



Marlborough Sounds Resource Management Plan

Plan Change 16

**Summary of Submissions received by Marlborough District
Council**

July 2009

Contents

PC16 - WHOLE PLAN CHANGE	1
M9.1 - INTRODUCTION	8
M9.1.2 - AQUACULTURE MANAGEMENT	8
M9.1.2 PARA 6. - AQUACULTURE MANAGEMENT -PARAGRAPH 6.	9
M9.4A - ISSUE	9
M9.4A.1 - OBJECTIVES AND POLICIES	10
M9.4A.1.1 - OBJECTIVE	10
M9.4A.1.1.2 - POLICY 1.2	10
M9.4A.2 - METHODS OF IMPLEMENTATION	11
M9.4A.2.A - AUTHORISATIONS	11
M9.4A.2.M - MONITORING	12
M9.4A.2.R - RULES	13
M9.4A.2.Z - ZONING	13
M9.4A1.1.3 - POLICY 1.3	13
M35.A.3 - ACTIVITIES IN AMAS	14
M35A.1 - PREAMBLE	14
M35A.2 - GENERAL RULES	14
M35A.2.1 - ALTERNATIVE ALLOCATION	15
M35A.2.1.1 - CIRCUMSTANCES UNDER WHICH THE METHOD WILL APPLY	16
M35A.2.1.2 - ALTERNATIVE ALLOCATION METHOD	16
M35A.2.1.2.1 - ONE PRIVATE PLAN CHANGE REQUEST	16
M35A.2.1.2.2 - MORE THAN ONE PRIVATE	17
M35A.2.1.2.3 - OFFERS NOT TAKEN UP	17
M35A.2.1.2.4 - CANCELLATION OR EXPIRY OF COASTAL PERMITS	17
M35A.4 - INFORMATION REQUIREMENTS	18
M35A.5 - MAPS	18
ALPHABETICAL INDEX OF SUBMITTERS (BY SURNAME) FOR PLAN CHANGE 16	19
NUMERICAL INDEX OF SUBMITTERS FOR PLAN CHANGE 16	21

Submission Summary - Marlborough Sounds Resource Management Plan - Plan Change 16 Allocation of Authorisations - By Section

PC16 - Whole plan change

Annette Stroh - Submitter #: 4 Submission Point : 8

Opposed to Plan Change 16

The lack of scientific certainty as to the ecological effects of marine farming needs to be addressed before creating new areas for aquaculture (AMA's)

Also opposed to the proposed Plan Change due to the increased visual pollution this will create.

Dismayed to see bays with no aquaculture development put at risk again by the proposal to create new areas for aquaculture under the proposed Plan Change

Bilbrough Family Trust (Ian & Jacqui Bilbrough) - Submitter #: 3 Submission Point : 12

Existing marine farms have not been subjected to rigorous testing and they now should be. There should only be one set of rules.

Campbell Black - Submitter #: 1 Submission Point : 3

The Plan change is opposed on the basis that it may lead to additional marine farms in the

Sounds. Marine farming in the Sounds is not compatible with land based activities (from a noise, visual and pollution perspective) including land development. This position on compatibility is supported by the NZ Marine Farming Association.

David Grigg - Submitter #: 12 Submission Point : 24

Support plan change 16 that once an AMA has been selected by Council, a piece or all can be selected by an individual/organisation to be used for aquaculture. The individual/organization that has done the research should be given first rights of refusal. However codicils need to be added.

Deep Trust (Quentin Wilson) - Submitter #: 10 Submission Point : 22

Opposed to the creation of any new marine farming area on the grounds that they remove access to large areas, are visually ugly and are a navigation hazard. Oppose any plan change that makes their creation easier.

Dolphin Watch Ecotours (Dan Engelhaupt) - Submitter #: 33 Submission Point : 66

Oppose this part of the plan change.

Object to any changes in the Plan that makes it easier for aquaculture industries to implement farms in the Queen Charlotte Sound or any other currently designated aquaculture exclusion areas that currently provide both sanctuary and critical foraging habitat to a variety of protected seals and dolphins. Additional exclusion areas should be established.

The implementation of measures to ease the application process for future additional aquaculture in Queen Charlotte Sounds will have a direct result on numerous tourism based businesses that rely on dolphins, seals and the perception of a pristine environment within Queen Charlotte Sounds.

East Bay Conservation Society (Ben Wybourne) - Submitter #: 26 Submission Point : 54

EBCS is concerned that the proposed AMA rules do not lead to a repeat of this type of situation, or allow marine farming zones to be created without proper consultation and consideration of marine ecological values.

East Bay Conservation Society (Mark Denize) - Submitter #: 24 Submission Point : 52

This will facilitate another gold rush of applications.

The rules in the current plan are not robust enough to regulate or do compliance properly.

It is fundamentally wrong to get rid of the tendering process. This will allow industry to choose their own AMA areas and have surety.

