
| | | | 33.7 | Volume Two | Chapter: 16 | Provision: 16.4.5.10 | Support | Retain as proposed |
| | | | 33.8 | Volume Two | Chapter: 16 | Provision: 16.5.3.5 | Support | Retain matter over which the Council has reserved control as proposed |
| | | | 33.9 | Volume Two | Chapter: 16 | Provision: 16.5.4.7 | Support | Retain matter over which the Council has reserved control as proposed |
| | | | 33.10 | Volume Two | Chapter: 16 | Provision: 16.5.3.7 | Support | Retain matter over which the Council has reserved control as proposed |
| | | | 33.11 | Volume Two | Chapter: 16 | Provision: 16.5.4.10 | Support | Retain matter over which the Council has reserved control as proposed |
| | | | 33.12 | Volume Two | Chapter: 16 | Provision: 16.5.5.4 | Support | Retain matter over which the Council has reserved control as proposed |
| | | | 33.13 | Volume Two | Chapter: 16 | Provision: 16.5.5.13 | Support | Retain matter over which the Council has reserved control as proposed |
| | | | 33.14 | Volume Four | CMU 42: Tory Channel | CMU item: CMU 42 Aquaculture Management Area - AMA 1 | Support | Retain the AMAs and FAMAs in CMU 42 as proposed. |
| | | | 33.15 | Volume Four | CMU 42: Tory Channel | CMU item: CMU 42 Aquaculture Management Area - AMA 2 | Support | Retain the AMAs and FAMAs in CMU 42 as proposed. |
| | | | 33.16 | Volume Four | CMU 42: Tory Channel | CMU item: CMU 42 Aquaculture Management Area - AMA 3 | Support | Retain the AMAs and FAMAs in CMU 42 as proposed. |
| | | | 33.17 | Volume Four | CMU 42: Tory Channel | CMU item: CMU 42 Aquaculture Management Area - AMA 4 | Support | Retain the AMAs and FAMAs in CMU 42 as proposed. |
| | | | 33.18 | Volume Four | CMU 42: Tory Channel | CMU item: CMU 42 Aquaculture Management Area - AMA 5 | Support | Retain the AMAs and FAMAs in CMU 42 as proposed. |
| | | | 33.19 | Volume Four | CMU 42: Tory Channel | CMU item: CMU 42 Aquaculture Management Area - AMA 6 | Support | Retain the AMAs and FAMAs in CMU 42 as proposed. |
| | | | 33.20 | Volume Four | CMU 42: Tory Channel | CMU item: CMU 42 Aquaculture Management Area - AMA 7 | Support | Retain the AMAs and FAMAs in CMU 42 as proposed. |
| | | | 33.21 | Volume Four | CMU 42: Tory Channel | CMU item: CMU 42 Aquaculture Management Area - AMA 8 | Support | Retain the AMAs and FAMAs in CMU 42 as proposed. |
| | | | 33.22 | Volume Four | CMU 42: Tory Channel | CMU item: CMU 42 Aquaculture Management Area - AMA 9 | Support | Retain the AMAs and FAMAs in CMU 42 as proposed. |
| | | | 33.23 | Volume Four | CMU 42: Tory Channel | CMU item: CMU 42 Aquaculture Management Area - Finfish AMA 1 | Support | Retain the AMAs and FAMAs in CMU 42 as proposed. |
| | | | 33.24 | Volume Four | CMU 42: Tory Channel | CMU item: CMU 42 Aquaculture Management Area - Finfish AMA 2 | Support | Retain the AMAs and FAMAs in CMU 42 as proposed. |
| | | | 33.25 | Volume Four | CMU 42: Tory Channel | CMU item: CMU 42 Aquaculture Management Area - Finfish AMA 3 | Support | Retain the AMAs and FAMAs in CMU 42 as proposed. |
| | | | 33.26 | Volume Four | CMU 42: Tory Channel | CMU item: CMU 42 Aquaculture Management Area - Finfish AMA 4 | Support | Retain the AMAs and FAMAs in CMU 42 as proposed. |
| 34 | Clifford Bay Marine Farms Limited | Quentin Alexander Muir Davies and Kerry Morgan Moor | 34.1 | Volume One | Chapter: 13 | Provision: Policy 13.21.4 | Neutral | Amend policy 13.21.4 to read as follows - additions are indicated by []: Policy 13.21.4 – Additional AMAs in the Enclosed Waters CMUs (AMAs that are not to provide for existing marine farms or the relocation of existing marine farms), and AMAs in Near-shore CMUs, and [new] marine farms in the offshore CMUs [that do not have an existing coastal permit] are not appropriate in |
| | | | 34.2 | Volume One | Chapter: 13 | Provision: Policy 13.21.6 | Neutral | Amend policy 13.21.6 to read as follows - additions are indicated by []: Policy 13.21.6 – The appropriateness of [new] marine farms (that is farms for which no resource consent has been held) within the offshore CMU will be assessed considering adverse effects on any of the natural and human use values of the coastal marine area including those identified in the Values Report 2018 and may be provided for when they are located: ... |
| | | | 34.3 | Volume One | Chapter: 13 | Provision: Policy 13.22.8 | Neutral | Amend policy 13.22.8 to read as follows - additions are indicated by []: Policy 13.22.8 – Change in layout (a) Enable a change to the layout of structures for an existing marine farm using conventional long-line structures within an AMA, [nearshore CMU or offshore CMU,] where there is no increase to the total area occupied by structures and no increase in the total length of lines. ... |
| | | | 34.4 | Volume Two | Chapter: 16 | Provision: 16.4.5 | Neutral | Amend Rule 16.4.5 to read as follows - deletion indicated by [deletion]: Rule 16.4.5 - Marine farming using conventional longline structures or intertidal structures [deletion] where a replacement consent is being sought or a new consent is required to allow for change of or addition of species or to change the layout of structures on the marine farm in: (i) an AMA for which an existing coastal permit for a marine farm has already been granted under Rule 16.4.3; ... |
| | | | 34.5 | Volume Two | Chapter: 16 | Provision: 16.6.13 | Neutral | Amend Rule 16.6.13 to read as follows - additions are indicated by []: Rule 16.6.13 Marine farming in an Offshore CMU [which is a new application for which a coastal permit has not previously been granted] including the associated occupation of space in the coastal marine area, the erection, placement, use of structures, disturbance of the seabed and ancillary discharges to water. |

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| | | | 34.6 | Volume One | Chapter: 13 | Provision: Policy 13.22.7 | Neutral | Amend Policy 13.22.7 to read as follows - additions are indicated by []: Rule 16.6.13 Marine farming in an Offshore CMU [which is a new application for which a coastal permit has not previously been granted] including the associated occupation of space in the coastal marine area, the erection, placement, use of structures, disturbance of the seabed and ancillary discharges to water. Policy 13.22.7 – The layout, positioning, design and operation of marine farms and associated structures must ensure: (a) for marine farms using conventional long line structures, the lines are generally positioned parallel to the shoreline, unless there is a reason related to the geography or bathymetry or hydrology of the location that this is not practicable; (b) for marine farms using conventional long line structures, the lines are positioned with a 15-20 metre space between each line [except for marine farms in offshore CMU's which may be 15 - 66m apart]; ... |
| | | | 34.7 | Volume Two | Chapter: 25 | Provision: Conventional longline structures | Neutral | Amend the definition to read as follows - additions are indicated by []: Conventional longline structures means the use of longline structure technology and layout, such as a single or double backbone line and spherical or capsule-shaped floats, and [includes longlines with subsurface backbones and] any future technological changes that do not substantially alter the concept of a longline layout. |
| | | | 34.8 | Volume Four | Open Water CMU | CMU item: Open Water CMU - MF8001 | Neutral | For marine farm 8001 a) Draw the AMA as per the Clifford Bay Realignment Option B (attached to submission); OR b) Draw the AMA as per the Clifford Bay Realignment Option A (attached to submission); c) Place the AMA around the installed/consented space; OR d) Relocate to another bay in the Marlborough Sounds where there is existing marine farming, in line with the rest of this submission |
| | | | 34.9 | Volume Two | Chapter: 16 | Provision: 16.4 | Support | Existing marine farms should be 'renewed' as a controlled activity without notification |
| | | | 34.10 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Neutral | (a) Existing marine farms should be 'renewed' as a controlled activity without notification; and (b) AMAs should be drawn in the way set out in this submission, provided that no existing marine farm loses area, total backbone length and if the farm is shifting from its existing space it is moved into equivalent space; or (c) The existing marine farm(s) should stay where they are currently installed (including when they are offsite); or (d) The existing marine farm(s) should shift into new space as long as they do not lose area, total backbone length and the move is into equivalent space. |
| 35 | David Muir McLaren & Lenore Mary McLaren | Bruce Cardwell | 35.1 | Volume Four | CMU 36: Port Ligar | CMU item: CMU 36 Aquaculture Management Area - AMA 2 | Support | Retain the AMA for marine farms 8497 and 8077 as proposed. |
| | | | 35.2 | Volume Four | CMU 36: Port Ligar | CMU item: CMU 36 Aquaculture Management Area - AMA 2 | Support | Retain the AMA for marine farm 8076 as proposed. |
| | | | 35.3 | Volume Four | CMU 36: Port Ligar | CMU item: CMU 36 Aquaculture Management Area - AMA 3 | Oppose | Relocate 2 x 100m lines from our Hallam Cove farm 8188 to the seaward side of 8074 as per the map attached to the submission. |
| | | | 35.4 | Volume Four | CMU 36: Port Ligar | CMU item: CMU 36 Aquaculture Management Area - AMA 10 | Support | Retain the AMA for marine farm 8066 as proposed. |
| | | | 35.5 | Volume Four | CMU 20: Hallam Cove | CMU item: CMU 20 Aquaculture Management Area - New AMA | Oppose | Relocate the 6 x 150m lines to the following farms: 4 x 100m lines to our Port Ligar farm 8065 (AMA 3, CMU 36, Map 4) and 2 x 100m lines to our Port Ligar farm 8074 (AMA 11, CMU 36, Map 5); OR Place an AMA over the existing site and retain 8188 as consented. |
| | | | 35.6 | Volume Four | CMU 36: Port Ligar | CMU item: CMU 36 Aquaculture Management Area - AMA 11 | Oppose | Relocate 4 x 100m lines from our Hallam Cove farm 8188 to the seaward side of 8065 as per the map provided in the submission. |
| | | | 35.7 | Volume Two | Chapter: 16 | Provision: 16.4 | Support | Existing marine farms should be 'renewed' as a controlled activity without notification |
| | | | 35.8 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Neutral | (a) Existing marine farms should be 'renewed' as a controlled activity without notification; and (b) AMAs should be drawn in the way set out in this submission, provided that no existing marine farm loses area, total backbone length and if the farm is shifting from its existing space it is moved into equivalent space; or (c) The existing marine farm(s) should stay where they are currently installed (including when they are offsite); or (d) The existing marine farm(s) should shift into new space as long as they do not lose area, total backbone length and the move is into equivalent space. |
| 36 | Jones | David Jones | 36.1 | Volume Four | CMU 17: Forsyth Bay | CMU item: CMU 17 Aquaculture Management Area - AMA 24 | Oppose | Draw the AMA as per the MFA/AQNZ submission (ie place the AMA around the newly consented space for marine farm 8132); (Map ref 083, Whakatahuri Bay, Forsyth Bay) |
| | | | 36.2 | Volume Two | Chapter: 16 | Provision: 16.4 | Support | Existing marine farms should be 'renewed' as a controlled activity without notification |

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| | | | 36.3 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Neutral | (a) Existing marine farms should be 'renewed' as a controlled activity without notification; and (b) AMAs should be drawn in the way set out in this submission, provided that no existing marine farm loses area, total backbone length and if the farm is shifting from its existing space it is moved into equivalent space; or (c) The existing marine farm(s) should stay where they are currently installed (including when they are offsite); or (d) The existing marine farm(s) should shift into new space as long as they do not lose area, total backbone length and the move is into equivalent space. If someone makes a submission that any existing marine farm should be removed from its current location, and that submission is accepted, then that farm(s) should move into new space in bays where there is currently marine farming. That is consistent with the principle of no loss of marine farming space and no loss of longline length. |
| 37 | Burns | Frank Burns | 37.1 | Volume Four | CMU 14: East Bay QCS | CMU item: CMU 14 Aquaculture Management Area - AMA 9 | Support | Retain the AMA for marine farm 8510 as proposed. (Inferred) |
| | | | 37.2 | Volume Four | CMU 14: East Bay QCS | CMU item: CMU 14 Aquaculture Management Area - AMA 6 | Support | Retain the AMA for marine farm 8400 as proposed. (Inferred) |
| | | | 37.3 | Volume Four | CMU 14: East Bay QCS | CMU item: CMU 14 Aquaculture Management Area - AMA 1 | Support | Retain the AMA for marine farm 8580 as proposed. (Inferred) |
| | | | 37.4 | Volume Two | Chapter: 16 | Provision: 16.4 | Support | Existing marine farms should be 'renewed' as a controlled activity without notification |
| | | | 37.5 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Neutral | (a) Existing marine farms should be 'renewed' as a controlled activity without notification; and (b) AMAs should be drawn in the way set out in this submission, provided that no existing marine farm loses area, total backbone length and if the farm is shifting from its existing space it is moved into equivalent space; or (c) The existing marine farm(s) should stay where they are currently installed (including when they are offsite); or (d) The existing marine farm(s) should shift into new space as long as they do not lose area, total backbone length and the move is into equivalent space. |
| 38 | Gary Brown and Nanette Buchanan-Brown | Bruce Cardwell | 38.1 | Volume Four | CMU 17: Forsyth Bay | CMU item: CMU 17 Aquaculture Management Area - AMA 23 | Support | Retain the AMA as mapped (marine farm 8131) |
| | | | 38.2 | Volume Four | CMU 22: Inner Pelorus Sound | CMU item: CMU 22 Aquaculture Management Area - AMA 7 | Neutral | Draw the AMA as per the MFA/AQNZ submission (ie place the inshore line of the AMA in line with the current consent boundary for marine farm 8343). (map ref 087, Yncyca Bay, Pelorus Sound) |
| | | | 38.3 | Volume Four | CMU 25: Keneperu Sound | CMU item: CMU 25 Aquaculture Management Area - AMA 1 | Support | Retain the AMA as mapped (Marine Farm 8465) |
| | | | 38.4 | Volume Two | Chapter: 16 | Provision: 16.4 | Support | Existing marine farms should be 'renewed' as a controlled activity without notification |
| | | | 38.5 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Neutral | (a) Existing marine farms should be 'renewed' as a controlled activity without notification; and (b) AMAs should be drawn in the way set out in this submission, provided that no existing marine farm loses area, total backbone length and if the farm is shifting from its existing space it is moved into equivalent space; or (c) The existing marine farm(s) should stay where they are currently installed (including when they are offsite); or (d) The existing marine farm(s) should shift into new space as long as they do not lose area, total backbone length and the move is into equivalent space. If someone makes a submission that any existing marine farm should be removed from its current location, and that submission is accepted, then that farm(s) should move into new space in bays where there is currently marine farming. That is consistent with the principle of no loss of marine farming space and no loss of longline length. |
| 39 | Chance Bay Marine Farms Limited | Colleen Buchanan | 39.1 | Volume Four | CMU 22: Inner Pelorus Sound | CMU item: CMU 22 Aquaculture Management Area - AMA 6 | Neutral | To adopt the modified AMA design proposed by the Marine Farming Association for Four Fathom Bay (yellow lines - see document attached to submission. (Marine farm 8379) |
| 40 | Tester | Jonathon Tester | 40.1 | Volume Four | CMU 39: Squally Cove | CMU item: CMU 39 Aquaculture Management Area - New AMA | Oppose | Map 7 - amend to include an AMA over existing farm 8645 (see plan annexed as 'A') |
| | | | 40.2 | Volume Four | CMU 28: Maud Island | CMU item: CMU 28 Aquaculture Management Area - New AMA | Oppose | Map 8 - amend to include an AMA over existing farm 8653 (see plan annexed as 'B'). |
| | | | 40.3 | Volume Four | CMU 11: Crail Bay | CMU item: CMU 11 Aquaculture Management Area - AMA 9 | Neutral | Map 9 - retain the AMA over the existing farm 8530 (AMA9) but adjust the boundary as shown on the plan annexed as 'C'. |
| | | | 40.4 | Volume Four | CMU 42: Tory Channel | CMU item: CMU 42 Aquaculture Management Area - AMA 3 | Neutral | Map 14 - adjust the boundary of the AMA over existing marine farm 8639 (AMA3) so that it covers the entire current farm footprint (see plan annexed as 'D'). |
| | | | 40.5 | Volume One | Chapter: 13 | Provision: Policy 13.21.3 | Oppose | Policies relating to Outstanding Natural Landscapes (including, but not limited to, Policies 13.21.3; 13.21.4; and 13.21.6) - Amend policies to recognise that not all of these criteria need to apply in every case and to give greater recognition that marine farms are appropriate within some ONLs. |
| | | | 40.6 | Volume One | Chapter: 13 | Provision: Policy 13.21.4 | Oppose | Policies relating to Outstanding Natural Landscapes (including, but not limited to, Policies 13.21.3; 13.21.4; and 13.21.6) - Amend policies to recognise that not all of these criteria need to apply in every case and to give greater recognition that marine farms are appropriate within some ONLs. |

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| | | | 40.7 | Volume One | Chapter: 13 | Provision: Policy 13.21.6 | Oppose | Policies relating to Outstanding Natural Landscapes (including, but not limited to, Policies 13.21.3; 13.21.4; and 13.21.6) - Amend policies to recognise that not all of these criteria need to apply in every case and to give greater recognition that marine farms are appropriate within some ONLs. |
| | | | 40.8 | Volume One | Chapter: 13 | Provision: Policy 13.22.7 | Neutral | Policy 13.22.7 - Amend the policy to recognise that a minimum longline space of 15m is not always practical. |
| | | | 40.9 | Volume One | Chapter: 13 | Provision: Policy 13.21.1 | Neutral | Policies 13.21.1 and 13.21.7- Amend to make it clear that where an existing farm needs to be relocated an area for relocation must be provided which is 'equivalent'. The provisions should specify that 'equivalent' means the area for relocation must achieve the following outcomes: (a) be of a sufficient size so as to be able to accommodate the same length of long lines; (b) be of a sufficient size to be able to accommodate adequate spacing between longlines; with no lesser spacing than that of the farm to be relocated; (c) have the same or a similar level of productivity; Equivalent AMAs that meet these criteria should be identified on the planning maps. |
| | | | 40.10 | Volume One | Chapter: 13 | Provision: Policy 13.21.7 | Neutral | Policies 13.21.1 and 13.21.7- Amend to make it clear that where an existing farm needs to be relocated an area for relocation must be provided which is 'equivalent'. The provisions should specify that 'equivalent' means the area for relocation must achieve the following outcomes: (a) be of a sufficient size so as to be able to accommodate the same length of long lines; (b) be of a sufficient size to be able to accommodate adequate spacing between longlines; with no lesser spacing than that of the farm to be relocated; (c) have the same or a similar level of productivity; Equivalent AMAs that meet these criteria should be identified on the planning maps. |
| | | | 40.11 | Volume One | Chapter: 13 | Provision: Policy 13.21.7 | Neutral | Provisions that require relocated marine farms to be of the same area including but not limited to Policies 13.21.7; 13.22.8, standards 16.4.3.3; 16.4.5.3, rule 16.5.4. – Amend the variation to remove the requirement that there be no increase to the total area occupied by structure/size of the marine farm. The provisions should permit a larger overall farm footprint and allow flexibility to reconfigure a farm (including where farms are relocated from shallower sites to deeper sites in order to allow for longer anchor warps, a workable farm layout, and wider spacing between longlines depending on the shape of the allocated AMA). |
| | | | 40.12 | Volume One | Chapter: 13 | Provision: Policy 13.22.8 | Neutral | Provisions that require relocated marine farms to be of the same area including but not limited to Policies 13.21.7; 13.22.8, standards 16.4.3.3; 16.4.5.3, rule 16.5.4. – Amend the variation to remove the requirement that there be no increase to the total area occupied by structure/size of the marine farm. The provisions should permit a larger overall farm footprint and allow flexibility to reconfigure a farm (including where farms are relocated from shallower sites to deeper sites in order to allow for longer anchor warps, a workable farm layout, and wider spacing between longlines depending on the shape of the allocated AMA). |
| | | | 40.13 | Volume Two | Chapter: 16 | Provision: 16.4.3.3 | Neutral | Provisions that require relocated marine farms to be of the same area including but not limited to Policies 13.21.7; 13.22.8, standards 16.4.3.3; 16.4.5.3, rule 16.5.4. – Amend the variation to remove the requirement that there be no increase to the total area occupied by structure/size of the marine farm. The provisions should permit a larger overall farm footprint and allow flexibility to reconfigure a farm (including where farms are relocated from shallower sites to deeper sites in order to allow for longer anchor warps, a workable farm layout, and wider spacing between longlines depending on the shape of the allocated AMA). |
| | | | 40.14 | Volume Two | Chapter: 16 | Provision: 16.4.5.3 | Neutral | Provisions that require relocated marine farms to be of the same area including but not limited to Policies 13.21.7; 13.22.8, standards 16.4.3.3; 16.4.5.3, rule 16.5.4. – Amend the variation to remove the requirement that there be no increase to the total area occupied by structure/size of the marine farm. The provisions should permit a larger overall farm footprint and allow flexibility to reconfigure a farm (including where farms are relocated from shallower sites to deeper sites in order to allow for longer anchor warps, a workable farm layout, and wider spacing between longlines depending on the shape of the allocated AMA). |
| | | | 40.15 | Volume Two | Chapter: 16 | Provision: 16.5.4 | Neutral | Provisions that require relocated marine farms to be of the same area including but not limited to Policies 13.21.7; 13.22.8, standards 16.4.3.3; 16.4.5.3, rule 16.5.4. – Amend the variation to remove the requirement that there be no increase to the total area occupied by structure/size of the marine farm. The provisions should permit a larger overall farm footprint and allow flexibility to reconfigure a farm (including where farms are relocated from shallower sites to deeper sites in order to allow for longer anchor warps, a workable farm layout, and wider spacing between longlines depending on the shape of the allocated AMA). |
| | | | 40.16 | Volume Two | Chapter: 16 | Provision: 16.4.3 | Neutral | Retain a controlled activity rule for consenting of marine farms (without notification). |
| | | | 40.17 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Neutral | Entire variation insofar as it relates to existing marine farm not currently within an AMA (including rule 16.7.9 and associated policies) - Amend the variation to enable existing marine farms not currently within an AMA to remain, and be consented (as a controlled activity), in their current location and with an AMA created over that existing area, until such time as equivalent (or greater) space is identified, shown as an AMA, and made available to the consent holder to relocate to ('grandparenting'), and not make marine farming a prohibited activity during that period. For space to be regarded as equivalent it must meet the outcomes set out in paragraph 4.7 above. |
| | | | 40.18 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Neutral | Entire variation - Provide flexibility within the variation to adjust the shape of an AMA on the basis of site specific benthic surveys, as part of the consenting process of older farms. |
| 41 | Bonnington | Kevin Bonnington | 41.1 | Volume Four | CMU 28: Maud Island | CMU item: CMU 28 Aquaculture Management Area - AMA 2 | Oppose | a) Remove part of the western area of the farm and move this area seaward of the existing consent as per the proposed amended AMA mapped in the MFA/AQNZ submission (map ref 093, Camel Point, Tawhitinui Reach) [Farm 8201] |

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| | | | 41.2 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Neutral | At a high level, KEVIN BONNINGTON submits that: (a) Existing marine farms should be 'renewed' as a controlled activity without notification; and (b) AMAs should be drawn in the way set out in this submission, provided that no existing marine farm loses area, total backbone length and if the farm is shifting from its existing space it is moved into equivalent space; or (c) The existing marine farm(s) should stay where they are currently installed (including when they are offsite); or (d) The existing marine farm(s) should shift into new space as long as they do not lose area, total backbone length and the move is into equivalent space. If someone makes a submission that any existing marine farm should be removed from its current location, and that submission is accepted, then that farm(s) should move into new space in bays where there is currently marine farming. That is consistent with the principle of no loss of marine farming space and no loss of longline length. |
| | | | 41.3 | Volume Two | Chapter: 16 | Provision: 16.4 | Support | Existing marine farms should be 'renewed' as a controlled activity without notification |
| 42 | Koata Limited | Hemi Toia | 42.1 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Oppose | The relief we seek in relation to the Variations is that both be amended to allow the opportunity for settlement assets in the form of waterspace to be available to Marlborough iwi, if that is the outcome agreed between iwi and the Crown. Because of the extent of the changes that will be required to the Variations in order to achieve this, we agree with Te Ohu Kaimoana that appropriate course is for those Variations to be withdrawn at this time, so that further work can be done by the Council in partnership with Marlborough iwi, as well as industry and the Crown. |
| | | | 42.2 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Oppose | Our concerns in relation to the Variations are set out in more detail in the submission of Te Ohu Kaimoana, Trustee of the Māori Commercial Aquaculture Trust. We wish to adopt and fully endorse that submission. |
| 43 | KPF Investments Ltd and United Fisheries Limited | Q A M Davies, A L Hills and E L Deason | 43.1 | Volume Four | CMU 1: Admiralty Bay | CMU item: CMU 1 Aquaculture Management Area - AMA 2 | Neutral | Marine Farm 8015 Amend AMA to include the consented and/or actual space, as per map 057 'Rerekarua Bay – Admiralty Bay' in MFA/AQNZ submission |
| | | | 43.2 | Volume Four | CMU 1: Admiralty Bay | CMU item: CMU 1 Aquaculture Management Area - AMA 5 | Neutral | Marine Farm 8018 Amend AMA to include the consented and/or actual space, as per map 026 'Garden Bay – Admiralty Bay' in MFA/AQNZ submission. |
| | | | 43.3 | Volume Four | CMU 1: Admiralty Bay | CMU item: CMU 1 Aquaculture Management Area - AMA 6 | Neutral | Marine Farm 8019 Amend AMA to include the consented and/or actual space, as per maps 026 'Garden Bay – Admiralty Bay' and 018 'Deep Bay – Admiralty Bay' in MFA/AQNZ submission. |
| | | | 43.4 | Volume Four | CMU 1: Admiralty Bay | CMU item: CMU 1 Aquaculture Management Area - AMA 10 | Support | Marine Farm 8022 Retain AMA as proposed. |
| | | | 43.5 | Volume Four | CMU 1: Admiralty Bay | CMU item: CMU 1 Aquaculture Management Area - AMA 13 | Neutral | Marine Farm 8025 Amend AMA to reflect the consented/installed space. |
| | | | 43.6 | Volume Four | CMU 1: Admiralty Bay | CMU item: CMU 1 Aquaculture Management Area - AMA 16 | Neutral | Marine Farm 8028 Amend AMA to reflect consented/installed space. |
| | | | 43.7 | Volume Four | CMU 1: Admiralty Bay | CMU item: CMU 1 Aquaculture Management Area - AMA 19 | Neutral | Marine Farm 8031 Amend AMA to reflect consented/installed space. |
| | | | 43.8 | Volume Four | CMU 1: Admiralty Bay | CMU item: CMU 1 Aquaculture Management Area - AMA 21 | Support | Marine Farm 8033 Retain AMA as proposed. |
| | | | 43.9 | Volume Four | CMU 1: Admiralty Bay | CMU item: CMU 1 Aquaculture Management Area - AMA 35 | Neutral | Marine Farm 8045 Amend AMA to include the consented and/or actual space, as per map 041 'Matatoko Point – Admiralty Bay' in MFA/AQNZ submission. |
| | | | 43.10 | Volume Four | CMU 1: Admiralty Bay | CMU item: CMU 1 Aquaculture Management Area - AMA 37 | Support | Marine Farm 8047 Retain AMA as proposed. |
| | | | 43.11 | Volume Four | CMU 1: Admiralty Bay | CMU item: CMU 1 Aquaculture Management Area - AMA 37 | Support | Marine Farm 8049 Retain AMA as proposed. |
| | | | 43.12 | Volume Four | CMU 1: Admiralty Bay | CMU item: CMU 1 Aquaculture Management Area - AMA 39 | Support | Marine Farm 8051 Retain AMA as proposed. |
| | | | 43.13 | Volume Four | CMU 1: Admiralty Bay | CMU item: CMU 1 Aquaculture Management Area - AMA 43 | Support | Marine Farm 8055 Retain AMA as proposed. |
| | | | 43.14 | Volume Four | CMU 1: Admiralty Bay | CMU item: CMU 1 Aquaculture Management Area - AMA 14 | Neutral | Marine Farm 8496 Amend the AMA consistent with the MFA/AQNZ submission map 036 'Island Bay – Admiralty Bay'. |
| | | | 43.15 | Volume Four | CMU 1: Admiralty Bay | CMU item: CMU 1 Aquaculture Management Area - AMA 36 | Neutral | Marine Farm 8080 Draw the AMA as per the MFA/AQNZ submission map 017 'Danger Point – Port Ligar'. |
| | | | 43.16 | Volume Four | CMU 17: Forsyth Bay | CMU item: CMU 17 Aquaculture Management Area - AMA 34 | Support | Marine Farm 8142 Retain AMA as proposed. |
| | | | 43.17 | Volume Four | CMU 2: Anakoha Bay | CMU item: CMU 2 Aquaculture Management Area - New AMA | Oppose | Marine Farm 8161 a) Place an AMA around the consented and/or actual space; OR b) Include site 8161 within the AMA immediately to the north in Anakoha Bay as per the MFA/AQNZ submission map 088 'Anakoha Bay', provided there is satisfactory space for site 8161 as well as the other existing farms (sites 8163 and 8162). That might be achieved, for example, by the overlay shown in the MFA/AQNZ submission map 097 'Anakoha Bay – Proposed AMA and Backbone Overlay' |

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| 43.18 | Volume Four | CMU 28: Maud Island | CMU item: CMU 28 Aquaculture Management Area - AMA 16 | Neutral | Marine Farm 8210 a) Amend the AMA consistent with the MFA/AQNZ submission map 035 'Horseshoe Bay – Pelorus Sound', provided the inside and outside boundaries of the AMA are parallel and public access to the inshore moorings and jetty is provided for; OR b) Place the AMA around the consented and/or actual space. |
| 43.19 | Volume Four | CMU 28: Maud Island | CMU item: CMU 28 Aquaculture Management Area - AMA 13 | Neutral | Marine Farm 8225 a) Draw the AMA as per the MFA/AQNZ submission map 037 'Kauauroa Bay – Pelorus Sound', subject to there being adequate space within the AMA to move inshore lines to outside of farm; OR b) Place the AMA around the consented and/or actual space. |
| 43.20 | Volume Four | CMU 3: Beatrix Bay | CMU item: CMU 3 Aquaculture Management Area - AMA 14 | Neutral | Marine Farm 8239 a) Draw the AMA as per the MFA/AQNZ submission maps 002 'Beatrix Bay North – Pelorus Sound' and 003 'Beatrix Bay Northwest – Pelorus Sound', subject to there being adequate space within the AMA to move inshore lines to outside of farm; OR b) Place the AMA around the consented and/or actual space. |
| 43.21 | Volume Four | CMU 28: Maud Island | CMU item: CMU 28 Aquaculture Management Area - AMA 10 | Neutral | Marine Farm 8316 a) Draw the AMA as per the MFA/AQNZ submission map 054 'Rams Head East – Tawhitinui Reach', subject to there being adequate space within the AMA to move inshore lines to outside of farm. In addition, any move would need to occur in conjunction with adjoining farms; OR b) Place the AMA around the consented and/or actual space. |
| 43.22 | Volume Four | CMU 22: Inner Pelorus Sound | CMU item: CMU 22 Aquaculture Management Area - New AMA | Oppose | Marine Farm 8325 a) Include site 8325 within an AMA, by creating an AMA around the consented and/or actual space; OR b) Relocate site 8325 to space in Richmond Bay, as indicated in yellow on the map prepared in 2017, attached to this submission; OR c) Relocate to equivalent space in an alternative bay in the Marlborough Sounds where there is existing marine farming, in line with the rest of this submission. |
| 43.23 | Volume Four | CMU 22: Inner Pelorus Sound | CMU item: CMU 22 Aquaculture Management Area - AMA 12 | Neutral | Marine Farm 8332 a) Draw the AMA as per the MFA/AQNZ submission map 063 'South East Bay North – Pelorus Sound'; OR b) Place the AMA around the consented and/or actual space. |
| 43.24 | Volume Four | CMU 22: Inner Pelorus Sound | CMU item: CMU 22 Aquaculture Management Area - AMA 10 | Neutral | Marine Farm 8336 a) Draw the AMA as per the MFA/AQNZ submission map 064 'South East Bay South – Pelorus Sound', as well as allowing for additional space on the outside of the farm to enable inshore lines to be moved; OR b) Place the AMA around the consented and/or actual space. |
| 43.25 | Volume Four | CMU 24: Kaiuma Bay | CMU item: CMU 24 Aquaculture Management Area - AMA 1 | Support | Marine Farm 8477 Retain AMA as proposed. |
| 43.26 | Volume Four | CMU 25: Kenepuru Sound | CMU item: CMU 25 Aquaculture Management Area - New AMA | Oppose | Marine Farm 8492 a) Relocate to equivalent space in a bay in the Marlborough Sounds where there is existing marine farming, in line with the rest of this submission; AND/OR b) Relocate individual backbones or backbone metres to existing KPF farms; OR c) Include the existing installed/consented space within an AMA. |
| 43.27 | Volume Four | CMU 11: Crail Bay | CMU item: CMU 11 Aquaculture Management Area - AMA 12 | Support | Marine Farm 8533 Retain AMA as proposed. |
| 43.28 | Volume Four | CMU 11: Crail Bay | CMU item: CMU 11 Aquaculture Management Area - AMA 18 | Neutral | Marine Farm 8541 a) Draw the AMA as per the MFA/AQNZ submission maps 029 'Grant Bay – Crail Bay'; OR b) Place the AMA around the consented and/or actual space. |
| 43.29 | Volume Four | CMU 25: Kenepuru Sound | CMU item: CMU 25 Aquaculture Management Area - AMA 11 | Oppose | Marine Farm 8563 a) Draw the AMA as per the MFA/AQNZ submission map 021 'Fish Bay East – Kenepuru Sound'; OR b) Relocate to equivalent space in a bay in the Marlborough Sounds where there is existing marine farming, in line with the rest of this submission. |
| 43.30 | Volume Four | CMU 25: Kenepuru Sound | CMU item: CMU 25 Aquaculture Management Area - AMA 11 | Neutral | Marine Farm 8566 a) Draw the AMA as per the MFA/AQNZ submission 021 'Fish Bay East – Kenepuru Sound'; OR b) Place the AMA around the consented and/or actual space. |
| 43.31 | Volume Four | All CMU | | Neutral | Make consequential changes to adjoining CMU and AMA maps where the CMU for a bay is depicted on more than one map. |
| 43.32 | Volume Two | Chapter: 16 | Provision: 16.4 | Support | Existing marine farms should be 'renewed' as a controlled activity without notification |

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| | | | 43.33 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Neutral | <p>At a high level:</p> <p>(a) AMAs should be drawn in the way set out in this submission, provided that no existing marine farm loses area, total backbone length and if the farm is shifting from its existing space it is moved into equivalent space; or</p> <p>(b) The existing marine farm(s) should stay where they are currently installed (including when they are offsite); or</p> <p>(c) The existing marine farm(s) should shift into new space as long as they do not lose area, total backbone length and the move is into equivalent space.</p> <p>If someone makes a submission that any existing marine farm should be removed from its current location, and that submission is accepted, then that farm(s) should move into new space in bays where there is currently marine farming. That is consistent with the principle of no loss of marine farming space and no loss of backbone length.</p> |
| 44 | LINDSAY AND JANE STUART | Bruce Cardwell | 44.1 | Volume Four | CMU 1: Admiralty Bay | CMU item: CMU 1 Aquaculture Management Area - AMA 41 | Support | <p>Marine Farm 8053</p> <p>Retain the AMA as mapped.</p> |
| | | | 44.2 | Volume Two | Chapter: 16 | Provision: 16.4 | Support | Existing marine farms should be 'renewed' as a controlled activity without notification |
| | | | 44.3 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Neutral | <p>(a) Existing marine farms should be 'renewed' as a controlled activity without notification; and</p> <p>(b) AMAs should be drawn in the way set out in this submission, provided that no existing marine farm loses area, total backbone length and if the farm is shifting from its existing space it is moved into equivalent space; or</p> <p>(c) The existing marine farm(s) should stay where they are currently installed (including when they are offsite); or</p> <p>(d) The existing marine farm(s) should shift into new space as long as they do not lose area, total backbone length and the move is into equivalent space.</p> <p>If someone makes a submission that any existing marine farm should be removed from its current location, and that submission is accepted, then that farm(s) should move into new space in bays where there is currently marine farming. That is consistent with the principle of no loss of marine farming space and no loss of longline length.</p> |
| 45 | Michael and Anna Richards | Bruce Cardwell | 45.1 | Volume Four | CMU 25: Kenepuru Sound | CMU item: CMU 25 Aquaculture Management Area - AMA 8 | Oppose | <p>Marine Farm 8488</p> <p>Draw the AMA as per the MFA/AQNZ submission (map ref 028, Goulter Bay, Kenepuru Sound)</p> |
| | | | 45.2 | Volume Four | CMU 25: Kenepuru Sound | CMU item: CMU 25 Aquaculture Management Area - AMA 9 | Support | <p>Marine Farm 8491</p> <p>Retain AMA as proposed [Inferred]</p> |
| | | | 45.3 | Volume Two | Chapter: 16 | Provision: 16.4 | Support | Existing marine farms should be 'renewed' as a controlled activity without notification |
| | | | 45.4 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Neutral | <p>(a) Existing marine farms should be 'renewed' as a controlled activity without notification; and</p> <p>(b) AMAs should be drawn in the way set out in this submission, provided that no existing marine farm loses area, total backbone length and if the farm is shifting from its existing space it is moved into equivalent space; or</p> <p>(c) The existing marine farm(s) should stay where they are currently installed (including when they are offsite); or</p> <p>(d) The existing marine farm(s) should shift into new space as long as they do not lose area, total backbone length and the move is into equivalent space.</p> <p>If someone makes a submission that any existing marine farm should be removed from its current location, and that submission is accepted, then that farm(s) should move into new space in bays where there is currently marine farming. That is consistent with the principle of no loss of marine farming space and no loss of longline length.</p> |
| 46 | PB Partnership (Wainui Green Limited & Two MF Limited) | Bruce Cardwell | 46.1 | Volume Four | All AMA in a CMU | | Support | <p>Marine Farm 8167</p> <p>a) Relocate to a bay with cool oceanic water equivalent to the existing space.</p> <p>b) Relocate to a bay in the Marlborough Sounds where there is existing marine farming, in line with the rest of my submission.</p> |
| | | | 46.2 | Volume Two | Chapter: 16 | Provision: 16.4 | Support | Existing marine farms should be 'renewed' as a controlled activity without notification |

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| | | | 46.3 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Neutral | (a) Existing marine farms should be 'renewed' as a controlled activity without notification; and (b) AMAs should be drawn in the way set out in the MARINE FARMING ASSOCIATION and AQUACULTURE NEW ZEALAND submission, provided that no existing marine farm loses area, total backbone length and if the farm is shifting from its existing space it is moved into equivalent space; or (c) The existing marine farm(s) should stay where they are currently installed (including when they are offsite); or (d) The existing marine farm(s) should shift into new space as long as they do not lose area, total backbone length and the move is into equivalent space. If someone makes a submission that any existing marine farm should be removed from its current location, and that submission is accepted, then that farm(s) should move into new space in bays where there is currently marine farming. That is consistent with the principle of no loss of marine farming space and no loss of longline length. |
| 47 | Okiwi Bay Aquaculture Ltd | Margaret Hippolite | 47.1 | Volume Four | CMU 39: Squally Cove | CMU item: CMU 39 Aquaculture Management Area - AMA2 | Neutral | MF Site : 8297 Symonds Bay we request should stay where it is. |
| | | | 47.2 | Volume Two | Chapter: 16 | Provision: 16.4 | Support | Existing marine farms should be 'renewed' as a controlled activity without notification |
| | | | 47.3 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Neutral | At a high level, OBA submits that: (a) Existing marine farms should be 'renewed' as a controlled activity without notification; and (b) AMAs should be drawn in the way set out in this submission, provided that no existing marine farm loses area, total backbone length and if the farm is shifting from its existing space it is moved into equivalent space; or (c) The existing marine farm(s) should stay where they are currently installed (including when they are offsite); or (d) The existing marine farm(s) should shift into new space as long as they do not lose area, total backbone length and the move is into equivalent space. If someone makes a submission that any existing marine farm should be removed from its current location, and that submission is accepted, then that farm(s) should move into new space in bays where there is currently marine farming. That is consistent with the principle of no loss of marine farming space and no loss of longline length. |
| | | | 47.4 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Neutral | OBA supports the submission of MARINE FARMING ASSOCIATION and AQUACULTURE NEW ZEALAND in its totality and adopts it as its submission. |
| 48 | PH Redwood & Company Limited | Quentin Davies and Kerry Moor | 48.1 | Volume Four | CMU 19: Guards Bay | CMU item: CMU 19 Aquaculture Management Area - New AMA | Oppose | a) An AMA be placed around the consented space [Farm 8164] that increases the site area two-fold (to reflect its importance to the industry); OR b) An AMA be placed around the installed/consented space; OR c) The farm be relocated to a remote bay in the outer Marlborough Sounds that is a suitable alternative, i.e. that provides for similar characteristics/type of water space as the existing Guards Bay site, such as Waitui Bay; OR d) The farm be relocated to a bay in the Marlborough Sounds that is a suitable alternative for the site where there is existing marine farming in line with the rest of this submission. |
| | | | 48.2 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Oppose | It submits that further consideration needs to be given to the industrial realities, including (but not limited to): (a) That not all water is equally productive. (b) That for factories to be supplied with mussels for the largest possible portion of the season, it is necessary to have farms spread across the Marlborough Shellfish Quality Programme (MSQP) areas. (c) Some farms are used exclusively as spat nurseries. (d) The bays need to be managed to ensure that overstocking does not occur. (e) Transition timeframes need to account for the time and expense involved in relocating mussel farms, including the limited number of boats in the area that are capable of shifting and installing farms. |
| | | | 48.3 | Volume Two | Chapter: 16 | Provision: 16.4 | Neutral | Existing marine farms should be 'renewed' as a controlled activity without notification |
| | | | 48.4 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Neutral | At a high level, (a) Existing marine farms should be 'renewed' as a controlled activity without notification; and (b) AMAs should be drawn in the way set out in this submission, provided that no existing marine farm loses area, total backbone length and if the farm is shifting from its existing space it is moved into equivalent space; or (c) The existing marine farm(s) should stay where they are currently installed (including when they are offsite); or (d) The existing marine farm(s) should shift into new space as long as they do not lose area, total backbone length and the move is into equivalent space. If someone makes a submission that any existing marine farm should be removed from its current location, and that submission is accepted, then that farm(s) should move into new space. That is consistent with the principle of no loss of marine farming space and no loss of backbone length. |

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| | | | 48.5 | Volume One | Chapter: 13 | Provision: Policy 13.21.7 | Oppose | The proposed plan for allocating 'equivalent space' for displaced farms needs to be clarified. It considers that: (a) Equivalent space' (eg Policy 13.21.7(b)(i)) must mean space with the same farming characteristics as the existing space. In respect of Site 8164 that means the same spat retention characteristics, and the same MSQP regime. It is unreasonable to expect a farmer to surrender an existing marine farm with no assurance that the proposed replacement will be a fair substitution. In respect of farm 8164, particularly given the points above regarding the particular characteristics of this site, it is concerned it won't receive like for like. It does not consider that a site in Richmond Bay would be a suitable substitute. (b) The proposed process places unfair risks on small industry players. (c) The timeframes provided for the relocation of mussel farms are impractical. Relocation of farms takes a great amount of time and expense. There are only 2 or 3 boats in the Sounds that are capable of installing and shifting farms. (d) The AMAs as proposed do not allow for the practicalities of laying out mussel farms. That is, the lines/shapes presently drawn on maps do not account for the physical realities of mussel farm placement in the water. |
| 49 | PHR Processing Limited | Quentin Davies and Kerry Moor | 49.1 | Volume Four | CMU 19: Guards Bay | CMU item: CMU 19 Aquaculture Management Area - New AMA | Oppose | a) An AMA be placed around the consented space of site 8164, that increases the site area two-fold (to reflect its importance to the industry); OR b) An AMA be placed around the current installed/consented space; OR c) The farm be relocated to a remote bay in the outer Marlborough Sounds that is a suitable alternative, i.e. that provides for similar characteristics/type of water space as the existing Guards Bay site, such as Waitui Bay; OR d) The farm be relocated to a bay in the Marlborough Sounds that is a suitable alternative for the site where there is existing marine farming in line with the rest of this submission. |
| | | | 49.2 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Oppose | It submits that further consideration needs to be given to the industrial realities, including (but not limited to): (a) The fact that not all water is equally productive, nor the same in nature. Not all water space can be used for the same purposes. (b) That for factories to be supplied with mussels for the largest possible portion of the season, it is necessary to have farms spread across the MSQP areas. This includes providing space for farms in the dry outer Sounds (such as farm 8164) which very rarely closed under the MSQP testing regime. These farms are essential for continual supply such to help with keeping operations going year round, rather than seasonally. (c) Outer Sounds marine farms, for various reasons, tend to be larger than inner Sounds farms. The outer Pelorus/ D'Urville Island marine farms have been deemed inappropriate due to 'outstanding natural features and landscapes'. In terms of the mussel processing industry, this is of concern, as removal of these farms means a much greater production loss. (d) Outer Sounds farms are all proven to be superior spat holding farms. Some farms are used exclusively as spat nurseries. This is becoming increasingly important as spat retention and growth is becoming difficult at other sites, in the inner Sounds. As with all farming no seed means no crop; no crop means no processing. PHR PROCESSING LTD cannot over-state its distress at the potential loss of such important farms. (e) The inner Sounds bays need to be managed to ensure that overstocking does not occur. Overstocking can cause quality and supply issues. (f) Transition timeframes need to account for the time and expense involved in relocating mussel farms, including the limited number of boats in the area that are capable of shifting and installing farms. Inadequate transition periods will impact on production and supply. |
| | | | 49.3 | Volume One | Chapter: 13 | Provision: Policy 13.21.7 | Support | Support in part - Clarify what 'equivalent space' for displaced farms means [inferred] |
| | | | 49.4 | Volume One | Chapter: 13 | Provision: New provision | Oppose | PHR PROCESSING LTD supports the submission of PH REDWOOD & COMPANY LTD in its totality and adopts it as its submission. It repeats that: (a) Farm 8164 is very important to the mussel industry. It is essential for ensuring consistent mussel supply for PHR PROCESSING LTD's operations because: (i) The farm performs exceptionally well at growing either Golden Bay or Kaitaia spat. That is because of the characteristics of this water space, being close to the exposed cool waters of Cook Strait and because it is an isolated location. This is particularly important as many Sounds farms are struggling to hold spat. (ii) The dry outer Sounds location means that it is very rarely closed under the Marlborough Shellfish Quality Programme (MSQP) testing regime. That allows access to supply while other inner Sounds sites are closed. (b) The land that surrounds the farm is actively farmed/pastoral land, and is not native bush. There are no houses with a view of marine farm 8164. The site was recently re-consented. The application did not have to be publicly notified. The application was limited notified to a number of local iwi, the Department of Conservation, the Pelorus Boat Club and PH REDWOOD AND COMPANY LTD's neighbour, Waitui Holdings Ltd. Waitui Holdings Ltd and the Pelorus Boat Club both submitted in support of the application. There were no opposing submissions. The farm was given a twenty year term, expiring 30 November 2034. |
| | | | 49.5 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Neutral | PHR PROCESSING LTD supports the submission of MARINE FARMING ASSOCIATION and AQUACULTURE NEW ZEALAND in its totality and adopts it as its submission. |
| 50 | Robert and Simon Pooley | Bruce Cardwell | 50.1 | Volume Four | CMU 22: Inner Pelorus Sound | CMU item: CMU 22 Aquaculture Management Area - AMA 21 | Oppose | Marine Farm 8321 Draw the AMA as per the MFA/AQNZ submission (map ref 086, Wilson Bay, Pelorus Sound) (ie place the AMA around the consented space); |
| | | | 50.2 | Volume Four | CMU 28: Maud Island | CMU item: CMU 28 Aquaculture Management Area - AMA 14 | Oppose | Marine Farm 8216 Draw the AMA as per the MFA/AQNZ submission (map ref 074, Tawhitinui Bay, Tawhitinui Reach) (ie place the AMA around the current application area); |
| | | | 50.3 | Volume Four | CMU 28: Maud Island | CMU item: CMU 28 Aquaculture Management Area - AMA 1 | Support | Marine Farm 8203 Retain AMA as proposed [Inferred] |