The establishment of AMA areas should have been a process instigated by Council through a public consultation round so that the public have a chance to say if, where or not at all, with this process industry chooses and the public have to use a very expensive process using lawyers to object.

If Council goes through with this then they need to somehow create a more level playing field, any applicant applying for a private plan change should be required to consult with all stakeholders and all sounds property owners to ensure that every one is informed about the process.

The rule change is allowing for the unfettered growth of aquaculture.

Council should not have the right to give away our seabed to a company with the biggest check book without first having a tendering process which gives transparency and accountability.

Frances Hall - Submitter #: 20 Submission Point : 48

Strongly oppose the plan change in its entirety

They are deeply unfair, discriminating against the local community and small businesses in favour of the largest multinational companies with the deepest pockets.

Public tenders are the default for a reason. They ensure a fair and transparent outcome, and give everyone a fair go. They should therefore be retained.

They change the allocation method with the aim of increasing aquaculture farming before Council has consulted on new aquaculture management and zoning provisions. This runs an enormous risk of inviting a rash of applications from companies aiming to develop new farms before we have a well thought through aquaculture framework in place. Aquaculture management will be outside the Council's control and there will be enormous regret that we did not have a more holistic plan as to where and how we want aquaculture to develop in the Sounds.

Friends of Nelson Haven and Tasman Bay Inc (Gwen Struik) - Submitter #: 7 Submission Point : 13

Oppose all parts of the plan change which relate to Alternative Allocation Methods.

It is considered that the proposed alternative allocation method will run counter to the MSRMP, NZCPS and the purpose and principles of the RMA. The method does not meet the requirements of s. 165I. In particular, the Council has not considered the alternative to the method, which is to first undertake its own planning assessment of the appropriateness of the Sounds for AMA's. The proposed method is not necessary in the circumstances of the region at this stage, nor is it the most appropriate for allocation in the circumstances. The s. 165I report prepared by NZKS prepared for the Council fails to consider the implications of allowing private plan change requests on an ad hoc basis, before Council has undertaken the wider integrated planning process to consider new AMA's in the Sounds. The report only considered the economic reasons for and against adopting the proposed changes. It fails to consider the effects on the environments or the wider community.

The proposed method is premature, because it opens up the Sounds to individual plan change requests for new aquaculture space before Council has undertaken a planning assessment of the future of aquaculture in the Marlborough Sounds.

The effect of the existing provisions is to effectively limit private plan changes for AMA's. The default provisions thus avoids the race for space situation which occurred under the old regime, before the introduction of the reforms.

Any alternative method should only be considered after the Council has first undergone a proper planning exercise in relation to aquaculture in the Sounds. It is only this way that the Council can ensure effects on the community, environment and economy are balanced and managed in an integrated way before request for AMA's are considered.

Fyvie Management Limited (Stephen Waring) - Submitter #: 29 Submission Point : 61

Opposed to Plan Change 16

The lack of scientific certainty as to the ecological effects of marine farming needs to be addressed before creating new areas for aquaculture (AMA's)

Also opposed to the proposed Plan Change due to the increased visual pollution this will create.

Dismayed to see bays with no aquaculture development put at risk again by the proposal to create new areas for aquaculture under the proposed Plan Change

Glenn Hall - Submitter #: 21 Submission Point : 49

Oppose the plan change

Changing the rules to favour the biggest players is not fair. These changes will keep out smaller, local and even national businesses.

AMA and exclusion areas should be delineated first of all by a Council led process. Then peoples voices can be heard democratically in helping to delineate the areas, as would seem a much fairer way of doing it.

Foresee a rush of applications once these rules have been changed. Apart from detracting from the pristine beauty, these farms might be far more polluting to the marine environment because the applications will come before the review of aquaculture provisions is finished.

Guardians of the Sounds (Peter Beech) - Submitter #: 23 Submission Point : 51

This will facilitate another gold rush of applications.

The rules in the current plan are not robust enough to regulate or do compliance properly.

It is fundamentally wrong to get rid of the tendering process. This will allow industry to choose their own AMA areas and have surety.

The establishment of AMA areas should have been a process instigated by Council through a public consultation round so that the public have a chance to say if, where or not at all, with this process industry chooses and the public have to use a very expensive process using lawyers to object.

If Council goes through with this then they need to somehow create a more level playing field, any applicant applying for a private plan change should be required to consult with all stakeholders and all sounds property owners to ensure that every one is informed about the process.

The rule change is allowing for the unfettered growth of aquaculture.

Council should not have the right to give away our seabed to a company with the biggest check book with out first having a tendering process which gives transparency and accountability.

Lynn Newman-Hall - Submitter #: 28 Submission Point : 60

Consider the proposal is contrary to the intention of the new laws governing the creation of AMA's through private plan changes. These laws quite clearly provide for contestability in the event a private party initiates a private plan change proposal. Consider that access to any new AMA area created should always be fully contestable, with the submission most beneficial to the community chosen, regardless of who initially proposed the change. To give preference to a party that funds an application simply gives preference to those with the most financial backing. It will also have the effect of reducing competition for our most precious resources, and is unlikely to lead to our achieving the best possible outcome for the community.