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| | | | 50.4 | Volume Four | CMU 20: Hallam Cove | CMU item: CMU 20 Aquaculture Management Area - AMA 1 | Oppose | Marine Farm 8186 Draw the AMA as per the MFA/AQNZ submission (map ref 061, Sheep Point, Hallam Cove) (ie better incorporate the existing structures) |
| | | | 50.5 | Volume Four | CMU 2: Anakoha Bay | CMU item: CMU 2 Aquaculture Management Area - AMA 1 | Oppose | Marine Farm 8146 Draw the AMA as per the MFA/AQNZ submission (map ref 088, Anakoha Bay) (ie orientate it with adjoining farms and ensure backbone length is retained) |
| | | | 50.6 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Neutral | (a) Existing marine farms should be 'renewed' as a controlled activity without notification; and (b) AMAs should be drawn in the way set out in this submission, provided that no existing marine farm loses area, total backbone length and if the farm is shifting from its existing space it is moved into equivalent space; or (c) The existing marine farm(s) should stay where they are currently installed (including when they are offsite); or (d) The existing marine farm(s) should shift into new space as long as they do not lose area, total backbone length and the move is into equivalent space. If someone makes a submission that any existing marine farm should be removed from its current location, and that submission is accepted, then that farm(s) should move into new space in bays where there is currently marine farming. That is consistent with the principle of no loss of marine farming space and no loss of longline length. |
| | | | 50.7 | Volume Two | Chapter: 16 | Provision: 16.4 | Support | Existing marine farms should be 'renewed' as a controlled activity without notification |
| 51 | Anstis | Scott Anstis | 51.1 | Volume Four | CMU 10: Coastal Section - South of French Pass | CMU item: CMU 10 Aquaculture Management Area - AMA 4 | Oppose | Two options presented for relief sought: (a) Place the AMA around the newly consented space as per the map in Schedule 2; OR (b) Draw the AMA as per the MFA/AQNZ submission (map ref 080 – Waikawa Bay – Current Basin) |
| | | | 51.2 | Volume Two | Chapter: 16 | Provision: 16.4 | Support | For existing marine farms be 'renewed' as a controlled activity without notification |
| | | | 51.3 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Neutral | At a high level; (a) Existing marine farms should be 'renewed' as a controlled activity without notification; and (b) AMAs should be drawn in the way set out in this submission, provided that no existing marine farm loses area, total backbone length and if the farm is shifting from its existing space it is moved into equivalent space; or (c) The existing marine farm(s) should stay where they are currently installed (including when they are offsite); or (d) The existing marine farm(s) should shift into new space as long as they do not lose area, total backbone length and the move is into equivalent space. If someone makes a submission that any existing marine farm should be removed from its current location, and that submission is accepted, then that farm(s) should move into new space in bays where there is currently marine farming. That is consistent with the principle of no loss of marine farming space and no loss of longline length. |
| 52 | Scott Madsen Family Trust | Scott Madsen | 52.1 | Volume Four | CMU 22: Inner Pelorus Sound | CMU item: CMU 22 Aquaculture Management Area - AMA 12 | Oppose | Farm 8333 Amend the mapping of the proposed AMA in CMU 22 so that it aligns with existing marine farm 8333. Alternatively, if that is not possible then amend the proposed AMA to enable the existing marine farm 8333 to be moved and accommodated within the proposed AMA as shown on the attached plan. |
| 53 | Te Ohu Kaimoana | Laws Lawson | 53.1 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Neutral | For Variation 1, we consider that this will require Marlborough iwi and Te Ohu Kaimoana to work with MDC, the Ministry for Primary Industries (MPI), and industry representatives early in 2021 to explore whether there is suitable space in which mussel settlement space could be accommodated within the proposed framework, or what other options may be available. We consider it important that the Council convenes this group and that this commences soon after submissions are received so that all the issues raised through the submissions can be addressed at the same time. Variation 1A should not proceed at this stage. Propose MDC to withdraw Variation 1A. Provisions must be included in both Variations that enable Marlborough iwi to have the option of a space-based settlement. (Inferred) |
| 54 | Wairangi Bay Marine Farms Ltd | Margaret Hippolite | 54.1 | Volume Four | CMU 39: Squally Cove | CMU item: CMU 39 Aquaculture Management Area - AMA14 | Oppose | Marine farm/lease site 8280 in Wairangi Bay. We would like the farm left where it is except for moving the farm seaward by one line to avoid the moorings close by. |
| | | | 54.2 | Volume Two | Chapter: 16 | Provision: 16.4 | Support | Existing marine farms should be 'renewed' as a controlled activity without notification |

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| | | | 54.3 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Support | At a high level, WBMF submits that: (a) Existing marine farms should be 'renewed' as a controlled activity without notification; and (b) AMAs should be drawn in the way set out in this submission, provided that no existing marine farm loses area, total backbone length and if the farm is shifting from its existing space it is moved into equivalent space; or (c) The existing marine farm(s) should stay where they are currently installed (including when they are offsite); or (d) The existing marine farm(s) should shift into new space as long as they do not lose area, total backbone length and the move is into equivalent space. If someone makes a submission that any existing marine farm should be removed from its current location, and that submission is accepted, then that farm(s) should move into new space in bays where there is currently marine farming. That is consistent with the principle of no loss of marine farming space and no loss of longline length. |
| 55 | Waitui Holdings Limited | Noel Moleta | 55.1 | Volume Four | CMU 45: Waitui Bay | CMU item: CMU 45 Aquaculture Management Area - New AMA | Oppose | To enable kelp farming to occur in CMU 45 through the use of 2 AMAs in the areas shown on the plan attached. Alternatively to redefine CMU45 as an Offshore CMU where such an activity would be a discretionary activity. |
| 56 | Worlds End Enterprises Limited | Brian & Nanette Bunting | 56.1 | Volume Four | CMU 28: Maud Island | CMU item: CMU 28 Aquaculture Management Area - AMA 7 | Support | a) Support MFA b) Adopt MDC AMA c) Remain in current location |
| | | | 56.2 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Neutral | Worlds End Enterprises supports the submission of MARINE FARMING ASSOCIATION and AQUACULTURE NEW ZEALAND in its totality and adopts it as its/his/her submission |
| | | | 56.3 | Volume Two | Chapter: 16 | Provision: 16.4 | Support | Existing marine farms should be 'renewed' as a controlled activity without notification |
| | | | 56.4 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Neutral | At a high level, Worlds End Enterprises Limited submits that: (a) Existing marine farms should be 'renewed' as a controlled activity without notification; and (b) AMAs should be drawn in the way set out in this submission, provided that no existing marine farm loses area, total backbone length and if the farm is shifting from its existing space it is moved into equivalent space; or (c) The existing marine farm(s) should stay where they are currently installed (including when they are offsite); or (d) The existing marine farm(s) should shift into new space as long as they do not lose area, total backbone length and the move is into equivalent space. If someone makes a submission that any existing marine farm should be removed from its current location, and that submission is accepted, then that farm(s) should move into new space in bays where there is currently marine farming. That is consistent with the principle of no loss of marine farming space and no loss of longline length. |
| 57 | The New Zealand King Salmon Co. Limited | Q A M Davies, A L Hills and E L Deason | 57.1 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Oppose | Variation 1 That the provisions in Variation 1 apply only to the growing of non-finish species and consequently delete all references to finfish from Variation 1. |
| | | | 57.2 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Oppose | Amend Variation 1A throughout to change any reference to salmon "cage" or "cages" to "pen" or "pens". |
| | | | 57.3 | Volume Two | Chapter: 25 | Provision: AMA | Oppose | Subject to the primary submission above, amend the definition of "AMA" to remove "FAMA" from the definition of "AMA". |
| | | | 57.4 | Volume Two | Chapter: 25 | Provision: Finfish AMA | Oppose | Amend definition to read: "Finfish AMA or FAMA means ..." |
| | | | 57.5 | Volume One | Chapter: 13 | Provision: Policy 13.21.7 | Oppose | Delete paragraph 13.21.7(g). |
| | | | 57.6 | Volume One | Chapter: 13 | Provision: Policy 13.21.7 | Oppose | Delete Policy 13.21.7(h); OR In the alternative, adopt the technical mechanism12 for enabling a site swap recommended by the Salmon Relocation Advisory Panel. |
| | | | 57.7 | Volume One | Chapter: 13 | Provision: Policy 13.22.10 | Oppose | Delete the Policy and replace it with a policy (which might be located in elsewhere in Plan, Volume 1, Chapter 13, so that it applies more broadly), which: (a) Creates a Technical Advisory Group to support Sounds-wide monitoring; and (b) As part of this, some of the indicators identified by that Technical Advisory Group might assist in identifying any far field effects of marine farming; and (c) Any impacts that may be farm related and outside those which are expected should be investigated and, consequently, the appropriate steps should be taken either by reviewing consent conditions, establishing an adaptive management programme or in some other way addressing the issues which have been identified. The Policy should explicitly signal that we are moving away from monitoring localised effects of aquaculture. The local effects for aquaculture are well understood. Aquaculture should be the subject of an auditing regime, rather than an annual monitoring programme. |
| | | | 57.8 | Volume One | Chapter: 13 | Provision: Policy 13.22.11 | Oppose | Delete Policy. |
| | | | 57.9 | Volume Two | Chapter: 16 | Provision: 16.5.5 | Oppose | Delete rule and replace with a rule which is consistent with NESMA, and make consequential changes to the policies from which Rule 16.5.5 was derived. |
| | | | 57.10 | Volume Four | All CMU | | Oppose | Delete maps. If maps are to be retained, make changes in accordance with this submission, in addition to any necessary consequential changes. |
| | | | 57.11 | Volume One | Chapter: 13 | Provision: New provision | Support | If Variation 1A is to be retained, insert a new policy which addresses biosecurity. New finfish farming enterprises, particularly in the Open Ocean environment, need to be in the order of 25km apart.17 NZ King Salmon produces a genetically distinct forms of King Salmon, such as Tyee. The biosecurity regime which is imposed should ensure that such products are able to be produced in a bio-secure way. |
| | | | 57.12 | Volume One | Chapter: 13 | Provision: New provision | Support | The Plan should include a policy that includes provision for new finfish farming in appropriate locations, especially in the open ocean. |
| | | | 57.13 | Volume One | Chapter: 13 | Provision: New provision | Support | The MEP should recognise the value of ecosystem services provided by finfish farms. |
| | | | 57.14 | Volume One | Chapter: 13 | Provision: New provision | Support | Insert new Policies and Rules. a) Consistent with the change of species provisions in NESMA; and b) Providing for the addition of finfish species within AMAs. |
| | | | 57.15 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Oppose | Variation 1A should be withdrawn and replaced with a fit-for-purpose Variation |

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| | | | 57.16 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Oppose | The Plan needs to enable adaptation to the risks that climate change will bring |
| | | | 57.17 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Oppose | Requires updated s32 Report considering alternative options [inferred] |
| | | | 57.18 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Oppose | Amend Variation 1A to be consistent with NESMA [inferred] |
| | | | 57.19 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Oppose | It is inappropriate for MARWG to be used as a basis for decisions regarding finfish and, consequently, Variation 1 should not apply to finfish. |
| | | | 57.20 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Support | At a high level, NZ King Salmon submits that if FAMAs are to be created, FAMAs should be drawn to ensure that no existing marine farm loses area, and if the farm is shifting from its existing space it is moved into equivalent or better space (and allowing for a minimum 24 month transition period if the farm is to be moved). |
| | | | 57.21 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Support | Support in part - If someone makes a submission that any existing marine farm should be removed from its current location, and that submission is accepted, then that farm(s) should move into new space in bays or reaches where the conditions are suitable for rearing salmon. That is consistent with the principle of no loss of marine farming space. |
| 58 | Smith | Vincent Smith | 58.1 | Volume Four | CMU 1: Admiralty Bay | CMU item: CMU 1 Aquaculture Management Area - New AMA | Support | To understand how my marine farm 8040 in Admiralty Bay best fits into the new proposed AMA system. I do have more information I would like to add to my submission for 8040, further supporting material will follow for my submission on 8040. |
| | | | 58.2 | Volume Four | CMU 22: Inner Pelorus Sound | CMU item: CMU 22 Aquaculture Management Area - AMA 11 | Support | Regarding 8334 in South East Bay, I can see how this farm can work within the new AMA system. Just a few more details, which I am sure will come with the role out of the new AMA system. |
| 59 | Port Underwood Association | Ken Roush | 59.1 | Volume One | Chapter: 13 | Provision: Introduction | Support | Support the statements: There is continuing and growing demand for coastal space and resources for commercial activities such as marine farming. While recognising the benefits of marine farming in Marlborough, it is important to make sure that this activity occurs in appropriate locations and is well managed to ensure the sustainable management purpose of the RMA is achieved. The proposed new spatial layout is aiming to strike a balance between maintaining the current amount of marine farming (measured by consented surface area) so that the benefits of that existing investment can continue to be received by the community, but to layout those marine farms in a more optimal manner. The Council have decided to be more stringent than the NESMA in areas identified as inappropriate for marine farming and have made marine farms in areas identified as inappropriate a prohibited activity. |
| | | | 59.2 | Volume One | Chapter: 13 | Provision: Issue 13N | Support | Support the paragraph: Issue 13N – There is uncertainty about the future of marine farming in Marlborough. For the industry, there is uncertainty about the process and outcome of any future resource consent application when existing resource consents for marine farms expire. For the community there is uncertainty about the future location and potential growth of marine farming, and whether or not existing marine farms in current locations are resulting in adverse effects on uses and values of the coastal environment. |
| | | | 59.3 | Volume One | Chapter: 13 | Provision: Issue 13O | Support | Support the inclusion of the statement in the plan -Issue 13O – If not managed well marine farming has the potential to have adverse effects, including cumulative adverse effects, on other processes, values and uses of the coastal environment. |
| | | | 59.4 | Volume One | Chapter: 13 | Provision: Objective 13.21 | Support | The Association supports Objective 13.21 and therefore the associated policies. |
| | | | 59.5 | Volume One | Chapter: 13 | Provision: Objective 13.22 | Support | The Association supports Objective 13.22 and therefore the associated policies. |
| | | | 59.6 | Volume Four | CMU 37: Port Underwood | CMU item: CMU 37 Aquaculture Management Area - New AMA | Neutral | Support the spatial allocation of Aquaculture Management Areas in Port Underwood. |
| | | | 59.7 | Volume Two | Chapter: 16 | Provision: 16.4 | Oppose | The Association does not support a Controlled Consent status and considers that the Restricted Discretionary is the more appropriate activity status for existing farms. |
| | | | 59.8 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Support | The Association supports the rules that are derived from Objectives 13.21 and 13.22 and the associated policies to those objectives. |

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| 60 | Port Gore Partnership & Slade King & King Ltd | Darryl Slade | 60.1 | Volume Four | CMU 34: Port Gore | CMU item: CMU 34 Aquaculture Management Area - AMA 5 | Oppose | Preferred option: Keep the farm rectangular. Make the inshore reduction area rectangular and the full length of the farm. Make the inshore reduction area 43m wide. To include scallop. Move the resultant 764m by 43m rectangle to the seaward side of AMAS Port Gore. Simply take a strip off the inside of the farm and add it to the outside of the farm. The farm would maintain its current shape but would be located further seaward. This is I understand is one of the core proposals of variation one. Like would be replaced with like. The advantages are: The farm would fit its AMA. No need to relocate the reduced farm area to another AMA or CMU. Simplicity A seaward shift of the farm away from in shore areas Increased navigational access to inshore areas. Inshore and seaward boundaries are straight lines with no navigation surprises. Like is replaced with like Conflicts associated with scalloping and usable space solved. There is ample open space for a seaward shift. The disadvantage is: The extra cost of moving or replacing the two eastern most anchors, on lines one and two. less preferred option (2) Square up the reduction area. Make it 43m wide to remove scalloping. Add the triangle to the AMA at its NW end to use the space outside the 1 OOm line and include anchors on line 2. Extend the AMA to seaward by the equivalent area. Make the seaward area 509.33m long (two longlines) and 43.24m wide. This enables the four longlines excluded by variation one, to be relocated to seaward. The advantages are Scalloping effects on usable space removed. Replacement space for the four lines achieved. Longline two, anchor on site The seaward replacement space is two longlines in length, and no more, this results in the replacement space also being usable space. The disadvantages are. Longline one will need to be shortened, and its SE anchor moved. Navigation inshore and seaward is complicated by the two lines protrusion. Less inshore space is freed up than in option one. least Preferred Option (3) : Option three has the same inshore features and dimensions as option (2). However, the seaward replacement area is spread over the full length of the farm. This results in a slimmer dimension of 28.82m in width. This would allow three seaward lines to be installed. But the inshore reduction removes four longlines. Further, the requirement for structures to be at least 5m inside their boundaries results in additional 1,273.35 (5x254.67) square meters .of space becoming unusable when compared to option (2). While option (3) and (2) are both the same area, option (3) has considerably less usable space than option (2). The advantages are. Scalloping effect on usable space is removed. Straight line for ease of navigation along seaward boundary. Line two anchor included in AMA. The disadvantages are. Only three lines fit into the seaward replacement, four are needed. Longline one will need to move an anchor and have the backbone shortened. Navigation inshore is complicated by the two longline protrusion. Less inshore space freed up than option (1). Same space to seaward as option two but considerably less usable space. A note on the Marine Farmers Association Map Submission These maps were prepared after input from members at a workshop to consider Variation 1 AMA mapping. As this farm has its own AMA, I was the sole submitter for this AMA. I suggested option (3) at this meeting, and this has been adopted in the MFA submission. Upon further reflection it has become obvious to me that that this option is the least beneficial for reasons listed above. Because of the tight time parameters for this process, the deadline for alterations to the MFA submission is imminent. The fault in this submission has been recommended option (2) for the |
| 61 | Wakatu Incorporation and Kono NZ LP | Riki Kotua | 61.1 | Volume Two | Chapter: 25 | Provision: New provision | Support | Amend Policy 13.21.1(c) to state: "new marine farms may be appropriate..." Further amend policy 13.21.1(c), or add new policy (d), to provide either that: "existing marine farms in Offshore CMUs will be located within AMAs"; or "existing marine farms in Offshore CMUs will be provided for as a controlled activity." (Or similar equivalent policy wording with the same effect). Corresponding changes will need to be made to the explanation to the Policy. Draw AMAs around existing marine farms and in particular Wakatū Farm 8561 at D'Urville. |
| | | | 61.2 | Volume One | Chapter: 13 | Provision: Policy 13.21.1 | Neutral | Adopt MFA/AQNZ submission 'Replace Part 7A mechanism with a searchable map identifying those consent holders who will be entitled to apply for each line in its identified location.' In the event that for any reason this Decision is not adopted or implemented, at a minimum Wakatū/Kono seek that the Council amend Policy 13.22.1(g) and any other relevant provisions to provide that where a proposed AMA covers the same area as an existing marine farm (whether in a Enclosed Water, Nearshore, or Offshore CMU), a new consent can be applied for that a marine farm as a controlled activity, without the need to first obtain an authorisation. |
| | | | 61.3 | Volume One | Chapter: 13 | Provision: Policy 13.21.1 | Neutral | Adopt MFA/AQNZ submission: Replace "equivalent amount of space" with "equivalent amount of farmable space" and add "the space provided is, as far as reasonably practical, to be equivalent space". A definition of equivalent space will need to be inserted, as per the submission above. |
| | | | 61.4 | Volume One | Chapter: 13 | Provision: Policy 13.21.1 | Neutral | Policy 13.21.1(f) - Adopt MFA/AQNZ submission: Replace "equivalent amount of space" with "equivalent amount of farmable space" and add "the space provided is, as far as reasonably practical, to be equivalent space". A definition of equivalent space will need to be inserted, as per the submission above. |

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| 61.5 | Volume One | Chapter: 13 | Provision: Policy 13.21.6 | Neutral | <p>Adopt MFA/AQNZ submission: Delete reference to "Values Report 2018" (otherwise include definition as per above submission). Amend text of policy to read "The appropriateness of new marine farms (for which no prior resource consent has been granted) within..."</p> <p>Amend (c) to read: "Outside areas where marine farming would adversely affect significant habitat of the New Zealand King Shag, elephant fish, dolphins and other important species."</p> <p>Amend (d) to read: Replace "more than minor" with "significant"</p> <p>Amend (e) to read: Replace "areas of ecologically significant marine biodiversity shown on the Volume 4 planning maps" with "Ecologically Significant Marine Sites, identified as Category A and B sites in Appendix 27."</p> <p>The second (e) should read (f).</p> <p>Delete (g)</p> <p>Additional Decisions Sought by Wakatū/Kono - New Consents Applied for by Existing Marine Farms - Wakatū also seeks that the Council amend Policy 13.2.6 (or add a new additional policy) to provide that new consents for existing marine farms within Offshore CMUs are provided for as controlled activities; or alternatively that AMAs are established to provide for the area of existing marine farms within Offshore CMUs (and that new consent applications within those AMAs are then provided for as a controlled activity). Reference to the 'Values Report 2018' – Remove reference to 'Values Report 2018' and if necessary include any identified values that form part of the assessment in the Policy or in a Schedule to the Plan.</p> |
| 61.6 | Volume One | Chapter: 13 | Provision: Policy 13.21.7 | Support | <p>Adopt MFA/AQNZ Decision Sought: This seeks that the policy be amended to provides for:</p> <p>(a) The marine farm mapping to identify on a line by line basis which consent holder as at 2 December 2020 (or their successor) ("existing consent holder") may apply for each line.</p> <p>(b) Existing consent holders may agree to their own arrangements, provided that no existing consent holder may obtain an increase in consented backbone length from the situation as at 2 December 2020.</p> <p>(c) No consent holder shall be allocated space immediately inshore or offshore of another existing consent holder, except where that situation presently exists.</p> <p>(d) Priority to space is to be given to the farmer who presently occupies that space. Farmers may be required to move to accommodate other farms moving into a ribbon.</p> <p>(e) Where insufficient space in a particular AMA arises, efforts should be made to find other equal length of backbone within that CMU.</p> <p>(f) Where insufficient space exists within AMAs in an entire CMU, alternative space for equal length of backbone will be found in another CMU.</p> <p>(g) Any space which remains after all allocation within all CMUs is complete (ie. each existing consent holder has obtained equal length of backbone), any remaining AMAs will be allocated by authorisation, subject to (c) above, as follows:</p> <p>a. Within the Enclosed Water CMUs</p> <p>i. The space will be held for a period of 6 years from the date the Plan became operative as space within which the Council will issue authorisations to farmers who are unsuccessful in their applications under Part 9A of the Fisheries Act 1996, or for some other reason are not able to move to the lines which they have been allocated; and then</p> <p>ii. The space will be removed or allocated by a future plan change.</p> <p>b. Beyond the Enclosed Water CMUs</p> <p>i. The space will be offered to the party who has contributed substantial technical or scientific information to enable the AMA to be created (if any); and then ii. The space will be offered to iwi as settlement space²⁹; and then</p> <p>iii. The space is to be publicly tendered.</p> <p>Additional Relief Sought by Wakatū/Kono: Amend policy so it is not necessary to obtain an authorisation for an existing marine farm when it is not required to relocate any of the farm into new space – in that situation consent should be able to be applied for directly as a controlled activity without first needing an authorisation.</p> |

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| 61.7 | Volume One | Chapter: 13 | Provision: Policy 13.21.7 | Neutral | <p>Wakatū adopts and seeks the Relief Sought by MFA/AQNZ in respect of Policy 13.21.7, sub policies (b) – (d), as follows:</p> <p>(b) Delete “the notified variation to the plan” and replace with “Variation 1”. Clarify whether this also applies to FAMAs.</p> <p>(i) Delete the words beginning “to accommodate” to the end of the sentence.</p> <p>(ii) Clarify meaning of “the same” in light of other MFA/AQNZ submission points.</p> <p>(iii) Amend to reflect the changes sought to Policy 13.31.7. However, if that alternative relief is not granted, then enable authorisations to be given to a marine farmer for their farm to occupy the available space in the relevant AMA ribbon.</p> <p>(iv) Replace “space” with “equivalent space” in both locations where that word is found.</p> <p>Where equivalent space in an alternative location is not provided for (eg. Alternative AMA space is too small, is not equivalent, or is removed via submissions in opposition), then AMAs should be created in the location of existing farms.</p> <p>(c) Delete the words “before any new marine farm consents can be exercised” and replace with “while allowing a transition period of up to 24 months”.</p> <p>(d) Delete “or the extension of Existing Marine Farms in AMAs”. Amend the definition of marine farms so that it is clear it relates to whole sites and locations contiguous with existing marine farms. Insert a new paragraph which would enable the extension of marine farming sites where appropriate environmental standards are met.</p> <p>Additional Relief Sought by Wakatu/Kono: Amend wording in policies 13.21.7(a) and (b) so that it allows greater flexibility to ensure that the equivalent farm space is retained. Allow for a buffer beyond the boundaries of the AMA for situations where a marine farm cannot wholly relocate.</p> <p>13.21.7(c) – Further to the MFA/AQNZ submission, Wakatū/Kono seeks an addition which would also enable the readjustment of a marine farming site, where appropriate environmental standards are met.</p> |
| 61.8 | Volume One | Chapter: 13 | Provision: Policy 13.22.5 | Oppose | <p>(a). Delete sub policy (b), or amend so that it provides that “Monitoring (including monitoring undertaken in accordance with Policy 13.22.1, shows significant adverse ecosystem effects are occurring and an assessment shows that those effects have been caused by marine farms.”</p> <p>Amend sub policy (c) as sought in the MFA/AQNZ submission to read “New information becomes available...if those effects are predicted to be significant.” Delete sub policy (d).</p> |
| 61.9 | Volume One | Chapter: 13 | Provision: Policy 13.22.9 | Neutral | <p>Amend policy 13.22.9(a) so it reads: Enable the change or addition of species to be farmed in a marine farm, provided that the species to be is a bi-valve, mollusc, sponge, or algae and is not: (a) a finfish species; and (b) there is no discharge of feed or medicinal or therapeutic compounds associated with the species.... (ie remove reference to Appendix 11).</p> <p>Support and adopt MFA/AQNZ relief sought in respect of Policy 13.22.9(e) and (f) and the Commentary on the Policy as follows:</p> <p>Amend the Policy so that it is consistent with NESMA by deleting the words “if the species to be added is” through to the end of the Policy.</p> <p>To the extent that activities provided in NESMA are not captured by the associated policies and rules, add new policies and rules consistent with NESMA.</p> <p>Delete 13.22.9(f).</p> <p>From the policy commentary - Remove reference to “discharge of contaminants”. AND Replace “bivalve species” with “bivalve, or mollusc, or sponge, or algae species”. AND Amend as a result of NESMA where appropriate.</p> |
| 61.10 | Volume One | Chapter: 13 | Provision: Policy 13.21.2 | Neutral | <p>Adopt MFA/AQNZ Decision Sought that the Plan should allocate further space in ASAs for iwi, in accordance with settlement legislation.</p> |
| 61.11 | Volume One | Chapter: 13 | Provision: 13.M.35 | Neutral | <p>Amend wording to clarify that renewal consents for existing marine farms in an Offshore CMU are a controlled activity; or drawing an AMA around those existing marine farms in Offshore CMUs and providing for renewal consents within the AMAs as a controlled activity.</p> |
| 61.12 | Volume One | Chapter: 13 | Provision: 13.M.39 | Neutral | <p>Wakatū/Kono adopts the MFA/AQNZ Decision Sought that there may need to be consequential changes to this text if an alternative to authorisations is used. Wakatū/Kono Additional Decision Sought: Implementation Plan should be included in Plan provisions or attached as a Schedule to the Plan; must not be left to be developed subsequently or separately as policy provisions are too significant.</p> |
| 61.13 | Volume Two | Chapter: 16 | Provision: 16.4.3 | Neutral | <p>Adopt MFA/AQNZ Decision Sought that authorisations be replaced with a map showing:</p> <p>(a) Farmable space within Marlborough;</p> <p>(b) Where farmers may place lines, and which consent holder may make a consent application to transfer that space (up to that maximum consented number of lines) in accordance with this Rule; and Update Rule 16.4.3 and associated standards accordingly.</p> <p>Alternative Wakatū/Kono Decision Sought - Rule 16.4.3 should be amended so that existing marine farms that are not moving into any new space, should be able to apply for a ‘renewal’ consent as a controlled activity without having to obtain an authorisation/go through the part 7A process. Seek to amend wording so that it says: “Marine farming using conventional longline structures or intertidal structures in an AMA, other than an ASA, which is for a replacement consent and the AMA for the marine farm is in the same location as the current marine farm; or for which an authorisation is held to apply for a coastal permit to occupy space within the AMA.....”</p> |

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| 61.14 | Volume Two | Chapter: 16 | Provision: 16.4.3.1 | Neutral | Insert a new Standard 16.4.3.1 which provides that: "The consent applicant holds an existing consent for an existing marine farm in the same location as the AMA in respect of which the coastal permit application is made; or "The consent applicant holds an authorisation to apply for a coastal permit to occupy space within the AMA..." (And any necessary further changes to the rule and explanation to give effect to these changes). Adopt the Decision Sought by MFA/AQNZ that "6 months" be replaced with "24 months". |
| 61.15 | Volume Two | Chapter: 16 | Provision: 16.4.3.2 | Neutral | Adopt Decisions Sought by MFA/AQNZ: If the alternative approach that the MFA/AQNZ is proposing is taken, this exercise will be undertaken at the mapping stage (ie. planning stage) and need not be assessed at the controlled activity consenting stage. therefore, delete as appropriate, but retain reference to "total backbone length", and add to that "measured in metres". |
| 61.16 | Volume Two | Chapter: 16 | Provision: 16.4.3.3 | Neutral | Adopt Decisions Sought by MFA/AQNZ to delete Standard 16.4.3.3. |
| 61.17 | Volume Two | Chapter: 16 | Provision: 16.4.3.4 | Neutral | Adopt Decisions Sought by MFA/AQNZ in respect of remaining standards and terms. |
| 61.18 | Volume Two | Chapter: 16 | Provision: 16.4.3.5 | Neutral | Adopt Decisions Sought by MFA/AQNZ to delete the policy. |
| 61.19 | Volume Two | Chapter: 16 | Provision: 16.4.3.6 | Neutral | Adopt Decisions Sought by MFA/AQNZ to delete the words "layout, positioning (including density)" from 16.4.3.6. |
| 61.20 | Volume Two | Chapter: 16 | Provision: 16.4.3.7 | Neutral | Adopt Decisions Sought by MFA/AQNZ to delete 16.4.3.7. |
| 61.21 | Volume Two | Chapter: 16 | Provision: 16.4.3.8 | Neutral | Adopt Decision Sought by MFA/AQNZ to replace "equivalent area" with "the same (or less) backbone length". |
| 61.22 | Volume Two | Chapter: 16 | Provision: 16.4.3.9 | Neutral | Adopt Decisions Sought by MFA/AQNZ - MFA DO NOT HAVE A SUBMISSION ON THIS POINT |
| 61.23 | Volume Two | Chapter: 16 | Provision: 16.4.3.10 | Neutral | Adopt Decisions Sought by MFA/AQNZ in respect of remaining standards and terms. |
| 61.24 | Volume Two | Chapter: 16 | Provision: 16.4.3.11 | Neutral | Adopt Decisions Sought by MFA/AQNZ to delete and replace with: "with respect to colour, the visibility and coherent appearance of marine farm structures". |
| 61.25 | Volume Two | Chapter: 16 | Provision: 16.4.3.12 | Neutral | Adopt Decisions Sought by MFA/AQNZ - MFA DO NOT HAVE A SUBMISSION ON THIS POINT |
| 61.26 | Volume Two | Chapter: 16 | Provision: 16.4.3.13 | Neutral | Adopt Decisions Sought by MFA/AQNZ - MFA DO NOT HAVE A SUBMISSION ON THIS POINT |
| 61.27 | Volume Two | Chapter: 16 | Provision: 16.4.3.14 | Neutral | Adopt Decisions Sought by MFA/AQNZ to: Replace "trigger levels in" with "trigger levels determined in accordance with". |
| 61.28 | Volume Two | Chapter: 16 | Provision: 16.4.3.15 | Neutral | Adopt Decisions Sought by MFA/AQNZ in respect of remaining standards and terms. |
| 61.29 | Volume Two | Chapter: 16 | Provision: 16.6.13 | Neutral | Replacement Consents Ensure consistency with NESMA, by adding the word "New" to the start of Rule 16.6.3. AND Add a new non-notified controlled activity rule for replacement consents for Offshore marine farms. New Consents Amend wording to read "Marine farming (including finfish farming) in an Offshore CMU, including the associated occupation of space in the coastal marine area, the erection, placement, use of structures, disturbance of the seabed and ancillary discharges to water." Amend wording to read "Marine farming (including finfish farming) in an Offshore CMU, including the associated occupation of space in the coastal marine area, the erection, placement, use of structures, disturbance of the seabed and ancillary discharges to water." |
| 61.30 | Volume Two | Chapter: 16 | Provision: 16.8.1 | Oppose | Delete rule in its entirety. |
| 61.31 | Volume Two | Chapter: 16 | Provision: 16.8.2 | Neutral | Support MFA/AQNZ Decision Sought to make necessary consequential amendments if the allocation regime proposed by MFA/AQNZ is adopted. Wakatū alternative Decision Sought: Amend rule 16.8.2 so that it reads "Rules to allocate new space in the common marine and coastal area using authorisations." Amend rule 16.8.2.1 to read, "The Council will allocate new space for marine farming within Enclosed Water CMUs and the Near-shore CMUs (excluding the area within ASAs) by allocating authorisations to occupy space." Amend rule 16.8.2.2 to read "Authorisations will only be allocated for new space within areas identified as AMAs in the plan." |
| 61.32 | Volume Two | Chapter: 16 | Provision: 16.8.2 | Neutral | Adopt Decisions Sought by MFA/AQNZ. Note that Wakatū/Kono is particularly concerned under Rule 16.8.2.9 that it should not be penalised because other farmers do not choose to uplift the authorisations. It considers that such an approach is not lawful under the RMA and the National Environmental Standards for Marine Aquaculture, and this rule must be deleted. |
| 61.33 | Volume Four | CMU 1: Admiralty Bay | CMU item: CMU 1 Aquaculture Management Area - AMA 14 | Neutral | Wakatū/Kono seeks flexibility of relocating lines (for Marine Farm 8036) within 20% of the AMA to provide for relocation of inshore lines to an offshore position under this scenario. |
| 61.34 | Volume Four | CMU 6: Clova Bay | CMU item: CMU 6 Aquaculture Management Area - AMA 3 | Oppose | Realign AMA boundaries in accordance with Map 1 provided with submission for marine farm 8556. |
| 61.35 | Volume Four | CMU 28: Maud Island | CMU item: CMU 28 Aquaculture Management Area - AMA 16 | Oppose | Realign AMA boundaries to ensure equivalent lines (to marine farm 8211) and line spacing can be accommodated within AMA, in accordance with Map 2 attached to the submission. |
| 61.36 | Volume Four | CMU 28: Maud Island | CMU item: CMU 28 Aquaculture Management Area - AMA 15 | Oppose | Realign AMA boundaries to ensure equivalent lines and line spacing (for marine farm 8213) can be accommodated within AMA, in accordance with Map 3 attached to the submission. |
| 61.37 | Volume Four | CMU 3: Beatrix Bay | CMU item: CMU 3 Aquaculture Management Area - AMA 7 | Oppose | AMA (for marine farm 8249) to be expanded to west and re-orientated as shown on Map 4 attached to the submission. This is to allow for deletion of recommended inshore exclusion area for ecological reasons. |
| 61.38 | Volume Four | CMU 28: Maud Island | CMU item: CMU 28 Aquaculture Management Area - AMA 7 | Oppose | AMA (for marine farm 8305) to be expanded in offshore area but equivalent inside area and an area to the north to be deleted, for ecological reasons, in accordance with Map 5 attached to submission. |
| 61.39 | Volume Four | CMU 22: Inner Pelorus Sound | CMU item: CMU 22 Aquaculture Management Area - AMA 8 | Oppose | AMA (for marine farm 8340) to be expanded in offshore area but equivalent cross hatched areas to be deleted, for ecological reasons, in accordance with Map 6 attached to submission. |

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| | | | 61.40 | Volume Four | CMU 22: Inner Pelorus Sound | CMU item: CMU 22 Aquaculture Management Area - AMA 4 | Oppose | AMA (for marine farm 8386) be amended to incorporate minor area in south-east corner as shown on Map 7 attached to submission. |
| | | | 61.41 | Volume Four | CMU 21: Hikapu Reach | CMU item: CMU 21 Aquaculture Management Area - AMA 1 | Oppose | AMA (for marine farm 8392) amended so it is expanded offshore from the farm, for ecological reasons, as shown in Map 8 attached to the submission. |
| | | | 61.42 | Volume Four | Open Water CMU | CMU item: Open Water CMU - MF8561 | Oppose | That the existing farm 8561 be zoned as being within an AMA; or that a new consent for this farm otherwise is provided for as a controlled activity. |
| | | | 61.43 | Volume Three | Appendix: 11 | Appendix item: Species authorised to be farmed within the Marlborough region's coastal waters | Neutral | Include provisions which allow for review and addition of additional species; or alternatively delete Appendix and specify in rules and policies by way of standards or conditions (in broad terms) the types of bivalves for which applications can be made as a controlled (or discretionary) activity. |
| | | | 61.44 | Volume Two | Chapter: 16 | Provision: New provision | Neutral | Rules need to be amended to protect authorisation holder in that situation. |
| | | | 61.45 | Volume Four | All CMU | | Neutral | Where existing farms are relocated, no line spacing or production capacity is lost as a result of the move, and that the plan provisions are sufficiently detailed to allow flexibility to allow some movement within the scope of an AMA to allow for, for instance, a realignment for ecological reasons |
| | | | 61.46 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Neutral | At a high level: -AMAs should be drawn in a way that ensures that no existing marine farm loses area, total backbone length and if the farm is shifting from its existing space it is moved into equivalent space. -Where necessary, the existing marine farm(s) should stay where they are currently installed (including when they are offsite); or -The existing marine farm(s) should shift into new space as long as they do not lose area, total backbone length and the move is into equivalent space; and -The boundaries for AMAs should allow flexibility to be extended in particular circumstances, in particular where a renewal consent is sought for an existing farm within an AMA and for ecological or practical reasons it is not possible for that relocation to take place exactly within the boundaries of the AMA. If someone makes a submission that any existing marine farm should be removed from its current location, and that submission is accepted, then that farm(s) should move into new space in bays where there is currently marine farming. That is consistent with the principle of no loss of marine farming space and no loss of backbone length. |
| 62 | The Marlborough Environment Centre | Tim Newsham | 62.1 | Volume One | Chapter: 13 | Provision: Policy 13.21.7 | Neutral | Amend Policy 13.21.7. h (ii) so that there is no provision of new FAMA space in CMU 28 Maud Island, CMU 44 Waitata Reach and CMU 42 Tory Channel for finfish farming. |
| | | | 62.2 | Volume One | Chapter: 13 | Provision: Policy 13.21.1 | Neutral | Amend the policy as required to ensure no further provision of AMA space in CMU 44 Waitata Reach for marine farming. |
| | | | 62.3 | Volume One | Chapter: 13 | Provision: Policy 13.21.2 | Neutral | Amend the policy as required to ensure no further provision of AMA space in CMU 44 Waitata Reach for marine farming. |
| | | | 62.4 | Volume One | Chapter: 13 | Provision: Policy 13.21.3 | Neutral | Amend the policy as required to ensure no further provision of AMA space in CMU 44 Waitata Reach for marine farming. |
| | | | 62.5 | Volume One | Chapter: 13 | Provision: Policy 13.21.4 | Neutral | Amend the policy as required to ensure no further provision of AMA space in CMU 44 Waitata Reach for marine farming. |
| | | | 62.6 | Volume One | Chapter: 13 | Provision: Policy 13.21.5 | Neutral | Amend the policy as required to ensure no further provision of AMA space in CMU 44 Waitata Reach for marine farming. |
| | | | 62.7 | Volume One | Chapter: 13 | Provision: Policy 13.21.6 | Neutral | Amend the policy as required to ensure no further provision of AMA space in CMU 44 Waitata Reach for marine farming. |
| | | | 62.8 | Volume One | Chapter: 13 | Provision: Policy 13.22.1 | Oppose | Amend Policy 13.22.1 to provide for more comprehensive and frequent monitoring. A baseline survey should be established immediately in control and farmed sentinel monitoring sites, including appropriate infaunal and epifaunal surveys and then 3 yearly monitoring implemented to provide an overview of effects in a reasonable timeframe. |
| | | | 62.9 | Volume One | Chapter: 13 | Provision: 13.M.37 | Oppose | Amend Method 13.M.37 to provide for more comprehensive and frequent monitoring. A baseline survey should be established immediately in control and farmed sentinel monitoring sites, including appropriate infaunal and epifaunal surveys and then 3 yearly monitoring implemented to provide an overview of effects in a reasonable timeframe. |
| | | | 62.10 | Volume One | Chapter: 13 | Provision: 13.M.38 | Oppose | Amend Method 13.M.38 to provide for more comprehensive and frequent monitoring. A baseline survey should be established immediately in control and farmed sentinel monitoring sites, including appropriate infaunal and epifaunal surveys and then 3 yearly monitoring implemented to provide an overview of effects in a reasonable timeframe. |
| | | | 62.11 | Volume Four | CMU 28: Maud Island | CMU item: CMU 28 Aquaculture Management Area - New AMA | Oppose | Amend Policy 13.21.7. h (ii) so that there is no provision of new FAMA space in CMU 28 Maud Island, |
| | | | 62.12 | Volume Four | CMU 44: Waitata Reach | CMU item: CMU 44 Aquaculture Management Area - New AMA | Oppose | Amend Policy 13.21.7. h (ii) so that there is no provision of new FAMA space in CMU 44 Waitata Reach for finfish farming. Amend Policies 13.21.1-6 as required to ensure no further provision of AMA space in CMU 44 Waitata Reach for marine farming. |
| | | | 62.13 | Volume Four | CMU 42: Tory Channel | CMU item: CMU 42 Aquaculture Management Area - New AMA | Oppose | Amend Policy 13.21.7. h (ii) so that there is no provision of new FAMA space in CMU 42 Tory Channel for finfish farming |
| 63 | Parkhurst Enterprises Ltd | Jim Jessep | 63.1 | Volume Four | CMU 22: Inner Pelorus Sound | CMU item: CMU 22 Aquaculture Management Area - New AMA | Oppose | Make the three farms, 8327, 8326, and 8325, in Fairy Bay into an AMA. |
| 64 | Juniper Trust | Anna Jocelyn Greig | 64.1 | Volume Four | CMU 25: Kenepuru Sound | CMU item: CMU 25 Aquaculture Management Area - AMA 1 | Support | I seek the Marlborough District Council to make the decisions set out in Variation 1. Where changes are proposed, further consequential amendments may be required. Alternative relief securing the same outcomes could be granted. |