Better outcomes for our community - if companies have to compete to provide the best outcomes for the local community then there will be better results overall. Adopting a 'pay for preference" approach will not provide a compelling incentive.

Giving small business a chance - the method effectively cuts our smaller, often local businesses. It is important that all local businesses be given opportunity to apply for an allocation within any new AMA created regardless of the process by which it was created.

Drag on Community resources -the method will encourage monopoly operations to invest in multiple applications for as much prime water as possible. The process has the potential to create a drag on both Council and community time and resources.

Protection in place first -it is not considered wise to effectively encourage private plan change submissions before future aquaculture zones are defined and agreed by the community. Companies may seek to pre-empt possible prohibited areas by applying under earlier planning provisions.

Resources are of immense value - oppose the suggestion that money can buy extra advantage when it comes to their allocation. PC16 potentially favours self selection based on money. The measures should be things like number of new jobs created, care for the environment, profits re-invested in the area, local ownership etc not simply having the money to fund a private plan change.

Marine Farming Association (Graeme Coates) - Submitter #: 2 Submission Point : 4

Supports the proposed plan change.

Marlborough Aquaculture Limited (David Clark) - Submitter #: 25 Submission Point : 53

Support

Marlborough Environment Centre Inc (Steffan Browning) - Submitter #: 6 Submission Point : 10

There have been gaps in the plans' objectives, policies, rules and zoning before, with significant and "unintended" aquaculture applications causing very large costs to the community, Council, and the industry. In terms of total community costs ad hoc and incomplete planning had very serious consequences.

The timing of allocation changes should be made carefully and not ahead of the community's input into the wider issues of Marlborough's coastal resources use and protection. The proposed Plan Change by NZ King Salmon could easily be a Trojan horse for another gold rush of applications anywhere in the Sounds. While it is suggested publicly by the industry that this is unlikely, the timeline of consultation and further plan changes is out of sync with these proposed Plan Changes.

Oppose the proposed Plan Changes as there are currently alternative allocation methods and King Salmon's Plan Change application has not properly evaluated alternatives as required. There are also alternatives for King Salmon in terms of available space as an option. Their most recent application in Waitata Reach is such an example.

The current Sounds Plan was created with significant outer sounds coastal space prohibited to marine farming. This Plan Change will encourage further applications ahead of improvement in the objectives and policies in the existing plan, and ahead of designation of Aquaculture Exclusion

Areas, which were the intended natural and more effective replacement for marine farming prohibited areas. This proposal will encourage applications in areas currently prohibited. These should not be dealt with though an ad hoc one by one hearing basis, but following a Council initiated process that corrects plan deficiencies as shown by previous Environment Court decisions, and protects public space from inappropriate use.

Due to the recognised high costs involved with creating AMA's, the proposed Plan Changes do not deal with the fair use of public resources. The intended allocation method disadvantages many in the community from having access to the resource that King Salmon wishes to take advantage of. A more appropriate method is a Council initiated Plan Change to create any required AMA's and to tender in such a way that would allow a wider community involvement in aquaculture. To encourage individual farmers or families in participating is a positive component of the wider social aspects that are likely to be covered in the Regional Policy Statement and RMA Plan reviews. Allocation methods are better left for that process.

A full consultive round that allows a holistic planning approach to aquaculture and the use of public space is required before the need for new allocation methods of any potential AMA's is needed. The planning process for the new Regional Policy Statement and Marlborough Resource Management Plans is underway and that is the correct mechanism to address the use and allocation of areas of public space.

Alternatively, the Plan Changes 19 & 52 intended for notification later in the year and dealing with the broader aquaculture issues including zoning should absorb these allocation proposals into that process, or deal with allocation after the wider issues are dealt with.

Should Marlborough District Council be predisposed towards further development of aquaculture then Council should initiate a plan change of its own and use the tendering process of allocation that was intended though the aquaculture reforms. Again however, this should also only be done after a holistic approach to the management of the Marlborough Sounds.

Minister of Conservation (Steven Wynne-Jones) - Submitter #: 9 Submission Point : 21

The MSRMP was prepared prior to the legislative reforms and does not contain adequate policy framework for considering plan change requests. The plan change would not meet the requirements of s 165I test until this policy framework is provided. The policy framework is required to provide appropriate guidance for subsequent private plan change requests to create new AMA's. It is important that the Council acknowledges the importance of amending the policy framework in the MSRMP and clarifies that it is not intended to apply the alternative

allocation regime proposed by the proposal until this policy framework is amended.

Ministry of Fisheries (Dan Lees) - Submitter #: 11 Submission Point : 23

Plan Change 16 does not propose any new AMA's and therefore M Fish has no comments on the plan changes effect on fishing.