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| 65 | Waide | Gordan Brian & Gaye Eleanor Waide | 65.1 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Support | Support the variation as proposed. |
| 66 | Tu Jaes Trust | Jean Hadley and Alice Behan | 66.1 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Support | Retain variations 1 and 1A as proposed. |
| 67 | Martin | Peter Martin | 67.1 | Volume One | Chapter: 4 | Provision: Objective 4.1 | Oppose | The variations go too far in the direction of allowing for aquaculture (including finfish). Consents should go through a public notification process. More should be done to monitor cumulative effects. [Inferred] |
| | | | 67.2 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Oppose | The variations go too far in the direction of allowing for aquaculture (including finfish). Consents should go through a public notification process. More should be done to monitor cumulative effects. [Inferred] |
| 68 | Ministry for Primary Industries (MPI) | Michael Nielsen | 68.1 | Volume Two | Chapter: 25 | Provision: AMA | Neutral | Amend the definition of AMA so that it applies only to AMAs. Consequential amendments throughout variation provisions to ensure objectives, policies, rules and methods apply to the relevant management area, i.e. all or only some of AMAs, FAMAs, ASAs |
| | | | 68.2 | Volume Two | Chapter: 25 | Provision: Enclosed Water CMU | Neutral | Amend the definition of Enclosed Water CMU to: a) Remove second occurrence of Waitata Bay in the list; and b) Re-order the list so that it is in alphabetical order. |
| | | | 68.3 | Volume Two | Chapter: 25 | Provision: Existing marine farm | Neutral | No amendment to the definition of "Existing marine farm", however amendments to the relevant policies and rules where use of this term causes issues are identified in submission points 23, 30, 31, 34 and 35. |
| | | | 68.4 | Volume Two | Chapter: 25 | Provision: Intertidal marine farming | Neutral | Amend definition to align with the definition of 'inter-tidal marine farm' in regulation 3 of the National Environmental Standard for Marine Aquaculture. |
| | | | 68.5 | Volume Two | Chapter: 25 | Provision: Marine farm | Neutral | Amend definition as follows: "...means a [deleted] [space] used for aquaculture activities (as defined in section 2 RMA) that..." |
| | | | 68.6 | Volume Two | Chapter: 25 | Provision: Offshore CMU | Neutral | Amend variation provisions as necessary so that only the term "Offshore CMU" is used to refer to the Offshore CMU. |
| | | | 68.7 | Volume Two | Chapter: 25 | Provision: ASA | Neutral | Amend the definition of ASA as follows: means an aquaculture settlement area [deleted] set aside for applications from iwi under the Māori Commercial Aquaculture Claims Settlement Act 2004 [(including, but not limited to, those labelled as ASA on the planning maps)]. |
| | | | 68.8 | Volume One | Chapter: 13 | Provision: Introduction | Neutral | Amend paragraph 7 of the introduction to the Marine Farming section as follows: The Resource Management National Environmental Standards for Marine Aquaculture Regulations 2020 (NESMA) came [deleted] into force on 1 December 2020. The NESMA provides for existing marine farms to seek replacement consents through the regulations, rather than through the rules in the regional plan. Regulation 13 of the NESMA states that a regional plan may have more stringent rules for replacement consents for existing marine farms in [deleted] inappropriate areas [for existing aquaculture activities]. The Council have identified the enclosed waters CMUs and the Near-shore CMU except in a mapped AMA, as inappropriate for marine farming. The Council have decided to be more stringent than the NESMA in areas identified as inappropriate for [deleted] [existing aquaculture activities] and have made marine farms in [these] areas [deleted] a prohibited activity. This means that existing marine farms located [in the enclosed waters CMUs and the Near-shore CMU but] outside AMAs will not be able to apply for a replacement resource consent using the NESMA. |
| | | | 68.9 | Volume One | Chapter: 13 | Provision: Policy 13.21.1 | Neutral | Amend Policy 13.21.1(d) as follows and then renumber subsequent clauses of the policy: (d) new and existing aquaculture activities are inappropriate in the following zones: (i) [deleted] (i) Port zone (ii) Marina zone (iii) Port landing area zone [(e) new and existing aquaculture activities are inappropriate unless they are located within an AMA (as provided for in the Marlborough Environment Plan or through a subsequent change or variation) or the open water CMU] Either provide equivalent space for existing finfish farming in new FAMAs, or amend Policy 13.21.1(f) to acknowledge that space is being reduced and undertake a full section 32 analysis of this proposal. |
| | | | 68.10 | Volume One | Chapter: 13 | Provision: Policy 13.21.2 | Neutral | Amend Policy 13.21.2 as follows: Policy 13.21.2 – Areas [deleted] [identified as aquaculture settlement areas] [deleted] [under section 12 of the Māori Commercial Aquaculture Claims Settlement Act 2004] are identified as Aquaculture Settlement Areas (ASAs) and resource consent to use that space for marine farming will only be granted to those holding an authorisation provided under s13 of the Māori Commercial Aquaculture Claims Settlement Act 2004. Amend the explanation of Policy 13.21.2 as follows: Areas have been [and are able to be] set aside for aquaculture for iwi under [section 12] [deleted] of the Māori Commercial Aquaculture Claims Settlement Act 2004. In these areas only [those holding authorisations issued under section 13 of that Act] [deleted] may apply for a resource consent for a marine farm. The plan provides for these areas as ASAs [deleted]. |
| | | | 68.11 | Volume One | Chapter: 13 | Provision: Policy 13.21.3 | Neutral | Amend Policy 13.21.3 so that it is clear that it applies to those AMAs that have been established to provide for the area of existing marine farms and that were proposed at the time the variation was notified. Amend Policy 13.21.3 so that it either more accurately applies to FAMAs or excludes FAMAs (with an equivalent FAMA policy created). |

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| 68.12 | Volume One | Chapter: 13 | Provision: Policy 13.21.5 | Neutral | Amend Policy 13.21.5 to: a) Clarify the link and interactions between the policy and the criteria in Policy 13.21.3 b) Ensure the policy has appropriate requirements to enable the establishment of additional AMAs for novel aquaculture that does not involve conventional longline marine farming and FAMAs for finfish farming (or develop a new policy to cover this) c) Clarify how Policy 13.21.5(a) is intended to apply in situations where there are no marine farms currently in a CMU d) Ensure the policy sets appropriate thresholds and requirements that will enable the establishment of additional AMAs (including for novel aquaculture methods and species) in a timely manner e) Ensure the policy sets appropriate thresholds and requirements for the establishment of additional FAMAs f) Clarify what the following terms mean: • Cobble habitats • Algae beds • Significantly narrow Amend the explanation of Policy 13.21.5 as follows: ...a[n] [deleted] [amendment] to a regional coastal plan made [deleted], by Order in Council [by the Governor-General,] under the regulations of s360[A] of the Act, [on the recommendation of the Minister of Aquaculture]. |
| 68.13 | Volume One | Chapter: 13 | Provision: Policy 13.21.6 | Neutral | Amend Policy 13.21.6 to clarify what the following terms mean: • Cobble habitats • Algae beds Create additional policies recognising the potential for open ocean aquaculture and providing a clear consenting pathway that facilitates development of open ocean aquaculture while recognising and managing its novel and new aspects compared to traditional inshore aquaculture. |
| 68.14 | Volume One | Chapter: 13 | Provision: Policy 13.21.7 | Neutral | Amend Policy 13.21.7 and the relevant allocation and consenting rules (including adding new rules, if necessary) to ensure there is a clear consenting pathway for marine farmers that need to apply to replace their resource consent prior to the allocation of authorisations process. Preferably these amendments would enable the realignment or relocation of the existing marine farm into the proposed new location, if applicable, in order for the proposed new spatial configuration to be realised in a timely manner. Amend title of Policy 13.21.7, Policy 13.21.7(a), and Policy 13.21.7(f) to also include reference to FAMAs. Amend Policy 13.21.7(b)(iv) to ensure allocation of authorisations for space within an AMA to an existing marine farm from a different CMU also takes into account whether additional space has been identified as available within the CMU into which the existing marine farm is proposed to move. Amend Policy 13.21.7(g) as follows: (g) Authorisations for [marine farms involving finfish aquaculture] [deleted] will only be allocated for space within FAMAs. Amend Policy 13.21.7 to clarify how space at the four current finfish sites that are not proposed to be FAMAs will be allocated (including enabling iwi first right to apply for the sites should the existing finfish farms not remain), and undertake a full section 32 analysis of this proposal (including assessment of how it interacts with the relevant NES-MA regulations). Amend Policy 13.21.7(h)(iii) so that the Council must first attempt to allocate authorisations in FAMAs to other finfish farmers before being allocated to non-fish farmers. Amend Policy 13.21.7 (and make consequential amendments to relevant methods and rules) to ensure appropriate management of biosecurity risks associated with relocation of existing marine farms between CMUs. Amend the explanation of Policy 13.21.7 as follows: Finfish farms can only locate in a FAMA. Space in the FAMAs will be allocated to existing finfish farms in the priority set out in the policy. This is consistent with the [report and recommendations from the Marlborough Sounds Salmon Farm Relocation Advisory Panel provided] [deleted] to the Minister of Fisheries [in 2017] [deleted]. Amend the explanation of Policy 13.21.7 to clarify that it does enable applications for new marine farms in AMAs in certain circumstances. |
| 68.15 | Volume One | Chapter: 13 | Provision: Issue 13O | Neutral | Amend the explanation of Issue 13O as follows: Marine farming activity raises a number of issues for managing the coastal environment, especially in the Marlborough Sounds where most of the [deleted] [existing marine farms are located]. These may include impacts from, or adverse effects on, the following: ... • reverse sensitivity including: • the establishment of marine farming where none has previously existed; or • where established or existing marine farming may be subject to activities[,] such as new tourism or residential activity that may affect water quality; |
| 68.16 | Volume One | Chapter: 13 | Provision: Policy 13.22.1 | Neutral | Amend Policy 13.22.1 to more directly reference the scientific work that it is informed by, and to ensure the policy is not being used to create a hard threshold if it is supposed to be based on the Best management practice guidelines. Amend the explanation of Policy 13.22.1 to better convey the level of uncertainty with respect to the benthic effects of conventional longline marine farming. Amend Policy 13.22.1 so that it is consistent with the expectations of the NES-MA 'adaptive management approach' definition. |

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| 68.17 | Volume One | Chapter: 13 | Provision: Policy 13.22.3 | Neutral | Amend Policy 13.22.3(a) to provide further clarity on the definition of a new marine farm. Amend Policy 13.22.3(b)(ii) to provide greater clarity as to whether multiple stages of development can be authorised under the same consent. Amend Policy 13.22.3 to provide clarity about its application to marine farming that does not involve conventional longline structures, including new farms in FAMAs (particularly those proposed to be relocated through the Marlborough Sounds salmon farm relocation proposal). If Policy 13.22.3 applies to new farms in FAMAs, amend Policy 13.22.3(b) to be consistent with the approach in the proposed salmon relocation regulations with respect to feed discharge staging. If Policy 13.22.3 does not apply to new farms in FAMAs, insert a policy to manage feed discharge increases at the three sites, consistent with the proposed salmon relocation regulations. Amend Policy 13.22.3 so that it is consistent with the expectations of the NES-MA 'adaptive management approach' definition. |
| 68.18 | Volume One | Chapter: 13 | Provision: Policy 13.22.4 | Neutral | Amend Policy 13.22.4 as follows: Policy 13.22.4 – [(a)] New and existing aquaculture activities are inappropriate in the following zones: (d) [deleted]; (i) Port zone; (ii) Marina zone; (iii) Port landing area zone; [deleted]. [(b) New and existing aquaculture activities are inappropriate unless they are located within an AMA (as provided for in the Marlborough Environment Plan or through a subsequent change or variation) or the open water CMU. Marine farms in inappropriate areas are prohibited.] Amend the explanation of Policy 13.22.4 as follows: Policy 13.21.1(e) and the planning maps define areas inappropriate for new and existing aquaculture activities and together are intended to [deleted] [identify] inappropriate area[s] for existing aquaculture activities [in accordance with] [deleted] regulation 6 of the NESMA. |
| 68.19 | Volume One | Chapter: 13 | Provision: Policy 13.22.5 | Neutral | Amend Policy 13.22.5 to provide clarity about whether it is intended to exclude marine farming that does not involve conventional longline structures. Amend Policy 13.22.5(a) to ensure an appropriate threshold for reviewing resource consents is established that does not single out marine farming unnecessarily. Amend Policy 13.22.5(b) to ensure it is clear what 'significant adverse ecosystem effects' means. |
| 68.20 | Volume One | Chapter: 13 | Provision: Policy 13.22.6 | Neutral | Amend explanation of Policy 13.22.6 to provide examples relevant to finfish farming too. |
| 68.21 | Volume One | Chapter: 13 | Provision: Policy 13.22.7 | Neutral | Amend Policy 13.22.7(d) and (g) so that it is consistent with equivalent provisions in the National Environmental Standard for Marine Aquaculture. |
| 68.22 | Volume One | Chapter: 13 | Provision: Policy 13.22.8 | Neutral | Amend Policy 13.22.8 so that it also provides for changes in layout for marine farming that does not involve conventional longline structures and for new marine farms consented after the variations were notified. |
| 68.23 | Volume One | Chapter: 13 | Provision: Policy 13.22.9 | Neutral | Amend Policy 13.22.9 (and make consequential amendments to relevant rules) so that it better enables a more diverse range of species to be farmed in order to enable innovation and better reflect the change of species provisions of the National Environmental Standard for Marine Aquaculture. |
| 68.24 | Volume One | Chapter: 13 | Provision: Policy 13.22.10 | Neutral | Amend Policy 13.22.10 by adding a new clause that outlines how areas where maximum enrichments stages of 5 and 3 are the thresholds will be defined. Amend Policy 13.22.10 (and make necessary amendments to Policy 13.22.3) to make clear which provisions apply to all marine farms and which apply only to finfish farms. Amend Policy 13.22.10(a)(v) as follows: (v) Conditions that require the management of the marine farm to be changed when thresholds are [deleted] [exceeded], in order to reduce adverse effects.... Amend Policy 13.22.10 so that it is consistent with the expectations of the NES-MA 'adaptive management approach' definition. |
| 68.25 | Volume One | Chapter: 13 | Provision: Policy 13.22.11 | Neutral | Amend Policy 13.22.11 to ensure it is clear which marine farms it applies to. |
| 68.26 | Volume One | Chapter: 13 | Provision: 13.M.35 | Neutral | Amend Method 13.M.35 as follows: Regional rules apply to the occupation of space in the coastal marine area for marine farming, [deleted] the erection and use of structures[, and any discharges] associated with marine farming. No marine farming activities are able to be permitted activities. Marine farming that is not in an AMA[, ASA, FAMA,] or in the offshore CMU is a prohibited activity. |
| 68.27 | Volume Two | Chapter: 16 | Provision: 16.4.3 | Neutral | Amend rule to include additional matter of control with respect to biosecurity risks. Amend standard and term 16.4.3.1 so that it is split into three parts to make it more understandable. |
| 68.28 | Volume Two | Chapter: 16 | Provision: 16.4.4 | Neutral | Amend rule to include additional matter of control with respect to biosecurity risks. Amend rule so that it provides for intertidal marine farms too. Amend rule so that it does not use the term 'existing marine farm'. |
| 68.29 | Volume Two | Chapter: 16 | Provision: 16.4.5 | Neutral | Amend rule to include additional matter of control with respect to biosecurity risks. Amend rule so that it also applies to those farms where there is an existing permit granted under 16.4.5, 16.5.3, 16.5.4, 16.6.14. Amend standard and term 16.4.5.4 so that it applies more broadly than species listed in Appendix 11, where those species are already on the existing consent. Amend standard and term 16.4.5.4 so that it is split into two parts for clarity (and to clarify what a marine farm solely authorised for monitoring purposes refers to). Include an advisory note regarding change of species applications that fall beyond the scope of this rule – i.e. those that would be considered as restricted discretionary activities under the NES-MA. Amend rule so that it does not use the term 'existing marine farm'. |

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| 68.30 | Volume Two | Chapter: 16 | Provision: 16.5.2 | Neutral | Amend rule to include additional matter of discretion with respect to biosecurity risks. Amend rule so that it provides for intertidal marine farms too. Amend rule so that it precludes public and limited notification. Create additional rules for marine farming within ASAs, notably: • Finfish farming, as a restricted discretionary activity • New marine farms not otherwise captured by the other rules, as a discretionary activity Include advisory note explaining that re-consenting of marine farms in ASAs (not otherwise provided for by the controlled activity rule) is provided for as a restricted discretionary activity under the NES-MA regulations. |
| 68.31 | Volume Two | Chapter: 16 | Provision: 16.5.3 | Oppose | It is unclear what the rule is trying to achieve. It appears the rule is duplicating the NES-MA in part, as it relates to re-consenting (within the scope of the NES-MA, i.e. not farms relocating or realigning more than one-third of the existing marine farm), so should be removed and replaced with an advisory note pointing to those regulations. |
| 68.32 | Volume Two | Chapter: 16 | Provision: 16.5.4 | Neutral | Amend rule so that it also applies to those farms where there is an existing permit granted under 16.4.5, 16.5.3, 16.5.4, 16.6.14. Amend rule to include additional matter of discretion with respect to biosecurity risks. Amend rule so that it does not use the term 'existing marine farm'. Amend rule so that it precludes public and limited notification. |
| 68.33 | Volume Two | Chapter: 16 | Provision: 16.5.5 | Neutral | The rule is duplicating the NES-MA in part, as it relates to re-consenting (within the scope of the NES-MA, i.e. not farms relocating), so should be removed and replaced with an advisory note referencing those regulations. Amend 16.5.5.6 to clarify what 'other method' means. Amend 16.5.5.18 to remove reference to Policy 13.22.1. Amend rule so that it does not use the term 'existing marine farm'. Amend rule so that it is clear whether an applicant can apply for a consent to move into a proposed AMA prior to allocation of authorisations. |
| 68.34 | Volume Two | Chapter: 16 | Provision: 16.6.13 | Neutral | Amend the rule so that it only applies to new marine farming in the Offshore CMU. Include an advisory note explaining that re-consenting of marine farms in Offshore CMU is provided for as a restricted discretionary activity under the NES-MA regulations. |
| 68.35 | Volume Two | Chapter: 16 | Provision: 16.6.14 | Neutral | Amend part (a) of the rule so that it relates only to new marine farming in AMAs. Remove part (b) of the rule as it is more stringent than the NES-MA. Include advisory note explaining that re-consenting of marine farms in AMAs (not otherwise provided for by the controlled activity rules) is provided for as a restricted discretionary activity under the NES-MA regulations. Amend rule so that it is clear whether an applicant can apply for a consent to move into a proposed AMA prior to allocation of authorisations. |
| 68.36 | Volume Two | Chapter: 16 | Provision: 16.6.15 | Neutral | Amend the rule so that it only applies to new marine farming. Include an advisory note explaining that discharges associated with re-consenting of marine farms are provided for as a restricted discretionary activity under the NES-MA regulations. Amend the rule so that it specifically exclude applications for finfish farming made under Rule 16.5.5. |
| 68.37 | Volume Two | Chapter: 16 | Provision: 16.7 | Neutral | Rule 16.7.9 Refer to Schedule 2 for commentary on interactions with the NES-MA. Decision not specified |
| 68.38 | Volume Two | Chapter: 16 | Provision: 16.8.1 | Neutral | Amend the allocation rules contained in Rules 16.8.1 and 16.8.2 to ensure the allocation of authorisations enables the transition to this new configuration to occur in the most efficient and effective way possible. |
| 68.39 | Volume Two | Chapter: 16 | Provision: 16.8.2 | Neutral | Amend the allocation rules contained in Rules 16.8.1 and 16.8.2 to ensure the allocation of authorisations enables the transition to this new configuration to occur in the most efficient and effective way possible. |
| 68.40 | Volume Two | Chapter: 16 | Provision: 16.8.2 | Neutral | Amend Rule 16.8.2.4 as follows: Allocation will not be by public tender, except in the circumstances set out in Policy 13.21.7 [(d)] [deleted]. |
| 68.41 | Volume Two | Chapter: 16 | Provision: 16.8.2 | Oppose | Remove Rule 16.8.2.6. |
| 68.42 | Volume Two | Chapter: 16 | Provision: 16.8.2 | Neutral | Amend Rule 16.8.2.8 (and make consequential amendments to other rules) in consultation with industry to ensure operational considerations are taken into account. |
| 68.43 | Volume Two | Chapter: 16 | Provision: 16.8.2 | Neutral | Amend Rule 16.8.2.9 to provide greater certainty about how the allocation of authorisations will occur in practice. |
| 68.44 | Volume Two | Chapter: 16 | Provision: 16.8.2.10 | Neutral | Amend Rule 16.8.2.10 as follows: Authorisations for [deleted] marine farms [involving finfish aquaculture] will only be allocated space within a FAMA |
| 68.45 | Volume Two | Chapter: 16 | Provision: 16.8.2.11 | Neutral | Amend Rule 16.8.2.11 so that the Council must first attempt to allocate authorisations in FAMAs to other finfish farmers before being allocated to non-fish farmers. |
| 68.46 | Volume Four | All CMU | | Neutral | Assess any other AMAs and FAMAs proposed to be included in these variations against the principles in Policy 13.21.3 (noting our submission points regarding the application of those principles to FAMAs), and only consider them for addition if they meet these principles. |
| 68.47 | Volume Four | All AMA in a CMU | | Neutral | Ensure appropriate assessment of the new AMAs in Richmond Bay has occurred, including consultation with fishers. |
| 68.48 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Neutral | Amend Variation 1A to ensure it enables a clearer and more certain direction for sustainable salmon farming in Marlborough, including realising the objectives of the Marlborough Sounds salmon farm relocation proposal. |
| 68.49 | Volume One | Chapter: 13 | Provision: Policy 13.20.2 | Neutral | Amend explanation of Policy 13.20.2 as follows: ... New marine farms [located outside of AMAs, ASAs or FAMAs] are prohibited in the enclosed waters of the Marlborough Sounds... |

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| | | | 68.50 | Volume One | Chapter: 13 | Provision: 13.M.39 | Neutral | Amend Method 13.M.39 so that central government agencies are also consulted with during the preparation of the implementation guide. |
| | | | 68.51 | Volume One | Chapter: 13 | Provision: Policy 13.21.7 | Neutral | Amend Policy 13.21.7(g) as follows: (g) Authorisations for [marine farms involving finfish aquaculture] [deleted] will only be allocated for space within FAMAs. Amend Policy 13.21.7 to clarify how space at the four current finfish sites that are not proposed to be FAMAs will be allocated (including enabling iwi first right to apply for the sites should the existing finfish farms not remain), and undertake a full section 32 analysis of this proposal (including assessment of how it interacts with the relevant NES-MA regulations). Amend Policy 13.21.7(h)(iii) so that the Council must first attempt to allocate authorisations in FAMAs to other finfish farmers before being allocated to non-fish farmers. Amend Policy 13.21.7 (and make consequential amendments to relevant methods and rules) to ensure appropriate management of biosecurity risks associated with relocation of existing marine farms between CMUs. Amend the explanation of Policy 13.21.7 as follows: Finfish farms can only locate in a FAMA. Space in the FAMAs will be allocated to existing finfish farms in the priority set out in the policy. This is consistent with the [report and recommendations from the Marlborough Sounds Salmon Farm Relocation Advisory Panel] [deleted] provided to the Minister of Fisheries [in 2017] [deleted]. Amend the explanation of Policy 13.21.7 to clarify that it does enable applications for new marine farms in AMAs in certain circumstances. |
| | | | 68.52 | Volume One | Chapter: 13 | Provision: Policy 13.21.7 | Neutral | Amend the explanation of Policy 13.21.7 to clarify that it does enable applications for new marine farms in AMAs in certain circumstances. |
| | | | 68.53 | Volume Four | All CMU | | Neutral | Amend variation provisions as necessary so that only the term "Offshore CMU" is used to refer to the Offshore CMU. |
| | | | 68.54 | Volume Two | Chapter: 16 | Provision: 16.5.5.6 | Neutral | Amend 16.5.5.6 to clarify what 'other method' means. |
| | | | 68.55 | Volume Two | Chapter: 16 | Provision: 16.5.5.18 | Neutral | Amend 16.5.5.18 to remove reference to Policy 13.22.1. |
| | | | 68.56 | Volume One | Chapter: 13 | Provision: Policy 13.20.2 | Support | Amend explanation of Policy 13.20.2 as follows: ... New marine farms *located outside of AMAs, ASAs or FAMAs* are prohibited in the enclosed waters of the Marlborough Sounds... (* denotes proposed new text) |
| 69 | Elkington | Carl Elkington | 69.1 | Volume Four | CMU 4: Catherine Cove | CMU item: CMU 4 Aquaculture Management Area - New AMA | Oppose | Opposes no AMA being provided at the site for MPE299/U110015 and to support the current location of MPE299/U110015. |
| 70 | Nelson Marlborough Conservation Board | Kath Inwood | 70.1 | Volume One | Chapter: 13 | Provision: Policy 13.21.3 | Oppose | To amend Policies 13.21.1-6 as required to ensure that no new AMA space is allocated in CMU 44 Waitata Reach for marine farming. |
| | | | 70.2 | Volume One | Chapter: 13 | Provision: Policy 13.22.1 | Oppose | Amend Policies 13.22.1 and 13.M.37, 13.M.38 to provide for more comprehensive and frequent monitoring. A baseline survey should be established immediately in control and farmed sentinel monitoring sites, including appropriate infaunal and epifaunal surveys and then 3 yearly monitoring implemented to provide an overview of effects in a reasonable timeframe. |
| | | | 70.3 | Volume One | Chapter: 13 | Provision: Policy 13.22.3 | Support | Retain Policy 13.22.3. |
| | | | 70.4 | Volume One | Chapter: 13 | Provision: Policy 13.22.10 | Support | Retain policy |
| | | | 70.5 | Volume One | Chapter: 13 | Provision: Policy 13.22.11 | Support | Retain policy |
| | | | 70.6 | Volume One | Chapter: 13 | Provision: Policy 13.21.7 | Oppose | Amend Policy 13.21.7. h (ii) so that there is no provision of new FAMA space in CMU 28 Maud Island and CMU 44 Waitata Reach for finfish farming. |
| | | | 70.7 | Volume Four | CMU 28: Maud Island | CMU item: CMU 28 Aquaculture Management Area - Finfish AMA 6 | Oppose | Amend Policy 13.21.7. h (ii) so that there is no provision of new FAMA space in CMU 28 Maud Island. |
| | | | 70.8 | Volume Four | CMU 44: Waitata Reach | CMU item: CMU 44 Aquaculture Management Area - Finfish AMA 7 | Oppose | Amend Policy 13.21.7. h (ii) so that there is no provision of new FAMA space in CMU 44 Waitata Reach for finfish farming. |
| | | | 70.9 | Volume Four | CMU 44: Waitata Reach | CMU item: CMU 44 Aquaculture Management Area - Finfish AMA 8 | Oppose | Amend Policy 13.21.7. h (ii) so that there is no provision of new FAMA space in CMU 44 Waitata Reach for finfish farming. |
| | | | 70.10 | Volume Four | CMU 44: Waitata Reach | CMU item: CMU 44 Aquaculture Management Area - Finfish AMA 9 | Oppose | Amend Policy 13.21.7. h (ii) so that there is no provision of new FAMA space in CMU 44 Waitata Reach for finfish farming. |
| | | | 70.11 | Volume One | Chapter: 13 | Provision: Policy 13.21.1 | Oppose | Amend Policies 13.21.1-6 as required to ensure that no new AMA space is allocated in CMU 44 Waitata Reach for marine farming. |
| | | | 70.12 | Volume One | Chapter: 13 | Provision: Policy 13.21.2 | Oppose | Amend Policies 13.21.1-6 as required to ensure that no new AMA space is allocated in CMU 44 Waitata Reach for marine farming. |
| | | | 70.13 | Volume One | Chapter: 13 | Provision: Policy 13.21.4 | Oppose | Amend Policies 13.21.1-6 as required to ensure that no new AMA space is allocated in CMU 44 Waitata Reach for marine farming. |
| | | | 70.14 | Volume One | Chapter: 13 | Provision: Policy 13.21.5 | Oppose | Amend Policies 13.21.1-6 as required to ensure that no new AMA space is allocated in CMU 44 Waitata Reach for marine farming. |
| | | | 70.15 | Volume Four | CMU 44: Waitata Reach | CMU item: CMU 44 Aquaculture Management Area - New AMA | Oppose | The Decision Sought is to Amend Policies 13.21.1-6 as required to ensure that no new AMA space is allocated in CMU 44 Waitata Reach for marine farming. |
| | | | 70.16 | Volume One | Chapter: 13 | Provision: 13.M.37 | Oppose | Amend Policies 13.22.1 and 13.M.37, 13.M.38 to provide for more comprehensive and frequent monitoring. A baseline survey should be established immediately in control and farmed sentinel monitoring sites, including appropriate infaunal and epifaunal surveys and then 3 yearly monitoring implemented to provide an overview of effects in a reasonable timeframe. |
| | | | 70.17 | Volume One | Chapter: 13 | Provision: 13.M.38 | Oppose | Amend Policies 13.22.1 and 13.M.37, 13.M.38 to provide for more comprehensive and frequent monitoring. A baseline survey should be established immediately in control and farmed sentinel monitoring sites, including appropriate infauna! and epifaunal surveys and then 3 yearly monitoring implemented to provide an overview of effects in a reasonable timeframe. |
| 71 | Reader | Arthur John Reader | 71.1 | Volume Four | CMU 39: Squally Cove | CMU item: CMU 39 Aquaculture Management Area - AMA14 | Support | Place the AMA around the consented and/or actual space in CMU 39 for Farm 8279. |
| | | | 71.2 | Volume Two | Chapter: 16 | Provision: 16.4 | Support | Arthur John Reader supports the submission of MARINE FARMING ASSOCIATION and AQUACULTURE NEW ZEALAND in its totality and adopts it as his submission |

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| | | | 71.3 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Support | At a high level, Arthur John Reader submits that: (a) Existing marine farms should be 'renewed' as a controlled activity without notification; and (b) AMAs should be drawn in the way set out in this submission, provided that no existing marine farm loses area, total backbone length and if the farm is shifting from its existing space it is moved into equivalent space; or (c) The existing marine farm(s) should stay where they are currently installed (including when they are offsite); or (d) The existing marine farm(s) should shift into new space as long as they do not lose area, total backbone length and the move is into equivalent space. If someone makes a submission that any existing marine farm should be removed from its current location, and that submission is accepted, then that farm(s) should move into new space in bays where there is currently marine farming. That is consistent with the principle of no loss of marine farming space and no loss of longline length. |
| 72 | Marine Farming Association Incorporated and Aquaculture New Zealand | Q A M Davies, A L Hills and E L Deason | 72.1 | Volume Two | Chapter: 25 | Provision: AMA | Neutral | Provision should be redrafted along the lines of "AMA or Aquaculture Settlement area means ..." or delete reference to "aquaculture settlement area (ASA)" in the AMA definition. Without prejudice to the primary submission that Variation 1A should be withdrawn and that Variation 1 should not apply to finfish farming, state precisely where AMAs includes FAMAs and/or ASAs throughout the variation. |
| | | | 72.2 | Volume Two | Chapter: 25 | Provision: Conventional longline structures | Neutral | Amend definition by adding the words "longlines with subsurface backbones and" after "and includes". |
| | | | 72.3 | Volume Two | Chapter: 25 | Provision: Enclosed Water CMU | Support | Delete duplication of "Waitata Bay" and correct typo ("Keneperu"). |
| | | | 72.4 | Volume Two | Chapter: 25 | Provision: Existing marine farm | Support | Retain provision. |
| | | | 72.5 | Volume Two | Chapter: 25 | Provision: Important species | Support | Retain definition subject to changes to associated policies being accepted. |
| | | | 72.6 | Volume Two | Chapter: 25 | Provision: Marine farm | Neutral | Amend the definition of "Marine Farm" to read: means a [deleted] spatial area used for aquaculture activities (as defined in section 2 RMA) that has or requires a coastal permit for the occupation of the coastal marine area and which may also have or require coastal permits that authorise one or more of the following activities: the erection, placement, and use of any structures for aquaculture; and any associated disturbance of the foreshore and seabed, and ancillary deposition or discharges in the coastal marine area. [Each marine farm is given a unique site number by the Marlborough District Council]. Marine farming has the related meaning. [For the avoidance of doubt, this does not include: a. Conservation aquaculture, defined as the use of human cultivation of an aquatic organism for the planned management and protection of a natural resource; or b. Structures resting on the seabed, such as craypots.] |
| | | | 72.7 | Volume Two | Chapter: 25 | Provision: New provision | Support | Add new definition for "the Values Report 2018" |
| | | | 72.8 | Volume Two | Chapter: 25 | Provision: New provision | Support | Add new definition: "Equivalent space" means equivalent in terms of relevant farming characteristics, production potential, size, length of backbone, and the efficacy of farming that space. |
| | | | 72.9 | Volume Two | Chapter: 25 | Provision: New provision | Support | Add new definition: "Backbone" means either a single or double line supported by floats which runs at the surface of the water or sub-surfaced and from which growing structures are suspended. Typically the ends of the backbone are marked by orange floats |
| | | | 72.10 | Volume Two | Chapter: 25 | Provision: New provision | Support | Add new definition: "Length of backbone" means the distance between the furthest floats measured in metres. In the case of intertidal oyster racks, length of backbone means the length of racks. |
| | | | 72.11 | Volume One | Chapter: 13 | Provision: Introduction | Support | Amend text to replace 1970s with 1960s. |
| | | | 72.12 | Volume One | Chapter: 13 | Provision: Introduction | Neutral | Amend introductory text as follows: At paragraph 2 insert as first sentence: "Marlborough is the largest aquaculture growing region in New Zealand, producing the majority of King salmon (56%) and Greenshell mussels (65%)." Replace last sentence paragraph 2 with: "Today, Marlborough's marine farming industry is made up of a mixture of large companies, small family businesses and iwi, including joint ventures and collaborations that produce premium seafood and high value products for export and domestic markets." Amend paragraph 3 in relation to benefits to include: comment on economic, social, cultural and environmental (ecosystem services, restoration) – Reference NZIER (2015) , TNC/Encourage Capital, ecosystem services report. Insert new paragraph 3: "There is a Government Aquaculture Strategy (2019) that sets a vision for New Zealand to be world-leading in sustainable and innovative aquaculture management across the value chain. Government has identified aquaculture as a key primary sector to accelerate economic growth for the benefit of New Zealand8." Insert new paragraph 4: "Future sustainable growth of the aquaculture industry will come from maximising the value of existing farms through innovation, high value novel products, and through increasing productivity, and extending into open ocean finfish aquaculture. Other forms of aquaculture such as restorative aquaculture and the farming of seaweeds and other new species will likely be part of future aquaculture in Marlborough." |
| | | | 72.13 | Volume One | Chapter: 13 | Provision: Introduction | Neutral | Replace sixth paragraph ("measured by consented surface area") with ("measured by consented backbone length"). |
| | | | 72.14 | Volume One | Chapter: 13 | Provision: Introduction | Neutral | Correct typo: should be "... (NESMA) came into force on 1 December 2020..." |
| | | | 72.15 | Volume One | Chapter: 13 | Provision: Introduction | Neutral | Correct typo. Page 3, final paragraph, fourth sentence. "Near-shore CMU" should be "Near-shore CMUs" plural. |

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| 72.16 | Volume One | Chapter: 13 | Provision: Issue 13N | Neutral | Amend Issue to read: "There is a need for greater certainty about the future of marine farming in Marlborough. The industry needs certainty about the process and outcome of any future resource consent application when existing resource consents for marine farms expire. Some parts of the community need certainty about the future location and potential growth of marine farming, and has expressed concern that existing marine farms in current locations are resulting in adverse effects on uses and values of the coastal environment." Replace "Over 300" with a more appropriate figure. |
| 72.17 | Volume One | Chapter: 13 | Provision: Objective 13.21 | Neutral | Amend text of objective to read: [Deleted] [Maintain and enhance the existing] marine farm[ing industry] [deleted] while protecting and maintaining the values of Marlborough's coastal environment. In addition, the commentary should be amended to: a) Refer to the NZIER report, the NIWA ecosystems report ¹⁴ , the MPI Value of a Job report, and the MPI 2013 and the Keeley 2009 reviews. b) Add to the end of the second sentence "and the physical and operating requirements of marine farms." c) Add to the final sentence after "occurs in appropriate locations" the words "in accordance with the wealth of available information, ..." |
| 72.18 | Volume One | Chapter: 13 | Provision: Policy 13.21.1 | Neutral | Amend Policy 13.21.1(c) to begin: "Where not identified as AMAs, ..." Provide for marine farms 8561 and 8001 in AMAs, as per the submissions of those consent holders. If Variation 1 applies to FAMAs, applications in the offshore CMU should be (F)AMAs as relevant. |
| 72.19 | Volume One | Chapter: 13 | Provision: Policy 13.21.1 | Neutral | Amend second paragraph of commentary by deleting "adverse effects" and replacing with "adverse and positive effects". Add a new Policy to recognise ecosystem services and other benefits provided by aquaculture. |
| 72.20 | Volume One | Chapter: 13 | Provision: Policy 13.21.1 | Neutral | Replace "equivalent amount of space" with "equivalent amount of [farmable] space" and add "the space provided is, as far as reasonably practical, to be equivalent space". A definition of equivalent space will need to be inserted [as stated in separate submission point] |
| 72.21 | Volume One | Chapter: 13 | Provision: Policy 13.21.1 | Neutral | Replace Part 7A mechanism with a searchable map identifying those consent holders who will be entitled to apply for each line in its identified location. Examples of how this would look in practice are shown on the three sample maps attached to this submission. The submission period was not long enough for the industry to complete this line by line exercise. It is in the process of doing that work. Tentative indicative amendments to the AMA boundaries are depicted in yellow. Maps are being prepared showing the location of individual lines within those yellow AMAs. Refer also submission in respect Policy 13.21.7. |
| 72.22 | Volume One | Chapter: 13 | Provision: Policy 13.21.2 | Neutral | Allocate further space in ASAs for iwi, in accordance with settlement obligations and in consultation with existing growers. |
| 72.23 | Volume One | Chapter: 13 | Provision: Policy 13.21.3 | Neutral | Amend text of policy to read "...are generally[, but not necessarily always,] located: ..." |
| 72.24 | Volume One | Chapter: 13 | Provision: Policy 13.21.3 | Neutral | Reword commentary to read: "[...] The Council intends that the new spatial layout achieved through AMAs will result in the values of the Marlborough Sounds [deleted] [being accounted for, by way of making it clear where existing marine farming activity will continue to occur.]" |
| 72.25 | Volume One | Chapter: 13 | Provision: Policy 13.21.3 | Neutral | Policy 13.21.3(a) - Replace 100 with 50. AND Replace "in order to" with "where necessary to". |
| 72.26 | Volume One | Chapter: 13 | Provision: Policy 13.21.3 | Neutral | Replace "away from" with "20m away from". AND Replace "in order to" with "where necessary to". AND Delete "and other areas of significant marine biodiversity value". |
| 72.27 | Volume One | Chapter: 13 | Provision: Policy 13.22.3 | Neutral | Amend text to read: "To ensure that adequate separation for navigation purposes is achieved to publically accessible boat launching facilities, public jetties, publically accessible beaches, public moorings, anchorages of refuge and recognised navigation routes ²⁰ where this is necessary to maintain and enhance the public recreation and amenity values of the Marlborough Sounds." |
| 72.28 | Volume One | Chapter: 13 | Provision: Policy 13.21.3 | Neutral | The policy be amended to reflect the situation where either Appendix 1 or Appendix 2 of the Plan identifies that marine farming is inappropriate in those areas, then those areas should be avoided. The Plan should be consistent in this regard. |
| 72.29 | Volume One | Chapter: 13 | Provision: Policy 13.21.3 | Neutral | Amend the policy to read: "Outside areas where marine farming would adversely affect significant habitat of the New Zealand King Shag, elephant fish, dolphins and other important species." |
| 72.30 | Volume One | Chapter: 13 | Provision: Policy 13.21.3 | Neutral | Policy 13.21.3(f) Add at the end" "where this is necessary to protect those sites". |
| 72.31 | Volume One | Chapter: 13 | Provision: Policy 13.21.4 | Neutral | Change to '[C]' policy rather than '[RPS]' policy; AND Amend the words of Policy 13.21.4 to read "...Near-shore CMUs, and new marine farms in the offshore CMUs that do not have an existing coastal permit are not appropriate in: ..." |
| 72.32 | Volume One | Chapter: 13 | Provision: Policy 13.21.4 | Neutral | Amend 13.21.4(a) by adding: "...with the exception of the Queen Charlotte College line in Shakespeare Bay" |
| 72.33 | Volume One | Chapter: 13 | Provision: Policy 13.21.4 | Neutral | Make the consequential change if the definition of the National Transportation Route is altered in other appeals. Make reference to the side bays being excluded in the explanatory text below the policy in line with this paragraph. |
| 72.34 | Volume One | Chapter: 13 | Provision: Policy 13.21.4 | Support | Retain provision Policy 13.21.4(c) |
| 72.35 | Volume One | Chapter: 13 | Provision: Policy 13.21.4 | Support | Retain provision Policy 13.21.4(d) |
| 72.36 | Volume One | Chapter: 13 | Provision: Policy 13.21.5 | Neutral | Replace "[RPS]" with "[C]". AND Replace "s 360" with "s 360A". AND Amend text of Policy 13.21.5 to include "applied for after Variation 1 becomes operative" after the words "additional AMAs". |
| 72.37 | Volume One | Chapter: 13 | Provision: Policy 13.21.5 | Neutral | Policy 13.21.5(a). Amend sub-policy (a) to require both positive and adverse effects to be considered. Delete the words beginning "without more..." to end of sub-policy. |
| 72.38 | Volume One | Chapter: 13 | Provision: Policy 13.21.5 | Neutral | Policy 13.21.5(b) - Change "within 50 metres" in sub-paragraphs (i) and (ii) to "within 20 metres". |
| 72.39 | Volume One | Chapter: 13 | Provision: Policy 13.21.6 | Neutral | Delete reference to "Values Report 2018" (otherwise include definition as per above submission). Amend text of policy to read "The appropriateness of [new] marine farms [(for which no prior resource consent has been granted)] within..." |

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| 72.40 | Volume One | Chapter: 13 | Provision: Policy 13.21.6 | Neutral | Policy 13.21.6(c) - The wording of this provision is identical to Policy 13.21.3(e). For the same reasons, the same changes should be made to this provision. Amend the policy to read: "Outside areas where marine farming would adversely affect significant habitat of the New Zealand King Shag, elephant fish, dolphins and other important species." |
| 72.41 | Volume One | Chapter: 13 | Provision: Policy 13.21.6 | Neutral | Policy 13.21.6(d) Replace "more than minor" with "significant" |
| 72.42 | Volume One | Chapter: 13 | Provision: Policy 13.21.6 | Neutral | Policy 13.21.6(e) Replace "areas of ecologically significant marine biodiversity shown on the Volume 4 planning maps" with "Ecologically Significant Marine Sites, identified as Category A and B sites in Appendix 27." |
| 72.43 | Volume One | Chapter: 13 | Provision: Policy 13.21.6 | Oppose | Policy 13.21.6(e) Correct the numbering (2 x sub-policy (e)). The second (e) should read (f). |
| 72.44 | Volume One | Chapter: 13 | Provision: Policy 13.21.6 | Oppose | Delete (g) |
| 72.45 | Volume One | Chapter: 13 | Provision: Policy 13.21.7 | Neutral | Oppose in part - This policy needs to be amended so that it provides for: (a) The marine farm mapping to identify on a line by line basis which consent holder as at 2 December 2020 (or their successor) ("existing consent holder") may apply for each line. (b) Existing consent holders may agree to their own arrangements, provided that no existing consent holder may obtain an increase in consented backbone length from the situation as at 2 December 2020. (c) No consent holder shall be allocated space immediately inshore or offshore of another existing consent holder, except where that situation presently exists. (d) Priority to space is to be given to the farmer who presently occupies that space. Farmers may be required to move to accommodate other farms moving into a ribbon. (e) Where insufficient space in a particular AMA arises, efforts should be made to find other equal length of backbone within that CMU. (f) Where insufficient space exists within AMAs in an entire CMU, alternative space for equal length of backbone will be found in another CMU. (g) Any space which remains after all allocation within all CMUs is complete (ie. each existing consent holder has obtained equal length of backbone), any remaining AMAs will be allocated by authorisation, subject to (c) above, as follows: a. Within the Enclosed Water CMUs i. The space will be held for a period of 6 years from the date the Plan became operative as space within which the Council will issue authorisations to farmers who are unsuccessful in their applications under Part 9A of the Fisheries Act 1996, or for some other reason are not able to move to the lines which they have been allocated; and then ii. The space will be removed or allocated by a future plan change. b. Beyond the Enclosed Water CMUs i. The space will be offered to the party who has contributed substantial technical or scientific information to enable the AMA to be created (if any); and then ii. The space will be offered to iwi as settlement space ²⁹ ; and then iii. The space is to be publicly tendered. |
| 72.46 | Volume One | Chapter: 13 | Provision: Policy 13.21.7 | Neutral | Policy 13.21.7(b) Delete "the notified variation to the plan" and replace with "Variation 1". Clarify whether this also applies to FAMAs. |
| 72.47 | Volume One | Chapter: 13 | Provision: Policy 13.21.7 | Neutral | Policy 13.21.7(b)(i) Delete the words beginning "to accommodate" to the end of the sentence. |
| 72.48 | Volume One | Chapter: 13 | Provision: Policy 13.21.7 | Neutral | Policy 13.21.7(b)(ii) Clarify meaning of "the same" in light of other MFA/AQNZ submission points. |
| 72.49 | Volume One | Chapter: 13 | Provision: Policy 13.21.7 | Neutral | Policy 13.21.7(b)(iii) Refer submission in respect of policy 13.21.7 for alternative allocation regime. If alternative relief is not granted, then enable authorisations to be given to a marine farmer for their farm to occupy the available space in the relevant AMA ribbon. |
| 72.50 | Volume One | Chapter: 13 | Provision: Policy 13.21.7 | Neutral | Policy 13.21.7(b)(iv) Replace "space" with "equivalent space" in both locations where that word is found. Where equivalent space in an alternative location is not provided for (eg. Alternative AMA space is too small, is not equivalent, or is removed via submissions in opposition), then AMAs should be created in the location of existing farms. |
| 72.51 | Volume One | Chapter: 13 | Provision: Policy 13.21.7 | Neutral | Policy 13.21.7(c) Replace "space" with "equivalent space" in both locations where that word is found. Where equivalent space in an alternative location is not provided for (eg. Alternative AMA space is too small, is not equivalent, or is removed via submissions in opposition), then AMAs should be created in the location of existing farms. |
| 72.52 | Volume One | Chapter: 13 | Provision: Policy 13.21.7 | Oppose | Delete "or the extension of Existing Marine Farms in AMAs". Amend the definition of marine farms so that it is clear it relates to whole sites and locations contiguous with existing marine farms. Insert a new paragraph which would enable the extension of marine farming sites where appropriate environmental standards are met. |
| 72.53 | Volume One | Chapter: 13 | Provision: Objective 13.22 | Support | Retain provisions. |