MFish notes the private plan change process for establishing AMA's lacks some of the benefits of the invited private plan change process. For example, the "invitation" process enables councils to capture the needs of the aquaculture industry in one hit which may lead to efficiencies for the Council and better management of cumulative effects. Also, the identification of "excluded areas" by councils gives the industry more certainty about where in the CMA a proposal for an AMA is more likely to succeed.

MFish supports Plan Change 19 and 52 that would set policies, objectives and rules for new AMA's.

M Fish also notes that the use of private plan change process could potentially result in difficulties form completing plan requests.

Norman & Linda Wilkins - Submitter #: 5 Submission Point : 9

Opposed to the Plan Change.

Reason- possible conflict of use of facilities of the Sounds.

1) Some bays in the Sounds are of particular note for their natural beauty and the presence of marine farms in these areas will detract from this.

2) Some bays in the Sounds have large numbers of dwellings and are hence used by a large number of people. The presence of a marine farm will conflict with this already established use.

P Meach - Submitter #: 36 Submission Point : 69

The documents consists of arguments prepared for NZKS and as such are not objective. Where is any contrary view.

Much seems to be made of the need to be fair. The question that needs to be asked is "to whom". The proposal is certainly not fair to the ratepayer.

What are the estimated costs involved in the establishment of a new AMA?

Why has the Council decided not to be the initiator of the establishment of new AMA's

Why are NZKS seemingly unwilling to undertake the normal commercial risk of any new venture.

The waters of the Marlborough Sounds are a public assets, and any and all decisions made concerning them should be undertaken publicly.

Justice must be seen to be done.

Pelorus Wildlife Sanctuaries Limited (Richard Smith) - Submitter #: 27 Submission Point : 59

Oppose the Alternative Allocation Method for Private Plan Change request in PC16 on the basis that it is premature. It considers that no alternative method should be decided upon until the Council has undergone a proper planning exercise (detailed in the submission) to determine its policy and to insert appropriate planning provisions into its plan in relation to AMA's in the Sounds. Until then the default method should remain.

Port Gore Group (Cliff Marchant) - Submitter #: 17 Submission Point : 33

Oppose all parts of Plan Change 16.

The plan change will encourage further applications out of step with the logical process of improvement in the objectives and policies in the existing plan, and ahead of the designation of AMA's.

This proposal will encourage applications in areas that are presently prohibited (or should be). These areas should be dealt with by a Council initiated process that corrects plan deficiencies as shown by previous Environment Court decision, and protects valuable public wilderness space from inappropriate use.

There are existing marine farm applications and appeals in process in Port Gore. The intent and wording of this plan change should not be used to prejudice the outcome of these proceedings.

There is also an AMA in Port Gore which has been banned from marine farm use by the Environment Court (with the agreement of the applicant), yet it remains an AMA. Where a coastal permit has been refused as in this case, any plan change needs to ensure that such an AMA will be removed from the plan. This proposed plan change fails to address this issue.

Should Council be predisposed towards further development of aquaculture then Council should imitate a more thorough plan change of its own and use the tendering process. However as the review of the RPS and Resource Management Plans are underway, it is believed that these are the correct mechanism to provide an appropriately robust and in depth outcome for the use and allocation of these areas of public space.

Port Underwood Association Inc. (Eric Jorgensen) - Submitter #: 35 Submission Point : 68

Oppose PC16 in its entirety.

PC16 should not be considered until the details of PC 19 & 20 are also available. Without the details of the plan changes the public have no ability to assess if the current process for a resource consent to farm is more appropriate than the approach proposed in PC16.

The Council is currently reviewing the RPS and MSRMP. The MSRMP provides for marine farming prohibited areas. The intent of the revised plan is unknown. Concerned that there is a potential for proliferation of new marine farm areas before the intent of the revised RPS is known. Such a situation has the potential for ad hoc development which is likely to undermine the intent of the revised RPS. The situation is unfair on the communities of the Marlborough Sounds who will be burdened with responding to applications for what is the privatisation of public space at the same time as being involved in the review of the RPS which includes the designation of aquaculture exclusions areas.

Queen Charlotte Wilderness Park Community (Ron Marriott) - Submitter #: 16 Submission Point : 30

Oppose all parts of Plan Change 16

The changes, by favouring a particular sector and introducing dubious processes will disenfranchise the wider community including other independent members of the aquaculture industry and future generations.

Robyn Vidak & Carney Soderberg (03 5799398) - Submitter #: 8 Submission Point : 17

Removing the competitive activity from the industry development process is bad procurement, bad government, and as envisioned here would likely risk the overall long term success of the initiative. There is a better way and the benefit is of adopting a different approach are significant.

Royal Forest and Bird Protection Society NZ, Inc. (Andrew John) - Submitter #: 34 Submission Point : 67

Oppose

Concerned that the rules are not available and cannot be sure that they will be effectively support Objectives and Policies in PC16.