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| 72.54 | Volume One | Chapter: 13 | Provision: Policy 13.22.1 | Oppose | Oppose in part - Delete provision and replace with a policy which includes: (a) The Council is to establish a technical advisory group (TAG) consisting of specialists in the fields of Mātauranga Maori, marine and terrestrial ecology, terrestrial farming, aquaculture, forestry, wild fishing, soil conservation and water quality. The membership of the TAG is to be determined by Council in consultation with interested parties; (b) The TAG is to recommend, review and periodically update an environmental monitoring programme for the Marlborough Sounds. That monitoring program is to be designed so that it integrates with other scientific programmes, and focusses on areas of greater scientific uncertainty and/or greatest ecological effect to ensure scarce scientific resources are applied in the best and most efficient way. The Council is to provide the TAG with an indicative budget; (c) The Council may accept or reject the recommendations of the TAG, but must do so formally as part of its decision-making under the Local Government Act 2002; (d) Monitoring results are to be published in the context of the publishing of wider state of the environment monitoring undertaken by Council. Publication must occur at least annually; (e) A formal review of that monitoring information is undertaken annually by the TAG; and (f) The TAG and Council will jointly commission a review of its operation and the operation of the monitoring program by an independent party after the first 3 years, then every 5 years thereafter. The policy will address the effects of all Sounds activities so may be better located in another part of Chapter 13. In terms of the commentary on Policy 13.22.1, there is very little uncertainty as to the benthic effects of marine farming using conventional longline structures. The commentary should be deleted and replaced with a more accurate statement reflecting the available science. In addition, the commentary relating to water column should be updated to reflect the most recent available science. |
| 72.55 | Volume Four | All CMU | | Neutral | All mapping provided is indicative. The 96 general maps included as part of this submission show the proposed AMA boundaries as dashed lines to allow for any adjustments required/identified by the line by line reconciliation process. The use of a solid yellow line on the three 'Backbone Overlay' maps, by contrast, indicates a greater level of confidence. If no alternative mapping (yellow lines) is provided, then we are seeking to retain the AMA as notified, provided the notified AMA is consistent with the consented total backbone length or with applications currently before the Marlborough District Council where those would result in an improved environmental outcome. |
| 72.56 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Oppose | In respect of Variation 1A, the MARINE FARMING ASSOCIATION INCORPORATED and AQUACULTURE NEW ZEALAND seek that that Variation be withdrawn in its entirety. |
| 72.57 | Volume One | Chapter: 13 | Provision: Policy 13.22.2 | Neutral | Policy 13.22.2(a)(ii) Delete from the words "for a period of" to "on the site". Delete "unused or obsolete" |
| 72.58 | Volume One | Chapter: 13 | Provision: Policy 13.22.2 | Neutral | Oppose in part - Delete Policy 13.22.2(b)(i), insert the word "if" before Policy 13.22.2(b)(ii), delete the words "is a block anchor and the block anchor" and replace the words "remaining block anchor" with "remaining anchoring structure". |
| 72.59 | Volume One | Chapter: 13 | Provision: Policy 13.22.3 | Oppose | Delete the policy and replace with: "For new marine farms, consider whether they should be established using an adaptive management regime" |
| 72.60 | Volume One | Chapter: 13 | Provision: Policy 13.22.3 | Oppose | Policy 13.22.3(a)(iii) The question ought to be whether the potential effects cannot be adequately predicted. If the potential adverse effects of an activity are well understood the fact that it is new for the region or for that. Delete paragraph. |
| 72.61 | Volume One | Chapter: 13 | Provision: Policy 13.22.3 | Oppose | Policy 13.22.3(a)(v) Delete paragraph. |
| 72.62 | Volume One | Chapter: 13 | Provision: Policy 13.22.3 | Oppose | Delete sub-policies (b) and (c). Alternatively, some of the discussion could be inserted into the commentary to provide guidance, but which is not necessarily mandatory in any particular circumstance. Note typo in sub-policy (b)(iii): "report" not "reported". |
| 72.63 | Volume One | Chapter: 13 | Provision: Policy 13.22.4 | Oppose | Policy 13.21.1(d). Delete Policy. Numbering is also incorrect. Cross reference to rule 16.7.10 in the commentary should be to rule 16.7.9. |
| 72.64 | Volume One | Chapter: 13 | Provision: Policy 13.22.5 | Oppose | Delete sub-paragraphs (a) and (d). AND Amend sub-paragraph (c) to read: "New information becomes available about the effects of marine farming, which requires changes to the management of marine farms to manage those effects[, if those effects are predicted to be significant]" |
| 72.65 | Volume One | Chapter: 13 | Provision: Policy 13.22.5 | Neutral | Amend sub-policy (d) to clarify that it is 5 years after the date of the last review. Delete first sentence of commentary and replace with: "Marine farming is the most well understood activity in the Marlborough marine environment." |
| 72.66 | Volume One | Chapter: 13 | Provision: Policy 13.22.6 | Neutral | Retain provision. Add sentence at end of commentary as follows: "This approach is consistent with the A+ Sustainable Management Framework and the Marine Farming Association's Environment Programme." |
| 72.67 | Volume One | Chapter: 13 | Provision: Policy 13.22.7 | Neutral | Replace "must" with "shall generally". |
| 72.68 | Volume One | Chapter: 13 | Provision: Policy 13.22.7 | Neutral | Amend references throughout to "long line" to "consented backbone", for consistency. |
| 72.69 | Volume One | Chapter: 13 | Provision: Policy 13.22.7 | Support | Policy 13.22.7(a) Retain provision. |
| 72.70 | Volume One | Chapter: 13 | Provision: Policy 13.22.7 | Neutral | Policy 13.22.7(b) Replace sub-policy with: "For marine farms using conventional longline structures, the lines will be generally positioned with a minimum of 10m space between each longline." |
| 72.71 | Volume One | Chapter: 13 | Provision: Policy 13.22.7 | Neutral | Replace sub-policy (c) with: "That a gap of 50m between seabed structures of adjacent marine farms in different ownership is generally retained, and that the existing gap between the surface structures of adjacent marine farms is generally retained to allow for public access to the foreshore (including for recreational access and access for other boating traffic)." This highlights why it is important to properly define "marine farm" (see above). |

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| 72.72 | Volume One | Chapter: 13 | Provision: Policy 13.22.7 | Neutral | Policy 13.22.7(d) Delete "visual amenity values" and replace with "visibility and coherent appearance" |
| 72.73 | Volume One | Chapter: 13 | Provision: Policy 13.22.7 | Neutral | Policy 13.22.7(g) Amend sub-policy to read: "that noise from the operation of the marine farm does not have significant effects on coastal amenity values" |
| 72.74 | Volume One | Chapter: 13 | Provision: Policy 13.22.8 | Neutral | Amend text as follows: a. Delete the words "no increase to the total area occupied by structures and" from sub-policy (a); b. Add the following to sub-policy (a): "...structures within an AMA, [nearshore CMU or offshore CMU] where there is no increase to the total area..."; and c. Delete (b) in its entirety. |
| 72.75 | Volume One | Chapter: 13 | Provision: Policy 13.22.9 | Neutral | Amend the Policy so that it is consistent with NESMA by deleting the words "if the species to be added is" through to the end of the Policy. To the extent that activities provided in NESMA are not captured by the associated policies and rules, add new policies and rules consistent with NESMA |
| 72.76 | Volume One | Chapter: 13 | Provision: Policy 13.22.9 | Oppose | Delete 13.22.9(f). |
| 72.77 | Volume One | Chapter: 13 | Provision: Policy 13.22.9 | Neutral | Remove reference to "discharge of contaminants". AND Replace "bivalve species" with "bivalve, or mollusc, or sponge, or algae species". AND Amend as a result of NESMA where appropriate. |
| 72.78 | Volume One | Chapter: 13 | Provision: 13.M.36 | Neutral | Correct typo. Should be "circumstances", plural. |
| 72.79 | Volume One | Chapter: 13 | Provision: 13.M.37 | Neutral | Need to alter text in light of changes sought to Policy 13.22.1. Replace "understand water column effects" with "better understand water column effects". |
| 72.80 | Volume One | Chapter: 13 | Provision: 13.M.39 | Neutral | There may need to be consequential changes to this text if an alternative to authorisations is used. However, there should still be an implementation plan. |
| 72.81 | Volume One | Chapter: 13 | Provision: 13.M.40 | Support | Retain method. |
| 72.82 | Volume One | Chapter: 13 | Provision: 13.AER.18 | Support | Retain text. |
| 72.83 | Volume One | Chapter: 13 | Provision: 13.AER.19 | Support | Retain text. |
| 72.84 | Volume One | Chapter: 13 | Provision: 13.AER.20 | Support | Retain text. |
| 72.85 | Volume Two | Chapter: 16 | Provision: 16.4.3 | Oppose | Support the principle but oppose the implementation. Replace authorisations with a map showing: (a) Farmable space within Marlborough; (b) Where farmers may place lines, and which consent holder may make a consent application to transfer that space (up to that maximum consented number of lines) in accordance with this Rule; and Update Rule 16.4.3 and associated standards accordingly. |
| 72.86 | Volume Two | Chapter: 16 | Provision: 16.4.3.1 | Neutral | Replace "6 months" with "24 months". |
| 72.87 | Volume Two | Chapter: 16 | Provision: 16.4.3.2 | Oppose | Delete as appropriate, but retain reference to "total backbone length", and add to that "measured in metres". |
| 72.88 | Volume Two | Chapter: 16 | Provision: 16.4.3.3 | Oppose | Delete the Standard. |
| 72.89 | Volume Two | Chapter: 16 | Provision: 16.4.3.5 | Oppose | Delete 16.4.3.5 and 16.4.3.7 and delete the words "layout, positioning (including density)" from 16.4.3.6. |
| 72.90 | Volume Two | Chapter: 16 | Provision: 16.4.3.6 | Oppose | Delete 16.4.3.5 and 16.4.3.7 and delete the words "layout, positioning (including density)" from 16.4.3.6. |
| 72.91 | Volume Two | Chapter: 16 | Provision: 16.4.3.7 | Oppose | Delete 16.4.3.5 and 16.4.3.7 and delete the words "layout, positioning (including density)" from 16.4.3.6. |
| 72.92 | Volume Two | Chapter: 16 | Provision: 16.4.3.8 | Neutral | Replace "equivalent area" with "the same (or less) backbone length". |
| 72.93 | Volume Two | Chapter: 16 | Provision: 16.4.3.11 | Oppose | Delete and replace with: "with respect to colour, the visibility and coherent appearance of marine farm structures". |
| 72.94 | Volume Two | Chapter: 16 | Provision: 16.4.3.14 | Neutral | Replace "trigger levels in" with "trigger levels determined in accordance with". |
| 72.95 | Volume Two | Chapter: 16 | Provision: 16.4.3.15 | Support | Retain text. |
| 72.96 | Volume Two | Chapter: 16 | Provision: 16.4.4 | Neutral | Make the same changes as sought above regarding Rule 16.4.3 and associated Standards and Matters of Control. Delete the reference to "(replacement consent)" in the body of the Policy, and delete Standard 16.4.4.1. Make consequential amendments to remove references to "existing coastal permit", "replacement consent", "equivalent space" or other similar language |
| 72.97 | Volume Two | Chapter: 16 | Provision: 16.4.4.15 | Support | Retain text. |
| 72.98 | Volume Two | Chapter: 16 | Provision: 16.4.5 | Neutral | Amend the rule as follows: Marine farming using conventional longline structures or intertidal structures [where a replacement consent is being sought or a new consent is required to allow for change of or addition of species or to change the layout of structures on the marine farm] in: a) an AMA [deleted] for which an existing coastal permit for a marine farm has already been granted under Rule 16.4.3; or b) [an offshore CMU with an existing coastal permit.] [deleted] |
| 72.99 | Volume Two | Chapter: 16 | Provision: 16.4.5.1 | Neutral | Amend Standard to read: The consent applicant holds an existing coastal permit to occupy space within the AMA [deleted] for marine farming, granted under Rule 16.4.3, in the location applied for, [or holds an existing coastal permit to occupy space within an offshore CMU]. |
| 72.100 | Volume Two | Chapter: 16 | Provision: 16.4.5.3 | Neutral | Replace "area" with "physical location". |
| 72.101 | Volume Two | Chapter: 16 | Provision: 16.4.5.6 | Neutral | Add: "insofar as these are being altered as a result of the change of or addition of species or the change to the layout of structures on the marine farm" to each matter of control. For replacement consents meeting the entry requirements of NESMA regulation 14, make other changes as per submissions in respect of Rule 16.4.3. |
| 72.102 | Volume Two | Chapter: 16 | Provision: 16.4.5.7 | Neutral | Add: "insofar as these are being altered as a result of the change of or addition of species or the change to the layout of structures on the marine farm" to each matter of control. For replacement consents meeting the entry requirements of NESMA regulation 14, make other changes as per submissions in respect of Rule 16.4.3. |

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| 72.103 | Volume Two | Chapter: 16 | Provision: 16.4.5.8 | Neutral | Add: "insofar as these are being altered as a result of the change of or addition of species or the change to the layout of structures on the marine farm" to each matter of control. For replacement consents meeting the entry requirements of NESMA regulation 14, make other changes as per submissions in respect of Rule 16.4.3. |
| 72.104 | Volume Two | Chapter: 16 | Provision: 16.4.5.10 | Neutral | Add: "insofar as these are being altered as a result of the change of or addition of species or the change to the layout of structures on the marine farm" to each matter of control. For replacement consents meeting the entry requirements of NESMA regulation 14, make other changes as per submissions in respect of Rule 16.4.3. |
| 72.105 | Volume Two | Chapter: 16 | Provision: 16.4.5.11 | Neutral | Add: "insofar as these are being altered as a result of the change of or addition of species or the change to the layout of structures on the marine farm" to each matter of control. For replacement consents meeting the entry requirements of NESMA regulation 14, make other changes as per submissions in respect of Rule 16.4.3. |
| 72.106 | Volume Two | Chapter: 16 | Provision: 16.4.5.12 | Neutral | Add: "insofar as these are being altered as a result of the change of or addition of species or the change to the layout of structures on the marine farm" to each matter of control. For replacement consents meeting the entry requirements of NESMA regulation 14, make other changes as per submissions in respect of Rule 16.4.3. |
| 72.107 | Volume Two | Chapter: 16 | Provision: 16.4.5.13 | Neutral | Add: "insofar as these are being altered as a result of the change of or addition of species or the change to the layout of structures on the marine farm" to each matter of control. For replacement consents meeting the entry requirements of NESMA regulation 14, make other changes as per submissions in respect of Rule 16.4.3. |
| 72.108 | Volume Two | Chapter: 16 | Provision: 16.4.5.14 | Neutral | Add: "insofar as these are being altered as a result of the change of or addition of species or the change to the layout of structures on the marine farm" to each matter of control. For replacement consents meeting the entry requirements of NESMA regulation 14, make other changes as per submissions in respect of Rule 16.4.3. |
| 72.109 | Volume Two | Chapter: 16 | Provision: 16.4.5.15 | Neutral | Add: "insofar as these are being altered as a result of the change of or addition of species or the change to the layout of structures on the marine farm" to each matter of control. For replacement consents meeting the entry requirements of NESMA regulation 14, make other changes as per submissions in respect of Rule 16.4.3. |
| 72.110 | Volume Two | Chapter: 16 | Provision: 16.4.5.16 | Neutral | Add: "insofar as these are being altered as a result of the change of or addition of species or the change to the layout of structures on the marine farm" to each matter of control. For replacement consents meeting the entry requirements of NESMA regulation 14, make other changes as per submissions in respect of Rule 16.4.3. |
| 72.111 | Volume Two | Chapter: 16 | Provision: 16.4.5.9 | Oppose | Delete this matter of control. |
| 72.112 | Volume Two | Chapter: 16 | Provision: 16.4.5.16 | Support | Retain text. |
| 72.113 | Volume Two | Chapter: 16 | Provision: New provision | Support | Add new rules consistent with NESMA where not provided for as a controlled activity. |
| 72.114 | Volume Two | Chapter: 16 | Provision: New provision | Support | Add new rules consistent with NESMA where not provided for as a controlled activity. |
| 72.115 | Volume Two | Chapter: 16 | Provision: 16.5.2.3 | Neutral | Delete reference to "and droppers" |
| 72.116 | Volume Two | Chapter: 16 | Provision: 16.5.2.11 | Neutral | Delete reference to "droppers" Replace "trigger levels in" with "trigger levels determined in accordance with" |
| 72.117 | Volume Two | Chapter: 16 | Provision: 16.5.3 | Neutral | If the alternative regime proposed by the industry is adopted: a. Add "and Standard 16.4.3.3" after "16.4.3.2"; OR b. Alternatively, delete reference to "Standard 16.4.3.2" in Rule 16.4.3. AND Standard 16.5.3.1 should be replaced with Standard 16.5.4.1, because the consent holder will already hold a coastal permit and would not need an authorisation to apply to increase the longline length. AND Delete the words "(it is a new farm and not replacing an existing farm)". |
| 72.118 | Volume Two | Chapter: 16 | Provision: 16.5.3.4 | Neutral | Delete reference to "and droppers" |
| 72.119 | Volume Two | Chapter: 16 | Provision: 16.5.3.12 | Neutral | Replace "trigger levels in" with "trigger levels determined in accordance with". |
| 72.120 | Volume Two | Chapter: 16 | Provision: 16.5.4 | Neutral | This provision might end up being a duplication and consequently can be deleted. |
| 72.121 | Volume Two | Chapter: 16 | Provision: 16.5.4.5 | Neutral | Delete reference to "and droppers" |
| 72.122 | Volume Two | Chapter: 16 | Provision: 16.5.4.9 | Oppose | Delete the matter of discretion. |
| 72.123 | Volume Two | Chapter: 16 | Provision: 16.5.4.15 | Neutral | Replace "trigger levels in" with "trigger levels determined in accordance with". |
| 72.124 | Volume Two | Chapter: 16 | Provision: New provision | Support | Add new discretionary activity rule providing for conservation aquaculture, carbon capture aquaculture, or remedial aquaculture (regardless of whether the application area is within an AMA). |
| 72.125 | Volume Two | Chapter: 16 | Provision: 16.6.13 | Neutral | Ensure consistency with NESMA, by adding the word "New" to the start of Rule 16.6.3. AND Add a new non-notified controlled activity rule for replacement consents for offshore marine farms, as per above submission in respect of rule 16.4.5. |
| 72.126 | Volume Two | Chapter: 16 | Provision: 16.6.14 | Oppose | Delete Rule 16.6.14(a) Overlaps with rule 16.4.3. This appears to be a typographical error. |
| 72.127 | Volume Two | Chapter: 16 | Provision: 16.6.14 | Neutral | Provide for NESMA; AND for farms falling outside NESMA: Insert a space after "ancillary discharges to water" so that the remaining part of the sentence relates to both 16.6.14(a) and (b). AND Replace "Prohibited Activity" with "Discretionary Activity". |
| 72.128 | Volume Two | Chapter: 16 | Provision: 16.6.15 | Neutral | Add "that is not otherwise provided for as a Controlled or Restricted Discretionary Activity" to the end of this rule; AND Ensure consistency with NESMA. |
| 72.129 | Volume Two | Chapter: 16 | Provision: 16.7 | Neutral | Rule 16.7.9 The words "and the discharge of feed or medicinal or therapeutic compounds" are unnecessary. Delete those words. |
| 72.130 | Volume Two | Chapter: 16 | Provision: 16.8.1 | Oppose | Delete rule. |
| 72.131 | Volume Two | Chapter: 16 | Provision: 16.8.2 | Neutral | Amendments will be necessary if the allocation regime proposed by MFA / AQNZ is adopted. Make necessary consequential amendments. |

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| | | | 72.132 | Volume Two | Chapter: 16 | Provision: 16.8.2 | Neutral | Amend to allow for a transition period of up to 24 months. OR Clarify application of policy. |
| | | | 72.133 | Volume Two | Chapter: 16 | Provision: 16.8.2 | Neutral | Rule 16.8.2.4 The cross-reference to "Policy 13.21.7 (6)(b)" is a typo and needs to be corrected. |
| | | | 72.134 | Volume Two | Chapter: 16 | Provision: 16.8.2 | Oppose | Delete "authorisations by public tender" at end of rule, and replace with rule consistent with Policy 13.21.7 as above. |
| | | | 72.135 | Volume Two | Chapter: 16 | Provision: 16.8.2 | Neutral | Replace "within 6 months" with "within 24 months". |
| | | | 72.136 | Volume Two | Chapter: 16 | Provision: 16.8.2 | Oppose | Delete Rule 16.8.2.9. |
| | | | 72.137 | Volume Three | Appendix: 11 | Appendix item: Species authorised to be farmed within the Marlborough region's coastal waters | Neutral | Retain Appendix 11 as it pertains to Rule 16.4.5; AND Add additional rules and policies consistent with NESMA. |
| | | | 72.138 | Volume One | Chapter: 13 | Provision: Heading | Oppose | Replace text with "apart from those objectives and policies listed under Issue 13N (and the associated methods of implementation and anticipated environmental results), this chapter does not contain provisions managing marine farming." |
| | | | 72.139 | Volume One | Chapter: 13 | Provision: Policy 13.20.2 | Neutral | Replace references to "new marine farms" with "marine farms, other than provided for in these rules". Provide for a circumstance where a party persuades the Council that a new AMA can be created, by allocating space to that party who provides Council with the necessary technical and scientific information necessary to establish the AMA (refer above to submissions in respect of policy 13.21.7) If the alternative regime proposed by MFA/AQNZ is preferred, make necessary consequential amendments. |
| | | | 72.140 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Neutral | NESMA consistently mis-cited. Make necessary consequential amendments. |
| | | | 72.141 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Neutral | Ensure first letter of defined terms are capitalised throughout (or not) to ensure consistency. |
| | | | 72.142 | Volume Four | All CMU | | Neutral | Replace maps with attached MFA/AQNZ mapping. Amend mapping to include outer Sounds farms within AMAs as per MFA/AQNZ mapping. Refer also submissions made in the covering document |
| | | | 72.143 | Volume One | Chapter: 13 | Provision: Policy 13.21.1 | Neutral | Amend Policy 13.21.1(d)(ii) to include: "..., except for the Queen Charlotte College line in Shakespeare Bay." |
| | | | 72.144 | Volume Four | All CMU | | Neutral | Amend the Index and mapping to make them more user friendly. That might be achieved by, for example: a. Amending the "Coastal Management Units & Aquaculture Management Areas" maps by replacing the CMU identifier numbers with the names of the CMUs; AND b. Replacing either the map numbers or CMU identifier numbers with letters; AND c. Amending the Index so that the reader knows which map number to turn to for any given CMU. |
| | | | 72.145 | Volume Two | Chapter: 16 | Provision: 16.4 | Support | Existing marine farms should be 'renewed' as a controlled activity without notification |
| | | | 72.146 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Neutral | At a high level : AMAs should be drawn in the way set out in this submission, provided that no existing marine farm loses area, total backbone length and if the farm is shifting from its existing space it is moved into equivalent space; or The existing marine farm(s) should stay where it/they are currently installed (including when they are offsite); or The existing marine farm(s) should shift into new space as long as they do not lose area, total backbone length and the move is into equivalent space. |
| | | | 72.147 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Neutral | Support in part - If someone makes a submission that any existing marine farm should be removed from its current location, and that submission is accepted, then that farm(s) should move into new space in bays where there is currently marine farming. That is consistent with the principle of no loss of marine farming space and no loss of backbone length. |
| 73 | Willans | Ian Willans | 73.1 | Volume Four | CMU 44: Waitata Reach | CMU item: CMU 44 Aquaculture Management Area - AMA 13 | Neutral | a) Draw the AMA as per the MFA/AQNZ submission (Map ref 079, Waihinu Bay, Pelorus Sound); OR b) Retain the AMA as proposed. |
| | | | 73.2 | Volume Two | Chapter: 16 | Provision: 16.4 | Support | Existing marine farms should be 'renewed' as a controlled activity without notification |
| | | | 73.3 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Neutral | (a) Existing marine farms should be 'renewed' as a controlled activity without notification; and (b) AMAs should be drawn in the way set out in this submission, provided that no existing marine farm loses area, total backbone length and if the farm is shifting from its existing space it is moved into equivalent space; or (c) The existing marine farm(s) should stay where they are currently installed (including when they are offsite); or (d) The existing marine farm(s) should shift into new space as long as they do not lose area, total backbone length and the move is into equivalent space. |
| 74 | Aroma (N.Z.) Limited and Aroma Aquaculture Limited | Q A M Davies, A L Hills and E L Deason | 74.1 | Volume Four | CMU 29: Nydia Bay | CMU item: CMU 29 Aquaculture Management Area - AMA 1 | Neutral | a) Draw the AMA as per the MFA/AQNZ submission map '047 Nydia Bay West – Pelorus Sound'; OR b) Retain AMA as proposed. MF 8358 |
| | | | 74.2 | Volume Four | CMU 37: Port Underwood | CMU item: CMU 37 Aquaculture Management Area - AMA 44 | Support | Retain AMA as proposed. MF 8416 |
| | | | 74.3 | Volume Four | CMU 28: Maud Island | CMU item: CMU 28 Aquaculture Management Area - AMA 15 | Neutral | a) Draw the AMA as per the MFA/AQNZ submission map '035 Horseshoe Bay – Pelorus Sound'; OR b) Draw an AMA around site 8214 as installed/ consented. MF 8214 |
| | | | 74.4 | Volume Four | CMU 25: Kenepuru Sound | CMU item: CMU 25 Aquaculture Management Area - AMA 6 | Neutral | a) Draw the AMA as per the MFA/AQNZ submission map '043 Mills Bay – Kenepuru Sound'; OR b) Draw an AMA around site 8480 as installed/ consented. |
| | | | 74.5 | Volume Four | CMU 25: Kenepuru Sound | CMU item: CMU 25 Aquaculture Management Area - AMA 8 | Neutral | a) Draw the AMA as per the MFA/AQNZ submission map '028 Goulter Bay – Kenepuru Sound'; OR b) Retain AMA as proposed. MF 8485 |
| | | | 74.6 | Volume Four | CMU 17: Forsyth Bay | CMU item: CMU 17 Aquaculture Management Area - AMA 21 | Support | Retain AMA as proposed. MF 8129 |
| | | | 74.7 | Volume Four | CMU 25: Kenepuru Sound | CMU item: CMU 25 Aquaculture Management Area - AMA 5 | Neutral | a) Draw the AMA as per the MFA/AQNZ submission map '058 Schnapper Point – Kenepuru Sound'; OR b) Retain AMA as proposed; OR c) Draw an AMA around site 8471 as consented/ installed. |

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| | | | 74.8 | Volume Four | CMU 25: Kenepuru Sound | CMU item: CMU 25 Aquaculture Management Area - AMA 5 | Neutral | Farm 8473 a) Draw the AMA as per the MFA/AQNZ submission map '058 Schnapper Point – Kenepuru Sound'; OR b) Retain AMA as proposed; OR c) Draw an AMA around site 8471 as consented/ installed. |
| | | | 74.9 | Volume Four | CMU 22: Inner Pelorus Sound | CMU item: CMU 22 Aquaculture Management Area - AMA 4 | Neutral | Draw the AMA as per the MFA/AQNZ submission maps 045 'Nikau Bay – Pelorus Sound', and 099 'Nikau Bay – Proposed AMA and Backbone Overlay. MF 8387 |
| | | | 74.10 | Volume Four | CMU 22: Inner Pelorus Sound | CMU item: CMU 22 Aquaculture Management Area - New AMA | Oppose | Include site 8327 within an AMA, by creating an AMA around the consented/ installed space. |
| | | | 74.11 | Volume Four | CMU 22: Inner Pelorus Sound | CMU item: CMU 22 Aquaculture Management Area - AMA 16 | Support | Farm 8350 Retain AMA as proposed. |
| | | | 74.12 | Volume Four | CMU 3: Beatrix Bay | CMU item: CMU 3 Aquaculture Management Area - AMA 15 | Support | Retain AMA as proposed. MF8235 |
| | | | 74.13 | Volume Four | CMU 28: Maud Island | CMU item: CMU 28 Aquaculture Management Area - AMA 15 | Neutral | a) Draw the AMA as per the MFA/AQNZ submission map '035 Horseshoe Bay – Pelorus Sound'; b) Retain AMA as proposed; OR c) Draw an AMA around site 8215 as installed/consented. |
| | | | 74.14 | Volume Four | CMU 34: Port Gore | CMU item: CMU 34 Aquaculture Management Area - AMA 4 | Support | Retain AMA as proposed. MF 8173 |
| | | | 74.15 | Volume Four | CMU 37: Port Underwood | CMU item: CMU 37 Aquaculture Management Area - AMA 37 | Support | Retain AMA as proposed. MF 8423 |
| | | | 74.16 | Volume Four | CMU 29: Nydia Bay | CMU item: CMU 29 Aquaculture Management Area - AMA 1 | Neutral | a) Draw the AMA as per the MFA/AQNZ submission map '047 Nydia Bay West – Pelorus Sound'; OR b) Draw AMA around site 8354 as installed/consented. |
| | | | 74.17 | Volume Four | CMU 29: Nydia Bay | CMU item: CMU 29 Aquaculture Management Area - AMA 1 | Neutral | a) Draw the AMA as per the MFA/AQNZ submission map '047 Nydia Bay West – Pelorus Sound'; OR b) Draw AMA around site 8355 as installed/consented. |
| | | | 74.18 | Volume Four | CMU 37: Port Underwood | CMU item: CMU 37 Aquaculture Management Area - AMA 16 | Neutral | Draw the AMA around site 8443 as installed/consented. |
| | | | 74.19 | Volume Four | CMU 4: Catherine Cove | CMU item: CMU 4 Aquaculture Management Area - AMA3 | Support | Retain AMA as proposed. MF 8631 |
| | | | 74.20 | Volume Four | CMU 4: Catherine Cove | CMU item: CMU 4 Aquaculture Management Area - AMA4 | Neutral | Amend AMAs to broadly reflect location of existing farms. Oppose the creation of AMA 4 in space next door north of site 8631, which will effect tidal flow to site 8631. |
| | | | 74.21 | Volume Four | CMU 25: Kenepuru Sound | CMU item: CMU 25 Aquaculture Management Area - AMA 10 | Neutral | a) Draw the AMA as per the MFA/AQNZ submission map '020 Fish Bay West – Kenepuru Sound'; OR b) Draw an AMA around site 8646 as currently installed/consented. |
| | | | 74.22 | Volume Four | CMU 3: Beatrix Bay | CMU item: CMU 3 Aquaculture Management Area - AMA 6 | Support | a) Draw the AMA as per the MFA/AQNZ submission map '020 Fish Bay West – Kenepuru Sound'; OR b) Draw an AMA around site 8646 as currently installed/consented. MF 8250 |
| | | | 74.23 | Volume Four | CMU 6: Clova Bay | CMU item: CMU 6 Aquaculture Management Area - AMA 3 | Support | Retain AMA as proposed. MF 8560 |
| | | | 74.24 | Volume Four | CMU 44: Waitata Reach | CMU item: CMU 44 Aquaculture Management Area - AMA 13 | Support | Farm 8082 Retain AMA as proposed. |
| | | | 74.25 | Volume Four | CMU 39: Squally Cove | CMU item: CMU 39 Aquaculture Management Area - AMA10 | Support | Farm 8288 Retain AMA as proposed. |
| | | | 74.26 | Volume Four | CMU 39: Squally Cove | CMU item: CMU 39 Aquaculture Management Area - AMA3 | Neutral | Farm 8296 Draw the AMA as per the MFA/AQNZ submission map '067 McLaren Bay – Squally Cove' |
| | | | 74.27 | Volume Four | All CMU | | Neutral | Make consequential changes to adjoining CMU and AMA maps where the CMU for a bay is depicted on more than one map. |
| | | | 74.28 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Neutral | At a high level, AROMA (N.Z.) LIMITED and AROMA AQUACULTURE LIMITED submit that: (a) Existing marine farms should be 'renewed' as a controlled activity without notification; and (b) AMAs should be drawn in the way set out in this submission, provided that no existing marine farm loses area, total backbone length and if the farm is shifting from its existing space it is moved into equivalent space; or (c) The existing marine farm(s) should stay where they are currently installed (including when they are offsite); or (d) The existing marine farm(s) should shift into new space as long as they do not lose area, total backbone length and the move is into equivalent space. If someone makes a submission that any existing marine farm should be removed from its current location, and that submission is accepted, then that farm(s) should move into new space in bays where there is currently marine farming. That is consistent with the principle of no loss of marine farming space and no loss of backbone length. |
| | | | 74.29 | Volume Two | Chapter: 16 | Provision: 16.4 | Support | Existing marine farms should be 'renewed' as a controlled activity without notification |
| 75 | Clearwater Mussels Limited | R D Sutherland | 75.1 | Volume Four | CMU 25: Kenepuru Sound | CMU item: CMU 25 Aquaculture Management Area - AMA 7 | Support | a) Retain AMA as proposed; OR b) Draw the AMA as per MFA/AQNZ submission map 028 'Goulter Bay - Kenepuru Sound'. MF 8482 |
| | | | 75.2 | Volume Four | CMU 25: Kenepuru Sound | CMU item: CMU 25 Aquaculture Management Area - AMA 7 | Neutral | Farm 8484 Draw the AMA as per MFA/AQNZ submission map 028 'Goulter Bay - Kenepuru Sound'. |
| | | | 75.3 | Volume Four | CMU 25: Kenepuru Sound | CMU item: CMU 25 Aquaculture Management Area - AMA 9 | Support | Farm 8490 Retain AMA as proposed |
| | | | 75.4 | Volume Four | CMU 25: Kenepuru Sound | CMU item: CMU 25 Aquaculture Management Area - AMA 5 | Neutral | Farm 8470 a) Draw the AMA as per MFA/AQNZ submission map 058 'Schnapper Point - Kenepuru Sound'; OR b) include existing farm within AMA |
| | | | 75.5 | Volume Four | CMU 22: Inner Pelorus Sound | CMU item: CMU 22 Aquaculture Management Area - AMA 2 | Neutral | Farm 8371 a) Include existing farm within AMA; OR b) Draw the AMA as per the MFA/AQNZ submission map 039 'Maori Bay - Pelorus Sound'; OR c) Retain AMA as proposed |

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| 75.6 | Volume Four | CMU 44: Waitata Reach | CMU item: CMU 44 Aquaculture Management Area - AMA 12 | Support | Farm 8084 a) Draw the AMA as per the MFA/AQNZ submission map 079 'Waihinu Bay - Pelorus Sound'; OR b) Retain AMA as proposed |
| 75.7 | Volume Four | CMU 14: East Bay QCS | CMU item: CMU 14 Aquaculture Management Area - AMA 7 | Neutral | Farm 8401 a) Retain AMA as proposed; OR b) include existing farm within an AMA |
| 75.8 | Volume Four | CMU 10: Coastal Section - South of French Pass | CMU item: CMU 10 Aquaculture Management Area - AMA 1 | Support | Farm 8009 a) Amend the AMA to include northeast corner of existing farm as per recently re-consented space; OR b) Retain AMA as proposed |
| 75.9 | Volume Four | CMU 1: Admiralty Bay | CMU item: CMU 1 Aquaculture Management Area - New AMA | Oppose | Farm 8057 a) Include site 8057 within an AMA by creating an AMA around the consented space; OR b) Relocate to equivalent space with equivalent characteristics in an alternative bay in the Marlborough Sounds, in line with the rest of this submission |
| 75.10 | Volume Four | CMU 36: Port Ligar | CMU item: CMU 36 Aquaculture Management Area - AMA 11 | Neutral | Farm 8064 a) Draw the AMA as per the MFA/AQNZ submission map 022 'Fishing Bay - Port Ligar'; OR b) Retain AMA as proposed |
| 75.11 | Volume Four | CMU 17: Forsyth Bay | CMU item: CMU 17 Aquaculture Management Area - AMA 29 | Support | Farm 8137 Retain AMA as proposed. |
| 75.12 | Volume Four | CMU 28: Maud Island | CMU item: CMU 28 Aquaculture Management Area - AMA 5 | Neutral | Farm 8180 a) Amend AMA to reflect actual consented space; OR b) Draw the AMA as per the MFA/AQNZ submission map 053 'Picnic Bay West - Tawhitinui Reach'. |
| 75.13 | Volume Four | CMU 28: Maud Island | CMU item: CMU 28 Aquaculture Management Area - AMA 4 | Neutral | Farm 8183 Draw the AMA as per the MFA/AQNZ submission map 061 'Sheep Point - Hallam Cove |
| 75.14 | Volume Four | CMU 3: Beatrix Bay | CMU item: CMU 3 Aquaculture Management Area - AMA 16 | Neutral | Farm 8229 'a) Draw the AMA as per the MFA/AQNZ submission maps 004 ' Beatrix Bay Southwest - Pelorus Sound' and 037 'Kauauroa Bay - Pelorus Sound'; OR b) Include existing consented/installed space within an AMA |
| 75.15 | Volume Four | CMU 3: Beatrix Bay | CMU item: CMU 3 Aquaculture Management Area - AMA 10 | Neutral | Farm 8246 a) Draw the AMA as per the MFA/AQNZ submission maps 001 'Beatrix Bay Northeast - Pelorus Sound' and 002 'Beatrix Bay North - Pelorus Sound' ; OR b) Include existing consented/installed space within an AMA. |
| 75.16 | Volume Four | CMU 22: Inner Pelorus Sound | CMU item: CMU 22 Aquaculture Management Area - AMA 14 | Support | Farm 8329 Retain AMA as proposed |
| 75.17 | Volume Four | CMU 22: Inner Pelorus Sound | CMU item: CMU 22 Aquaculture Management Area - AMA 10 | Support | Farm 8335 Amend AMA to reflect consented/installed space. |
| 75.18 | Volume Four | CMU 22: Inner Pelorus Sound | CMU item: CMU 22 Aquaculture Management Area - AMA 7 | Neutral | Farm 8342 Amend AMA to reflect consented/installed space. |
| 75.19 | Volume Four | CMU 29: Nydia Bay | CMU item: CMU 29 Aquaculture Management Area - AMA 1 | Neutral | Farm 8369 a) Draw the AMA as per the MFA/AQNZ submission map 046 'Nydia Bay East - Pelorus Sound'; OR b) Retain AMA as proposed. |
| 75.20 | Volume Four | CMU 21: Hikapu Reach | CMU item: CMU 21 Aquaculture Management Area - AMA 1 | Neutral | Farm 8393 a) Draw the AMA as per the MFA/AQNZ submission map 033 ' Hikapu Reach - Peorus OSund'; OR b) Retain AMA as proposed. |
| 75.21 | Volume Four | CMU 14: East Bay QCS | CMU item: CMU 14 Aquaculture Management Area - AMA 4 | Neutral | Farm 8398 Draw the AMA as per the MFA/AQNZ submission map 050 'Otanerau Bay - East Bay'. |
| 75.22 | Volume Four | CMU 25: Kenepuru Sound | CMU item: CMU 25 Aquaculture Management Area - AMA 4 | Neutral | Farm 8462 a) Draw the AMA as per the MFA/AQNZ submission map 062 'Skiddaw - Kenepuru Sound'; OR b) Retain AMA as proposed; OR c) Include existing farm within an AMA. |
| 75.23 | Volume Four | CMU 25: Kenepuru Sound | CMU item: CMU 25 Aquaculture Management Area - AMA 9 | Neutral | Farm 8489 a) Draw the AMA as per the MFA/AQNZ submission maps 028 ' Goulter Bay - Kenepuru Suund' and 081 'Waitaria Bay - Kenepuru Sound'; OR b) Retain AMA as proposed; OR c) Include existing farm within an AMA. |
| 75.24 | Volume Four | CMU 6: Clova Bay | CMU item: CMU 6 Aquaculture Management Area - AMA 2 | Neutral | Farm 8549 a) Draw the AMA as per the MFA/AQNZ submission map 012 ' Clova Bay West - Pelorus Sound'; OR b) Retain AMA as proposed; OR c) Include existing farm within an AMA. |
| 75.25 | Volume Four | CMU 36: Port Ligar | CMU item: CMU 36 Aquaculture Management Area - AMA 8 | Neutral | Farm 8654 a) Draw the AMA as per MFA/AQNZ submission 091 'Maori Bay - Port Ligar'; OR b) Amend AMA to reflect recent re-consent and realignment. |
| 75.26 | Volume Four | CMU 36: Port Ligar | CMU item: CMU 36 Aquaculture Management Area - AMA 3 | Support | Farm 8074 a) Retain AMA as proposed; OR b) Draw the AMA as per the MFA/AQNZ submission map 009 'Cape Horn - Port Ligar'. |
| 75.27 | Volume Four | CMU 36: Port Ligar | CMU item: CMU 36 Aquaculture Management Area - AMA 2 | Support | Farm 8076 Retain AMA as proposed. |

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| | | | 75.28 | Volume Four | CMU 36: Port Ligar | CMU item: CMU 36 Aquaculture Management Area - AMA 11 | Neutral | Farm 8065 a) Draw the AMA as per the MFA/AQNZ submission map 022 'Fishing Bay - Port Ligar'; OR b) Retain AMA as proposed. |
| | | | 75.29 | Volume Four | CMU 36: Port Ligar | CMU item: CMU 36 Aquaculture Management Area - AMA 10 | Support | Farm 8066 Retain AMA as proposed. |
| | | | 75.30 | Volume Four | All CMU | | Neutral | Make consequential changes to adjoining CMU and AMA maps where the CMU for a bay is depicted on more than one map. |
| | | | 75.31 | Volume Two | Chapter: 16 | Provision: 16.4 | Support | Existing marine farms should be 'renewed' as a controlled activity without notification |
| | | | 75.32 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Neutral | AMAs should be drawn in the way set out in this submission, provided that no existing marine farm loses area, total backbone length and if the farm is shifting from its existing space it is moved into equivalent space; or (c) The existing marine farm(s) should stay where they are currently installed (including when they are offsite); or (d) The existing marine farm(s) should shift into new space as long as they do not lose area, total backbone length and the move is into equivalent space. If someone makes a submission that any existing marine farm should be removed from its current location, and that submission is accepted, then that farm(s) should move into new space in bays where there is currently marine farming. That is consistent with the principle of no loss of marine farming space and no loss of backbone length. Examples of possible locations which, depending on the farm, might have similar characteristics, are attached to the submission. |
| 76 | Marlborough Aquaculture Limited | David Clark | 76.1 | Volume Two | Chapter: 16 | Provision: 16.7 | Oppose | Amend standard 16.7 so that it exempts existing marine farms even if they are not in an AMA. |
| | | | 76.2 | Volume One | Chapter: 13 | Provision: Policy 13.21.1 | Oppose | Amend policy 13.21.1 to exempt marine farms from being prohibited. |
| | | | 76.3 | Volume Four | All AMA in a CMU | | Support | Support the mapping of AMAs in CMU 37 page 14 for Port Underwood |
| | | | 76.4 | Volume Four | CMU 1: Admiralty Bay | CMU item: CMU 1 Aquaculture Management Area - AMA 7 | Oppose | Farm 8056 Amend mapping of AMA in Deep Bay as set out in the attached amended plan. |
| | | | 76.5 | Volume Four | Near-shore CMU | | Oppose | Amend mapping of CMU 9 at Blow Hole Point to provide for an AMA where the Submitters existing marine farm is positioned as shown on the attached plan. |
| | | | 76.6 | Volume Four | CMU 22: Inner Pelorus Sound | CMU item: CMU 22 Aquaculture Management Area - AMA 12 | Oppose | Amend mapping of CMU 22 at South East Bay alternatively to align with the existing marine farm (8333) or to align the proposed AMA in accordance with the layout of the existing lines in accordance with the attached plan. |
| | | | 76.7 | Volume Four | CMU 44: Waitata Reach | CMU item: CMU 44 Aquaculture Management Area - AMA 9 | Oppose | Amend mapping of CMU 44 at Burnt Point/Waihinau so that the AMA aligns with the existing marine farms 8086 and 8087 or alternatively so that the proposed AMA aligns with the existing layout of the lines in accordance with the attached plan. |
| | | | 76.8 | Volume Four | CMU 22: Inner Pelorus Sound | CMU item: CMU 22 Aquaculture Management Area - AMA 6 | Oppose | Amend mapping of CMU 22 at Four Fathom Bay so that the AMA aligns with the existing marine farm 8376 or alternatively so that the proposed AMA aligns with the existing layout of the lines in accordance with the attached plan. |
| | | | 76.9 | Volume Two | Chapter: 25 | Provision: Existing marine farm | Oppose | Amend the definition of "Existing marine farm" to add the following "...and includes a marine farm or a marine farm extension applied for prior to the date upon which MEP variation 1 was notified." |
| 78 | Hughes | Ciaran Hughes | 78.1 | Volume Four | CMU 39: Squally Cove | CMU item: CMU 39 Aquaculture Management Area - New AMA | Oppose | Amend AMA to include AMA over existing farm 8645 (see plan annexed as "A"). |
| | | | 78.2 | Volume Four | CMU 28: Maud Island | CMU item: CMU 28 Aquaculture Management Area - New AMA | Oppose | Amend AMA to include an AMA over existing farm 8653 (see plan annexed as "B"). |
| | | | 78.3 | Volume Four | CMU 11: Crail Bay | CMU item: CMU 11 Aquaculture Management Area - AMA 9 | Neutral | Retain the AMA over the existing farm 8530 (AMA9) but adjust the boundary as shown on the plan annexed as "C". |
| | | | 78.4 | Volume Four | CMU 42: Tory Channel | CMU item: CMU 42 Aquaculture Management Area - AMA 3 | Neutral | Adjust the boundary of the AMA over existing marine farm 8639 (AMA) so that it covers the entire current farm footprint see plan annexed as "D"). |
| | | | 78.5 | Volume One | Chapter: 13 | Provision: Policy 13.21.3 | Oppose | Amend the policies to recognise that not all of those criteria need to apply in every case and to give greater recognition that marine farms are appropriate within some ONLs. |
| | | | 78.6 | Volume One | Chapter: 13 | Provision: Policy 13.21.4 | Oppose | Amend the policies to recognise that not all of those criteria need to apply in every case and to give greater recognition that marine farms are appropriate within some ONLs. |
| | | | 78.7 | Volume One | Chapter: 13 | Provision: Policy 13.21.6 | Oppose | Amend the policies to recognise that not all of those criteria need to apply in every case and to give greater recognition that marine farms are appropriate within some ONLs. |
| | | | 78.8 | Volume One | Chapter: 13 | Provision: Policy 13.22.7 | Neutral | Amend the policy to recognise that a minimum longline space of 15m is not always practical. |
| | | | 78.9 | Volume One | Chapter: 13 | Provision: Policy 13.21.1 | Neutral | Amend to make it clear that where an existing farm needs to be relocated an area for relocation must be provided which is "equivalent". The provisions should specify that "equivalent" means the area for relocation must achieve the following outcomes: (a) be of a sufficient size so as to [be] able to accommodate the same length of longlines; (b) be of a sufficient size to be able to accommodate adequate spacing between longlines; with no lesser spacing than that of the farm to be relocated; (c) have the same or a similar level of productivity; Equivalent AMAs that meet these criteria should be identified on the planning maps. |

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| | | | 78.10 | Volume One | Chapter: 13 | Provision: Policy 13.21.7 | Neutral | Amend to make it clear that where an existing farm needs to be relocated an area for relocation must be provided which is "equivalent". The provisions should specify that "equivalent" means the area for relocation must achieve the following outcomes: (a) be of a sufficient size so as to [be] able to accommodate the same length of longlines; (b) be of a sufficient size to be able to accommodate adequate spacing between longlines; with no lesser spacing than that of the farm to be relocated; (c) have the same or a similar level of productivity; Equivalent AMAs that meet these criteria should be identified on the planning maps. |
| | | | 78.11 | Volume One | Chapter: 13 | Provision: Policy 13.21.7 | Neutral | Amend the variation to remove the requirement that there be no increase to the total area occupied by structures/size of the marine farm. The provisions should permit a large overall farm footprint and allow flexibility to reconfigure a farm (including where farms are relocated from shallower sites to deeper sites in order to allow for longer anchor warps, a workable farm layout, and wider spacing between longlines depending on the shape of the allocated AMA). |
| | | | 78.12 | Volume One | Chapter: 13 | Provision: Policy 13.22.8 | Neutral | Amend the variation to remove the requirement that there be no increase to the total area occupied by structures/size of the marine farm. The provisions should permit a large overall farm footprint and allow flexibility to reconfigure a farm (including where farms are relocated from shallower sites to deeper sites in order to allow for longer anchor warps, a workable farm layout, and wider spacing between longlines depending on the shape of the allocated AMA). |
| | | | 78.13 | Volume Two | Chapter: 16 | Provision: 16.4.3.3 | Neutral | Provisions that require relocated marine farms to maintain the same area including but not limited to Policies 13.21.7, 13.22.8, standards 16.4.3.3; 16.4.5.3, rule 16.5.4 - Amend the variation to remove the requirement that there be no increase to the total area occupied by structures/size of the marine farm. The provisions should permit a large overall farm footprint and allow flexibility to reconfigure a farm (including where farms are relocated from shallower sites to deeper sites in order to allow for longer anchor warps, a workable farm layout, and wider spacing between longlines depending on the shape of the allocated AMA). |
| | | | 78.14 | Volume Two | Chapter: 16 | Provision: 16.4.5.3 | Neutral | Provisions that require relocated marine farms to maintain the same area including but not limited to Policies 13.21.7, 13.22.8, standards 16.4.3.3; 16.4.5.3, rule 16.5.4 - Amend the variation to remove the requirement that there be no increase to the total area occupied by structures/size of the marine farm. The provisions should permit a large overall farm footprint and allow flexibility to reconfigure a farm (including where farms are relocated from shallower sites to deeper sites in order to allow for longer anchor warps, a workable farm layout, and wider spacing between longlines depending on the shape of the allocated AMA). |
| | | | 78.15 | Volume Two | Chapter: 16 | Provision: 16.5.4 | Neutral | Provisions that require relocated marine farms to maintain the same area including but not limited to Policies 13.21.7, 13.22.8, standards 16.4.3.3; 16.4.5.3, rule 16.5.4 - Amend the variation to remove the requirement that there be no increase to the total area occupied by structures/size of the marine farm. The provisions should permit a large overall farm footprint and allow flexibility to reconfigure a farm (including where farms are relocated from shallower sites to deeper sites in order to allow for longer anchor warps, a workable farm layout, and wider spacing between longlines depending on the shape of the allocated AMA). |
| | | | 78.16 | Volume Two | Chapter: 16 | Provision: 16.4.3 | Neutral | Retain a controlled activity rule for consenting of marine farms (without notification). |
| | | | 78.17 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Neutral | Amend the variation to enable existing marine farms not currently within an AMA to remain, and be consented (as a controlled activity), in their current location and with an AMA created over that existing area, until such time as equivalent (or greater) space is identified, shown as an AMA, and made available to the consent holder to relocate to ("grandparenting"), and not make marine farming a prohibited activity during that period. |
| | | | 78.18 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Neutral | Provide flexibility within the variation to adjust the shape of an AMA on the basis of site specific benthic surveys, as part of the consenting process for older farms. |
| 79 | Minister of Conservation (the Minister) - Hon. Kiritapu Allan | Murray Brass | 79.1 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Neutral | Entire Variation - Support in part. Retain as notified except for recommendations in submission, and any other or consequential changes required to give effect to the intent of the recommendations of the Marlborough Aquaculture Review Working Group (MARWG). |
| | | | 79.2 | Volume Two | Chapter: 25 | Provision: Finfish AMA | Neutral | Reword the definition of AMA as follows or to like effect: "means an aquaculture management area or an aquaculture settlement area (ASA) or a Finfish AMA (FAMA) identified on the planning maps as an AMA or ASA or FAMA." Insert a new definition as follows or to like effect: "Finfish AMA means a finfish aquaculture management area identified on the planning maps as FAMA." Retain all other definitions as notified. |
| | | | 79.3 | Volume One | Chapter: 13 | Provision: Objective 13.21 | Support | Retain as notified. |
| | | | 79.4 | Volume One | Chapter: 13 | Provision: Policy 13.21.1 | Support | Retain as notified, except for changes as to improve clarity and effectiveness set out in submission. |
| | | | 79.5 | Volume One | Chapter: 13 | Provision: Policy 13.21.2 | Support | Retain as notified, except for changes as to improve clarity and effectiveness set out in submission. |
| | | | 79.6 | Volume One | Chapter: 13 | Provision: Policy 13.21.3 | Support | Retain as notified, except for changes as to improve clarity and effectiveness set out in submission. |
| | | | 79.7 | Volume One | Chapter: 13 | Provision: Policy 13.21.4 | Support | Retain as notified, except for changes as to improve clarity and effectiveness set out in submission. |

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| 79.8 | Volume One | Chapter: 13 | Provision: Policy 13.21.5 | Neutral | Retain as notified, except for changes as to improve clarity and effectiveness set out below. Reword the policy as follows or to like effect: "Where they are not inappropriate under Policy 13.21.4, the appropriateness of additional AMAs in the enclosed Waters CMUs and AMAs in the Near-shore CMUs will be assessed..." |
| 79.9 | Volume One | Chapter: 13 | Provision: Policy 13.21.6 | Support | Retain as notified, except for changes as to improve clarity and effectiveness set out below. Reword the policy as follows or to like effect: "The appropriateness of marine farms within the offshore CMU will be assessed considering adverse effects on any of the natural and human use values of the coastal marine area including those identified in the Values Report 2018 and marine farms within the offshore CMU may be provided for when they are located..." |
| 79.10 | Volume One | Chapter: 13 | Provision: Policy 13.21.7 | Neutral | Retain as notified, except for changes as to improve clarity and effectiveness set out below. Reword clause (d)(ii) as follows or to like effect: "... and that additional marine farming activities can be undertaken within the CMU without creating a significant adverse effect on the natural and human use values of the CMU." |
| 79.11 | Volume One | Chapter: 13 | Provision: Objective 13.22 | Support | Retain as notified. |
| 79.12 | Volume One | Chapter: 13 | Provision: Policy 13.22.1 | Neutral | Retain as notified, apart from changes to improve clarity and effectiveness as set out below. Reword the policy heading as follows or to like effect: "Monitoring and adaptive management for unanticipated or cumulative benthic effects of marine farms using..." Insert an addition to this policy, or a separate policy, providing for water column monitoring including inter alia: - Creation of an independent advisory group to advise on appropriate monitoring parameters and methodology, and review of results; - Monitoring of appropriate water quality variables at representative control and farm sites; - Review of the monitoring data by the independent advisory group to i. determine whether there are ecologically significant adverse effects attributable to marine farming and, if so ii. advise on appropriate effects-based limits and adaptive management approaches that can be implemented if these limits are exceeded. |
| 79.13 | Volume One | Chapter: 13 | Provision: Policy 13.22.2 | Support | Retain as notified, apart from changes to improve clarity and effectiveness as set out in submission. |
| 79.14 | Volume One | Chapter: 13 | Provision: Policy 13.22.3 | Support | Retain as notified, apart from changes to improve clarity and effectiveness as set out in submission. |
| 79.15 | Volume One | Chapter: 13 | Provision: Policy 13.22.4 | Support | Retain as notified, apart from changes to improve clarity and effectiveness as set out below. Relocate this policy to the 13.21 suite of policies. |
| 79.16 | Volume One | Chapter: 13 | Provision: Policy 13.22.5 | Support | Retain as notified, apart from changes to improve clarity and effectiveness as set out below. Reword clause (a) as follows or to like effect: "If monitoring and assessment undertaken in accordance with Policy 13.22.1 conclude that the Enrichment Stage (ES) for a marine farm..." Add a Definition of "Enrichment Stage (ES)" to the Definitions in Volume 2, Chapter 25. This definition should specifically refer to the Best Management Practice Guidelines for salmon farms in the Marlborough Sounds: Benthic environmental quality standards and monitoring protocols 2019 (1 Keeley, N; Gillard, M; Broekhuizen, N; Ford, R; Schuckard R; Ulrich S. 2019). |
| 79.17 | Volume One | Chapter: 13 | Provision: Policy 13.22.6 | Support | Retain as notified, apart from changes to improve clarity and effectiveness as set out in submission. |
| 79.18 | Volume One | Chapter: 13 | Provision: Policy 13.22.7 | Neutral | Retain as notified, apart from changes to improve clarity and effectiveness as set out below. Insert an addition to this policy as follow or to like effect: "(g) that any stock, structures or other materials relocated from elsewhere do not create a biosecurity risk or allow the release or spread of harmful aquatic organisms." |
| 79.19 | Volume One | Chapter: 13 | Provision: Policy 13.22.8 | Neutral | Retain as notified, apart from changes to improve clarity and effectiveness as set out in submission. |
| 79.20 | Volume One | Chapter: 13 | Provision: Policy 13.22.9 | Neutral | Retain as notified, apart from changes to improve clarity and effectiveness as set out below. Reword clause (b) as follows or to like effect: "is one of the species listed in Appendix 11 (except for introduction of Pacific oysters into a CMU where they are not already established); and" Reword clause (c) as follows or to like effect: "A, mollusc, sponge or algae; and" Reword clause (f) as follows or to like effect: "The marine farm is currently authorised solely..." |
| 79.21 | Volume One | Chapter: 13 | Provision: 13.M.39 | Neutral | Reword as follows or to like effect: "...The Council will prepare the implementation guide in consultation with iwi, DOC, MPI, and industry and community stakeholders |
| 79.22 | Volume Two | Chapter: 16 | Provision: 16.4.3 | Neutral | Insert an additional matter of control for each rule as follow or to like effect: "Measures to prevent the release or spread of harmful aquatic organisms" |
| 79.23 | Volume Two | Chapter: 16 | Provision: 16.4.4 | Neutral | Reword Rule 16.4.4 as follows or to like effect: "Marine farming in an ASA using conventional longline structures or intertidal structures for which there is...". Reword Standard 16.4.5.4 as follows or to like effect: "...the species must be a bivalve or plant species set out in Appendix 11 other than Pacific oysters if the application would introduce them into a CMU where they are not already established, except for ... |
| 79.24 | Volume Two | Chapter: 16 | Provision: 16.4.5.4 | Neutral | Reword Rule 16.4.4 as follows or to like effect: "Marine farming in an ASA using conventional longline structures or intertidal structures for which there is...". Reword Standard 16.4.5.4 as follows or to like effect: "...the species must be a bivalve or plant species set out in Appendix 11 other than Pacific oysters if the application would introduce them into a CMU where they are not already established, except for ... |
| 79.25 | Volume Two | Chapter: 16 | Provision: 16.5.2 | Support | Retain as notified, with an additional matter of discretion for each rule as follow or to like effect: "Measures to prevent the release or spread of harmful aquatic organisms". Insert an addition to Rule 16.5.2 as follows or to like effect: "Marine farming in an ASA for which no existing coastal permit is held using conventional longline structures or intertidal structures including the associated..." |

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| | | | 79.26 | Volume Two | Chapter: 16 | Provision: 16.5.3 | Support | Retain as notified, with an additional matter of discretion for each rule as follow or to like effect: "Measures to prevent the release or spread of harmful aquatic organisms". Insert an addition to Rule 16.5.2 as follows or to like effect: "Marine farming in an ASA for which no existing coastal permit is held using conventional longline structures or intertidal structures including the associated...". |
| | | | 79.27 | Volume Two | Chapter: 16 | Provision: 16.5.4 | Support | Retain as notified, with an additional matter of discretion for each rule as follow or to like effect: "Measures to prevent the release or spread of harmful aquatic organisms". Insert an addition to Rule 16.5.2 as follows or to like effect: "Marine farming in an ASA for which no existing coastal permit is held using conventional longline structures or intertidal structures including the associated...". |
| | | | 79.28 | Volume Two | Chapter: 16 | Provision: 16.6.13 | Support | Retain as notified, except for Rule 16.6.14. |
| | | | 79.29 | Volume Two | Chapter: 16 | Provision: 16.6.14 | Neutral | Reword as follows or to like effect: "Marine farming within an AMA, for which a) an authorisation is held to apply for a coastal permit to occupy space with the AMA, or b) there is an existing coastal permit to occupy space within the AMA for marine farming in the same location, including the associated occupation of space in the coastal marine area, the erection, placement, use of structures, disturbance of the seabed and ancillary discharges to water, _____ that is not provided for as a Controlled, Restricted Discretionary Activity or Prohibited Activity." |
| | | | 79.30 | Volume Two | Chapter: 16 | Provision: 16.6.15 | Support | Retain as notified, except for Rule 16.6.14. |
| | | | 79.31 | Volume Two | Chapter: 16 | Provision: 16.7 | Support | Retain as notified. |
| | | | 79.32 | Volume Two | Chapter: 16 | Provision: 16.8.1 | Support | Retain as notified. |
| | | | 79.33 | Volume Two | Chapter: 16 | Provision: 16.8.2 | Support | Retain as notified. |
| | | | 79.34 | Volume Three | Appendix: 11 | Appendix item: Species authorised to be farmed within the Marlborough region's coastal waters | Support | Retain as notified. |
| | | | 79.35 | Volume One | Chapter: 4 | Provision: Objective 4.1 | Support | Retain as notified. |
| | | | 79.36 | Volume One | Chapter: 13 | Provision: Heading | Support | Retain as notified. |
| | | | 79.37 | Volume One | Chapter: 13 | Provision: Policy 13.20.2 | Support | Retain as notified. |
| | | | 79.38 | Volume Four | All CMU | | Support | Retain Variation 1 elements as notified and either remove the Variation 1A elements or make the distinction more explicit, except for Map 4 as addressed below. Assess any other AMAs proposed to be included in this Variation against the principles in Policy 13.21.3, and only consider them for addition if they meet these principles. |
| | | | 79.39 | Volume Four | All AMA in a CMU | | Oppose | Assess the new AMAs in Richmond Bay against the principles in Policy 13.21.3 and remove any AMAs that do not meet these principles unless the adverse effects associated with the AMAs are offset by the removal of farms elsewhere. |
| | | | 79.40 | Volume One | Chapter: 13 | Provision: Policy 13.21.7 | Neutral | Variation 1A: Retain as notified, with an addition to clause (h)(iii) as follows or to like effect: "... may allocate authorisations for finfish or non-finish marine farming..." |
| | | | 79.41 | Volume One | Chapter: 13 | Provision: Policy 13.22.10 | Support | Variation 1A: Reword the heading of this policy as follows or to like effect: "Policy 13.22.10 – Managing adverse effects of finfish farms and discharge of feed at all marine farms..." Add a Definition of "Enrichment Stage (ES)" to the Definitions in Volume 2, Chapter 25. This definition should specifically refer to the Best Management Practice Guidelines for salmon farms in the Marlborough Sounds: Benthic environmental quality standards and monitoring protocols 2019 (1 Keeley, N; Gillard, M; Broekhuizen, N; Ford, R; Schuckard R; Ulrich S. 2019). |
| | | | 79.42 | Volume One | Chapter: 13 | Provision: Policy 13.22.11 | Support | Variation 1A: Retain as notified. |
| | | | 79.43 | Volume Two | Chapter: 16 | Provision: 16.5.5 | Support | Variation 1A: Retain as notified. |
| | | | 79.44 | Volume Two | Chapter: 16 | Provision: 16.8.2 | Support | Variation 1A: Retain as notified. |
| | | | 79.45 | Volume Two | Chapter: 25 | Provision: New provision | Support | Add a Definition of "Enrichment Stage (ES)" to the Definitions in Volume 2, Chapter 25. This definition should specifically refer to the Best Management Practice Guidelines for salmon farms in the Marlborough Sounds: Benthic environmental quality standards and monitoring protocols 2019 (1 Keeley, N; Gillard, M; Broekhuizen, N; Ford, R; Schuckard R; Ulrich S. 2019). |
| | | | 79.46 | Volume Two | Chapter: 16 | Provision: 16.4.4 | Neutral | Insert an additional matter of control for each rule as follow or to like effect: "Measures to prevent the release or spread of harmful aquatic organisms". |
| | | | 79.47 | Volume Two | Chapter: 16 | Provision: 16.4.5 | Neutral | Insert an additional matter of control for each rule as follow or to like effect: "Measures to prevent the release or spread of harmful aquatic organisms". |
| | | | 79.48 | Volume One | Chapter: 13 | Provision: Introduction | Support | 13.2.3 - retain as notified |
| | | | 79.49 | Volume Four | All CMU | | Support | Retain Variation 1A elements as notified, and either remove the Variation 1 elements or make the distinction more explicit. Assess any other FAMAs proposed to be included in this Variation against the principles in Policy 13.21.3, and only consider them for addition if they meet these principles. |
| 80 | Browning | Steffan Browning | 80.1 | Volume Two | Chapter: 16 | Provision: 16.7 | Support | I support the Prohibited Activities intention in Volume 2 16.7, that protect the values as supported through many appeals to the Environment Court, by Friends of Nelson Haven and Tasman Bay and others. |
| | | | 80.2 | Volume Four | All CMU | | Oppose | All CMU - Research on the effects of the current massive longline mussel farming should be carried out before the intended increase in plankton filtration occurs, so I oppose the changes to marine farm layouts until that occurs, although there will be environmental merit in many cases of reducing inshore lines. |

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| | | | 80.3 | Volume One | Chapter: 13 | Provision: Policy 13.22.1 | Oppose | Monitoring of water column effects of mussel farming appears to be limited to using chlorophyll-A, particulate carbon and nitrogen as the tools or a proxy for what should be much more detailed observations of what is being filtered and consumed or killed by the extensive and unnatural mussel population. This is a big fail in building an understanding what is happening to the marine ecosystems of the Sounds. Monitoring must be much deeper and the Plan variation needs to show a determination by Council to respond effectively to the information that good comprehensive and independent research may provide. There has long been information to show that mussels consume or kill a wide range of organisms, yet studies on what is being consumed and the significance of that is dodged by the marine farming industry and its chosen science providers. I can speak to this. |
| | | | 80.4 | Volume One | Chapter: 13 | Provision: 13.M.37 | Oppose | Monitoring of water column effects of mussel farming appears to be limited to using chlorophyll-A, particulate carbon and nitrogen as the tools or a proxy for what should be much more detailed observations of what is being filtered and consumed or killed by the extensive and unnatural mussel population. This is a big fail in building an understanding what is happening to the marine ecosystems of the Sounds. Monitoring must be much deeper and the Plan variation needs to show a determination by Council to respond effectively to the information that good comprehensive and independent research may provide. There has long been information to show that mussels consume or kill a wide range of organisms, yet studies on what is being consumed and the significance of that is dodged by the marine farming industry and its chosen science providers. I can speak to this. |
| 81 | Allan Roy Tester, Ronald Dennis Bothwell and Rosemary Joy Bothwell | Jonathon Tester | 81.1 | Volume Four | CMU 37: Port Underwood | CMU item: CMU 37 Aquaculture Management Area - AMA 24 | Oppose | Marine Farm 8581 Delete the AMA shown over marine farms 8615, 8616 and 8581 |
| | | | 81.2 | Volume Four | CMU 37: Port Underwood | CMU item: CMU 37 Aquaculture Management Area - AMA 28 | Oppose | Marine Farm 8616 Delete the AMA shown over marine farms 8615, 8616 and 8581 □ |
| | | | 81.3 | Volume Four | CMU 37: Port Underwood | CMU item: CMU 37 Aquaculture Management Area - AMA 29 | Oppose | Marine Farm 8615 Delete the AMA shown over marine farms 8615, 8616 and 8581 |
| | | | 81.4 | Volume One | Chapter: 13 | Provision: New provision | Neutral | Provide flexibility within the variation to adjust the shape of an AMA on the basis of site specific benthic surveys, as part of the consenting process for older farms. |
| 82 | Environmental Defence Society Incorporated | Cordelia Woodhouse | 82.1 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Support | EDS supports 1) the direction in Policy 13.21.3, and from a cursory assessment of the AMAs, is supportive of the location of the AMAs proposed. 2) the prohibited activity status for marine farming outside an AMA in an enclosed water CMU or near shore CMU. 3) provision for the development of offshore as a discretionary activity. 4) seeks to ensure that the avoidance requirements of the NZCPS (in particular Policies 11, 13 and 15) are all given effect to in the provisions of the pMEP. This requires that matters to have regard to and matters of control/discretion in the pMEP policies and rules include the adverse effects of a proposal on landscape, natural character and indigenous biodiversity. Impacts on water quality should also be considered. 5) the use of adaptive management is also supported. EDS considers that any framework for adaptive management be robust and based on an adequate evidential foundation. The continuation and enhancement of the current monitoring of effects of marine farming will assist in achieving that evidential foundation. |
| | | | 82.2 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Oppose | Variation 1A EDS does not support 1) the approach taken for identifying finfish AMAs (FAMAs). Unlike the MARWG process for AMAs, the process for identifying FAMAs appears neither robust nor collaborative. 2) The proposal to relocate finfish farms to Richmond Bay and Horsehoe Bay proposals will contribute to the cumulative effects generated by the other proposed marine farms within the Waitata Reach and will subtly erode the inherent naturalness and perceptual values of the area. Both proposals will have an impact on the Maud Island outstanding natural landscape and outstanding natural character values. In addition, EDS considers that the addition of new finfish farms will be a step too far in regard to the cumulative effects of finfish AMAs on natural character and landscape values. 3) Restricted discretionary activity status for marine farming within these areas is therefore not supported, and EDS considers this should be full discretionary. If this change is not adopted, EDS considers that matters of discretion should include the adverse effects of a proposal on landscape, natural character and indigenous biodiversity. Currently, the matters over which the Council has reserved discretion are incomplete and do not address adverse effects on these values. This means those factors cannot be considered by the decision-maker thereby preventing assessment and control of adverse environment effects. |

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| 83 | Friends of Nelson Haven and Tasman Bay Inc | Rob Schuckard | 83.1 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Neutral | Existing aquaculture activities and proposed new sites for aquaculture be assessed in the context of a valid and reliable assessment and mapping exercise for (1) the identification of areas of high, very high and outstanding natural character within the coastal environment, and (2) outstanding natural features and landscapes (including seascapes) in the Marlborough Sounds. It is a central issue in Friends appeal on the MEP that this process has been deficient, and the landscape and natural character provisions of the Decisions Version of the MEP are invalid and unreliable. A consequence of this is that only 22 marine farms within the Sounds (of some 580 marine farms in total) have been identified within ONFL/ONC overlays. Existing and proposed aquaculture should also be assessed against associated schedules of landscape/seascape values and natural character attributes and characteristics. Such schedules should clearly enunciate what is sought to be protected, and values and attributes should "...be described in terms of their landscape capacity and resilience, so that issues of vulnerability and sensitivity can be identified." It is a further issue in Friends' appeal on the MEP that the Appendix 1 (ONFL) and Appendix 2 (Natural Character) schedules are not fit for purpose in assessing the appropriateness of marine farming within the Marlborough Sounds. A discretionary activity rule framework that enables these matters to be assessed in any application for a new coastal permit for an existing aquaculture activity; and non-complying or prohibited rule framework for new aquaculture activities in such areas. Marlborough Environment Plan (MEP) appeal process be deferred until such time as Variations 1 and 1A to the MEP merge with and become part of the MEP. By way of example, Friends appeal on MEP will require consideration of Policy 13.21.3, Policy 13.21.4 and Policy 13.21.6 as part of the integrated management task. Such deferral will allow to give effect to Objective 13.21 - Provide for marine farming in appropriate locations while protecting and maintaining the values of Marlborough's coastal environment. |
| | | | 83.2 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Neutral | Maintain and recognize the prohibited status for aquaculture in Coastal marine Zone 1 in the operational plan as an integrated part to achieve sustainable management. Newly created farm space in the coastal marine zone 1 of Richmond Bay and new FAMA's for salmon farming in Richmond Bay, Horseshoe Bay and Tory Channel to be deleted. |
| | | | 83.3 | Volume One | Chapter: 13 | Provision: Introduction | Neutral | Include in quotation: "... by: including in regional policy statements and regional coastal plans provision for aquaculture activities in appropriate places in the coastal environment." |
| | | | 83.4 | Volume One | Chapter: 13 | Provision: Policy 13.21.1 | Neutral | Introduce additional policy: - CMU's as tool to manage biodiversity decline and ecological management in the Marlborough Sounds is limited due to: <ul style="list-style-type: none"> • Environmental heterogeneity exists at multiple spatial scales to which organisms respond differently and at different scales; • Connectivity is an important ecological pattern and process; |
| | | | 83.5 | Volume One | Chapter: 13 | Provision: Policy 13.21.3 | Neutral | Policy 13.21.3(e) Refer to Important Bird Area as NZ King Shag feeding area instead of 'non defined significant feeding habitat'. |
| | | | 83.6 | Volume One | Chapter: 13 | Provision: Policy 13.21.3 | Neutral | Policy 13.21.3(f) Refer to Policy 3 of NZCPS: uncertainty of ecological effect and cumulative effects are unknown and require further precaution. Marlborough Sounds as ecosystem is the culmination of a range of sequential dynamics |
| | | | 83.7 | Volume One | Chapter: 13 | Provision: Policy 13.21.5 | Oppose | Delete this policy |
| | | | 83.8 | Volume One | Chapter: 13 | Provision: Policy 13.21.6 | Neutral | Additional Policy: Prior to establishing the appropriateness of future applications in the offshore areas of the Marlborough Sounds, comprehensive surveys will be carried out to establish the spatial distribution of new to be identified marine significant areas. |
| | | | 83.9 | Volume One | Chapter: 13 | Provision: Policy 13.22.1 | Neutral | <ul style="list-style-type: none"> • Include zooplankton monitoring in standard monitoring protocol. • Uncertainty of ecological effect of filter feeders need to be addressed to provide better understanding of effect and improve the sounds wide modelling. • Improve the knowledge if mussels are a source or sink for nitrogen. Such will be important for future modelling. • Due to uncertainty, provide annual data to establish effect of activity. • Change ES 4.0 as maximum for mussels to ES 3.5. (ES 4.0 is a level of high enrichment, a transitional stage between moderate effects and peak macrofauna abundance and major community change unlikely reached under mussel farms). • Sulfide levels are set at the average 615 µM mL⁻¹ correspond with low flow measures. For High Flow farms this level should be about 500 µM mL⁻¹. For ES 3.5, levels should be at 450 µM mL⁻¹ and 250 µM mL⁻¹ respectively |
| | | | 83.10 | Volume One | Chapter: 13 | Provision: Policy 13.22.3 | Oppose | Delete entire policy. |
| | | | 83.11 | Volume One | Chapter: 13 | Provision: Policy 13.22.8 | Neutral | <ul style="list-style-type: none"> • Change 'total length of lines' into total 'length of culture rope'. • Delete 13.2.8 (b) iii - ... 'the positive effect' ... is unsubstantiated and not defined. |
| | | | 83.12 | Volume Two | Chapter: 16 | Provision: 16.6.15 | Neutral | Use of mentioned compounds should be prohibited to be used in all circumstances in coastal marine zone. Move this paragraph to prohibited chapter. |
| | | | 83.13 | Volume One | Chapter: 13 | Provision: Policy 13.21.7 | Oppose | Variation 1A Friends opposes all new Finfish Aquaculture Management Areas (and new Aquaculture Management Areas in prohibited areas of the operational Plan): |

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| | | | 83.14 | Volume One | Chapter: 13 | Provision: Policy 13.22.10 | Neutral | Variation 1A Policy 13.22.10 – Managing adverse effects of finfish farms. Replace text for managing FAMA sites with existing operational footprint allowance and BMP for FAMA sites (excluding relocation sites) as standard or new conditions when existing conditions expire. |
| | | | 83.15 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Oppose | No further increase in production means of existing marine farms and no new sites for marine farms |
| | | | 83.16 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Oppose | Variation 1A - No further increase in finfish farming or relocation to new finfish farming sites in the Marlborough Sounds |
| | | | 83.17 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Oppose | Variation 1A - Introduce BMP as generic conditions for all farms. |
| | | | 83.18 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Oppose | Variation 1A - Maintain footprint modelling as baseline for consent and reference to BMP. |
| 84 | J & A Seggie Family Trust | Bruce Cardwell | 84.1 | Volume Four | CMU 28: Maud Island | CMU item: CMU 28 Aquaculture Management Area - AMA 13 | Oppose | Marine Farm 8223 a) Draw the AMA as per the MFA/AQNZ submission (map ref 037, Kauauroa Bay, Pelorus Sound); OR b) Place the AMA around the recently consented space |
| | | | 84.2 | Volume Four | CMU 3: Beatrix Bay | CMU item: CMU 3 Aquaculture Management Area - AMA 13 | Oppose | Marine Farm 8240 Draw the AMA as per the MFA/AQNZ submission; (map ref 002, Beatrix Bay North, Pelorus Sound); |
| | | | 84.3 | Volume Four | CMU 25: Kenepuru Sound | CMU item: CMU 25 Aquaculture Management Area - AMA 5 | Oppose | Marine Farm 8472 Draw the AMA as per the MFA/AQNZ submission; (map ref 058, Schnapper Point, Kenepuru Sound) |
| | | | 84.4 | Volume Four | CMU 25: Kenepuru Sound | CMU item: CMU 25 Aquaculture Management Area - AMA 5 | Oppose | Marine Farm 8471 a) Place the AMA around the existing consented space; OR b) Draw the AMA as per the MFA/AQNZ submission; (map ref 058, Schnapper Point, Kenepuru Sound) |
| | | | 84.5 | Volume Four | CMU 36: Port Ligar | CMU item: CMU 36 Aquaculture Management Area - AMA 7 | Oppose | Marine Farm 8071 Draw the as per the proposed amended AMA map provided in Schedule 2. |
| | | | 84.6 | Volume Two | Chapter: 16 | Provision: 16.4 | Support | Existing marine farms should be 'renewed' as a controlled activity without notification |
| | | | 84.7 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Neutral | (a) Existing marine farms should be 'renewed' as a controlled activity without notification; and (b) AMAs should be drawn in the way set out in this submission, provided that no existing marine farm loses area, total backbone length and if the farm is shifting from its existing space it is moved into equivalent space; or (c) The existing marine farm(s) should stay where they are currently installed (including when they are offsite); or (d) The existing marine farm(s) should shift into new space as long as they do not lose area, total backbone length and the move is into equivalent space. |
| 85 | Te Rūnanga o Kaikōura and Te Rūnanga o Ngāi Tahu (collectively referred to as Ngāi Tahu). | Trudy Heath | 85.1 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Oppose | 1) Withdraw Variation 1 as it applies within the Ngāi Tahu takiwā. 2) Create separate enclosed water and open water CMUs for that part of the coastal marine area that lies within the Ngāi Tahu takiwā. 3) The Council in partnership with Te Rūnanga o Kaikōura and Te Rūnanga o Ngāi Tahu: (i) identify areas within Te Tai o Marakoura where aquaculture would be inappropriate and areas where it may be appropriate with a resource consent; and (ii) develop the appropriate provisions to guide decision-making on such applications in the Proposed Marlborough Environment Plan. 4) To notify a variation to the Proposed Marlborough Environment Plan to manage marine farming within the Ngāi Tahu takiwā once that mahi has occurred |
| | | | 85.2 | Volume Four | All AMA in a CMU | | Oppose | Add to Volume 4 two new CMUs: CMU 38A –Te Tai o Marakoura, Enclosed Water; CMU8A – Te Tai o Marakoura, Open Water; and Specify the nautical boundary between these two CMUs. Amend Planning Map 16 accordingly. Extend Planning Map 16 to show the southern extent of Marlborough DC and the CMUs. |
| | | | 85.3 | Volume Four | CMU 38: South Marlborough | CMU item: CMU 38 Aquaculture Management Area - New AMA | Oppose | Add to Volume 4 two new CMUs: CMU 38A –Te Tai o Marakoura, Enclosed Water; CMU8A – Te Tai o Marakoura, Open Water; and Specify the nautical boundary between these two CMUs. Amend Planning Map 16 accordingly. Extend Planning Map 16 to show the southern extent of Marlborough DC and the CMUs. |
| | | | 85.4 | Volume Two | Chapter: 25 | Provision: CMU | Oppose | Stipulate in the definitions that the boundary between the Off-shore CMU and Enclosed Water CMUs is 500m from mean high-water springs. |
| | | | 85.5 | Volume Two | Chapter: 25 | Provision: Offshore CMU | Oppose | Stipulate in the definitions that the boundary between the Off-shore CMU and Enclosed Water CMUs is 500m from mean high-water springs. |

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| 85.6 | Volume Four | All CMU | | Oppose | <p>Insert topographical features into the base layer of Planning Maps 1-16 so the location of CMUs relative to landmarks can be deduced.</p> <p>Identify the latitudinal and longitudinal extent of each CMU and any AMAs and FAMAs in Volume 4 as is done for Tasman District and other areas in Schedule 3 of the Resource Management (National Environmental Standards for Marine Aquaculture) Regulations 2020.</p> |
| 85.7 | Volume One | Chapter: 13 | Provision: Policy 13.21.1 | Oppose | <p>Amend clause (c) to read: "marine farms may be appropriate in the off-shore CMUs and which will be assessed under Policy 13.21.6 and in the Enclosed Water CMU for Te Tai o Marokura which will be assessed under Policy 13.21.8."</p> <p>Renumber subsequent clauses accordingly.</p> |
| 85.8 | Volume One | Chapter: 13 | Provision: Policy 13.21.4 | Oppose | <p>Amend Policy 13.21.4 by adding at the start the words: "Except for the CMUs 38A and 8A for Te Tai o Marokura, (A)additional..."</p> <p>and add to the end of the policy the words: "The establishment of any marine farm or any AMA within the CMUs for Te Tai o Marokura shall be managed in accordance with Policy 13.21.8."</p> |
| 85.9 | Volume One | Chapter: 13 | Provision: Policy 13.21.5 | Oppose | <p>Amend Policy 13.2.5 by adding at the start the words: "Other than in the Enclosed CMU 38A Te Tai o Marokura t(T)he appropriateness of ..."</p> <p>and add to the end of the policy the words: "The establishment of any marine farm or any AMA within the CMUs for Te Tai o Marokura shall be managed in accordance with Policy 13.21.8."</p> |
| 85.10 | Volume One | Chapter: 13 | Provision: Policy 13.21.6 | Oppose | <p>Amend Policy 13.21.6 by adding at the start the words: "Except for the CMUs 38A and 8A for Te Tai o Marokura, (A)additional..."</p> <p>and add to the end of the policy the words: "The establishment of any marine farm or any AMA within the CMUs for Te Tai o Marokura shall be managed in accordance with Policy 13.21.8."</p> |
| 85.11 | Volume One | Chapter: 13 | Provision: Policy 13.21.7 | Support | <p>Add a new Policy 13.21.8 to provide for the management of new marine farms within both the enclosed waters and open coastal waters that fall within the takiwā of Ngāi Tahu. This policy should be developed in consultation with Te Rūnanga o Ngāi Tahu and Te Rūnanga o Kaikōura to determine how proposed Objective 31.21 applies within the Ngāi Tahu takiwā. These provisions should be inserted into the Proposed Marlborough Environment Plan by way of a variation once complete.</p> <p>Renumber subsequent policies accordingly.</p> |
| 85.12 | Volume Two | Chapter: 16 | Provision: 16.6 | Oppose | <p>Amend Rule 16.6 to read: "Other than in Off-shore CMU 8A – Te Tai o Marokura, m(M)arine farming in an off-shore CMU..."</p> <p>Add an appropriate rule for marine farming in open coastal waters within the Ngāi Tahu takiwā after a policy position has been developed in consultation with Te Rūnanga of Ngāi Tahu and Te Rūnanga o Kaikōura and add to the proposed plan by way of a variation.</p> |
| 85.13 | Volume Two | Chapter: 16 | Provision: 16.7 | Oppose | <p>Amend Rule 16.7 to read: "Other than in Enclosed CMU 38A – Te Tai o Marokura, m(M)arine farming inside an Enclosed CMU or Near-shore CMU and not within an AMA..."</p> <p>Add an appropriate rule for marine farming in enclosed waters within the Ngāi Tahu takiwā after a policy position has been developed in consultation with Te Rūnanga of Ngāi Tahu and Te Rūnanga o Kaikōura, and added to the proposed plan by way of a variation.</p> |
| 85.14 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Oppose | <p>Variation 1A</p> <ol style="list-style-type: none"> 1) Withdraw Variation 1A as it applies within the Ngāi Tahu takiwā. 2) Create separate enclosed water and open water CMUs under the proposed Marlborough Environment Plan for that part of the coastal marine area that lies within the Ngāi Tahu takiwā. 3) The Council in partnership with Te Rūnanga o Kaikōura and Te Rūnanga o Ngāi Tahu identify areas within Te Tai o Marokura where finfish farming would be inappropriate and areas where it may be appropriate with a resource consent; and the appropriate provisions to guide decision-making on such applications in the Proposed Marlborough Environment Plan. 4) To notify a variation to the Proposed Marlborough Environment Plan to manage finfish farming within the Ngāi Tahu takiwā once that mahi has occurred |
| 85.15 | Volume One | Chapter: 13 | Provision: Policy 13.21.7 | Oppose | <p>Amend proposed Policy 13.21.7(6) by adding at the start the words: "Except for the CMUs 38A and 8A for Te Tai o Marokura, (A)authorisations for finfish farms..."</p> <p>and add to the end of the policy the words: "The establishment of any finfish farm within the CMUs for Te Tai o Marokura shall be managed in accordance with Policy 13.21.8."</p> <p>Add an appropriate policy for finfish farming in both enclosed and open waters within the Ngāi Tahu takiwā after consultation with Te Rūnanga of Ngāi Tahu and Te Rūnanga o Kaikōura, and add to the proposed plan by way of a variation.</p> |

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| | | | 85.16 | Volume Two | Chapter: 16 | Provision: 16.8.2 | Oppose | Amend Rule 16.8.2 by adding to the start of the rules the words: "Other than in Enclosed CMU 38A and Open Water CMU 8A – Te Tai o Marokura, a(A)uthorisations for finfish marine farms will only... Add appropriate rules for finfish farming in the Ngāi Tahu takiwā after a policy position has been developed in consultation with Te Rūnanga of Ngāi Tahu and Te Rūnanga o Kaikōura; and add these rules to the proposed plan by way of a variation. |
| | | | 85.17 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Neutral | Ngāi Tahu do not request any amendment to Variations 1 and 1A as they apply outside the Ngāi Tahu takiwā as this is for other iwi authorities to determine. However we do suggest that whatever the final form of the plan provisions, the relationship between the general provisions for marine farming in Variation 1 and the specific provisions for finfish farming in Variation 1A need to be reconciled |
| 86 | Te Rūnanga o Ngāti Kuia Trust | Julia Eason | 86.1 | Volume Two | Chapter: 25 | Provision: Near-shore CMU | Neutral | Include Coastal Section Outer Pelorus (CMU 9) and Chetwode Islands, Titi Island and Forsyth Island (Nga Motu) (CMU 5) in the near-shore CMU definition. |
| | | | 86.2 | Volume Two | Chapter: 25 | Provision: Enclosed Water CMU | Neutral | Edit the definition as Wataia Bay is mentioned twice in the definition of Enclosed CMU. |
| | | | 86.3 | Volume One | Chapter: 13 | Provision: Policy 13.21.4 | Neutral | Add (e) Coastal Section Outer Pelorus 9 and; Chetwode Islands, Titi Island and Forsyth Island CMU's. |
| | | | 86.4 | Volume One | Chapter: 13 | Provision: Policy 13.22.3 | Neutral | Replace the word 'Significant' with "more than minor". |
| | | | 86.5 | Volume Two | Chapter: 16 | Provision: 16.4.3 | Neutral | Add new rule provisions Rules 16.4.3.16; 16.4.5.17; 16.5.3.14; and 16.5.4.17 "Effects on cultural values" |
| | | | 86.6 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Support | Set limits on aquaculture. In some bays the carrying capacity of the environment has been exceeded and this requires a bay by bay assessment. |
| | | | 86.7 | Volume Four | All AMA in a CMU | | Neutral | Ability to establish a Matatitai Reserve at Anakoha, a traditional Mahinga Kai. CMU2 |
| | | | 86.8 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Oppose | To reject Proposed variation 1A. To alter the relevant Policies, rules and definitions as suggested at paragraphs 13,15 and 17. To undertake and expert review of cultural values for each CMU. |
| | | | 86.9 | Volume Two | Chapter: 16 | Provision: 16.4.5 | Neutral | Add new rule provisions Rules 16.4.3.16; 16.4.5.17; 16.5.3.14; and 16.5.4.17 "Effects on cultural values" |
| | | | 86.10 | Volume Two | Chapter: 16 | Provision: 16.5.3 | Neutral | Add new rule provisions Rules 16.4.3.16; 16.4.5.17; 16.5.3.14; and 16.5.4.17 "Effects on cultural values" |
| | | | 86.11 | Volume Two | Chapter: 16 | Provision: 16.5.4 | Neutral | Add new rule provisions Rules 16.4.3.16; 16.4.5.17; 16.5.3.14; and 16.5.4.17 "Effects on cultural values" |
| | | | 86.12 | Volume Four | CMU 44: Waitata Reach | CMU item: CMU 44 Aquaculture Management Area - New AMA | Neutral | To retain the removal of farms in Waitata reach. |
| | | | 86.13 | Volume Two | Chapter: 16 | Provision: 16.7 | Support | To support the prohibited status of farms outside of AMA's |
| | | | 86.14 | Volume Four | All CMU | | Neutral | For Council to undertake an expert review of cultural values for each CMU |
| | | | 86.15 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Oppose | Incorporate mechanisms for the Crown to settle any fisheries obligations in to the proposal. [inferred] |
| 87 | Red Sky Trust | Kevin Oldham | 87.1 | Volume Four | CMU 14: East Bay QCS | CMU item: CMU 14 Aquaculture Management Area - AMA 8 | Neutral | a) Adopt AMA 8, shown in attached Plan A and the line layout shown in attached Plan B; OR b) Adopt alternative boundaries to provide for AMA 8 of area 8 ha and practical lines arrangement within the envelope shown in attached Plan C, with the adopted AMA area not larger than the AMA area shown in Variation 1; OR c) Adopt the AMA as proposed in Variation 1. (Marine farm 8402) |
| | | | 87.2 | Volume Four | CMU 17: Forsyth Bay | CMU item: CMU 17 Aquaculture Management Area - New AMA | Oppose | a) Place an AMA over the consented space as per attached Plan D; OR b) Relocate to Richmond Bay (CMU 44), where Variation 1 proposes AMA 7, with proposed AMA 7 enlarged as per attached Plan G to provide a similar total length of crop rope to Marine Farm 8572 in a high-flow area ; OR c) Relocate to Catherine Cove (CMU 4) where Variation 1 proposes AMA 4 in a doubleparked arrangement, with the proposed AMA 4 enlarged to 10.475 ha (being similar in area as Marine Farm 8572) as per attached Plan F; OR d) Relocate farm to AMA 11 at the head of Waihinu Bay in the Waitata Reach (CMU 44), with the proposed AMA 11 enlarged as per attached Plan E; AND e) If a reduction arises in total backbone metres or marine farm area permitted under Variation 1 for marine farming by RED SKY TRUST then a partial transfer of lines to AMA 8 (CMU 14, Map 11) is permitted. The transfer may be up to 5 additional backbone lines and backbone extensions on other lines, cumulatively adding up to 1,500 relocated backbone metres to existing site 8402. All line changes arising from such transfers are to fit within the envelope shown in attached Plan C. |
| | | | 87.3 | Volume Two | Chapter: 16 | Provision: 16.4 | Support | Existing marine farms should be 'renewed' as a controlled activity without notification |

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| | | | 87.4 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Neutral | <p>At a high level: (a) AMAs should be drawn in the way set out in this submission, provided that no existing marine farm loses area, total backbone length and if the farm is shifting from its existing space it is moved into equivalent space; or (b) The existing marine farm(s) should stay where they are currently installed (including when they are offsite); or (c) The existing marine farm(s) should shift into new space as long as they do not lose area, total backbone length and the move is into equivalent space; or (d) The existing marine farm(s) should shift into a high-flow area as long as they do not lose total length of crop rope when using shorter droppers as is necessary to cater for mussel farming operations in a high flow environment.</p> <p>If someone makes a submission that any existing marine farm should be removed from its current location, and that submission is accepted, then that farm(s) should move into new space in bays where there is currently marine farming. Any net loss of backbone metres or total length of total crop rope from this process should be made up by allowing expansion of AMA for marine farms owned by the affected coastal permit holder in the same or other Coastal Management Units. That is consistent with the principle of no loss of marine farming space and no loss of backbone length.</p> |
| 88 | New Zealand Sports Fishing Council | Helen Pastor | 88.1 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Support | Only approve future consents for land-based aquaculture. Land-based aquaculture will contain filtration systems for run-off, which is more sustainable for the natural environment. This aligns with the NZSFC policy 4.2.1 where marine biodiversity is no longer threatened by land-based aquaculture. |
| | | | 88.2 | Volume One | Chapter: 13 | Provision: Objective 13.21 | Oppose | <p>To not relocate marine farms to open water Coastal Management Units as relocating of farms to open water is just shifting the environmental issues associated with marine farms to another site.</p> <p>For Marlborough District Council to only approve future consents for land-based aquaculture.</p> |
| | | | 88.3 | Volume One | Chapter: 13 | Provision: Policy 13.21.7 | Oppose | <p>For Marlborough District Council to revert any unoccupied FAMA spaces to more natural environments.</p> <p>For Marlborough District Council to not issue any permits for non-Finfish marine farms.</p> <p>To revert unoccupied FAMA spaces to a more natural environment</p> |
| | | | 88.4 | Volume One | Chapter: 13 | Provision: Policy 13.22.10 | Oppose | <p>To not allow resource consents to farms under 13.22.10, where the expectation under this policy is that marine farms will report and manage seabed and water column effects.</p> <p>Farms applying for consent should not be given consent until research of accumulative effects is carried out preliminary.</p> <p>Where the farms do not meet sustainable environmental standards, and cannot prove they would have no adverse affects on the natural environment, consent should not be given.</p> <p>For Marlborough District Council to pay for this research as it directly affects the natural, social, and cultural environment, and potential tourism opportunities.</p> |
| | | | 88.5 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Oppose | <p>For Marlborough District Council to realign focus to environmental, public interest, tourism, and recreational sectors.</p> <p>We recommend the Marlborough District Council does not issue any new consents for marine farms, as MARWG and the Marlborough District Council acknowledge the enclosed sounds are at full capacity.</p> |
| | | | 88.6 | Volume Two | Chapter: 16 | Provision: 16.4 | Oppose | Any renewal should be treated as a new consent with rigorous environmental standards to be applied. |
| | | | 88.7 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Oppose | Wait until the RMA reform has come to fruition before proposing the variation changes |
| 89 | Queen Charlotte Sound Residents Association | Monyeen Wedge | 89.1 | Volume Two | Chapter: 25 | Provision: CMU | Neutral | Add to definition all of Queen Charlotte Sound plus 1000 metres from any Marine Reserve and/or on the coast side of any wildlife sanctuary. |
| | | | 89.2 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Support | Support moving marine farms seaward and more stringent rules for replacement consent for existing farms. |
| | | | 89.3 | Volume One | Chapter: 13 | Provision: Issue 13N | Oppose | Oppose on the basis that by 2024 more research will be available regarding both the species and more appropriate structures. Furthermore change in species can have different effects on the seabed and surrounding wildlife. |
| | | | 89.4 | Volume One | Chapter: 13 | Provision: Policy 13.21.1 | Neutral | For item (d), add all the new designated coastal living area as set by the balance of the Plan. |
| | | | 89.5 | Volume One | Chapter: 13 | Provision: Policy 13.21.2 | Neutral | Regarding subletting ASAs - no decision sought. |
| | | | 89.6 | Volume One | Chapter: 13 | Provision: Policy 13.21.4 | Neutral | This should also include the area designated by the Harbourmaster for Cruise boat transport. |
| | | | 89.7 | Volume One | Chapter: 13 | Provision: Policy 13.21.5 | Neutral | To always publically notify the creation of an AMA. |
| | | | 89.8 | Volume One | Chapter: 13 | Provision: Policy 13.21.6 | Neutral | Amend policy 13.21.6(d) to add and other Important species. |
| | | | 89.9 | Volume One | Chapter: 13 | Provision: Policy 13.22.9 | Neutral | Amend policy 13.22.9(c) -amend seaweed to address only indigenous varieties that are already naturally occurring within the surrounding area. Ensure that the existing seagrass in the surrounding area is not adversely affected. Evaluation must be precautionary and must include an independent peer review. Such to be at the cost of the applicant. |