PC 19 will not be available until later in 2009.

Preferential treatment in tender processes in RMA applications appears to be significant development away from open and equitable treatment by government.

There may be alternative ways of ensuring that an applicant for a Standard Private Plan Change or Council - Invited Private Plan Change may not unreasonably bear the cost of making the application.

Support strong and effective independent environmental monitoring and urge that this be achieved directly by payments made by the applicant.

M9.1 - Introduction

Billbrough Family Trust (Ian & Jacqui Billbrough) - Submitter #: 3 Submission Point : 5

Oppose

Note: It is uncertain which part of the proposed plan change this submission point relates as the submission was based on the text in PC 53.

M9.1.2 - Aquaculture Management

Te Ohu Kaimoana Trustee Limited (Craig Lawson) - Submitter #: 30 Submission Point : 63

2nd to last paragraph

Support the Plan Change on the basis that it establishes an economically efficient way of allocating authorisations in AMA's created as a result of private plan changes and provides for the development of aquaculture.

The support is subject to a minor wording change which accurately reflects the intent of the allocation to iwi, which does not, in fact relate to Historic Treaty claims, but is intended to recognise the ongoing Treaty interest of iwi.

Totaranui Limited (Jane du Feu) - Submitter #: 31 Submission Point : 64

2nd to last paragraph

Support the Plan Change on the basis that it establishes an economically efficient way of allocating authorisations in AMA's created as a result of private plan changes and provides for the development of aquaculture.

The support is subject to a minor wording change which accurately reflects the intent of the allocation to iwi, which does not, in fact relate to Historic Treaty claims, but is intended to recognise the ongoing Treaty interest of iwi.

M9.1.2 para 6. - Aquaculture Management -Paragraph 6.

Bilbrough Family Trust (Ian & Jacqui Bilbrough) - Submitter #: 3 Submission Point : 6

Oppose

Chaucer Bay Family Trust (Mr E J Matla) - Submitter #: 15 Submission Point : 28

Oppose the plan changes on the following grounds:

Hold grave concerns regarding the very wide powers conferred under these proposed changes, with appear to address the impact of plan changes on commercial and cultural grounds, and give little regard to the impact on residential, tourist and recreational aspects of the Sounds.

Specifically request at this early stage of the proposals, that the Bay of Many Coves be specifically excluded from any future consideration to establish AMA's or any other commercial marine

M9.4A - Issue

Friends of Nelson Haven and Tasman Bay Inc (Gwen Struik) - Submitter #: 7 Submission Point : 14

Oppose all parts of the plan change which relate to Alternative Allocation Methods, in particular paragraphs 2 & 3.

It is considered that the proposed alternative allocation method will run counter to the MSRMP, NZCPS and the purpose and principles of the RMA. The method does not meet the requirements of s. 165I. In particular, the Council has not considered the alternative to the method, which is to first undertake its own planning assessment of the appropriateness of the Sounds for AMA's. The proposed method is not necessary in the circumstances of the region at this stage, nor is it the most appropriate for allocation in the circumstances. The s. 165I report prepared by NZKS prepared for the Council fails to consider the implications of allowing private plan change requests on an ad hoc basis, before Council has undertaken the wider integrated planning process to consider new AMA's in the Sounds. The report only considered the economic reasons for and against adopting the proposed changes. It fails to consider the effects on the environments or the wider community.

The proposed method is premature, because it opens up the Sounds to individual plan change requests for new aquaculture space before Council has undertaken a planning assessment of the future of aquaculture in the Marlborough Sounds.

The effect of the existing provisions is to effectively limit private plan changes for AMA's. The default provisions thus avoid the race for space situation which occurred under the old regime, before the introduction of the reforms.

Any alternative method should only be considered after the Council has first undergone a proper planning exercise in relation to aquaculture in the Sounds. It is only this way that the Council can ensure effects on the community, environment and economy are balanced and managed in an integrated way before request for AMA's are considered.

Fyvie Management Limited (Stephen Waring) - Submitter #: 29 Submission Point : 62

Pelorus Wildlife Sanctuaries Limited (Richard Smith) - Submitter #: 27 Submission Point : 55

Para 2 & 3 -Opposed to this part of the proposed plan change.

Robin Cox - Submitter #: 32 Submission Point : 65

The likelihood of a private plan change is only viable if the applicant has a right to seek a coastal permit to use the AMA for economic benefit. This change is strongly supported as it provides

the possibility of economic benefits, both to the applicant and Marlborough, providing employment at minimal environment impact which is checked through the RMA process.

The New Zealand King Salmon Co. Ltd (Quentin Davies) - Submitter #: 18 Submission Point : 70

An alternative the Council may wish to consider is whether or not to allocate space without any express reference to "authorisations".

Such an approach would be open to the Council by virtue of s.165H. The criteria for the allocation of space would be that there would not need to be public notice of the offer of authorisations. In the circumstances where authorisations were being granted to a clearly identifiable party that would appear to be unnecessary. The submission is made on the basis that what is proposed may well result in a better outcome in terms of administrative efficiency. It does not detract from the material which King Salmon has already lodged. The suggestion is intended as a practicable suggestion as to process.

M9.4A.1 - Objectives and Policies

Minister of Conservation (Steven Wynne-Jones) - Submitter #: 9 Submission Point : 19

The MSRMP was prepared prior to the legislative reforms and does not contain adequate policy framework for considering plan change requests. The plan change would not meet the requirements of s 165I test until this policy framework is provided. The policy framework is required to provide appropriate guidance for subsequent private plan change requests to create new AMA's. It is important that the Council acknowledges the importance of amending the policy framework in the MSRMP and clarifies that it is not intended to apply the alternative allocation regime proposed by the proposal until this policy framework is amended.

M9.4A.1.1 - Objective

The New Zealand King Salmon Co. Ltd (Quentin Davies) - Submitter #: 18 Submission Point : 71

An alternative the Council may wish to consider is whether or not to allocate space without any express reference to "authorisations".

Such an approach would be open to the Council by virtue of s.165H. The criteria for the allocation of space would be that there would not need to be public notice of the offer of authorisations. In the circumstances where authorisations were being granted to a clearly identifiable party that would appear to be unnecessary. The submission is made on the basis that what is proposed may well result in a better outcome in terms of administrative efficiency. It does not detract from the material which King Salmon has already lodged. The suggestion is intended as a practicable suggestion as to process.

M9.4A.1.1.2 - Policy 1.2

Jonathon Hall - Submitter #: 19 Submission Point : 34

Oppose because the policy is unfair to other businesses, and especially smaller companies, that allocation will be allotted automatically without a public tender process. This is public space, so all businesses should have the right to bid to sustainably develop aquaculture in the area. There is also an issue of equity between businesses and locals. Local residents would be denied the right to develop their own area because all aquaculture rights may have been invested in one business. Having a public tender process is a crucial enactment of this principle that coastal marine areas are public space, a principle which risks being overturned by this plan change to the unfair disadvantage of many. A public tender is locally, nationally and internationally recognised as a very valuable means of ensuring the best outcomes for all. It is a public tender process which will ensure that authorisations are allocated in 'a manner that is effective, efficient and fair' and which will protect the principle of public space.

The New Zealand King Salmon Co. Ltd (Quentin Davies) - Submitter #: 18 Submission Point : 72

An alternative the Council may wish to consider is whether or not to allocate space without any express reference to "authorisations".

Such an approach would be open to the Council by virtue of s.165H. The criteria for the allocation of space would be that there would not need to be public notice of the offer of authorisations. In the circumstances where authorisations were being granted to a clearly identifiable party that would appear to be unnecessary. The submission is made on the basis that what is proposed may well result in a better outcome in terms of administrative efficiency. It does not detract from the material which King Salmon has already lodged. The suggestion is intended as a practicable suggestion as to process.

M9.4A.2 - Methods of Implementation

Queen Charlotte Wilderness Park Community (Ron Marriott) - Submitter #: 16 Submission Point : 31

If these changes are approved:

- Council will receive applications for new AMA's for most of the Marlborough Sounds.

-Most of the applications will be from a small number of powerful and wealthy aquaculture players.

-The applications will be broadly approved at Council level. The legal effort from the applicant's will be overwhelmingly massive because of the high stakes involved.

-If the Council does approve these applications they are unlikely to be appealed, given the new RMA changes that are going through parliament at the moment which will make it almost impossible for ordinary people to appeal a case to the Environment Court.

-If the Council does not approve these applications the applicant will certainly appeal and that be vigorously challenged.

-Under these proposed changes, the right to exploit these new AMA's will pass to the applicant(s) who initiated the plan changes.

-The result of all of this will be that within a very short time, most of the Sounds is likely to be owned by a single, wealthy, foreign controlled monopolistic entity. The community will have effectively for ever lost the right to exploit and use the resource for its own benefit.

M9.4A.2.A - Authorisations

Friends of Nelson Haven and Tasman Bay Inc (Gwen Struik) - Submitter #: 7 Submission Point : 15

Oppose all parts of the plan change which relate to Alternative Allocation Methods, in particular para's 2 & 3.

It is considered that the proposed alternative allocation method will run counter to the MSRMP, NZCPS and the purpose and principles of the RMA. The method does not meet the requirements of s. 165I. In particular, the Council has not considered the alternative to the method, which is to first undertake its own planning assessment of the appropriateness of the Sounds for AMA's. The proposed method is not necessary in the circumstances of the region at this stage, nor is it the most appropriate for allocation in the circumstances. The s. 165I report prepared by NZKS prepared for the Council fails to consider the implications of allowing private plan change requests on an ad hoc basis, before Council has undertaken the wider integrated planning process to consider new AMA's in the Sounds. The report only considered the economic reasons for and against adopting the proposed changes. It fails to consider the

effects on the environments or the wider community.