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| 89.10 | Volume One | Chapter: 13 | Provision: 13.M.37 | Neutral | For Council to continue to monitor and enhance same allocating a minimum of 75% of the Coastal occupation charges received from the industry to enable such. Reporting to the public every 3 years would be more appropriate given the climate change and seawater change that is going to occur. |
| 89.11 | Volume One | Chapter: 13 | Provision: 13.M.40 | Neutral | Include the SAG members the same as a separate interested party. |
| 89.12 | Volume One | Chapter: 13 | Provision: 13.AER.19 | Neutral | Include the SAG members the same as a separate interested party. |
| 89.13 | Volume Two | Chapter: 16 | Provision: 16.4.3 | Oppose | Resource consent applications under this rule to be considered without public notification and without limited notification. Limited notification could be considered providing it includes the SAG members could be an acceptable compromise the same consideration applies to 16.4.4 and 16.4.5 (Inferred) |
| 89.14 | Volume Three | Appendix: 11 | Appendix item: Species authorised to be farmed within the Marlborough region's coastal waters | Oppose | Farming of scallops in the Sounds should not be authorised species. It is recommended that any species not currently in the Sounds as an indigenous species should have to prove it is acceptable species and be introduced on a limited and well monitored basis before becoming an acceptable farming species. Amend seaweed to address only indigenous varieties that are already naturally occurring within the surrounding area. [Inferred] |
| 89.15 | Volume Two | Chapter: 16 | Provision: New provision | Neutral | Variation 1A : Finfish Farming. It should be mandatory that all and every person employed by the Aquaculture Industry must be a) A permanent resident of New Zealand b) Be subject to minimum standards as per wages and employment issues set by Central Government. c) Must prove they have all current certifications as per current and any future vaccination requirements. d) Have addressed and attended an appropriate meeting regarding water safety issues. e) Must each have their own appropriate life jacket. |
| 89.16 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Neutral | If the Sounds Advisory Group is part of the collective consultation process in conjunction with others (see page 7 and 8 of Section 32 Evaluation) show evidence to support this. |
| 89.17 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Neutral | As list in the S32 Report, the following should include provisions so that Marpol requirements are mandatory: Objective 13.1 – 13.3, 13.6, 13.7, 13.10, 13.12a, 13.14, 13.15, 13.17, 5.13.M |
| 89.18 | Volume Two | Chapter: 16 | Provision: 16.4 | Oppose | Before any new farm or transferred can be established then the applicant should at their cost provide a full benthic report out to twice the area it is to occupy. With the entire area being re-examined every 5 years, |
| 89.19 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Neutral | The total effect form all forms of farming in the marine environment need to collectively address the possibility of cumulative effects as climate change issues inclusive of sea level rise and the inevitable effect of same on the land areas adjacent to the CMA under some policy and conditions of consent. |
| 89.20 | Volume One | Chapter: 13 | Provision: Policy 13.21.7 | Oppose | Remove final paragraph as proposed as it is not appropriate as per different environmental effects and could have effects on the monitoring of finfish effects in the surrounding area. |
| 89.21 | Volume Two | Chapter: 16 | Provision: 16.5.5 | Neutral | Restricted Discretionary Activities. In order to appropriately address the standards and terms, it will be necessary for the Council to have an independent analysis of the application, which has to be, peer-reviewed. Council lacks the necessary expertise to on their own analyses and evaluate any reports provided by any applicant. Until such time as the Council has the appropriate skills in this area things such as local knowledge from the community needs to be given weight. |
| 89.22 | Volume Four | All CMU | | Neutral | It is important that the 'legend' has attached to same a written analysis of the full meaning inclusive of laypersons language to understand what an allocation means. The sea and coastal waters belong to all the people of New Zealand and the proposed variation should have given weight to the remoteness of many areas and the limited ability of some permanent residents to access the Internet or indeed understand the technical and legal language of these documents. The Council in addressing issues for remote and isolated areas of the Marlborough Sounds must address guidance Document as per 1A and make available to all the Marlborough Sounds community the full proposal from the Ministry of Primary Industries. This proposal must of course have addressed the New Zeland Coastal Policy Statement (2010). |
| 89.23 | Volume Two | Chapter: 16 | Provision: 16.4.4 | Oppose | Resource consent applications under this rule will be considered without public notification and without limited notification. Unacceptable the CMA belongs to the people and furthermore since predicted sea level rise and other climate change issues will arise during the life of this plan. Limited notification providing it includes the SAG members could be an acceptable compromise the same consideration applies to 16.4.4 and 16.4.5 |
| 89.24 | Volume Two | Chapter: 16 | Provision: 16.4.5 | Oppose | Resource consent applications under this rule will be considered without public notification and without limited notification. Unacceptable the CMA belongs to the people and furthermore since predicted sea level rise and other climate change issues will arise during the life of this plan. Limited notification providing it includes the SAG members could be an acceptable compromise the same consideration applies to 16.4.4 and 16.4.5 |
| 89.25 | Volume One | Chapter: 13 | Provision: New provision | Oppose | Add provision for the Coastal Occupancy Charges. [Inferred] |

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| | | | 89.26 | Volume Two | Chapter: 16 | Provision: 16.5 | Oppose | Section 32 Evaluation Marine Farming 4.1.2 Effects on the seabed Before any new farm or transferred can be established then the applicant should at their cost provide a full benthic report out to twice the area it is to occupy. With the entire area being re-examined every 5 years, |
| | | | 89.27 | Volume Two | Chapter: 16 | Provision: 16.6 | Oppose | Section 32 Evaluation Marine Farming 4.1.2 Effects on the seabed Before any new farm or transferred can be established then the applicant should at their cost provide a full benthic report out to twice the area it is to occupy. With the entire area being re-examined every 5 years, |
| | | | 89.28 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Neutral | The Council in addressing issues for remote and isolated areas of the Marlborough Sounds must address guidance Document as per 1A and make available to all the Marlborough Sounds community the full proposal from the Ministry of Primary Industries. This proposal must of course have addressed the New Zealand Coastal Policy Statement (2010). |
| | | | 89.29 | Volume One | Chapter: 13 | Provision: Issue 13O | Neutral | Ensure that the existing sea grass in the surrounding area is not adversely affected |
| 90 | Clova Bay Residents Association Incorporated | Trevor Offen | 90.1 | Volume Four | CMU 6: Clova Bay | CMU item: CMU 6 Aquaculture Management Area - AMA 1 | Oppose | We submit that there are significant environmental issues with any aquaculture activity within what is currently the Coastal Marine Zone 1 at the head of Clova Bay, including Site 8553. As such, the proposed AMA over Site 8553 should be removed from V1. |
| | | | 90.2 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Neutral | Whilst the NES facilitates some consent conditions for the 'adaptive management' of ecological or biodiversity effects, the NES does not facilitate the adoption of a precautionary approach on ecological or biodiversity grounds when re-consenting. Therefore, we submit, this must, if appropriate, be adopted at the local planning level. As we explain below, a precautionary approach is required in some areas, particularly where the signals are toward potentially significant adverse effects. V1 fails in this regard. |
| | | | 90.3 | Volume One | Chapter: 13 | Provision: Policy 13.22.1 | Neutral | We submit that V1 should adopt, as a Sounds wide ecological carrying capacity standard, the pelagic carrying capacity provisions as prescribed in para 2.2 of the ASC Standard. Council should incorporate into its allocation regime a discretion to prorate reductions in activity levels across all of a group of existing marine farmers in such manner as MDC deems appropriate. |
| | | | 90.4 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Neutral | 1. If, and contrary to our submission, the pelagic standard is not adopted by V1, then we would submit that at the very least the pelagic effect standard safe harbour rule (being a relevant water body should carry no more than a 10% coverage of bi-valve aquaculture), must be adopted as part of the V1 benthic standard. Secondly, the determinants of an ES 4 level are not fully disclosed, including if and to what extent changes in community structure are considered acceptable. 2. Our submission is that unnaturally induced changes in community structures can adversely effect publicly held values in the ecosystem and also challenge the resilience of indigenous biodiversity. As such, these effects should be avoided if potentially significant, or otherwise remedied or mitigated. We submit that the prescribed ES 4 test may stand as deficient in this respect. |
| | | | 90.5 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Neutral | Council to determine whether or not the activity proposed for AMA's will have a significant adverse effect on the natural landscape or natural feature values of any area with natural landscape or natural character values - with that assessment taken from a baseline naked of the proposed AMA activity (NZCPS 7, 13.1(b) and NZCPS 15(b)). Council has not undertaken this assessment either. As such we submit that the proposed AMA's are also inappropriate to this extent. |
| | | | 90.6 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Neutral | we submit that it be made clear in the provisions that the utility of CMU's is limited to planning and consenting administration and that CMU's should not be taken as indicating boundaries to the reach of effects of activities. |
| | | | 90.7 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Neutral | AMAs should commence no closer than 100m from mean low water mark unless that is determined as inappropriate for environmental reasons and that AMAs should not extend beyond 250m from mean low water mark. |
| | | | 90.8 | Volume Four | All CMU | | Neutral | We also submit that 'mean low water' should be objectively defined in order to avoid confusion or disputes over where an AMA's geometric location should be actually measured from. We submit that 'mean low water' should be defined as mean low water springs as this point can be objectively determined by reference to chart datums. |
| | | | 90.9 | Volume One | Chapter: 13 | Provision: Introduction | Neutral | i. Delete para 3; ii. Amend para 4 Paragraph 4 to refer to appropriate densities. iii. Para 6 - It should be made clear here that the meeting of existing activity level is aspirational only – being contingent on the meeting of environmental standards and requirements and that as such it may not be possible to maintain all existing aquaculture within the Sounds. |
| | | | 90.10 | Volume One | Chapter: 13 | Provision: Issue 13N | Neutral | Issue 13N puts up uncertainty of future resource consent outcomes as a key issue and then renders this down in the commentary to a question of "security of occupancy". These are unavoidable functions of undertaking an exploitive activity in a highly valued marine environment. They are issues that can't actually be addressed without necessarily compromising environmental standards. In our view this means they fail at a fundamental level and as such they should be removed as Issues from V1. The Issue that should be raised here is that of consenting process efficacy – seeking to maximise the efficiency of the environmental assessment process, such as through the adoption of bay by bay assessment processes, without compromising on the environmental assessments and thresholds that the activity necessarily demands. |
| | | | 90.11 | Volume One | Chapter: 13 | Provision: Objective 13.21 | Oppose | This objective should refer to marine farming in appropriate locations and densities |

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| 90.12 | Volume One | Chapter: 13 | Provision: Policy 13.21.1 | Neutral | <p>1. We agree that marine farming outside of AMAs and within the enclosed waters of the Sounds is inappropriate.</p> <p>2. The utility of CMU's for managing marine farms is limited to administrative. This should be clarified in the commentary to the policy.</p> <p>3. (f) should be deleted as it does not contemplate meeting environmental standards at all and stands to clash with other environmentally focused policies.</p> <p>4. creating new AMA space with a view toward only allocating it to displaced existing consent holders from elsewhere is inequitable – the wider public is just as entitled to the use of that public marine space as someone who has previously had a consented activity elsewhere.</p> |
| 90.13 | Volume One | Chapter: 13 | Provision: Policy 13.21.3 | Neutral | <p>1. That this policy commence with the qualifier "To the extent possible within environmental standards and other parameters, AMAs (other than ASAs) are established...."</p> <p>2. Policy 13.21.3 should be amended to also require specific regard to the matters outlined in Issue 13O.</p> <p>3. Considerations should include the utility or suitability of the particular area to aquaculture activities – with reference to the likes of product yield history, water currents and water depth.</p> <p>4. For the purpose of paragraph (c) clarify that "recognised navigation routes" includes any point to point line of navigation that is likely to be used by recreational boats for open speed navigation.</p> <p>5. paragraph (e) should be rewritten to something along the lines as follows: "Outside of areas that are likely, singularly or cumulatively, to have a more than minor adverse effect on the feeding or breeding activities of NZ King Shag, elephant fish, dolphins, high value recreational fish species such as cod, sole, flounder, snapper or kawahai, and other important species"</p> <p>6. Paragraph (f) should be corrected to account for buffer zones – e.g. by adding the words "or their buffer zones" after the following wording "ecologically significant marine sites"</p> |
| 90.14 | Volume One | Chapter: 13 | Provision: New provision | Support | <p>we submit that a policy along the following lines should be added after Policy 13.21.3: Policy 13.21.3.1 - The size or area of any AMA or AMAs shall be determined with regard to the following criteria: a) The containment of filter feeding aquaculture to within the pelagic effects standard as prescribed by paragraph 2.2 of the Aquaculture Stewardship Council ASC Bivalve Standard version 1.1 March 2019. b) The avoidance of significant adverse effects on natural character values or natural landscape values. c) The avoidance of any other significant adverse effects on indigenous ecosystems and habitats. d) The Issues outlined in Issue 13O.</p> |
| 90.15 | Volume One | Chapter: 13 | Provision: Policy 13.21.4 | Neutral | <p>Accordingly, we submit that the following areas (currently CMZ 1 areas under the MSRMP) be added to Policy 13.21.4(a): • Tuhitarata Bay, in Beatrix Bay • The head waters of Clova Bay • Hopai Bay in Crail Bay • The north side of Kenepuru Sound from Skiddaw Bay around to Mills Bay • The south side of Kenepuru Sound from Broughton Bay to the Kenepuru Heads</p> |
| 90.16 | Volume One | Chapter: 13 | Provision: Policy 13.21.5 | Neutral | <p>1. What is needed is an extraordinary activity threshold that must be met before more AMA's can be added within the Sounds. We submit that policy 13.21.5 be amended to the effect that a new AMA must be for an aquaculture activity that cannot, for biophysical or hydrodynamic reasons, be undertaken within the existing AMA space in the Sounds.</p> <p>2. We submit that a cumulative effect paragraph must be added to the policy before paragraph (a). This new paragraph should provide that a new AMA must not be created if it is likely to result in or contribute to the exceedance of any of the cumulative effect thresholds identified in proposed new Policy 13.21.3.1 above.</p> <p>3. Paragraph (a) should not refer to a CMU as effects can cross CMU boundaries. Rather, it should refer to the 'area of influence'. An area of influence is self-explanatory – it is the area that the activities actually influence.</p> <p>4. As noted in section 4 above, paragraph (a) is crafted on the ASC Standard for benthic effects and does not facilitate any regard to cumulative effects. The new paragraph submitted for in (1) above (which includes application of the ASC Standard for pelagic effects) must be included to effect any cumulative limit.</p> <p>5. Paragraph (c) is far too narrow and is inappropriately worded. We submit that this paragraph should be rewritten as follows: " the location of an AMA and subsequent marine farm will not narrow any navigable channel resulting in a speed restriction nor otherwise have any more than minor adverse effects on navigation, including by encroachment on lines of point to point navigation" (</p> <p>6. It is not appropriate that regard only be had to amenity values to the extent that they are affected by lights or noise from proposed farm activity. Paragraph (e) should thus be amended to require regard to be had to the matters referred to at Issue 13O, including visual amenity broadly.</p> <p>7. In paragraphs (b)(ii), (d) and (e) "significant" effects should be replaced by "no more than minor" effects. A plan change in an environment that is already considered to be full should demand adverse effect thresholds that are, at the very least, as stringent as they are when applying for a non-complying resource consent under section 104D(1)(a).</p> <p>8. There is reference to a Values Report 2018. We submit that it should be made clear: • That values are dynamic matters of fact that cannot be dictated by a plan and that the Values Report has not been notified and consulted on and as such it does not form part of V1. • That the Values Report is also not intended to be comprehensive, nor is it intended to be a representation or constraint on Council's view on the values for any area, and nor is it intended to be representative of the values held by the communities or other stakeholders in areas.</p> |

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| 90.17 | Volume One | Chapter: 13 | Provision: Policy 13.21.6 | Neutral | <p>1. Reference to Values Report should be deleted.</p> <p>2. "recognised navigation routes" should, for this purpose, be defined in the same way as proposed for policy 13.21.3.</p> <p>3. paragraph (c) should be rewritten to something along the lines as follows: "Outside of areas that are likely, singularly or cumulatively, to have a more than minor adverse effect on the feeding or breeding activities of NZ King Shag, elephant fish, dolphins, high value recreational fish species including cod, sole, flounder snapper or kawahai, and other important species"</p> <p>4. Paragraphs (g) and(h) set a threshold for effects of 'significant'. This is inappropriate. The threshold for effects such as these should be no more than minor.</p> <p>5. A new paragraph should be added requiring that applications for marine farms under this policy must also demonstrate that the proposed activity will comply with the pelagic effects standard as prescribed by paragraph 2.2 of the Aquaculture Stewardship Council ASC Bivalve Standard version 1.1 March 2019.</p> |
| 90.18 | Volume One | Chapter: 13 | Provision: Policy 13.21.7 | Support | <p>1. We support the policy of managing demand for coastal marine space by way of an allocation scheme.</p> <p>2. Policy 13.21.7(b) be amended by adding the wording as indicated below: For space in AMAs created as part of the notified variation to the plan, other than FAMAs, and subject to any need to control or regulate activity in order to manage environmental issues including cumulative effects, authorisations for marine farming.....</p> <p>3. Policy 13.21.7(b) should be amended as follows: (1) The second sentence in paragraph (b) should be changed to read: "Subject to paragraph (g), Council shall have discretion as to where and to what extent an existing consent holder is granted an allocation right or rights in an AMA. In exercising this discretion Council shall adopt the following principles: (2) At the beginning of each of paragraphs (b)(i) to (iv) add the words: "Where possible and to the degree that Council in its discretion determines," (3) Add a new paragraph (ba) as follows: (ba) Council may elect to move to publicly tender some or all authorisations for an AMA or AMAs created as part of the notified variation to the plan if and to the extent that Council considers the allocation procedure under paragraph (b) to be impractical or inefficient to implement.</p> <p>4. Our submission is thus that Council has made an inadequate assessment and has failed to meet the threshold required by section 165H(1) of the Resource Management Act 1991 to allocate consent rights other than by way of tender.</p> <p>5. we submit that the following new policy (g) is required: (g) Allocations for second term resource consents in AMAs created as part of the notified variation to the plan or by private plan change shall be publicly tendered.</p> <p>6. We support paragraph (c) of Policy 13.21.7</p> <p>7. we submit that paragraph (d)(ii) be replaced with the following: Filter feeding aquaculture in the relevant area of influence is and will remain within the limits prescribed in the pelagic effects standard in paragraph 2.2 of the Aquaculture Stewardship Council ASC Bivalve Standard version 1.1 March 2019 and the additional marine farming activities can be undertaken without more than minor adverse effects on the human use values of the relevant area.</p> <p>8. Subject to our comments on public tendering above, we support paragraph (e).</p> <p>9. Paragraph (f) should commence with the words "Subject to paragraph (g)".</p> |
| 90.19 | Volume One | Chapter: 13 | Provision: Issue 13O | Neutral | We support Issue 13O. However, note our submission point above to the effect that these Issues must also be brought into objective 13.21 and policies 13.21.3, 13.21.4 and 13.21.5 for the purposes of determining where and how much aquaculture is appropriate. |
| 90.20 | Volume One | Chapter: 13 | Provision: Objective 13.22 | Neutral | This is about the management of marine farms once they are established. We submit that the wording be amended by adding "avoiding or" before "minimised" in the first sentence. |
| 90.21 | Volume One | Chapter: 13 | Provision: Policy 13.22.1 | Oppose | We thus submit that references in Policy 13.22.1 to the management of cumulative effects are incorrect and should be deleted. We submit that a further policy should be added requiring monitoring and the review of consent conditions to ensure the containment of filter feeding aquaculture to the pelagic effects standard as prescribed by paragraph 2.2 of the Aquaculture Stewardship Council ASC Bivalve Standard version 1.1 March 2019. |
| 90.22 | Volume One | Chapter: 13 | Provision: Policy 13.22.2 | Neutral | This policy requires the removal of structures upon the cessation of activity. This policy should extend to a forfeiture of consent rights where activity is abandoned for 5 years or more. |
| 90.23 | Volume One | Chapter: 13 | Provision: Policy 13.22.3 | Neutral | We take the opportunity to highlight the contradiction that this Policy raises within V1. It, quite rightly, prescribes a precautionary approach for the addition of one new marine farm activity. However, at the same time V1 is facilitating the renewal of all existing activity as a controlled activity when it is in the same field and is facing the same uncertainty and potentially significant adverse effects. |
| 90.24 | Volume One | Chapter: 13 | Provision: Policy 13.22.4 | Support | We support this policy. |
| 90.25 | Volume One | Chapter: 13 | Provision: Policy 13.22.5 | Neutral | We make the following submissions with regard to this policy: i) There is no need for reference CMUs in this policy. CMU's are not relevant parameters to ecological effect assessments. ii) The threshold for a response in paragraph (b) should be more than minor effects, not significant effects. iii) Assuming the ASC Standard pelagic effect standard is, as we submit, adopted as a cumulative effect tool, then there should be a clause added requiring a review toward the adoption of better models or measurement systems for water column effects if and when they become available. iv) It would be remiss to not note in the commentary that long term monitoring and data collection are unlikely, of themselves, to assist with the meaningful determination of the effects of existing farming. |

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| 90.26 | Volume One | Chapter: 13 | Provision: Policy 13.22.6 | Neutral | We urge the Council policy section to develop some policy and rules to outline a pathway to stop/replace the use of synthetic material with an associated time line to stop this significant adverse effect for insertion into V1 as a matter of urgency. |
| 90.27 | Volume One | Chapter: 13 | Provision: Policy 13.22.7 | Neutral | We support most of the standards imposed but make the following submissions: i) There is requirement to have a gap of at least 50m between farms to allow for public access to the foreshore. There should also be gap of at least 50m wide through a farm for every 200m of surface structure. This is because some farms are over a kilometre long and as such there is a need to ensure that there are appropriate breaks in structures within farms to facilitate public coastal access. ii) There should be more objective standards set to control amenity impacts, such as a prohibition on night vessel activity (light or noise) in at least moderately populated areas such as the Kenepuru Sound or the Beatrix Basin. |
| 90.28 | Volume One | Chapter: 13 | Provision: Policy 13.22.8 | Neutral | Paragraph (ii) is inadequate on a number of fronts. As such, a third paragraph should be added as follows: (new paragraph iii) Natural character or natural landscape values are not already, or will not become as a result of the spreading, significantly adversely effected by development. Thus paragraph (iii) as proposed by V1 should be deleted. As such, we submit that any application for more area or more intensive marine farming within an AMA must meet the criteria as outlined in our proposed new policy 13.21.3.1, with the threshold test with regard to issues identified in Issue 13O being no more than minor. Security of structures is another issue that should be accommodated – longer lines within a consented site will generally only be achievable by effecting more acutely angled anchor lines - and this increases the fragility of the structures and brings accordant risks to the public and the environment. As an aside, we take "area occupied" to be a reference to surface area, as any change to consented area itself would require a new resource consent. However, it may be worth being more specific in the provisions when referencing 'area' or 'area occupied'. In our view it is inappropriate for the commentary to this policy to state that the effects of changing the layout of structures for an established farm 'will be only minor' and these comments should be deleted. This policy goes much further than that and stands to facilitate potentially significant adverse effects, not only cumulative ecological, natural character or landscape effects, but also with site specific effects such as navigation, public access and safety, recreational use and visual amenity. |
| 90.29 | Volume One | Chapter: 13 | Provision: Policy 13.22.9 | Neutral | We submit that there needs to be a further standard added to this enabling policy to the effect that the new species must have the same or lesser demand on primary production (i.e. base community structure such as phytoplankton or zooplankton) than the currently consented species, and must also have the same or lesser depositional impact on the benthic environment. |
| 90.30 | Volume One | Chapter: 13 | Provision: 13.M.37 | Neutral | A more pragmatic and appropriate Method would be that as recommended in the NB Report as "larger scale field manipulations" ⁴³ . The issues identified by the NB Report with farmer resistance with this method would not exist if, as we have submitted, an at risk area(s) is/are necessarily farmed down to an acceptable level under the pelagic effects ASC Standard. This will afford an ideal opportunity to undertake the recommended field work and to empirically measure the degree of community change that occurs with the changing intensity of cultured bi-valve activity. |
| 90.31 | Volume One | Chapter: 13 | Provision: 13.M.39 | Neutral | As we have indicated in our submission on 13.21.7, we submit that Council needs to allocate the first round of consent rights by discretion and adopt more of a take it or leave it approach to the allocation decisions it makes. |
| 90.32 | Volume One | Chapter: 13 | Provision: 13.AER.20 | Neutral | We submit that the anticipated environmental results table should reflect an AER and/or Monitoring Effectiveness should encompass not exceeding the standards for benthic or pelagic effects as specified in the Aquaculture Stewardship Council ASC Bivalve Standard Version 1.1 |
| 90.33 | Volume Two | Chapter: 16 | Provision: 16.4 | Neutral | We submit that there are no grounds made for the adoption of controlled activity status for any Sounds aquaculture activity and neither are there any grounds made for the non-notification of consent applications for aquaculture activities within the Sounds. We submit that a rapidly changing environment and public demands and values means that consenting for aquaculture within AMAs in the Sounds should be, at the least, limited discretionary. Moreover, all consent applications for aquaculture in the Sounds should be notified unless it is dictated by the NES that they should not be notified. We submit that there must, at the least, be an explicit policy adopted of either restricting consent terms or restricting the issue of future authorisations where the term of a prospective consent is likely to transgress a future plan review. |
| 90.34 | Volume Two | Chapter: 16 | Provision: 16.4.3 | Neutral | We submit that such applications should be, at the least, limited discretionary with notification as it will inevitably be a complete relocation or a significant relocation. We also submit that there is no provision to control structures to effect public access to the coast – this necessary to ensure that there are 50m wide access lanes through the farm to the shore if lines in a farm exceed 200m in length. There should also be discretion over the use of synthetic structures, such as plastic ties and structure rope, and over operation times to protect amenity and to avoid noise at inappropriate times. |
| 90.35 | Volume Two | Chapter: 16 | Provision: 16.4.4 | Neutral | Rule 16.4.4 applies to replacement consents for the same area in an ASA. The activity status should be limited discretionary. We also submit that there should be provision to control structures to effect public access to the coast – this necessary to ensure that there is 50m wide access lanes to the shore if lines in a farm exceed 200m in length. There should also be controls over the use of synthetic structures, such as plastic ties and structure rope, and over operation times to protect amenity and to avoid noise at inappropriate times. |

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| 90.36 | Volume Two | Chapter: 16 | Provision: 16.4.5 | Neutral | Rule 16.4.5 applies to replacement consent within an AMA. This should be limited discretionary. We also submit that there should be discretion over structures to effect public access to the coast – this necessary to ensure that there is 50m wide access lanes to the shore if lines in a farm exceed 200m in length. There should also be discretion or controls over the use of synthetic structures, such as plastic ties and structure rope, and over operation times to protect amenity and to avoid noise at inappropriate times. There should also be discretion or controls over genetic and biosecurity issues and also to manage farming density or intensity if required because new species bring different filtration rates or different benthic deposition capacity. |
| 90.37 | Volume Two | Chapter: 16 | Provision: 16.5.2 | Neutral | Rule 16.5.2 applies to qualify new farms in an ASA as limited discretionary. We submit that these applications should be notified with discretion specifically reserved in full to manage cumulative effects on natural character or natural landscape values and to manage the attainment of ASC Standard pelagic and benthic standards. Discretion should also be specifically reserved over structures to effect public access to the coast – this necessary to ensure that there is at least 50m wide access lanes through to the shore if lines in a farm exceed 200m in length. There should also be discretion over the use of synthetic structures, such as plastic ties and structure rope, and over operation times to protect amenity and to avoid noise at inappropriate times. |
| 90.38 | Volume Two | Chapter: 16 | Provision: 16.5.3 | Neutral | Rule 16.5.3 applies to qualify a new farm in an AMA as limited discretionary. We make the same submission for this policy as we do for Policy 16.5.2: Rule 16.5.2 applies to qualify new farms in an ASA as limited discretionary. We submit that these applications should be notified with discretion specifically reserved in full to manage cumulative effects on natural character or natural landscape values and to manage the attainment of ASC Standard pelagic and benthic standards. Discretion should also be specifically reserved over structures to effect public access to the coast – this necessary to ensure that there is at least 50m wide access lanes through to the shore if lines in a farm exceed 200m in length. There should also be discretion over the use of synthetic structures, such as plastic ties and structure rope, and over operation times to protect amenity and to avoid noise at inappropriate times. |
| 90.39 | Volume Two | Chapter: 16 | Provision: 16.5.4 | Neutral | Rule 16.5.4 applies to an qualify an extension of surface area of an existing farm within an AMA as limited discretionary. We submit that these applications should be notified with discretion specifically reserved in full to manage cumulative effects on natural character or natural landscape values and to manage the attainment of ASC Standard pelagic and benthic standards. Discretion should also be specifically reserved over structures to effect public access to the coast – this necessary to ensure that there is at least 50m wide access lanes to the shore if lines in a farm exceed 200m in length. There should also be discretion over the use of synthetic structures, such as plastic ties and structure rope, and over operation times to protect amenity and to avoid noise at inappropriate times. |
| 90.40 | Volume Two | Chapter: 16 | Provision: 16.6.14 | Support | We agree that residual “within AMA” activities should be discretionary. |
| 90.41 | Volume Two | Chapter: 16 | Provision: 16.6.15 | Oppose | No consideration has been given to the potential risks of the discharge of feed or medicinal or therapeutic compounds associated with conventional long line bi-valve filter feeder farming. This is pertinent given the activity covers such a potentially wide area. We submit that this should thus be a prohibited activity unless and until there has been comprehensive study undertaken of the potential environmental risks of such a wide reaching practice. |
| 90.42 | Volume Two | Chapter: 16 | Provision: 16.7 | Support | Rule 16.7.9 – we agree that marine farming should be a prohibited activity outside of an AMA. |
| 90.43 | Volume Two | Chapter: 16 | Provision: 16.8 | Support | Rule 16.8 – we agree with a rule that applications cannot be made without authorisations. |
| 90.44 | Volume Two | Chapter: 16 | Provision: 16.8.1 | Support | Rule 16.8.1 – we agree with Council suspending the receipt of applications and effecting the ability to process and hear together applications in common area. |
| 90.45 | Volume Two | Chapter: 16 | Provision: 16.8.2 | Neutral | we refer to our submissions on Policy 13.21.7 and submit that Rule 16.8.2 should be amended to follow those submission points, including with regard to allocations being publicly tendered from the second AMA consent term and beyond, that allocations should also only be made if and to the extent that marine farming activity is and will be in accordance with the pelagic and benthic effect standards of the ASC Standard. Council must also reserve discretion to allocate first term AMA authorisations by tender if and to the extent that the procedure proposed of allocating first term consents to existing consent holders becomes too impractical or inefficient to implement. |
| 90.46 | Volume One | Chapter: 13 | Provision: New provision | Support | Consequential Changes to Other PMEP Provisions Policy 13.2.3 – We agree that marine farm lapse periods should be 3 years. |
| 90.47 | Volume One | Chapter: 13 | Provision: Policy 13.20.2 | Oppose | We disagree with a grandparenting allocation mechanism after the first term of AMA consents. Facilitating perpetual use entitlements is inequitable and inefficient. All AMA consents should be tendered after the first AMA consent term. |
| 90.48 | Volume Four | All CMU | | Neutral | For the reasons given in submissions we submit that the extent and location of CMU's and AMAs has not been appropriately determined and as such the CMUs and AMAs as depicted in the proposed overlay maps do not represent appropriate CMUs or AMAs. |
| 90.49 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Neutral | All aquaculture activity, whether new or renewal activity, must meet the same environmental standards and principles. We cannot see any basis made for an increase to the band of area considered 'appropriate' for aquaculture activities. |

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| 91 | Kenepuru & Central Sounds Residents Association Incorporated | Andrew Caddie | 91.1 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Neutral | <p>In our view the social and economic values of proposed renewal activities are the same as those for proposed new activities and as such a proposition to elevate renewal activity for protection under NZCPS policy 8 is unsupported. All aquaculture activity, whether new or renewal activity, must meet the same environmental standards and principles.</p> <p>We cannot see an basis made for an increase to the band of area considered 'appropriate' for aquaculture activity.</p> |
| | | | 91.2 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Neutral | <p>Whilst the NES facilitates some consent conditions for the 'adaptive management' of ecological or biodiversity effects, the NES does not facilitate the adoption of a precautionary approach on ecological or biodiversity grounds when re-consenting. Therefore, we submit, this must, if appropriate, be adopted at the local planning level. As we explain below, a precautionary approach is required in some areas, particularly where the signals are toward potentially significant adverse effects. V1 fails in this regard.</p> |
| | | | 91.3 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Neutral | <p>We submit that V1 should adopt, as a Sounds wide ecological carrying capacity standard, the pelagic carrying capacity provisions as prescribed in para 2.2 of the ASC Standard. Council should incorporate into its allocation regime a discretion to prorate reductions in activity levels across all of a group of existing marine farmers in such manner as MDC deems appropriate.</p> |
| | | | 91.4 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Neutral | <p>1. If, and contrary to our submission, the pelagic standard is not adopted by V1, then we would submit that at the very least the pelagic effect standard safe harbour rule (being a relevant water body should carry no more than a 10% coverage of bi-valve aquaculture), must be adopted as part of the V1 benthic standard. Secondly, the determinants of an ES 4 level are not fully disclosed, including if and to what extent changes in community structure are considered acceptable.</p> <p>2. Our submission is that unnaturally induced changes in community structures can adversely effect publicly held values in the ecosystem and also challenge the resilience of indigenous biodiversity. As such, these effects should be avoided if potentially significant, or otherwise remedied or mitigated. We submit that the prescribed ES 4 test may stand as deficient in this respect.</p> |
| | | | 91.5 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Oppose | <p>Council to determine whether or not the activity proposed for AMA's will have a significant adverse effect on the natural landscape or natural feature values of any area with natural landscape or natural character values - with that assessment taken from a baseline naked of the proposed AMA activity (NZCPS 7, 13.1(b) and NZCPS 15(b)). Council has not undertaken this assessment either. As such we submit that the proposed AMA's are also inappropriate to this extent.</p> |
| | | | 91.6 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Neutral | <p>We submit that it be made clear in the provisions that the utility of CMU's is limited to planning and consenting administration and that CMU's should not be taken as indicating boundaries to the reach of effects of activities.</p> |
| | | | 91.7 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Neutral | <p>AMAs should commence no closer than 100m from mean low water mark unless that is determined as inappropriate for environmental reasons and that AMAs should not extend beyond 250m from mean low water mark.</p> |
| | | | 91.8 | Volume Four | CMU 6: Clova Bay | CMU item: CMU 6 Aquaculture Management Area - AMA 1 | Neutral | <p>We submit that there are significant environmental issues with any aquaculture activity within what is currently the Coastal Marine Zone 1 at the head of Clova Bay, including Site 8553. As such, the proposed AMA over Site 8553 should be removed from V1.</p> |
| | | | 91.9 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Neutral | <p>We also submit that 'mean low water' should be objectively defined in order to avoid confusion or disputes over where an AMA's geometric location should be actually measured from. We submit that 'mean low water' should be defined as mean low water springs as this point can be objectively determined by reference to chart datums.</p> |
| | | | 91.10 | Volume One | Chapter: 13 | Provision: Introduction | Neutral | <p>i. Delete para 3; ii. Amend para 4 Paragraph 4 to refer to appropriate densities. iii. Para 6 - It should be made clear here that the meeting of existing activity level is aspirational only – being contingent on the meeting of environmental standards and requirements and that as such it may not be possible to maintain all existing aquaculture within the Sounds.</p> |
| | | | 91.11 | Volume One | Chapter: 13 | Provision: Issue 13N | Neutral | <p>Issue 13N puts up uncertainty of future resource consent outcomes as a key issue and then renders this down in the commentary to a question of "security of occupancy". These are unavoidable functions of undertaking an exploitive activity in a highly valued marine environment. They are issues that can't actually be addressed without necessarily compromising environmental standards. In our view this means they fail at a fundamental level and as such they should be removed as Issues from V1. The Issue that should be raised here is that of consenting process efficacy – seeking to maximise the efficiency of the environmental assessment process, such as through the adoption of bay by bay assessment processes, without compromising on the environmental assessments and thresholds that the activity necessarily demands.</p> |
| | | | 91.12 | Volume One | Chapter: 13 | Provision: Objective 13.21 | Neutral | <p>This objective should refer to marine farming in appropriate locations and densities</p> |

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| 91.13 | Volume One | Chapter: 13 | Provision: Policy 13.21.1 | Neutral | <p>1. We agree that marine farming outside of AMAs and within the enclosed waters of the Sounds is inappropriate.</p> <p>2. The utility of CMU's for managing marine farms is limited to administrative. This should be clarified in the commentary to the policy.</p> <p>3. (f) should be deleted as it does not contemplate meeting environmental standards at all and stands to clash with other environmentally focused policies.</p> <p>4. creating new AMA space with a view toward only allocating it to displaced existing consent holders from elsewhere is inequitable – the wider public is just as entitled to the use of that public marine space as someone who has previously had a consented activity elsewhere.</p> |
| 91.14 | Volume One | Chapter: 13 | Provision: Policy 13.21.3 | Neutral | <p>1. That this policy commence with the qualifier "To the extent possible within environmental standards and other parameters, AMAs (other than ASAs) are established...."</p> <p>2. Policy 13.21.3 should be amended to also require specific regard to the matters outlined in Issue 13O.</p> <p>3. Considerations should include the utility or suitability of the particular area to aquaculture activities – with reference to the likes of product yield history, water currents and water depth.</p> <p>4. For the purpose of paragraph (c) clarify that "recognised navigation routes" includes any point to point line of navigation that is likely to be used by recreational boats for open speed navigation.</p> <p>5. paragraph (e) should be rewritten to something along the lines as follows: "Outside of areas that are likely, singularly or cumulatively, to have a more than minor adverse effect on the feeding or breeding activities of NZ King Shag, elephant fish, dolphins, high value recreational fish species such as cod, sole, flounder, snapper or kawahai, and other important species"</p> <p>6. Paragraph (f) should be corrected to account for buffer zones – e.g. by adding the words "or their buffer zones" after the following wording "ecologically significant marine sites"</p> |
| 91.15 | Volume One | Chapter: 13 | Provision: New provision | Neutral | <p>We submit that a policy along the following lines should be added after Policy 13.21.3: Policy 13.21.3.1 - The size or area of any AMA or AMAs shall be determined with regard to the following criteria: a) The containment of filter feeding aquaculture to within the pelagic effects standard as prescribed by paragraph 2.2 of the Aquaculture Stewardship Council ASC Bivalve Standard version 1.1 March 2019. b) The avoidance of significant adverse effects on natural character values or natural landscape values. c) The avoidance of any other significant adverse effects on indigenous ecosystems and habitats. d) The Issues outlined in Issue 13O.</p> |
| 91.16 | Volume One | Chapter: 13 | Provision: Policy 13.21.4 | Neutral | <p>Accordingly, we submit that the following areas (currently CMZ 1 areas under the MSRMP) be added to Policy 13.21.4(a): • Tuhitarata Bay, in Beatrix Bay • The head waters of Clova Bay • Hopai Bay in Crail Bay • The north side of Kenepuru Sound from Skiddaw Bay around to Mills Bay • The south side of Kenepuru Sound from Broughton Bay to the Kenepuru Heads</p> |
| 91.17 | Volume One | Chapter: 13 | Provision: Policy 13.21.5 | Neutral | <p>1. What is needed is an extraordinary activity threshold that must be met before more AMA's can be added within the Sounds. We submit that policy 13.21.5 be amended to the effect that a new AMA must be for an aquaculture activity that cannot, for biophysical or hydrodynamic reasons, be undertaken within the existing AMA space in the Sounds.</p> <p>2. We submit that a cumulative effect paragraph must be added to the policy before paragraph (a). This new paragraph should provide that a new AMA must not be created if it is likely to result in or contribute to the exceedance of any of the cumulative effect thresholds identified in proposed new Policy 13.21.3.1 above.</p> <p>3. Paragraph (a) should not refer to a CMU as effects can cross CMU boundaries. Rather, it should refer to the 'area of influence'. An area of influence is self-explanatory – it is the area that the activities actually influence.</p> <p>4. As noted in section 4 above, paragraph (a) is crafted on the ASC Standard for benthic effects and does not facilitate any regard to cumulative effects. The new paragraph submitted for in (1) above (which includes application of the ASC Standard for pelagic effects) must be included to effect any cumulative limit.</p> <p>5. Paragraph (c) is far too narrow and is inappropriately worded. We submit that this paragraph should be rewritten as follows: " the location of an AMA and subsequent marine farm will not narrow any navigable channel resulting in a speed restriction nor otherwise have any more than minor adverse effects on navigation, including by encroachment on lines of point to point navigation" (</p> <p>6. It is not appropriate that regard only be had to amenity values to the extent that they are affected by lights or noise from proposed farm activity. Paragraph (e) should thus be amended to require regard to be had to the matters referred to at Issue 13O, including visual amenity broadly.</p> <p>7. In paragraphs (b)(ii), (d) and (e) "significant" effects should be replaced by "no more than minor" effects. A plan change in an environment that is already considered to be full should demand adverse effect thresholds that are, at the very least, as stringent as they are when applying for a non-complying resource consent under section 104D(1)(a).</p> <p>8. There is reference to a Values Report 2018. We submit that it should be made clear: • That values are dynamic matters of fact that cannot be dictated by a plan and that the Values Report has not been notified and consulted on and as such it does not form part of V1. • That the Values Report is also not intended to be comprehensive, nor is it intended to be a representation or constraint on Council's view on the values for any area, and nor is it intended to be representative of the values held by the communities or other stakeholders in areas.</p> |

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| 91.18 | Volume One | Chapter: 13 | Provision: Policy 13.21.6 | Neutral | <p>1. Reference to Values Report should be deleted.</p> <p>2. "recognised navigation routes" should, for this purpose, be defined in the same way as proposed for policy 13.21.3.</p> <p>3. paragraph (c) should be rewritten to something along the lines as follows: "Outside of areas that are likely, singularly or cumulatively, to have a more than minor adverse effect on the feeding or breeding activities of NZ King Shag, elephant fish, dolphins, high value recreational fish species including cod, sole, flounder snapper or kawahai, and other important species"</p> <p>4. Paragraphs (g) and(h) set a threshold for effects of 'significant'. This is inappropriate. The threshold for effects such as these should be no more than minor.</p> <p>5. A new paragraph should be added requiring that applications for marine farms under this policy must also demonstrate that the proposed activity will comply with the pelagic effects standard as prescribed by paragraph 2.2 of the Aquaculture Stewardship Council ASC Bivalve Standard version 1.1 March 2019.</p> |
| 91.19 | Volume One | Chapter: 13 | Provision: Policy 13.21.7 | Neutral | <p>1. We support the policy of managing demand for coastal marine space by way of an allocation scheme.</p> <p>2. Policy 13.21.7(b) be amended by adding the wording as indicated below: For space in AMAs created as part of the notified variation to the plan, other than FAMAs, and subject to any need to control or regulate activity in order to manage environmental issues including cumulative effects, authorisations for marine farming.....</p> <p>3. Policy 13.21.7(b) should be amended as follows: (1) The second sentence in paragraph (b) should be changed to read: "Subject to paragraph (g), Council shall have discretion as to where and to what extent an existing consent holder is granted an allocation right or rights in an AMA. In exercising this discretion Council shall adopt the following principles: (2) At the beginning of each of paragraphs (b)(i) to (iv) add the words: "Where possible and to the degree that Council in its discretion determines," (3) Add a new paragraph (ba) as follows: (ba) Council may elect to move to publicly tender some or all authorisations for an AMA or AMAs created as part of the notified variation to the plan if and to the extent that Council considers the allocation procedure under paragraph (b) to be impractical or inefficient to implement.</p> <p>4. Our submission is thus that Council has made an inadequate assessment and has failed to meet the threshold required by section 165H(1) of the Resource Management Act 1991 to allocate consent rights other than by way of tender.</p> <p>5. we submit that the following new policy (g) is required: (g) Allocations for second term resource consents in AMAs created as part of the notified variation to the plan or by private plan change shall be publicly tendered.</p> <p>6. We support paragraph (c) of Policy 13.21.7</p> <p>7. we submit that paragraph (d)(ii) be replaced with the following: Filter feeding aquaculture in the relevant area of influence is and will remain within the limits prescribed in the pelagic effects standard in paragraph 2.2 of the Aquaculture Stewardship Council ASC Bivalve Standard version 1.1 March 2019 and the additional marine farming activities can be undertaken without more than minor adverse effects on the human use values of the relevant area.</p> <p>8. Subject to our comments on public tendering above, we support paragraph (e).</p> <p>9. Paragraph (f) should commence with the words "Subject to paragraph (g)".</p> |
| 91.20 | Volume One | Chapter: 13 | Provision: Issue 13O | Support | We support Issue 13O. However, note our submission point above to the effect that these Issues must also be brought into objective 13.21 and policies 13.21.3, 13.21.4 and 13.21.5 for the purposes of determining where and how much aquaculture is appropriate. |
| 91.21 | Volume One | Chapter: 13 | Provision: Objective 13.22 | Neutral | This is about the management of marine farms once they are established. We submit that the wording be amended by adding "avoiding or" before "minimised" in the first sentence. |
| 91.22 | Volume One | Chapter: 13 | Provision: Policy 13.22.1 | Neutral | We thus submit that references in Policy 13.22.1 to the management of cumulative effects are incorrect and should be deleted. We submit that a further policy should be added requiring monitoring and the review of consent conditions to ensure the containment of filter feeding aquaculture to the pelagic effects standard as prescribed by paragraph 2.2 of the Aquaculture Stewardship Council ASC Bivalve Standard version 1.1 March 2019. |
| 91.23 | Volume One | Chapter: 13 | Provision: Policy 13.22.2 | Neutral | This policy requires the removal of structures upon the cessation of activity. This policy should extend to a forfeiture of consent rights where activity is abandoned for 5 years or more. |
| 91.24 | Volume One | Chapter: 13 | Provision: Policy 13.22.3 | Support | We take the opportunity to highlight the contradiction that this Policy raises within V1. It, quite rightly, prescribes a precautionary approach for the addition of one new marine farm activity. However, at the same time V1 is facilitating the renewal of all existing activity as a controlled activity when it is in the same field and is facing the same uncertainty and potentially significant adverse effects. |
| 91.25 | Volume One | Chapter: 13 | Provision: Policy 13.22.4 | Support | We support this policy. |
| 91.26 | Volume One | Chapter: 13 | Provision: Policy 13.22.5 | Neutral | We make the following submissions with regard to this policy: i) There is no need for reference CMUs in this policy. CMU's are not relevant parameters to ecological effect assessments. ii) The threshold for a response in paragraph (b) should be more than minor effects, not significant effects. iii) Assuming the ASC Standard pelagic effect standard is, as we submit, adopted as a cumulative effect tool, then there should be a clause added requiring a review toward the adoption of better models or measurement systems for water column effects if and when they become available. iv) It would be remiss to not note in the commentary that long term monitoring and data collection are unlikely, of themselves, to assist with the meaningful determination of the effects of existing farming. |

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| 91.27 | Volume One | Chapter: 13 | Provision: Policy 13.22.6 | Oppose | We urge the Council policy section to develop some policy and rules to outline a pathway to stop/replace the use of synthetic material with an associated time line to stop this significant adverse effect for insertion into V1 as a matter of urgency. |
| 91.28 | Volume One | Chapter: 13 | Provision: Policy 13.22.7 | Neutral | We support most of the standards imposed but make the following submissions: i) There is requirement to have a gap of at least 50m between farms to allow for public access to the foreshore. There should also be gap of at least 50m wide through a farm for every 200m of surface structure. This is because some farms are over a kilometre long and as such there is a need to ensure that there are appropriate breaks in structures within farms to facilitate public coastal access. ii) There should be more objective standards set to control amenity impacts, such as a prohibition on night vessel activity (light or noise) in at least moderately populated areas such as the Kenepuru Sound or the Beatrix Basin. |
| 91.29 | Volume One | Chapter: 13 | Provision: Policy 13.22.8 | Neutral | Landscape values are not already, or will not become as a result of the spreading, significantly adversely effected by development. Thus paragraph (iii) as proposed by V1 should be deleted. As such, we submit that any application for more area or more intensive marine farming within an AMA must meet the criteria as outlined in our proposed new policy 13.21.3.1, with the threshold test with regard to issues identified in Issue 13O being no more than minor. Security of structures is another issue that should be accommodated – longer lines within a consented site will generally only be achievable by effecting more acutely angled anchor lines - and this increases the fragility of the structures and brings accordant risks to the public and the environment. As an aside, we take "area occupied" to be a reference to surface area, as any change to consented area itself would require a new resource consent. However, it may be worth being more specific in the provisions when referencing 'area' or 'area occupied'. In our view it is inappropriate for the commentary to this policy to state that the effects of changing the layout of structures for an established farm 'will be only minor' and these comments should be deleted. This policy goes much further than that and stands to facilitate potentially significant adverse effects, not only cumulative ecological, natural character or landscape effects, but also with site specific effects such as navigation, public access and safety, recreational use and visual amenity. |
| 91.30 | Volume One | Chapter: 13 | Provision: Policy 13.22.9 | Neutral | We submit that there needs to be a further standard added to this enabling policy to the effect that the new species must have the same or lesser demand on primary production (i.e. base community structure such as phytoplankton or zooplankton) than the currently consented species, and must also have the same or lesser depositional impact on the benthic environment. |
| 91.31 | Volume One | Chapter: 13 | Provision: 13.M.37 | Neutral | A more pragmatic and appropriate Method would be that as recommended in the NB Report as "larger scale field manipulations" ⁴³ . The issues identified by the NB Report with farmer resistance with this method would not exist if, as we have submitted, an at risk area(s) is/are necessarily farmed down to an acceptable level under the pelagic effects ASC Standard. This will afford an ideal opportunity to undertake the recommended field work and to empirically measure the degree of community change that occurs with the changing intensity of cultured bi-valve activity. |
| 91.32 | Volume One | Chapter: 13 | Provision: 13.M.39 | Neutral | As we have indicated in our submission on 13.21.7, we submit that Council needs to allocate the first round of consent rights by discretion and adopt more of a take it or leave it approach to the allocation decisions it makes. |
| 91.33 | Volume One | Chapter: 13 | Provision: 13.AER.20 | Neutral | We submit that the anticipated environmental results table should reflect an AER and/or Monitoring Effectiveness should encompass not exceeding the standards for benthic or pelagic effects as specified in the Aquaculture Stewardship Council ASC Bivalve Standard Version 1.1 |
| 91.34 | Volume Two | Chapter: 16 | Provision: 16.4 | Oppose | We submit that there are no grounds made for the adoption of controlled activity status for any Sounds aquaculture activity and neither are there any grounds made for the non-notification of consent applications for aquaculture activities within the Sounds. We submit that a rapidly changing environment and public demands and values means that consenting for aquaculture within AMAs in the Sounds should be, at the least, limited discretionary. Moreover, all consent applications for aquaculture in the Sounds should be notified unless it is dictated by the NES that they should not be notified. We submit that there must, at the least, be an explicit policy adopted of either restricting consent terms or restricting the issue of future authorisations where the term of a prospective consent is likely to transgress a future plan review. |
| 91.35 | Volume Two | Chapter: 16 | Provision: 16.4.3 | Neutral | We submit that such applications should be, at the least, limited discretionary with notification as it will inevitably be a complete relocation or a significant relocation. We also submit that there is no provision to control structures to effect public access to the coast – this necessary to ensure that there are 50m wide access lanes through the farm to the shore if lines in a farm exceed 200m in length. There should also be discretion over the use of synthetic structures, such as plastic ties and structure rope, and over operation times to protect amenity and to avoid noise at inappropriate times. |
| 91.36 | Volume Two | Chapter: 16 | Provision: 16.4.4 | Neutral | Rule 16.4.4 applies to replacement consents for the same area in an ASA. The activity status should be limited discretionary. We also submit that there should be provision to control structures to effect public access to the coast – this necessary to ensure that there is 50m wide access lanes to the shore if lines in a farm exceed 200m in length. There should also be controls over the use of synthetic structures, such as plastic ties and structure rope, and over operation times to protect amenity and to avoid noise at inappropriate times. |

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| | | | 91.37 | Volume Two | Chapter: 16 | Provision: 16.4.5 | Neutral | Rule 16.4.5 applies to replacement consent within an AMA. This should be limited discretionary. We also submit that there should be discretion over structures to effect public access to the coast – this necessary to ensure that there is 50m wide access lanes to the shore if lines in a farm exceed 200m in length. There should also be discretion or controls over the use of synthetic structures, such as plastic ties and structure rope, and over operation times to protect amenity and to avoid noise at inappropriate times. There should also be discretion or controls over genetic and biosecurity issues and also to manage farming density or intensity if required because new species bring different filtration rates or different benthic deposition capacity. |
| | | | 91.38 | Volume Two | Chapter: 16 | Provision: 16.5.2 | Neutral | Rule 16.5.2 applies to qualify new farms in an ASA as limited discretionary. We submit that these applications should be notified with discretion specifically reserved in full to manage cumulative effects on natural character or natural landscape values and to manage the attainment of ASC Standard pelagic and benthic standards. Discretion should also be specifically reserved over structures to effect public access to the coast – this necessary to ensure that there is at least 50m wide access lanes through to the shore if lines in a farm exceed 200m in length. There should also be discretion over the use of synthetic structures, such as plastic ties and structure rope, and over operation times to protect amenity and to avoid noise at inappropriate times. |
| | | | 91.39 | Volume Two | Chapter: 16 | Provision: 16.5.3 | Neutral | Rule 16.5.3 applies to qualify a new farm in an AMA as limited discretionary. We make the same submission for this policy as we do for Policy 16.5.2: Rule 16.5.2 applies to qualify new farms in an ASA as limited discretionary. We submit that these applications should be notified with discretion specifically reserved in full to manage cumulative effects on natural character or natural landscape values and to manage the attainment of ASC Standard pelagic and benthic standards. Discretion should also be specifically reserved over structures to effect public access to the coast – this necessary to ensure that there is at least 50m wide access lanes through to the shore if lines in a farm exceed 200m in length. There should also be discretion over the use of synthetic structures, such as plastic ties and structure rope, and over operation times to protect amenity and to avoid noise at inappropriate times. |
| | | | 91.40 | Volume Two | Chapter: 16 | Provision: 16.5.4 | Neutral | Rule 16.5.4 applies to an qualify an extension of surface area of an existing farm within an AMA as limited discretionary. We submit that these applications should be notified with discretion specifically reserved in full to manage cumulative effects on natural character or natural landscape values and to manage the attainment of ASC Standard pelagic and benthic standards. Discretion should also be specifically reserved over structures to effect public access to the coast – this necessary to ensure that there is at least 50m wide access lanes to the shore if lines in a farm exceed 200m in length. There should also be discretion over the use of synthetic structures, such as plastic ties and structure rope, and over operation times to protect amenity and to avoid noise at inappropriate times. |
| | | | 91.41 | Volume Two | Chapter: 16 | Provision: 16.6.14 | Support | We agree that residual “within AMA” activities should be discretionary. |
| | | | 91.42 | Volume Two | Chapter: 16 | Provision: 16.6.15 | Neutral | No consideration has been given to the potential risks of the discharge of feed or medicinal or therapeutic compounds associated with conventional long line bi-valve filter feeder farming. This is pertinent given the activity covers such a potentially wide area. We submit that this should thus be a prohibited activity unless and until there has been comprehensive study undertaken of the potential environmental risks of such a wide reaching practice. |
| | | | 91.43 | Volume Two | Chapter: 16 | Provision: 16.7 | Support | Rule 16.7.9 – we agree that marine farming should be a prohibited activity outside of an AMA. |
| | | | 91.44 | Volume Two | Chapter: 16 | Provision: 16.8 | Support | Rule 16.8 – we agree with a rule that applications cannot be made without authorisations. |
| | | | 91.45 | Volume Two | Chapter: 16 | Provision: 16.8.1 | Support | Rule 16.8.1 – we agree with Council suspending the receipt of applications and effecting the ability to process and hear together applications in common area. |
| | | | 91.46 | Volume Two | Chapter: 16 | Provision: 16.8.2 | Neutral | we refer to our submissions on Policy 13.21.7 and submit that Rule 16.8.2 should be amended to follow those submission points, including with regard to allocations being publicly tendered from the second AMA consent term and beyond, that allocations should also only be made if and to the extent that marine farming activity is and will be in accordance with the pelagic and benthic effect standards of the ASC Standard. Council must also reserve discretion to allocate first term AMA authorisations by tender if and to the extent that the procedure proposed of allocating first term consents to existing consent holders becomes too impractical or inefficient to implement. |
| | | | 91.47 | Volume One | Chapter: 13 | Provision: New provision | Support | Consequential Changes to Other PMEP Provisions Policy 13.2.3 – We agree that marine farm lapse periods should be 3 years. |
| | | | 91.48 | Volume One | Chapter: 13 | Provision: Policy 13.20.2 | Oppose | We disagree with a grandparenting allocation mechanism after the first term of AMA consents. Facilitating perpetual use entitlements is inequitable and inefficient. All AMA consents should be tendered after the first AMA consent term. |
| | | | 91.49 | Volume Four | All CMU | | Neutral | For the reasons given in submissions we submit that the extent and location of CMU’s and AMAs has not been appropriately determined and as such the CMUs and AMAs as depicted in the proposed overlay maps do not represent appropriate CMUs or AMAs. |
| 92 | Sanford Limited | Alison Undorf-Lay | 92.1 | Volume Two | Chapter: 25 | Provision: Existing marine farm | Support | Retain definition as proposed |
| | | | 92.2 | Volume Two | Chapter: 25 | Provision: Marine farm | Neutral | Amend the definition so that it is clear it relates to permits and locations contiguous with existing marine farms. |
| | | | 92.3 | Volume Two | Chapter: 25 | Provision: New provision | Support | Add new definition: ‘Equivalent space’ means equivalent in terms of farming production or its utility (e.g. spat catching/holding) and the ability to use that space. |

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| 92.4 | Volume One | Chapter: 13 | Provision: Introduction | Neutral | Replace "measured by consented surface area" in para 6 with "measured by consented backbone length". Amend to provide more flexibility to the 50m gap between farms by adding 'should generally be 50 meters between farms in different ownership'. |
| 92.5 | Volume One | Chapter: 13 | Provision: Policy 13.21.1 | Neutral | Policy 13.21.1(f) - Replace "equivalent amount of space" with "equivalent amount of farmable space" and add "the space provided is, as far as reasonably practical, to be equivalent space". A definition of equivalent space will need to be inserted, as per the submission above. |
| 92.6 | Volume One | Chapter: 13 | Provision: Policy 13.21.1 | Neutral | Replace Part 7A mechanism with a searchable map identifying the consent holder entitled to apply for a specific AMA area. (Examples of how this would look are attached to submission) (Sanford provided examples of this for Anakoha Bay, Elie Bay and Nikau Bay - see submission for maps) |
| 92.7 | Volume Four | All CMU | | Neutral | Sanford has provided a full set of maps for all Coastal Management Units (CMU) with this submission and signals that it will speak about the proposed yellow lines during the oral hearing. (Refer to Appendix 2 attached to submission). Sanford seeks that the yellow line versions of AMAs replace the Council's proposed redline versions. Sanford supports the AMA seaward and inshore boundaries, being shown as broken yellow lines denoting that some flexibility would significantly assist in the final relocation positioning. Once the farm is relocated, we propose that the colour of the AMA line change to red. Throughout the farm relocation process, Sanford seeks that the Council set up a 'backbone reconciliation inventory' in which an account is kept for each marine farm business tracking their authorised backbone metres (Dec 2021) against relocated backbone metres to ensure equivalent space is achieved. Where new space within the CMU is identified for new farms, this should be allocated to existing farmers needing to reconcile 'lost' backbone length rather than to new farmers. |
| 92.8 | Volume One | Chapter: 13 | Provision: Policy 13.21.2 | Oppose | Establish an iwi – industry – council working group to work on a solution |
| 92.9 | Volume One | Chapter: 13 | Provision: Policy 13.21.3 | Neutral | Replace 100 with 50m. AND Replace "in order to" with "where necessary to". AND Insert 'generally' before the reference to 50 and 300m. |
| 92.10 | Volume One | Chapter: 13 | Provision: Policy 13.21.6 | Oppose | Amend to 50 to read 20m |
| 92.11 | Volume One | Chapter: 13 | Provision: Policy 13.21.7 | Neutral | Delete and replace this policy and associated rules and methods with provisions establishing the layout for marine farming in the Marlborough Sounds after the Plan becomes operative. That should include the layout of both the AMA generally and where individual marine farms within it are to be located, which consent holders can apply, and in what locations; inside each AMA - i.e. as set out in the MAF-AQNZ yellow-line version. As much as possible, all marine farm (backbone length) relocations should be predetermined and allocated on revised CMU maps. Sanford has provided a full set of revised CMU maps with this submission, proposing how the above can be achieved while ensuring Sanford retains the same amount of authorised farming space. Within each AMA, identify the individual farms and where they move from and to: (a) Where the farm's position and the direction of lines are the same or less, this move should be a controlled activity. (b) Where the intention is to lay out the farm blocks differently, e.g. a different orientation, it should be a restricted discretionary activity with limited notification to adjoining marine farm owners. (c) Within each of the sites, identify the areas which are farmable (i.e. areas that would contain the farmed species/growing structures and areas which would only be used for moorings); and (d) To record the above in an integrated Sounds-wide map and corresponding database, detailing where every longline will be moved from and where it will be moved to. (e) Where an AMA lacks space for a farm to move into (e.g. Sanford Site 8539), there should be a process for the permit holder to relocate lost lines into equivalent space elsewhere in the Sounds. For example, Sanford Sites 8511 and Site 8512 could be extended with less than a minor impact on CMU integrity. (e) the Plan should provide for this reconciliation as described above as a controlled activity. |
| 92.12 | Volume One | Chapter: 13 | Provision: Policy 13.21.7 | Neutral | Policy 13.21.7(b)(i) - Delete the words from "to accommodate" through to the end of the sentence. Policy 13.21.7(b)(ii) - Amend to so that same space is measured as a combination of backbone metres and production quality, i.e. pick up nuances of 'same.' Policy 13.21.7(b)(iii) Refer to Sanford submission in respect of policy 13.21.7 for the alternative allocation regime method. Policy 13.21.7(b)(iv) - Replace "space" with "equivalent space" in both locations where that word is found. Provide guidance in the policy for moving or amending the proposed AMA line, i.e. where equivalent space in an alternative location is not provided; AMAs should be created in the existing farm's location. For example where: - 1. AMA space is not provided for a farm; 2. Alternative AMA space is too small; 3. AMA is not equivalent, does not have the same use-value; 4. There is no room in the AMA adjacent to the site; 5. Incurs significant relocation costs/effort for minimal benefit; 6. Could give rise to community concerns as to whether the move into the AMA creates disbenefits, e.g. Site 8283 and navigation Policy 13.21.7(c)- Delete the words "before any new marine farm consents can be exercised" and replace with "while allowing a transition period of up to 24 months". Policy 13.21.7(d) - Delete "or the extension of Existing Marine Farms in AMAs". (Also seeking related definition amendment). Insert a new paragraph that would enable the extension of marine farming sites where appropriate environmental standards are met to provide additional lines, i.e. to offset lost backbone lines elsewhere from a farm in the same ownership. |

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| 92.13 | Volume One | Chapter: 13 | Provision: Policy 13.22.1 | Oppose | Delete. Remove reference to ES Requires more discussion as to what is being monitored, including how other users generating bay-wide effects such as forestry will be considered. |
| 92.14 | Volume One | Chapter: 13 | Provision: Policy 13.22.2 | Oppose | Delete 13.22.2(a)(ii) |
| 92.15 | Volume One | Chapter: 13 | Provision: Policy 13.22.3 | Oppose | Delete Policy 13.22.3(b) and (c) |
| 92.16 | Volume One | Chapter: 13 | Provision: Policy 13.22.5 | Oppose | Seeks deletion of both whole policy and 13.22.5(d). |
| 92.17 | Volume One | Chapter: 13 | Provision: Policy 13.22.7 | Neutral | Policy 13.22.7(b) - Replace with: "For marine farms using conventional longline structures, the lines will be generally positioned with 10m spacing between each longline." Policy 13.22.7(c) - Replace with: "Current gaps are retained where adjacent marine farms are in different ownership")" |
| 92.18 | Volume One | Chapter: 13 | Provision: Policy 13.22.8 | Neutral | In (a) delete the words "no greater than 10% increase to the total area occupied by structures and" and delete (b) in its entirety. |
| 92.19 | Volume One | Chapter: 13 | Provision: Policy 13.22.9 | Oppose | Delete 13.22.9(f). |
| 92.20 | Volume One | Chapter: 13 | Provision: 13.M.37 | Neutral | Need to alter the text to enable changes sought to Policy 13.22.1. Replace "understand water column effects" with "better understand water column effects". |
| 92.21 | Volume One | Chapter: 13 | Provision: New provision | Support | Add a policy that allows the applicant to assess whether the move is efficient and effective. |
| 92.22 | Volume Two | Chapter: 16 | Provision: 16.4.3.1 | Neutral | Replace "6 months" with "24 months". |
| 92.23 | Volume Two | Chapter: 16 | Provision: 16.4.3.2 | Oppose | Delete the Standard or amend so the calculation is done per company, not per licence, and information held by the Council. |
| 92.24 | Volume Two | Chapter: 16 | Provision: 16.4.3.3 | Oppose | Delete the Standard. |
| 92.25 | Volume Two | Chapter: 16 | Provision: 16.4.3.5 | Neutral | Delete 16.4.3.5 and 16.4.3.7 and delete the words "layout, positioning (including density)" from 16.4.3.6. |
| 92.26 | Volume Two | Chapter: 16 | Provision: 16.4.3.6 | Neutral | Delete the words "layout, positioning (including density)" |
| 92.27 | Volume Two | Chapter: 16 | Provision: 16.4.3.7 | Neutral | Delete matter of control 16.4.3.7 |
| 92.28 | Volume Two | Chapter: 16 | Provision: 16.4.3.8 | Neutral | Replace "equivalent area" with "equivalent backbone length". |
| 92.29 | Volume Two | Chapter: 16 | Provision: 16.4.5.9 | Oppose | Delete this matter of control. |
| 92.30 | Volume Two | Chapter: 16 | Provision: 16.6.14 | Neutral | Insert a space after "ancillary discharges to water" so that the remaining part of the sentence relates to both 16.6.14(a) and (b). AND Replace "Prohibited Activity" with "Discretionary Activity". |
| 92.31 | Volume Two | Chapter: 16 | Provision: 16.8.1 | Support | Retain provision |
| 92.32 | Volume Two | Chapter: 16 | Provision: 16.8.2 | Neutral | Make necessary consequential amendments if the alternative allocation regime proposed by MFA/AQNZ is not adopted. |
| 92.33 | Volume Two | Chapter: 16 | Provision: 16.8.2 | Oppose | Rule 16.8.2.6 - Replace this rule with one which provides for farms that lose space and/or authorised lines in the relocation to be added to other sites in the same ownership irrespective of which CMU they are in. |
| 92.34 | Volume Two | Chapter: 16 | Provision: 16.8.2 | Oppose | 16.8.2.9 - Delete Rule 16.8.2.9. |
| 92.35 | Volume Three | Appendix: 11 | Appendix item: Species authorised to be farmed within the Marlborough region's coastal waters | Oppose | Amend the list so that it is not species-specific and replace it with more generic terms such as • Finfish • Seaweeds • Molluscs etc |
| 92.36 | Volume One | Chapter: 13 | Provision: Heading | Oppose | Policy 13.2.3 (a) -Delete insertion |
| 92.37 | Volume Four | All AMA in a CMU | | Oppose | Move the farming into the AMA, which is a soft shape, so there is sufficient flexibility for anchors. |
| 92.38 | Volume Four | All AMA in a CMU | | Neutral | Replace the proposed AMA 'red' boundaries as depicted in Variation 1 and 1A maps with those 'yellow' boundaries attached to this submission, refer to Appendix 2. These amended maps 'yellow' boundaries were drawn up in consultation with Sanford and other marine farmers, and represent our best efforts in a constrained timeframe, further revision may be needed. Relief sought for Sanford farms, amend the AMA adjacent to our sites as proposed by the MFA-AQNZ alternative yellow line maps. As soon as possible and prior to the Plan becoming operative reconcile the relocation of backbone lines to ensure there is no loss. During the transitioning from 'existing' to 'within the AMA', amend the seaward and inshore lines of each AMA so that it is dotted, i.e. a soft, flexible yellow line. Following the confirmation of where the farm will be relocated to, fix the dotted line by moving it to a solid red line. Indicate where each farm will move from and to. Provide for reconciling, which is where backbone lines may be moved between sites over time to ensure that the overall, aggregated effect for each coastal permit holder is that their business is no worse off because of the proposed Plan. In spaces within AMAs where there won't be any farm structure, e.g. the ~50m gap between farms, use a softer shade of the AMA red. This will provide a visual signal to readers of the Plan that not all the AMA space is available to be farmed. Create a new AMA between Mary's Bay and Homeward Bay – where there is space for reconciling backbone length lost elsewhere. This is not about additional water space, but is for relocating backbone length. |
| 92.39 | Volume One | Chapter: 13 | Provision: New provision | Support | Add a new policy to the Plan for calculating the area within the licence that can be farmed. Amend the Council's smart maps by including an additional layer that records useable space on the licence |

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| | | | 92.40 | Volume Four | All CMU | | Neutral | Variation 1 and 1A list of inappropriately located farms should mirror the agreement of the MAWG, less the two farms where the tubeworms were subsequently identified as exotic (Site 8258 and Site 8259). Sanford signals that it agrees to amend the location of our sites which were identified in the MAWG process, by either: - • moving the farm in its entirety, • removing some lines or • spreading 'inappropriate lines' across other Sanford farms such as For example, Site 8555 in Clova Bay, which could be relocated to Site 8550 and Site 8548. Relocate Crail Bay Site 8539 by adding one line width to the Sanford farms on the other side of the Bay and widening that AMA accordingly. Allocate in the proposed Plan AMAs for all farms (including those deemed inappropriate), i.e. show where Site 8212 will move to. Reinstate Site 8299 and Site 8300. These are important spat holding and seed growing areas that cannot be replicated in alternative locations. They were also not part of the MAWG identified inappropriate farms discussion. |
| | | | 92.41 | Volume Four | All AMA in a CMU | | Neutral | Rezone areas around proposed salmon farm finfish sites as intensive aquaculture and provide for multispecies such as salmon and mussels. |
| | | | 92.42 | Volume Four | All CMU | | Neutral | Amend the AMA boundaries for all CMU as proposed in mapping attached to the submission. |
| | | | 92.43 | Volume Two | Chapter: 16 | Provision: 16.5 | Neutral | Delete Replace this policy and associated rules and methods with provisions establishing the layout for marine farming in the Marlborough Sounds after the Plan becomes operative. That should include the layout of both the AMA generally and where individual marine farms within it are to be located, which consent holders can apply, and in what locations; inside eachAMA - i.e. as set out in the MAF-AQNZ yellow-line version As much as possible, all marine farm (backbone length) relocations should be predetermined and allocated on revised CMU maps. Sanford has provided a full set of revised CMU maps with this submission, proposing how the above can be achieved while ensuring Sanford retains the same amount of authorised farming space; refer to Appendix 2 of our submission to view these maps. Within each AMA, identify the individual farms and where they move from and to: (a) Where the farm's position and the direction of lines are the same or less, this move should be a controlled activity. (b) Where the intention is to lay out the farm blocks differently, e.g. a different orientation, it should be a restricted discretionary activity with limited notification to adjoining marine farm owners. (c) Within each of the sites, identify the areas which are farmable (i.e. areas that would contain the farmed species/growing structures and areas which would only be used for moorings); and (d) To record the above in an integrated Sounds-wide map and corresponding database, detailing where every longline will be moved from and where it will be moved to. (e) Where an AMA lacks space for a farm to move into (e.g. Sanford Site 8539), there should be a process for the permit holder to relocate lost lines into equivalent space elsewhere in the Sounds. For example, Sanford Sites 8511 and Site 8512 could be extended with less than a minor impact on CMU integrity. (e) the Plan should provide for this reconciliation as described above as a controlled activity. |
| | | | 92.44 | Volume Four | CMU 11: Crail Bay | CMU item: CMU 11 Aquaculture Management Area - AMA 1 | Neutral | Relocate Crail Bay Site 8539 by adding one line width to the Sanford farms on the other side of the Bay and widening that AMA accordingly. |
| | | | 92.45 | Volume Four | CMU 39: Squally Cove | CMU item: CMU 39 Aquaculture Management Area - New AMA | Neutral | Reinstate Site 8299 and Site 8300. These are important spat holding and seed growing areas that cannot be replicated in alternative locations. They were also not part of the MAWG identified inappropriate farms discussion. |
| 93 | Ngāti Apa ki te Rā Tō Charitable | Simon Karipa | 93.1 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Oppose | The relief we seek in relation to the Variations is that both be amended to allow the opportunity for settlement |
| 94 | Pearson | Mark Pearson | 94.1 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Oppose | I would oppose ANY further placement of salmon farms within the Marlborough Sounds. I would go so far as to advocate the removal of existing salmon farms in areas where they could possibly come into contact with native fish. ☐ |
| | | | 94.2 | Volume One | Chapter: 13 | Provision: Policy 13.22.6 | Oppose | the problem with plastic rubbish (both large bits and microplastics) related to the aquaculture industry needs to be much better addressed. |
| 95 | Te Rūnanga o Ngāi Tahu | Rakihia Tau | 95.1 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Oppose | Recommends: <ul style="list-style-type: none"> • withdraw Variation 1A • establish a working group between iwi, Te Ohu, MPI, the Council and, where appropriate, industry representatives, to address issues relating to settlement and any other opportunities, including re-design and provide a new Variation 1A that gives effect to the Crown's settlement obligations that arise from the Settlement Act. • amend the proposed variations to enable iwi to obtain space-based settlement assets in the Marlborough coastal marine area; • amend provisions in both variations to recognise likely changes and developments in climate change and technology over the next 20 years. |
| 96 | Beleve Limited, R J Davidson Family Trust, and Treble Tree Holdings Limited | R D Sutherland | 96.1 | Volume Four | CMU 11: Crail Bay | CMU item: CMU 11 Aquaculture Management Area - AMA 10 | Neutral | Amend the AMA to reflect space re- consented in 2020, as shown on 082 map 'Wet Inlet - Crail Bay' attached to the MFA/AQNZ submission. (Marine farm 8531) |
| | | | 96.2 | Volume Four | CMU 39: Squally Cove | CMU item: CMU 39 Aquaculture Management Area - AMA19 | Neutral | Include the existing farm within the AMA (Marine Farm 8627) |
| | | | 96.3 | Volume Four | CMU 3: Beatrix Bay | CMU item: CMU 3 Aquaculture Management Area - AMA 3 | Support | Retain AMA as proposed. (Marine farm 8623) |
| | | | 96.4 | Volume Four | CMU 6: Clova Bay | CMU item: CMU 6 Aquaculture Management Area - AMA 4 | Neutral | a) Draw the AMA as per the MFA/AQNZ submission map 075 'Te Puraka - Pelorus Sound'; OR b) Retain the AMA as proposed; OR c) Place the AMA around the installed space. (Marine farm 8263) |

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| | | | 96.5 | Volume Four | CMU 2: Anakoha Bay | CMU item: CMU 2 Aquaculture Management Area - AMA 2 | Neutral | a) Retain AMA as proposed; OR b) Draw the AMA as per the MFA/ AQNZ submission map 088 'Anakoha Bay'; OR c) Place the AMA around the existing consented/installed site. (Marine farm 8153) |
| | | | 96.6 | Volume Two | Chapter: 16 | Provision: 16.4 | Support | Existing marine farms should be 'renewed' as a controlled activity without notification |
| | | | 96.7 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Neutral | - AMAs should be drawn in the way set out in this submission, provided that no existing marine farm loses area, total backbone length and if the farm is shifting from its existing space it is moved into equivalent space; or - The existing marine farm(s) should stay where they are currently installed (including when they are offsite); or - The existing marine farm(s) should shift into new space as long as they do not lose area, total backbone length and the move is into equivalent space. If someone makes a submission that any existing marine farm should be removed from its current location, and that submission is accepted, then that farm(s) should move into new space in bays where there is currently marine farming. That is consistent with the principle of no loss of marine farming space and no loss of backbone length. |
| 97 | Kapua Marine Farms Limited | R D Sutherland | 97.1 | Volume Four | CMU 4: Catherine Cove | CMU item: CMU 4 Aquaculture Management Area - AMA6 | Neutral | Amend the AMA as shown on map 010 'Catherine Cove - D'Urville Island' in the MFA/AQNZ submission. (Marine farm 8005) |
| | | | 97.2 | Volume Four | CMU 4: Catherine Cove | CMU item: CMU 4 Aquaculture Management Area - AMA3 | Support | Retain the AMA as proposed. (Marine farm 8008) |
| | | | 97.3 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Neutral | At a high level, Kapua Marine Farms Limited submits that: (a) Existing marine farms should be 'renewed' as a controlled activity without notification; and (b) AMAs should be drawn in the way set out in this submission, provided that no existing marine farm loses area, total backbone length and if the farm is shifting from its existing space it is moved into equivalent space; or (c) The existing marine farm(s) should stay where they are currently installed (including when they are offsite); or (d) The existing marine farm(s) should shift into new space as long as they do not lose area, total backbone length and the move is into equivalent space. If someone makes a submission that any existing marine farm should be removed from its current location, and that submission is accepted, then that farm(s) should move into new space in bays where there is currently marine farming. That is consistent with the principle of no loss of marine farming space and no loss of backbone length. |
| | | | 97.4 | Volume Two | Chapter: 16 | Provision: 16.4 | Support | Existing marine farms should be 'renewed' as a controlled activity without notification; |
| 98 | Kuku Holdings Limited | R D Sutherland | 98.1 | Volume Four | CMU 28: Maud Island | CMU item: CMU 28 Aquaculture Management Area - AMA 14 | Neutral | a) Place the AMA around the installed/consented farm and include space sought under application U200493 (marine farm 8217); OR b) Amend the AMA as shown on map 074 'Tawhitinui Bay -Tawhitinui Reach' attached to the MFA/AQNZ submission, as well as providing additional room in that AMA for the space sought under application U200493. |
| | | | 98.2 | Volume Four | CMU 1: Admiralty Bay | CMU item: CMU 1 Aquaculture Management Area - AMA 26 | Neutral | Place the AMA around the existing installed/consented space, as per the MFA/AQNZ submission map 036 'Island Bay- Admiralty Bay'. (Farm 8038) |
| | | | 98.3 | Volume Four | CMU 1: Admiralty Bay | CMU item: CMU 1 Aquaculture Management Area - AMA 14 | Support | Retain AMA as proposed. (Marine farm 8026) |
| | | | 98.4 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Neutral | At a high level, Kuku Holdings Limited submits that: (a) Existing marine farms should be 'renewed' as a controlled activity without notification; and (b) AMAs should be drawn in the way set out in this submission, provided that no existing marine farm loses area, total backbone length and if the farm is shifting from its existing space it is moved into equivalent space; or (c) The existing marine farm(s) should stay where they are currently installed (including when they are offsite); or (d) The existing marine farm(s) should shift into new space as long as they do not lose area, total backbone length and the move is into equivalent space. |
| | | | 98.5 | Volume Two | Chapter: 16 | Provision: 16.4 | Neutral | Existing marine farms should be 'renewed' as a controlled activity without notification |
| 99 | Ngati Rarua Atiawa Trust Board | R D Sutherland | 99.1 | Volume Four | CMU 21: Hikapu Reach | CMU item: CMU 21 Aquaculture Management Area - AMA 1 | Neutral | a) Draw the AMA as per the MFA/AQNZ submission map 033 'Hikapu Reach -Pelorus Sound'; OR b) Retain AMA as proposed; OR c) Place the AMA around the installed/consented farm. (Marine farm 8570) |

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| | | | 99.2 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Neutral | <p>At a high level, Ngati Rarua Atiawa Iwi Trust Board submits that:</p> <p>(a) Existing marine farms should be 'renewed' as a controlled activity without notification; and</p> <p>(b) AMAs should be drawn in the way set out in this submission, provided that no existing marine farm loses area, total backbone length and if the farm is shifting from its existing space it is moved into equivalent space; or</p> <p>(c) The existing marine farm(s) should stay where they are currently installed (including when they are offsite); or</p> <p>(d) The existing marine farm(s) should shift into new space as long as they do not lose area, total backbone length and the move is into equivalent space. See submission for details.</p> <p>If someone makes a submission that any existing marine farm should be removed from its current location, and that submission is accepted, then that farm(s) should move into new space in bays where there is currently marine farming. That is consistent with the principle of no loss of marine farming space and no loss of backbone length.</p> |
| | | | 99.3 | Volume Two | Chapter: 16 | Provision: 16.4 | Neutral | Existing marine farms should be 'renewed' as a controlled activity without notification. |
| 100 | Goulding Trustees Limited | Jim Goulding & Julian Goulding | 100.1 | Volume Four | CMU 43: Waitata Bay | CMU item: CMU 43 Aquaculture Management Area - AMA 6 | Oppose | <p>The relief that we seek is as follows: (a) For the most part, draw the AMA as per the MFA/AQNZ submission [Steamboat Bay, Waitata Bay] except for a small change on the SW corner of the AMA. The alternative proposal set out in the attached map [8097 Proposed AMA Map.jpg] (proposed changes ref 'Adjusted MFA AMA' in legend); OR (b) Draw the AMA as per the MFA/AQNZ submission [Steamboat Bay, Waitata Bay]; OR (c) Place the AMA around the consented and/or actual space (marine farm 8097). The reasons for seeking the above relief is as follows: (a) The SW corner is to follow the proposed MDC AMA to create a straight line allowing for the appropriate warp length of the relocated inside lines. (b) This would generally meet the principles of the Marlborough Aquaculture Review Working Group (MARWG). (c) This would enable the farm to continue to provide ecosystem services. (d) This would maintain employment and development in the region. (e) MFA AMA allows space for the loss of inshore lines to be transferred offshore upon incorporating relief option (a).</p> |
| | | | 100.2 | Volume Four | CMU 43: Waitata Bay | CMU item: CMU 43 Aquaculture Management Area - AMA 8 | Oppose | <p>The relief that we seek is as follows: (a) For the most part, Draw the AMA as per the MFA?AQNZ submission [Camp Bay, Waitata Bay] except for a small change on the NW corner of the AMA. The alternative proposal set out in the attached map [8095 Proposed AMA Map.jpg](proposed changes ref 'Adjusted MFA AMA' in legend) OR (b) Draw the AMA as per the MFA/AQNZ submission [Steamboat Bay, Waitata Bay]; or (c) Place the AMA around the consented and/or actual space (Marine Farm 8095). The reasons for seeking the above relief is as follows: (a) NW Corner has been adjusted to allow for practical farming shape and to minimize the loss in backbone length while maintaining the 100m distance from shore. (b) This would generally meet the principles of the Marlborough Aquaculture Review Working Group (MARWG). (c) This would enable the farm to continue to provide ecosystem services. (d) This would maintain employment and development in the region. (e) MFA AMA allows space for the loss of inshore lines to be transferred offshore upon incorporating relief option (a).</p> |
| | | | 100.3 | Volume Four | CMU 43: Waitata Bay | CMU item: CMU 43 Aquaculture Management Area - AMA 1 | Oppose | <p>The relief that we seek is as follows: (a) Draw the AMA as per the MFA/AQNZ submission [Hamilton Cove, Waitata Bay]; OR (b) Place the AMA around the consented and/or actual space. The reasons for the relief we seek is as follows: (a) This would generally meet the principles of the Marlborough Aquaculture Review Working Group (MARWG). (b) This would enable the farm to continue to provide ecosystem services. (c) This would maintain employment and development in the region. (d) MFA AMA allows space for the loss of inshore lines to be transferred offshore. (Marine Farm 8102)</p> |
| | | | 100.4 | Volume Four | CMU 43: Waitata Bay | CMU item: CMU 43 Aquaculture Management Area - AMA 2 | Oppose | <p>The relief we seek is as follows: (a) Draw the AMA as per the MFA/AQNZ submission [Hamilton Cove, Waitata Bay]; OR (b) Place the AMA around the consented and/or actual space (Marine Farm 8102). The reasons for the relief we seek is as follows: (a) This would generally meet the principles of the Marlborough Aquaculture Review Working Group (MARWG). (b) This would enable the farm to continue to provide ecosystem services. (c) This would maintain employment and development in the region. (d) This would avoid the sensitive benthic areas. (e) MFA AMA allows space for the loss of inshore lines to be transferred offshore.</p> |
| | | | 100.5 | Volume Four | CMU 43: Waitata Bay | CMU item: CMU 43 Aquaculture Management Area - AMA 3 | Oppose | <p>The relief we seek is as follows: (a) Draw the AMA as per the MFA/AQNZ submission [Turner Bay, Waitata Bay]; OR (b) Place the AMA around the consented and/or actual space (Marine Farm 8100). The reasons for the relief we seek is as follows: (a) This would generally meet the principle of the Marlborough Aquaculture Review Working Group (MARWG). (b) This would enable the farm to continue to provide ecosystem services. (c) This would maintain employment and development in the region. (d) MFA AMA allows space for the loss of inshore lines to be transferred offshore.</p> |
| | | | 100.6 | Volume Four | CMU 43: Waitata Bay | CMU item: CMU 43 Aquaculture Management Area - AMA 8 | Oppose | <p>We seek the following relief: (a) Draw the AMA as per the MFA/AQNZ submission [Camp Bay, Waitata Bay]; OR (b) Place the AMA around the consented and/or actual space (Marine Farm 8093). Reasons for the relief we seek is as follows: (a) This would generally meet the principles of the Marlborough Aquaculture Review Working Group (MARWG). (b) This would enable the farm to continue to provide ecosystem services. (c) This would maintain employment and development in the region. (d) MFA AMA allows space for the loss of inshore lines to be transferred offshore.</p> |

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| 100.7 | Volume Four | CMU 36: Port Ligar | CMU item: CMU 36 Aquaculture Management Area - AMA 11 | Oppose | The relief we seek is as follows: (a) Draw the AMA as per the MFA/AQNZ submission [Fishing Bay, Port Ligar]; OR (b) Place the AMA around the consented and/or actual space (Marine Farm 8062). The reasons we seek the above relief is as follows: (a) This would generally meet the principles of the Marlborough Aquaculture Review Working Group (MARWG). (b) This would enable the farm to continue to provide ecosystem services, including King Shag considerations. (c) This would maintain employment and development in the region. (d) MFA AMA follows the existing consent as per MARWG King Shag suggestions. |
| 100.8 | Volume Four | CMU 28: Maud Island | CMU item: CMU 28 Aquaculture Management Area - AMA 16 | Oppose | We seek the following relief: (a) Draw the AMA as per the MFA/AQNZ submission [Horseshoe Bay]; OR (b) Place the AMA around the consented and/or actual space (Marine Farm 8207). Reasons for the relief we seek are as follows: (a) This would generally meet the principles of the Marlborough Aquaculture Review Working Group (MAWRG). (b) This would enable the farm to continue to provide ecosystem services, including King Shag Considerations. (c) This would maintain employment and development in the region. (d) MFA AMA allows space for the loss of inshore lines to be transferred offshore. |
| 100.9 | Volume Two | Chapter: 16 | Provision: 16.4 | Support | Existing marine farms should be 'renewed' as a controlled activity without notification |
| 100.10 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Neutral | At a high level, Goulding Trustees Limited submits that: (a) Existing marine farms should be 'renewed' as a controlled activity without notification; and (b) AMAs should be drawn in the way set out in this submission, provided that no existing marine farm loses area, total backbone length and if the farm is shifting from its existing space it is moved into equivalent space; or (c) The existing marine farm(s) should stay where they are currently installed (including when they are offsite); or (d) The existing marine farm(s) should shift into new space as long as they do not lose area, total backbone length and the move is into equivalent space. If someone makes a submission that any existing marine farm should be removed from its current location, and that submission is accepted, then that farm(s) should move into new space in bays where there is currently marine farming. That is consistent with the principle of no loss of marine farming space and no loss of longline length. |
| 100.11 | Volume Four | CMU 28: Maud Island | CMU item: CMU 28 Aquaculture Management Area - AMA 17 | Oppose | We seek the following relief: (a) Draw the AMA as per the MFA/AQNZ submission [Horseshoe Bay]; OR (b) Place the AMA around the consented and/or actual space. Reasons for the relief we seek are as follows: (a) This would generally meet the principles of the Marlborough Aquaculture Review Working Group (MAWRG). (b) This would enable the farm to continue to provide ecosystem services, including King Shag Considerations. (c) This would maintain employment and development in the region. (d) MFA AMA allows space for the loss of inshore lines to be transferred offshore. |
| 100.12 | Volume Four | CMU 28: Maud Island | CMU item: CMU 28 Aquaculture Management Area - Finfish AMA 6 | Oppose | We seek the following relief: (a) Draw the AMA as per the MFA/AQNZ submission [Horseshoe Bay]; OR (b) Place the AMA around the consented and/or actual space (Marine farm 8531). Reasons for the relief we seek are as follows: (a) This would generally meet the principles of the Marlborough Aquaculture Review Working Group (MAWRG). (b) This would enable the farm to continue to provide ecosystem services, including King Shag Considerations. (c) This would maintain employment and development in the region. (d) MFA AMA allows space for the loss of inshore lines to be transferred offshore. |
| 100.13 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Neutral | Goulding Trustees limited supports the submission of MARINE FARMING ASSOCIATION and AQUACULTURE NEW ZEALAND in its totality and adopts it as its submission. |

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| 102 | McGuinness Institute | Wendy McGuinness | 102.1 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Oppose | <ul style="list-style-type: none"> We seek the deletion of every objective, policy, rule or other method that is inconsistent with the Government's aquaculture strategy, or the amendment of those provisions and/or addition of new provisions to ensure the strategy is implemented, but we go further. We seek provisions: <ul style="list-style-type: none"> That finfish farming be either landbased or deepsea based by 2040. Both the Queen Charlotte and Pelorus Sounds become finfish free by 2040. A transitional plan is developed and agreed to cover this transition from 2022 to 2040. That provisions are introduced to preclude any new marine finfish farms from being given a coastal permit in the inner and outer Queen Charlotte or Pelorus Sounds (with the view the existing Long Island - Kokomohua Marine Reserve⁴³ be extended from west to east, connecting Ship Cove, Motuara Island bird sanctuary⁴⁴ and Arapawa Island). That the existing coastal permit system continues, but that more work is done at enabling the farms to be seen as a group, and as such having group impacts; and to the extent that the Plan enables finfish farming in the Marlborough Sounds, it does so on the basis that no sites are pre-determined to be appropriate, and applications for any sites are open to full assessment on a case-by-case basis, with appropriate weight able to be put on environmental values. Public consultation and legal processes must continue to be available to the public. The public's success to date indicates how important these processes are, and are indicative of the changing values and expectations in society and in the law. For policy to be durable, it needs to be flexible and trusted. That the NZKS application for offshore aquaculture should be treated as simply another application in the Marlborough Sounds. It should not be treated separately, as it is within the 10 nautical miles and therefore forms part of the MDC area of management. Furthermore, landbased aquaculture, inshore aquaculture and offshore aquaculture operate together as one business model, therefore, in our view, their impacts cannot be assessed in isolation. That limits and targets are included in variation 1 and 1A to provide clarity of purpose and improve public trust and transparency over intentions and guide decision making. A bird sanctuary be created around the black shags, so they are managed and researched to improve and support biodiversity within the Marlborough Sounds. We support the concept of Coastal Marine Unit (CMU) and the resulting 45 units, however we believe a mechanism needs to be put in place to bring them together so as to understand interconnections and improve public policy outcomes. The fact that the proposed CMUs traverse land and ocean, supports our view that an integrated approach is necessary to bring about the intention of the RMA (section 5, 6 and 7). Such other changes to the provisions of Variations 1 and 1A (whether those are alternative, additional or consequential to the changes outlined above) as may be required to address the issues identified above. |
| | | | 102.2 | Volume One | Chapter: 13 | Provision: Issue 13O | Neutral | The marine mammal sanctuary be extended, regulated and researched, with a particular focus on the Hector's dolphins. The sanctuary could run along the mouth of all three entry points (to the Tory Channel, the Queen Charlotte and Pelorus) and up to French Pass. A bird sanctuary be created around the black shags, so they are managed and researched to improve and support biodiversity within the Marlborough Sounds. |
| | | | 102.3 | Volume Four | All AMA in a CMU | | Oppose | Offshore CMU - That the NZKS application for offshore aquaculture should be treated as simply another application in the Marlborough Sounds. It should not be treated separately, as it is within the 10 nautical miles and therefore forms part of the MDC area of management. Furthermore, landbased aquaculture, inshore aquaculture and offshore aquaculture operate together as one business model, therefore, in our view, their impacts cannot be assessed in isolation. |
| | | | 102.4 | Volume Four | All AMA in a CMU | | Oppose | That provisions are introduced to preclude any new marine finfish farms from being given a coastal permit in the inner and outer Queen Charlotte or Pelorus Sounds (with the view the existing Long Island - Kokomohua Marine Reserve be extended from west to east, connecting Ship Cove, Motuara Island bird sanctuary and Arapawa Island). |
| 103 | McCarthy | S.G.T McCarthy | 103.1 | Volume Four | CMU 4: Catherine Cove | CMU item: CMU 4 Aquaculture Management Area - AMA7 | Neutral | (a) Draw the AMA as per the MFA/AQNZ submission map 010 'Catherine Cove - D'Urville Island'; OR (b) Retain AMA as proposed. (Marine Farm 8004) |
| | | | 103.2 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Neutral | <p>At a high level, S.G.T McCarthy submits that:</p> <p>(a) existing marine farms should be 'renewed' as a controlled activity without notification; and</p> <p>(b) AMAs should be drawn in the way set out in this submission, provided that no existing marine farm loses area, total backbone length and if the farm is shifting from its existing space it is moved into equivalent space;</p> <p>or</p> <p>(c) The existing marine farms should stay where they are currently installed (including when they are offsite);</p> <p>or</p> <p>(d) The existing marine farm(s) should shift into new space as long as they do not lose area, total backbone length and the move is into equivalent space.</p> <p>If someone makes a submission that any existing marine farm should be removed from its current location, and that submission is accepted, then that farm(s) should move into new space in bays where there is currently marine farming. That is consistent with the principle of no loss of marine farming space and no loss of backbone length.</p> |
| | | | 103.3 | Volume Two | Chapter: 16 | Provision: 16.4 | Support | At a high level, S.G.T McCarthy submits that existing marine farms should be 'renewed' as a controlled activity without notification |