The proposed method is premature, because it opens up the Sounds to individual plan change requests for new aquaculture space before Council has undertaken a planning assessment of the future of aquaculture in the Marlborough Sounds.

The effect of the existing provisions is to effectively limit private plan changes for AMA's. The default provisions thus avoid the race for space situation which occurred under the old regime, before the introduction of the reforms.

Any alternative method should only be considered after the Council has first undergone a proper planning exercise in relation to aquaculture in the Sounds. It is only this way that the Council can ensure effects on the community, environment and economy are balanced and managed in an integrated way before request for AMA's are considered.

Jonathon Hall - Submitter #: 19 Submission Point : 37

1. Support the part of the plan change which states that public tender be used to allocate authorisations within AMA zones included in the Plan as a result of a Council-initiated Plan Change. This part of the plan change is a fair and open method of allocation.

2. Oppose paragraph 2.
Authorisations should not be offered automatically to the "first person whose private plan change was complete and successful resulted in an operative AMA zone for that area of coastal marine area". Oppose for the reasons outlined previously in the submission.

Pelorus Wildlife Sanctuaries Limited (Richard Smith) - Submitter #: 27 Submission Point : 56

Para 2 & 3 -opposed to these methods.

The New Zealand King Salmon Co. Ltd (Quentin Davies) - Submitter #: 18 Submission Point : 74

An alternative the Council may wish to consider is whether or not to allocate space without any express reference to "authorisations".

Such an approach would be open to the Council by virtue of s.165H. The criteria for the allocation of space would be that there would not need to be public notice of the offer of authorisations. In the circumstances where authorisations were being granted to a clearly identifiable party that would appear to be unnecessary. The submission is made on the basis that what is proposed may well result in a better outcome in terms of administrative efficiency. It does not detract from the material which King Salmon has already lodged. The suggestion is intended as a practicable suggestion as to process.

M9.4A.2.M - Monitoring

Anthony John Coard - Submitter #: 13 Submission Point : 26

Wish that the MDC would do its job now as monitoring marine farms is poor and all those Non AMA farms poorly monitored are now to be given a special AMAZ. But any new site application faces a full consent process, very unfair.

Jonathon Hall - Submitter #: 19 Submission Point : 39

Oppose, because these monitoring methods should be drafted and consulted upon before the allocation method is changed.

M9.4A.2.R - Rules

Jonathon Hall - Submitter #: 19 Submission Point : 36

Oppose the rules should be enacted before the allocation method is changed. Leaving this change till later leaves open the possibility of unforeseen and undesired consequences as well as a rush of AMA zone applications taking place before new rules are put in place.

Rene P - Submitter #: 22 Submission Point : 50

PC16 effectively has no rules yet and is a plan change that is happening now. Such rules for plan change 16, will happen at a later date via plan change 19 (consultation re AMA site establishment).

Don't want to see the possibility of any new means for the establishment of any new AMA's slipping through unchallenged (or on any other technicality) into areas that have been already closed for new marine farms around D'Urville island, as a result of no rules having been promoted in the first instance of the current PC16 process and becoming operational prior to the completion

M9.4A.2.Z - Zoning

Anthony John Coard - Submitter #: 13 Submission Point : 25

Para 2. I wish MDC to not put this badly worded section: as all marine farms not in AMA areas will now be in "A" special AMAZ i.e. Fairy Bay Farms will be in same AMAZ as Durville Is or Tory Channel ?? Or Cloudy Bay??

Billbrough Family Trust (Ian & Jacqui Bilbrough) - Submitter #: 3 Submission Point : 11

Oppose paragraph 2.

Oppose paragraph 3

Jonathon Hall - Submitter #: 19 Submission Point : 35

Oppose because whilst most of them might be totally appropriate as AMA sites, Council should be conducting holistic consultation to decide where AMA's should be located.

Queen Charlotte Wilderness Park Community (Ron Marriott) - Submitter #: 16 Submission Point : 32

Para 2.

Council reassures in the documents that PC16 does not create new AMA's yet this clause will do exactly that. Approval of this clause will effectively mean that AMA's will be approved in perpetuity which is clearly not the intention of the RMA which approves only for a term.

The Environment Court has expressly ordered that the question of whether the area in which some marine farms exists is suitable for their continued existence and must be subject to further public consideration. By including this method the Council is attempting to deny the authority of the Environment Court.

M9.4A1.1.3 - Policy 1.3

The New Zealand King Salmon Co. Ltd (Quentin Davies) - Submitter #: 18 Submission Point : 73

An alternative the Council may wish to consider is whether or not to allocate space without any express reference to "authorisations".

Such an approach would be open to the Council by virtue of s.165H. The criteria for the allocation of space would be that there would not need to be public notice of the offer of authorisations. In the circumstances where authorisations were being granted to a clearly identifiable party that would appear to be unnecessary. The submission is made on the basis that what is proposed may well result in a better outcome in terms of administrative efficiency. It does not detract from the material which King Salmon has already lodged. The suggestion is intended as a practicable suggestion as to process.