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| 104 | Elkington and McCarthy | T.R. Elkington and S.G.T. McCarthy Elkington and McCarthy | 104.1 | Volume Four | CMU 4: Catherine Cove | CMU item: CMU 4 Aquaculture Management Area - New AMA | Oppose | a) Draw the AMA as per the attached map 'Marine Farm 8002 -Cherry Tree Bay' dated 25 February 2021, relocating marine farm 8002 slightly offshore of its existing location within Cherry Tree Bay; OR b) Amend the mapping of the AMA to include an AMA around the installed/consented site 8002; OR c) Relocate site 8002 to equivalent space in an alternative bay in the Marlborough Sounds. |
| | | | 104.2 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Neutral | At a high level, T.R. Elkington and S.G.T. McCarthy submit that: (a) Existing marine farms should be 'renewed' as a controlled activity without notification; and (b) AMAs should be drawn in the way set out in this submission, provided that no existing marine farm loses area, total backbone length and if the farm is shifting from its existing space it is moved into equivalent space; or (c) The existing marine farm(s) should stay where they are currently installed (including when they are offsite); or (d) The existing marine farm(s) should shift into new space as long as they do not lose area, total backbone length and the move is into equivalent space. If someone makes a submission that any existing marine farm should be removed from its current location, and that submission is accepted, then that farm(s) should move into new space in bays where there is currently marine farming. That is consistent with the principle of no loss of marine farming space and no loss of backbone length. |
| | | | 104.3 | Volume Two | Chapter: 16 | Provision: 16.4 | Support | At a high level, T.R. Elkington and S.G.T. McCarthy submit that: Existing marine farms should be 'renewed' as a controlled activity without notification; |
| 105 | Orman | Bridget and Tony Orman | 105.1 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Oppose | The time is for the Marlborough District Council to self examine it's perspective of the Marlborough Sounds. Reassessment needed Accordingly the council needs to urgently re-evaluate its Marlborough Sounds policy. It needs to jettison its policy of seeing the Sounds in an exploitation light and to see it in an environmental light with economic benefits from outdoor recreation, scenic values and tourism use. Of concern is that aquaculture occupies public sea bed space but pays no rates. Rates from aquaculture could be used to fund research and monitoring which seems to be lacking. Monitoring should not be done by the 'laissez-faire' policy of relying on complaints from the public. Apart from divers seeing sludge under farms, how is the public to see and complain about ill effects under the water? Monitoring needs to be more regular - not a lax five year gap. Early or preferably six monthly monitoring would be advisable. Summary Rather than "rolling over" aquaculture renewals, a positive move should be made to relocate mussel farms and salmon farms into open water as is done in other parts of New Zealand, e.g. Coromandel. In a nutshell there are aspects of aquaculture which need addressing:- MDC needs to jettison the "industrial use" policy and focus on the public's environment, outdoor recreation and tourism which generates regional economic activity |
| | | | 105.2 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Oppose | No more aquaculture in the Sounds. Growth rates of farmed mussels have declined strongly suggesting the carrying capacity for mussel farms has been exceeded. There should be no future for fin fish farming in the Sounds, water or land based. Aquaculture should be moved to open waters. |
| | | | 105.3 | Volume One | Chapter: 13 | Provision: New provision | Support | The aquaculture which continues to occupy the public's space for private profit, pay no rates. It is logical that they pay rates and at amounts which covers environmental policing and compliance |
| 107 | Ngāi Tahu Seafood | Thomas Hildebrand | 107.1 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Neutral | Amend provisions in both variations to recognise likely changes and developments in technology over the next 20 years. |
| | | | 107.2 | Volume Two | Chapter: 25 | Provision: AMA | Neutral | Amend the definition of AMA to recognise that an ASA could be used for all types of aquaculture, and so could be both an ASA and a FAMA. |
| | | | 107.3 | Volume Four | CMU 1: Admiralty Bay | CMU item: CMU 1 Aquaculture Management Area - AMA 42 | Neutral | The AMA should be reconsidered and moved further offshore if required (Marine farm site 8054) |
| | | | 107.4 | Volume Four | CMU 2: Anakoha Bay | CMU item: CMU 2 Aquaculture Management Area - AMA 1 | Neutral | Either (in order of preference): 1. Redraw the proposed AMA to provide sufficient space for marine farm sites 8145 and 8146; 2. Ngāi Tahu Seafood is aware of the proposed mapping of Anakoha Bay undertaken by the Marine Farming Association as part of its submission. Provided the mapping is implemented in its entirety, this may provide a suitable amount of space for the two Ngāi Tahu Seafood sites; 3. Provide an AMA over the existing farm sites, and adjust the relevant policies through the variations to ensure it is possible to obtain consent. |
| | | | 107.5 | Volume Four | CMU 3: Beatrix Bay | CMU item: CMU 3 Aquaculture Management Area - AMA 6 | Neutral | Either (in order of preference): 1. Extend the proposed AMA seawards so that it provides equivalent space to the area covered by the current consents; or 2. Provide an AMA over the existing farm site, and adjust the relevant policies through the variations to ensure it is possible to obtain consent. (Marine farm site 8252) |
| | | | 107.6 | Volume Four | CMU 6: Clova Bay | CMU item: CMU 6 Aquaculture Management Area - AMA 4 | Neutral | Either (in order of preference): 1. Extend the proposed AMA seawards so that it provides equivalent space to the area covered by the current consents; or 2. Provide an AMA over the existing farm site, and adjust the relevant policies through the variations to ensure it is possible to obtain consent. Marine farm site 8265 |
| | | | 107.7 | Volume Four | CMU 3: Beatrix Bay | CMU item: CMU 3 Aquaculture Management Area - Finfish AMA 5 | Support | Confirm the proposed AMA. |

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| | | | 107.8 | Volume Four | CMU 3: Beatrix Bay | CMU item: CMU 3 Aquaculture Management Area - AMA 6 | Support | Confirm the proposed AMA. |
| | | | 107.9 | Volume One | Chapter: 13 | Provision: Policy 13.21.6 | Neutral | Define 'recognised navigational routes'. Amend Policy 13.21.6(b) as follows (insert between * _ *, delete between [_]): 'Outside areas *where marine farming would adversely affect* significant breeding or feeding habitat for New Zealand King Shag, elephant fish, dolphins and [other important species]' and include other species rather than the current catch-all phrase. The Values Report 2018 does not appear to be readily available. |
| | | | 107.10 | Volume One | Chapter: 13 | Provision: Policy 13.22.1 | Oppose | Delete Policy 13.22.1 and replace it with a more appropriately tailored monitoring and management policy. |
| | | | 107.11 | Volume One | Chapter: 13 | Provision: Policy 13.22.5 | Neutral | Amend Policy 13.22.5 as follows: (b) Monitoring (including monitoring undertaken in accordance with Policy 13.22.1 shows significant adverse ecosystem effects from marine farming are occurring; or... |
| | | | 107.12 | Volume One | Chapter: 13 | Provision: Policy 13.22.7 | Neutral | Amend Policy 13.22.7(b) and (c) to recognise current situations where no significant adverse effects are occurring as a result of spacing different to that specified within the policies, and to provide flexibility for line spacing so that the most effective use can be made of available marine farming space |
| | | | 107.13 | Volume One | Chapter: 13 | Provision: Policy 13.22.7 | Neutral | Amend Policy 13.22.7(g) to recognise the difficulty of determining the source of noise or odour effects |
| | | | 107.14 | Volume One | Chapter: 13 | Provision: Policy 13.22.8 | Neutral | Amend Policy 13.22.8 so that it covers finfish farming as well |
| | | | 107.15 | Volume One | Chapter: 13 | Provision: Policy 13.22.9 | Oppose | Delete Policy 13.22.9 (a) and (d) as finfish and discharge of feed should be considered based on proper evaluation of effects at the proposed marine farm and AMA. |
| | | | 107.16 | Volume One | Chapter: 13 | Provision: Policy 13.22.9 | Oppose | Delete Policy 13.22.9(f) |
| | | | 107.17 | Volume One | Chapter: 13 | Provision: 13.M.37 | Neutral | Amend Method 13.M.37 consequential to amendments made to Policy 13.22.1. Amend the explanation of Method 13.M.37 to remove reference to measuring the cumulative adverse effects of marine farms |
| | | | 107.18 | Volume One | Chapter: 13 | Provision: 13.AER.18 | Neutral | Amend monitoring for 13.AER.18 to provide more detail on Council's actions or approaches in response to public complaints about the effects of marine farming. |
| | | | 107.19 | Volume Three | Appendix: 11 | Appendix item: Species authorised to be farmed within the Marlborough region's coastal waters | Neutral | Add the following to Appendix 11: Sea cucumber (<i>Stichopus molis</i>) Geoduck (<i>Panopea zelandica</i>) |
| | | | 107.20 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Oppose | V1A: Finfish Farming Schedule of Changes is withdrawn replaced with a fit-for-purpose Variation |
| | | | 107.21 | Volume One | Chapter: 13 | Provision: Policy 13.21.1 | Neutral | Policy 13.21.1(b) Policy 13.21.1(e) Policy 13.21.1(f) - That the identification of AMAs for some of the NTS sites on the maps are not consistent with the approach identified in the policies, so either the decisions requested in terms of the maps need to be made, or the policy framework needs to be adjusted so that it is more accurate |
| | | | 107.22 | Volume One | Chapter: 13 | Provision: Policy 13.21.3 | Neutral | That the identification of AMAs for some of the NTS sites on the maps are not consistent with the approach identified in the policies, so either the decisions requested in terms of the maps need to be made, or the policy framework needs to be adjusted so that it is more accurate |
| 108 | Marlborough Recreational Fishers Association | John Leader, Des Boyce and Lawrence Stevenson | 108.1 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Oppose | It has been clearly shown that rearing salmon in the Sounds is not a viable economic activity, and NZ King Salmon should be encouraged to pursue alternative, preferable land-based methods. |
| | | | 108.2 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Neutral | For mussel farms, Council should mandate yearly monitoring of activities, to ensure that farming can continue in a sustainable fashion, without seriously impinging on the rights of other users of the Sounds, and allowing recreational fishing to proceed. In addition, coastal occupancy charges should be introduced. This would enable funding for monitoring the activities of mussel farmers. Scallop fishery - We urge the MDC to manage its responsibility. |
| 109 | Guardians of the Sounds Inc | Clare Pinder and William Foster | 109.1 | Volume One | Chapter: 13 | Provision: Policy 13.22.1 | Oppose | Variation 1 must have yearly monitoring reports and the Council should be mandated to enforce rules that breach resource consents and degrade the environment. The Council cannot continue to be Industry led rather than scientifically based. Ensure that monitoring covers the extent to what the receiving environment can sustain without degrading the natural environment. Introduce costal occupancy charges to enable Council to do its own monitoring of mussel farms and extend ability to enforce the rules for salmon farms. |
| | | | 109.2 | Volume One | Chapter: 13 | Provision: Policy 13.22.10 | Oppose | Council should be mandated to take meaningful action on the rules they say are in place. Introduce costal occupancy charges to enable Council to do its own monitoring of mussel farms and extend ability to enforce the rules for salmon farms. |
| | | | 109.3 | Volume One | Chapter: 13 | Provision: Policy 13.21.5 | Oppose | Marine Farms: Ideally the distance should be 500 metres. Salmon Farms: The distance from ecologically significant sites from a salmon farm should be 1 km. These farms are using the sea to disperse waste from their activities and should ideally be land based where pollutants can be managed. It is no longer acceptable for human and dairy farm waste to be discharged into waterways. Fin fish farming is no different. |
| | | | 109.4 | Volume One | Chapter: 13 | Provision: Policy 13.21.6 | Oppose | Marine Farms: Ideally the distance should be 500 metres. Salmon Farms: The distance from ecologically significant sites from a salmon farm should be 1 km. These farms are using the sea to disperse waste from their activities and should ideally be land based where pollutants can be managed. It is no longer acceptable for human and dairy farm waste to be discharged into waterways. Fin fish farming is no different. |

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| | | | 109.5 | Volume One | Chapter: 13 | Provision: Policy 13.22.6 | Oppose | Mussel Farms: There should be a 2 week window for licence farmers to clean up their rubbish if notified and they should conduct a monthly check of areas that rubbish from the farms is known to drift to. How hard it is to essentially empty your rubbish bin. Salmon Farms: A two week window to clean up any identified rubbish and a monthly check of know areas that rubbish drifts or is blown to. Council to on-charge costs and report on their website |
| | | | 109.6 | Volume One | Chapter: 13 | Provision: Policy 13.22.10 | Oppose | The continuation of salmon farming in the Sounds is inconsistent with the NZCP precautionary principle policy 8. Take into account the cumulative effects of all users of the sounds both natural and man- made as under NZCP statement. |
| 110 | Kenepuru and Central Sounds Residents' Association | Andrew Caddie | 110.1 | Volume Four | CMU 28: Maud Island | CMU item: CMU 28 Aquaculture Management Area - Finfish AMA 6 | Oppose | The proposed site should be declined. |
| | | | 110.2 | Volume Four | CMU 44: Waitata Reach | CMU item: CMU 44 Aquaculture Management Area - Finfish AMA 7 | Oppose | The proposed site should be declined. |
| | | | 110.3 | Volume One | Chapter: 13 | Provision: Policy 13.21.7 | Neutral | Amend title to read "Authorisation Methodology – AMAs and FAMAs" |
| | | | 110.4 | Volume One | Chapter: 13 | Provision: Policy 13.21.7 | Neutral | 13. 21.7(h) be changed to "finfish marine farming" Amend ambiguity between the use of "same space", consented area and the definition of marine farm |
| | | | 110.5 | Volume One | Chapter: 13 | Provision: Policy 13.21.7 | Oppose | We recommend the deletion of the references to Waitata Reach CMU and Maud Island CMU in sub clause (h)(ii). |
| | | | 110.6 | Volume One | Chapter: 13 | Provision: Policy 13.21.7 | Oppose | These historical errors when siting marine farms should not we submit be "grandfathered" into the future. |
| | | | 110.7 | Volume One | Chapter: 13 | Provision: Policy 13.22.10 | Oppose | In short this Policy is we submit full of intentions but no substance and as such is basically flawed. However, some "substance" can be readily achieved by referring to the Best Management Practice guidelines for the benthic and water column as the guiding documents. Sub clauses (a)(i) to (a)(vi) should be replaced by a reference to the Best Management Practice guidelines for salmon farms in the Marlborough Sounds. |
| | | | 110.8 | Volume One | Chapter: 13 | Provision: Policy 13.22.10 | Oppose | The Enrichment Stage scale of 1 to 7 is a construct, created by combining 3 groups of Environmental Quality Standards parameters, where a weighted average is taken, which results in a single number between 1 and 7 on this Enrichment Stage scale. It is a handy shorthand, but is too broad brush we submit to use on its own, without the additional test of checking if specific EQS parameter values are consistent with the calculated ES number. It is a way of making sure that the calculated ES number is consistent with the observed or measured level of benthic degradation. |
| | | | 110.9 | Volume One | Chapter: 13 | Provision: Policy 13.22.11 | Oppose | After a careful read of Policy 13.22.1, it appears from the description that Policy 13.22.1 is only meant to apply for marine farms using longlines. Hopefully Council will sort its thinking out here. Accordingly we reserve our position to comment further once the drafting is confirmed. |
| | | | 110.10 | Volume One | Chapter: 13 | Provision: Policy 13.21.6 | Neutral | We note rule 16.6 but nevertheless recommend that the introduction to this Policy 13.21.16 be changed so that it refers within the policy at the start ' The appropriateness of marine farms within in the offshore [sic] CMU will be classified as discretionary activities and will be assessed" The opening paragraph of this policy should also go on to say "....and may be provided for, by way of example and not limitation, when they are located" |
| | | | 110.11 | Volume One | Chapter: 13 | Provision: Policy 13.21.6 | Oppose | Accordingly we recommend that the distinction be made to the introduction of this sub clause and wording added along the lines of "In the case of an AMA for bivalve farming more than 100 metres and in the case of a Finfish AMA more than 1800 metres from...." We recommend deleting the word "significantly" in clause 9g) (ii) to better ensure compliance with the NZCPS and Part 2 of the RMA. We note the use of the word "Outside" in sub clauses (a) to (g) is rather vague and underlines the need for such areas to have significant buffer zones given the large volumes of waste generated from a Finfish farm over a large footprint. |
| | | | 110.12 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Neutral | We reserve the right to submit further on this issue as the hearing process proceeds and /or we obtain expert professional advice. |
| 111 | Te Ātiawa Manawhenua Ki Te Tau Ihu Trust | Ian Shapcott | 111.1 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Oppose | Te Ātiawa urges precaution across the board and also the application of significant monitoring /compliance terms, along with, proactive adaptive management, in the event that it is approved: E tata tapahi, e roa whakatū (It can take a long time to repair a rash act.) |
| | | | 111.2 | Volume One | Chapter: 13 | Provision: Issue 130 | Oppose | With respect t to the proposed Variation 1, Te Ātiawa urges precaution across the board and the also application of significant monitoring /compliance terms, along with, proactive adaptive management, in the event that it is approved: E tata tapahi, e roa whakatū (It can take a long time to repair a rash act.) |
| | | | 111.3 | Volume One | Chapter: 13 | Provision: Policy 13.21.7 | Oppose | It is important that a sunset date is applied to all consents and that the rolling process results in re-tendering; a just position. This retendering should be weighted, first for iwi, second for local people and then for others. |
| | | | 111.4 | Volume One | Chapter: 13 | Provision: Policy 13.20.2 | Oppose | It is important that a sunset date is applied to all consents and that the rolling process results in re-tendering; a just position. This retendering should be weighted, first for iwi, second for local people and then for others. |
| | | | 111.5 | Volume Two | Chapter: 25 | Provision: Important species | Neutral | A place saver is required, within Variation 1, so that iwi can populate this provision over time. |
| | | | 111.6 | Volume One | Chapter: 13 | Provision: Issue 130 | Oppose | There is a need to turn marine farming aspirations to a less sensitive open ocean option and recast the way that the industry might address that. This could be similar to the commercial forestry functional model, where there are owners and a range of support service providers. If this approach isn't given front-foot attention in this process, it will evolve haphazardly and undesirably. The future needs to be confronted, proactively, |
| | | | 111.7 | Volume One | Chapter: 13 | Provision: Policy 13.21.2 | Neutral | MDC needs progressive guidance from Marlborough's Tangata Whenua Iwi |
| | | | 111.8 | Volume One | Chapter: 13 | Provision: Objective 13.22 | Support | Supports policy |

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| | | | 111.9 | Volume Two | Chapter: 16 | Provision: 16.4 | Oppose | Flexibility of provisions and consequent action is required to responsibly deal with each of these circumstances. |
| | | | 111.10 | Volume Two | Chapter: 16 | Provision: 16.5 | Neutral | All new decisions that are at a level above Controlled Activity status must be the subject of notified applications for resource consent, to enable iwi and the stakeholder community, communities of knowledge, to participate in the process to increase its robustness. |
| | | | 111.11 | Volume Two | Chapter: 16 | Provision: 16.6 | Neutral | All new decisions that are at a level above Controlled Activity status must be the subject of notified applications for resource consent, to enable iwi and the stakeholder community, communities of knowledge, to participate in the process to increase its robustness. |
| | | | 111.12 | Volume One | Chapter: 13 | Provision: Issue 13O | Neutral | For the variations to address that Te Ao Māori is a complete world operating in parallel to Te Ao Pākehā and that Te Ao Māori is a complete Māori cultural world, which mean the adverse effects cited in this instance concern 'everything'. (Inferred) |
| | | | 111.13 | Volume One | Chapter: 13 | Provision: Objective 13.22 | Oppose | The cost of Both SOE and specific marine farm performance monitoring /compliance must be met by the industry, as the industry is totally reliant on the public domain, not then private domain, for its existence and profit making. Rates must not cover these aspects. Iwi must be provided with exemption from all related fees / charges / costs, as colonization and its effects have negated the ability of iwi to have acted effectively as kaitiaki, which would have prevented the current parlous natural world state situation. |
| | | | 111.14 | Volume One | Chapter: 13 | Provision: Policy 13.22.1 | Neutral | Revisit the thresholds themselves at regular intervals, to respond to growing/changing knowledge. |
| | | | 111.15 | Volume One | Chapter: 13 | Provision: Heading | Neutral | Urgently address Coastal Occupancy Charges |
| | | | 111.16 | Volume One | Chapter: 13 | Provision: Issue 13O | Neutral | Te Ātiawa seeks the inclusion of intent to investigate and act on the 'micro plastic' threat in Variation 1. |
| | | | 111.17 | Volume One | Chapter: 13 | Provision: Heading | Neutral | For there to be adequate engagement and to show how the particular iwi values are acquired for these provisions. (Inferred) |
| | | | 111.18 | Volume One | Chapter: 13 | Provision: Heading | Neutral | All of those propositions need to be counter balanced by soundly understanding the cost of not acting alternatively. Then a balanced/safe conclusion is possible. |
| | | | 111.19 | Volume One | Chapter: 13 | Provision: Heading | Oppose | Provide an appropriate specific response in Variation 1? With respect t to the proposed Variation 1, Te Ātiawa urges precaution across the board and the also application of significant monitoring /compliance terms, along with, proactive adaptive management, in the event that it is approved: E tata tapahi, e roa whakatū (It can take a long time to repair a rash act.) |
| | | | 111.20 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Neutral | With respect to the proposed Variation 1A, Te Ātiawa urges precaution across the board and the also application of significant monitoring /compliance terms, along with, proactive adaptive management, in the event that it is approved: E tata tapahi, e roa whakatū (It can take a long time to repair a rash act.) |
| | | | 111.21 | Volume One | Chapter: 13 | Provision: Policy 13.22.10 | Oppose | Variation 1A For there to be a following /recovery year, applied to offset impacts. |
| | | | 111.22 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Oppose | That the Variation 1 and 1A process be put on hold, until Marlborough's Tangata Whenua Iwi have been adequately supported by the MDC to achieve a reasonable capacity to respond meaningfully, and that the related and applicable engagement process which follows this outcome offers sufficient breadth of 'collaborative management', as anticipated by Te Ātiawa Kaitiaki and affirmed by Te Tiriti o Waitangi. |
| | | | 111.23 | Volume One | Chapter: 13 | Provision: Policy 13.21.5 | Neutral | Add the principle : "Away from areas of particular significance to iwi." [inferred] |
| 112 | Apex Marine Farm Limited | Amanda Hills/ Emma Deason/ Bruce Hearn | 112.1 | Volume One | Chapter: 13 | Provision: Policy 13.22.7 | Support | Retain sub-policy (a) |
| | | | 112.2 | Volume One | Chapter: 13 | Provision: Policy 13.22.7 | Oppose | Delete sub-policy (b) in its entirety. Longline spacing is a matter that should be decided on a case by case basis. |
| | | | 112.3 | Volume Four | CMU 42: Tory Channel | CMU item: CMU 42 Aquaculture Management Area - AMA 6 | Support | Retain AMA as proposed. (Farm 8411) |
| | | | 112.4 | Volume Four | CMU 42: Tory Channel | CMU item: CMU 42 Aquaculture Management Area - AMA 7 | Support | Retain AMA as proposed (marine farm 8412) |
| | | | 112.5 | Volume Four | CMU 42: Tory Channel | CMU item: CMU 42 Aquaculture Management Area - AMA 8 | Support | Retain AMA as proposed. (Marine farm 8413) |
| | | | 112.6 | Volume Four | CMU 42: Tory Channel | CMU item: CMU 42 Aquaculture Management Area - AMA 9 | Support | Retain AMA as proposed. (Marine farm 8414) |
| | | | 112.7 | Volume Four | CMU 22: Inner Pelorus Sound | CMU item: CMU 22 Aquaculture Management Area - AMA 15 | Support | Retain AMA as proposed, provided this provides for sufficient room for the inside lines to remain within the AMA. (Marine farm 8328) |
| | | | 112.8 | Volume Four | CMU 22: Inner Pelorus Sound | CMU item: CMU 22 Aquaculture Management Area - AMA 5 | Support | a) Draw the AMA as per the MFA/AQNZ submission map 045 'Nikau Bay – Pelorus Sound', provided total backbone length is retained, as shown on MFA/AQNZ submission map 099 'Nikau Bay – Proposed AMA and Backbone Overlay'; OR b) Place the AMA around the consented and/or actual space [Farm 8382] |
| | | | 112.9 | Volume Four | CMU 17: Forsyth Bay | CMU item: CMU 17 Aquaculture Management Area - AMA 6 | Support | Retain AMA as proposed. (Marine farm 8114) |
| | | | 112.10 | Volume Four | CMU 42: Tory Channel | CMU item: CMU 42 Aquaculture Management Area - AMA 2 | Support | Draw the AMA as per the MFA/AQNZ submission map 044 'Ngaruru Bay – Tory Channel'. [Farm 8406] |

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| | | | 112.11 | Volume Four | CMU 37: Port Underwood | CMU item: CMU 37 Aquaculture Management Area - AMA 26 | Support | Retain AMA as proposed. (Marine farm 8433) |
| | | | 112.12 | Volume Four | CMU 37: Port Underwood | CMU item: CMU 37 Aquaculture Management Area - AMA 27 | Support | Retain AMA as proposed. (Marine farm 8432) |
| | | | 112.13 | Volume Four | CMU 37: Port Underwood | CMU item: CMU 37 Aquaculture Management Area - AMA 32 | Support | Retain AMA as proposed. (Marine farm 8429) |
| | | | 112.14 | Volume Four | CMU 37: Port Underwood | CMU item: CMU 37 Aquaculture Management Area - AMA 33 | Support | Retain AMA as proposed. (Marine farm 8427) |
| | | | 112.15 | Volume Four | CMU 31: Onapua Bay | CMU item: CMU 31 Aquaculture Management Area - New AMA | Oppose | Include three AMAs to provide for blocks A, B and C of the marine farm sought as part of Private Plan Change and concurrent resource consent applications U170038, U170039 and U170040. |
| | | | 112.16 | Volume Two | Chapter: 16 | Provision: 16.4 | Support | Existing marine farms should be 'renewed' as a controlled activity without notification |
| | | | 112.17 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Neutral | (a) Existing marine farms should be 'renewed' as a controlled activity without notification; and (b) AMAs should be drawn in the way set out in this submission, provided that no existing marine farm loses area, total backbone length and if the farm is shifting from its existing space it is moved into equivalent space; or (c) The existing marine farm(s) should stay where they are currently installed (including when they are offsite); or (d) The existing marine farm(s) should shift into new space as long as they do not lose area, total backbone length and the move is into equivalent space. If someone makes a submission that any existing marine farm should be removed from its current location, and that submission is accepted, then that farm(s) should move into new space in bays where there is currently marine farming. That is consistent with the principle of no loss of marine farming space and no loss of backbone length. |
| 113 | Talley's Group Limited | R D Sutherland | 113.1 | Volume Four | CMU 4: Catherine Cove | CMU item: CMU 4 Aquaculture Management Area - AMA8 | Neutral | a) Draw the AMA as per the MFA/AQNZ submission map 010 'Catherine Cove - D'Urville Island'; OR b) Retain the AMA as proposed. (Marine farm 8003) |
| | | | 113.2 | Volume Four | CMU 4: Catherine Cove | CMU item: CMU 4 Aquaculture Management Area - AMA5 | Support | Retain the AMA as proposed (Marine farm 8006) |
| | | | 113.3 | Volume Four | CMU 4: Catherine Cove | CMU item: CMU 4 Aquaculture Management Area - AMA1 | Neutral | a) Draw the AMA as per the MFA/ AQNZ submission map 010 'Catherine Cove - D'Urville Island'; OR b) Retain AMA as proposed. (Marine farm 8007) |
| | | | 113.4 | Volume Four | CMU 13: D'Urville Island | CMU item: CMU 13 Aquaculture Management Area - New AMA | Oppose | a) Relocate to equivalent space in an alternative bay, such as Outer Admiralty Bay or Okuri Bay, in line with the rest of this submission; OR b) Include site 8013 within an AMA, by creating an AMA around the consented space; OR c) Relocate to equivalent space in an alternative bay in the Marlborough Sounds, consistent with remainder of submission. (Marine farm 8013) |
| | | | 113.5 | Volume Four | CMU 1: Admiralty Bay | CMU item: CMU 1 Aquaculture Management Area - AMA 8 | Neutral | a) Draw the AMA as per the MFA/AQNZ submission map 018 'Deep Bay-Admiralty Bay'; OR b) Retain AMA as proposed. (Marine farm 8020) |
| | | | 113.6 | Volume Four | CMU 1: Admiralty Bay | CMU item: CMU 1 Aquaculture Management Area - AMA 28 | Support | Retain AMA as proposed. (Marine farm 8041) |
| | | | 113.7 | Volume Four | CMU 1: Admiralty Bay | CMU item: CMU 1 Aquaculture Management Area - AMA 29 | Support | Retain AMA as proposed. (Marine farm 8041) |
| | | | 113.8 | Volume Four | Near-shore CMU | | Oppose | a) Relocate site 8059 to equivalent space with equivalent characteristics in an alternative bay in the Marlborough Sounds, such as Outer Admiralty Bay, in line with the rest of this submission; OR b) Include site 8059 within an AMA, by creating an AMA around the consented space. |
| | | | 113.9 | Volume Four | CMU 36: Port Ligar | CMU item: CMU 36 Aquaculture Management Area - AMA 11 | Neutral | a) Draw the AMA as per the MFA/AQNZ submission map 022 'Fishing Bay- Port Ligar'; OR b) Retain AMA as proposed. (Marine farm 8063) |
| | | | 113.10 | Volume Four | CMU 36: Port Ligar | CMU item: CMU 36 Aquaculture Management Area - AMA 9 | Neutral | Draw the AMA as per the MFA/AQNZ submission map 091 'Maori Bay- Port Ligar'. (Marine farm 8067) |
| | | | 113.11 | Volume Four | CMU 36: Port Ligar | CMU item: CMU 36 Aquaculture Management Area - AMA 3 | Neutral | Draw the AMA as per the MFA/AQNZ submission map 009 'Cape Horn - Port Ligar'. (Marine farm 8075) |
| | | | 113.12 | Volume Four | CMU 17: Forsyth Bay | CMU item: CMU 17 Aquaculture Management Area - AMA 5 | Support | Retain AMA as proposed. (Marine farm 8113) |
| | | | 113.13 | Volume Four | CMU 17: Forsyth Bay | CMU item: CMU 17 Aquaculture Management Area - AMA 15 | Support | Retain AMA as proposed. (Marine farm 8123) |
| | | | 113.14 | Volume Four | CMU 28: Maud Island | CMU item: CMU 28 Aquaculture Management Area - AMA 6 | Neutral | Amend AMA to reflect actual consented/installed space, as per the MFA/AQNZ submission map 052 'Picnic Bay East-Tawhitinui Reach'. (Marine farm 8177) |
| | | | 113.15 | Volume Four | CMU 20: Hallam Cove | CMU item: CMU 20 Aquaculture Management Area - AMA 2 | Support | Retain AMA as proposed (Marine farm 8191) |
| | | | 113.16 | Volume Four | CMU 20: Hallam Cove | CMU item: CMU 20 Aquaculture Management Area - AMA 3 | Neutral | Amend AMA to reflect existing consented/installed space. - Marine farm 8192 |
| | | | 113.17 | Volume Four | CMU 28: Maud Island | CMU item: CMU 28 Aquaculture Management Area - AMA 1 | Support | Retain AMA as proposed (Marine farm 8202) |

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| 113.18 | Volume Four | CMU 28: Maud Island | CMU item: CMU 28 Aquaculture Management Area - AMA 16 | Neutral | a) Draw the AMA as per the MFA/AQNZ submission map 035 'Horseshoe Bay- Pelorus Sound'; OR b) Amend AMA to reflect existing consented/installed space. (Marine farm 8208) |
| 113.19 | Volume Four | CMU 3: Beatrix Bay | CMU item: CMU 3 Aquaculture Management Area - AMA 16 | Neutral | a) Draw the AMA as per the MFA/AQNZ submission maps 004 'Beatrix Bay Southwest - Pelorus Sound' and 037 'Kauauroa Bay- Pelorus Sound'; OR b) Amend AMA to reflect existing consented/installed space. - Marine farm 8228 |
| 113.20 | Volume Four | CMU 3: Beatrix Bay | CMU item: CMU 3 Aquaculture Management Area - AMA 6 | Neutral | a) Draw the AMA as per the MFA/AQNZ submission map 038 'Laverique Bay- Beatrix Bay'; OR b) Amend AMA to reflect existing consented/installed space. (Marine farm 8253) |
| 113.21 | Volume Four | CMU 28: Maud Island | CMU item: CMU 28 Aquaculture Management Area - AMA 9 | Neutral | a) Draw the AMA as per the MFA/AQNZ submission map 055 'Rams Head West - Tawhitinui Reach'; OR b) Amend AMA to reflect existing consented/installed space. - Marine farm 8311 |
| 113.22 | Volume Four | CMU 28: Maud Island | CMU item: CMU 28 Aquaculture Management Area - AMA 10 | Neutral | Draw the AMA as per the MFA/AQNZ submission map 054 'Rams Head East -Tawhitinui Reach'; OR Amend AMA to reflect existing consented/installed space - Marine farm 8317 |
| 113.23 | Volume Four | CMU 28: Maud Island | CMU item: CMU 28 Aquaculture Management Area - AMA 9 | Neutral | a) Draw the AMA as per the MFA/AQNZ submission map 055 'Rams Head West - Tawhitinui Reach'; OR b) Retain AMA as proposed (Marine farm 8315) |
| 113.24 | Volume Four | CMU 22: Inner Pelorus Sound | CMU item: CMU 22 Aquaculture Management Area - AMA 8 | Neutral | a) Amend AMA to reflect consented/installed space (marine farm 8339); OR b) Draw the AMA as per the MFA/AQNZ submission map 064 'South East Bay South - Pelorus Sound'; OR c) Retain AMA as proposed. Farm 8339 |
| 113.25 | Volume Four | CMU 29: Nydia Bay | CMU item: CMU 29 Aquaculture Management Area - AMA 1 | Neutral | a) Draw the AMA as per the MFA/AQNZ submission map 047 'Nydia Bay West- Pelorus Sound'; OR b) Retain AMA as proposed; OR c) Amend AMA to reflect consented/installed space.(Marine farm 8357) |
| 113.26 | Volume Four | CMU 22: Inner Pelorus Sound | CMU item: CMU 22 Aquaculture Management Area - AMA 3 | Neutral | a) Draw the AMA as per the MFA/AQNZ submission map 039 'Maori Bay- Pelorus Sound'; OR b) Retain AMA as proposed; OR c) Amend AMA to reflect existing consented/installed space.(Marine farm 8375) |
| 113.27 | Volume Four | CMU 37: Port Underwood | CMU item: CMU 37 Aquaculture Management Area - AMA 21 | Support | Retain AMA as proposed (Marine farm 8438) |
| 113.28 | Volume Four | CMU 25: Kenepuru Sound | CMU item: CMU 25 Aquaculture Management Area - AMA 1 | Neutral | Draw the AMA as per the MFA/AQNZ submission map 059 'Scotts Bay-Kenepuru Sound'. (Marine farm 8466) |
| 113.29 | Volume Four | CMU 11: Crail Bay | CMU item: CMU 11 Aquaculture Management Area - AMA 20 | Neutral | a) Draw the AMA as per the MFA/AQNZ submission map 029 'Grant Bay- Crail Bay'; OR b) Amend AMA to reflect existing consented/installed space - marine farm 8546 |
| 113.30 | Volume Four | CMU 6: Clova Bay | CMU item: CMU 6 Aquaculture Management Area - AMA 2 | Neutral | Draw the AMA as per the MFA/AQNZ submission map 012 'Clova Bay West -Pelorus Sound'. (Marine farm 8552) |
| 113.31 | Volume Four | CMU 6: Clova Bay | CMU item: CMU 6 Aquaculture Management Area - AMA 3 | Neutral | Draw the AMA as per the MFA/AQNZ submission maps 012 'Clova Bay West - Pelorus Sound' and 011 'Clova Bay East - Pelorus Sound'. (Marine farm 8557) |
| 113.32 | Volume Four | CMU 3: Beatrix Bay | CMU item: CMU 3 Aquaculture Management Area - AMA 6 | Neutral | a) Draw the AMA as per the MFA/AQNZ submission map 038 'Laverique Bay- Beatrix Bay'; OR b) Retain AMA as proposed; OR c) Include the existing farm within an AMA. - Marine farm 8254 |
| 113.33 | Volume Four | CMU 22: Inner Pelorus Sound | CMU item: CMU 22 Aquaculture Management Area - AMA 7 | Neutral | a) Draw the AMA as per the MFA/AQNZ submission map 087 'Yncyca Bay- Pelorus Sound'; OR b) Include existing farm within an AMA. - Marine farm 8345 |
| 113.34 | Volume Four | CMU 37: Port Underwood | CMU item: CMU 37 Aquaculture Management Area - AMA 40 | Support | Retain AMA as proposed. (Marine farm 8421) |
| 113.35 | Volume Four | CMU 37: Port Underwood | CMU item: CMU 37 Aquaculture Management Area - AMA 39 | Support | Retain AMA as proposed. (Marine farm 8422) |
| 113.36 | Volume Four | CMU 37: Port Underwood | CMU item: CMU 37 Aquaculture Management Area - AMA 43 | Support | Retain AMA as proposed. (Marine farm 8640) |
| 113.37 | Volume Four | CMU 37: Port Underwood | CMU item: CMU 37 Aquaculture Management Area - AMA 34 | Neutral | Amend AMA to reflect consented/installed space.(Marine farm 8426) |
| 113.38 | Volume Four | CMU 37: Port Underwood | CMU item: CMU 37 Aquaculture Management Area - AMA 31 | Support | Retain AMA as proposed (Marine farm 8428) |
| 113.39 | Volume Four | CMU 37: Port Underwood | CMU item: CMU 37 Aquaculture Management Area - AMA 27 | Support | Retain AMA as proposed. (Marine farm 8431) |
| 113.40 | Volume Four | CMU 37: Port Underwood | CMU item: CMU 37 Aquaculture Management Area - AMA 3 | Support | Retain AMA as proposed (Marine farm 8454) |
| 113.41 | Volume Four | CMU 28: Maud Island | CMU item: CMU 28 Aquaculture Management Area - AMA 9 | Neutral | a) Amend AMA to reflect existing consented/installed space (marine farm 8506); OR b) Retain AMA as proposed; OR c) Draw the AMA as per the MFA/AQNZ submission map 055 'Rams Head West - Tawhitinui Reach'. |
| 113.42 | Volume Four | CMU 11: Crail Bay | CMU item: CMU 11 Aquaculture Management Area - AMA 5 | Neutral | a) Draw the AMA as per the MFA/AQNZ submission map 013 'Crail Bay Central - Crail Bay'; OR b) Amend AMA to reflect consented/installed space. (Marine farm 8516) |
| 113.43 | Volume Four | CMU 25: Kenepuru Sound | CMU item: CMU 25 Aquaculture Management Area - AMA 6 | Neutral | a) Draw the AMA as per the MFA/AQNZ submission map 043 Mills Bay- Kenepuru Sound'; OR b) Draw an AMA around site 8480 as installed/ consented. |

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| | | | 113.44 | Volume Four | CMU 37: Port Underwood | CMU item: CMU 37 Aquaculture Management Area - AMA 37 | Support | Retain AMA as proposed. (Marine farm 8423) |
| | | | 113.45 | Volume Four | CMU 39: Squally Cove | CMU item: CMU 39 Aquaculture Management Area - AMA4 | Neutral | a) Draw the AMA as per the MFA/AQNZ submission map 067 'Mclarens Bay-Squally Cove'; OR b) Draw an AMA around sites as installed/ consented. -Marine farms 8295 / 8636 / 8637 |
| | | | 113.46 | Volume Four | CMU 39: Squally Cove | CMU item: CMU 39 Aquaculture Management Area - AMA1 | Neutral | a) Draw the AMA as per the MFA/AQNZ submission map 069 'Symonds Bay-Squally Cove'; OR b) Draw an AMA around sites as installed/ consented. - Marine farm 8298 |
| | | | 113.47 | Volume Four | CMU 14: East Bay QCS | CMU item: CMU 14 Aquaculture Management Area - AMA 5 | Neutral | a) Draw the AMA as per the MFA/AQNZ submission map 050 'Otanerau Bay- East Bay'; OR b) Retain AMA as proposed; OR c) Draw an AMA around site as installed/ consented. (Marine farm 8399) |
| | | | 113.48 | Volume Four | All CMU | | Neutral | Make consequential changes to adjoining CMU and AMA maps where the CMU for a bay is depicted on more than one map. |
| | | | 113.49 | Volume Four | CMU 4: Catherine Cove | CMU item: CMU 4 Aquaculture Management Area - AMA2 | Neutral | a) Draw the AMA as per the MFA/ AQNZ submission map 010 'Catherine Cove - D'Urville Island'; OR b) Retain AMA as proposed. (Marine farm 8007) |
| | | | 113.50 | Volume Two | Chapter: 16 | Provision: 16.4 | Support | Existing marine farms should be 'renewed' as a controlled activity without notification. |
| | | | 113.51 | Volume One | Chapter: 13 | Provision: All aquaculture provisions | Neutral | (a) AMAs should be drawn in the way set out in this submission, provided that no existing marine farm loses area, total backbone length and if the farm is shifting from its existing space it is moved into equivalent space; or (b)The existing marine farm(s) should stay where they are currently installed (including when they are offsite); or (c) The existing marine farm(s) should shift into new space as long as they do not lose area, total backbone length and the move is into equivalent space. If someone makes a submission that any existing marine farm should be removed from its current location, and that submission is accepted, then that farm(s) should move into new space in bays where there is currently marine farming. That is consistent with the principle of no loss of marine farming space and no loss of backbone length. Examples of possible locations which, depending on the farm, might have similar characteristics, are attached to the submission |
| 114 | Slade | Darryl Slade | 114.1 | Volume Four | CMU 3: Beatrix Bay | CMU item: CMU 3 Aquaculture Management Area - AMA 13 | Oppose | The decision I seek from Council is that the AMA at Site 8242 be widened to seaward by approximately 2.4m at the western end and reduced by 4.2m. at the eastern end, this would result in the seaward boundary being parallel to the inshore boundary. Making the AMA the same width as the associated farm. There would seem to be no impediment to this as there is ample room inside the 300m from shoreline. See map 2. Site 8242 would then fit within its adjacent AMA. |
| | | | 114.2 | Volume Four | CMU 3: Beatrix Bay | CMU item: CMU 3 Aquaculture Management Area - AMA 13 | Oppose | The Councils proposed AMA adjacent to Sanford site 8241 and 8579, (map 1) extends into the area declined under U990620. (map 4). It could be argued that the seaward shift of this farm to outside the 100m line at the proposed MDC AMA inshore boundary would have no additional sustainability impacts, than at its old position. Provided the farms dimensions and stocking rate remained unchanged. In fact, there are probably benefits to the inshore benthic ecosystems. But the Councils adjacent AMA is wider than the Farm. (see map 5 page 9) The western end of the AMA is 17.3m, and the eastern end is 17.1 m wider than needed to accommodate the Sanford farm. (map 5 page 9) If this extra AMA space was to be farmed it would contravene the intent of the declined consent U990620. The decision I seek from the Council is that they respect the intent of their previous decision in U990620. In addition, The decision I seek from the Council is. Will the declined extension consent U990620 move to seaward with its attached farm? |
| | | | 114.3 | Volume Four | CMU 3: Beatrix Bay | CMU item: CMU 3 Aquaculture Management Area - AMA 11 | Oppose | The Decision I seek from the Council is keep AMAs 11, 12, 13. Separate as is currently in the Council Variation 1. Respect the area of the declined consent U990620. Make only slight tweaks to AMA 13 boundaries so its associated farms can fit into it. See submission for mapping and consent document. |
| | | | 114.4 | Volume Four | CMU 3: Beatrix Bay | CMU item: CMU 3 Aquaculture Management Area - AMA 12 | Oppose | The Decision I seek from the Council is keep AMAs 11, 12, 13. Separate as is currently in the Council Variation 1. Respect the area of the declined consent U990620. Make only slight tweaks to AMA 13 boundaries so its associated farms can fit into it. See submission for mapping and consent document. |
| | | | 114.5 | Volume Four | CMU 3: Beatrix Bay | CMU item: CMU 3 Aquaculture Management Area - AMA 13 | Oppose | The Decision I seek from the Council is keep AMAs 11, 12, 13. Separate as is currently in the Council Variation 1. Respect the area of the declined consent U990620. Make only slight tweaks to AMA 13 boundaries so its associated farms can fit into it. See submission for mapping and consent document. |
| 115 | Darryl Slade, William King & Evelyn King (Estate) | Darryl Slade | 115.1 | Volume Four | CMU 34: Port Gore | CMU item: CMU 34 Aquaculture Management Area - AMA 2 | Oppose | Make the underlying AMA, at its southern end, of sufficient width to accommodate the 150m wide farm. This is easily achieved by pivoting the seaward boundary of the AMA to the East (see yellow dotted line, Map 2 attached to submission). This proposed seaward boundary will be well within the 300m seaward AMA guidelines (see map 2) (8) The shallow scalloping of the southern inshore boundary of the AMA (circled On Maps 1&2), only complicates the drafting of the AMA for no discernible benefit. It should be straitened as in Map 2, or the inshore boundary of the AMA moved seaward minutely. The recent benthic survey included in the application to renew this site found no benthic concerns |