M35.A.3 - Activities in AMAs

Jonathon Hall - Submitter #: 19 Submission Point : 46

Oppose these plan changes as they postpone to a later date very important rules and requirements which need to be in place before any new AMA Zones are established.

M35A.1 - Preamble

Jonathon Hall - Submitter #: 19 Submission Point : 40

Oppose this part of the plan change which states that a cross-reference to information requirements for private plan changes for AMA zones will be included by a subsequent Council initiates plan change. Plan change 19 and the attendant consultation should happen before any move is undertaken to change the method.

Minister of Conservation (Steven Wynne-Jones) - Submitter #: 9 Submission Point : 20

The MSRMP was prepared prior to the legislative reforms and does not contain adequate policy framework for considering plan change requests. The plan change would not meet the requirements of s 165I test until this policy framework is provided. The policy framework is required to provide appropriate guidance for subsequent private plan change requests to create new AMA's. It is important that the Council acknowledges the importance of amending the policy framework in the MSRMP and clarifies that it is not intended to apply the alternative allocation regime proposed by the proposal until this policy framework is amended.

The New Zealand King Salmon Co. Ltd (Quentin Davies) - Submitter #: 18 Submission Point : 75

An alternative the Council may wish to consider is whether or not to allocate space without any express reference to "authorisations".

Such an approach would be open to the Council by virtue of s.165H. The criteria for the allocation of space would be that there would not need to be public notice of the offer of authorisations. In the circumstances where authorisations were being granted to a clearly identifiable party that would appear to be unnecessary. The submission is made on the basis that what is proposed may well result in a better outcome in terms of administrative efficiency. It does not detract from the material which King Salmon has already lodged. The suggestion is intended as a practicable suggestion as to process.

M35A.2 - General Rules

Jonathon Hall - Submitter #: 19 Submission Point : 41

Oppose these plan changes in their entirety, as they are not a fair allocation method (reasons given previously in the submission).

Minister of Conservation (Steven Wynne-Jones) - Submitter #: 9 Submission Point : 18

The MSRMP was prepared prior to the legislative reforms and does not contain adequate policy

framework for considering plan change requests. The plan change would not meet the requirements of s 165I test until this policy framework is provided. The policy framework is required to provide appropriate guidance for subsequent private plan change requests to create new AMA's. It is important that the Council acknowledges the importance of amending the policy framework in the MSRMP and clarifies that it is not intended to apply the alternative allocation regime proposed by the proposal until this policy framework is amended.

M35A.2.1 - Alternative Allocation

Friends of Nelson Haven and Tasman Bay Inc (Gwen Struik) - Submitter #: 7 Submission Point : 16

Oppose all parts of the plan change which relate to Alternative Allocation Methods, in particular all of the general rule.

It is considered that the proposed alternative allocation method will run counter to the MSRMP, NZCPS and the purpose and principles of the RMA. The method does not meet the requirements of s. 165I. In particular, the Council has not considered the alternative to the method, which is to first undertake its own planning assessment of the appropriateness of the Sounds for AMA's. The proposed method is not necessary in the circumstances of the region at this stage, nor is it the most appropriate for allocation in the circumstances. The s. 165I report prepared by NZKS prepared for the Council fails to consider the implications of allowing private plan change requestson an ad hoc basis, before Council has undertaken the wider integrated planning process to consider new AMA's in the Sounds. The report only considered the economic reasons for and against adopting the proposed changes. It fails to consider the effects on the environments or the wider community.

The proposed method if premature, because it opens up the Sounds to individual plan change requests for new aquaculture space before Council has undertaken a planning assessment of the future of aquaculture in the Marlborough Sounds.

The effect of the existing provisions is to effectively limit private plan changes for AMA's. The default provisions thus avid the race for space situation which occurred under the old regime, before the introduction of the reforms.

Any alternative method should only be considered after the Council has first undergone a proper planning exercise in relation to aquaculture in the Sounds. It is only this way that the Council can ensure effects on the community, environment and economy are balanced and managed in an integrated way before request for AMA's are considered.

Pelorus Wildlife Sanctuaries Limited (Richard Smith) - Submitter #: 27 Submission Point : 57

Oppose this rule

The New Zealand King Salmon Co. Ltd (Quentin Davies) - Submitter #: 18 Submission Point : 76

An alternative the Council may wish to consider is whether or not to allocate space without any express reference to "authorisations".

Such an approach would be open to the Council by virtue of s.165H. The criteria for the allocation of space would be that there would not need to be public notice of the offer of authorisations. In the circumstances where authorisations were being granted to a clearly identifiable party that would appear to be unnecessary. The submission is made on the basis that what is proposed may well result in a better outcome in terms of administrative efficiency. It does not detract from the material which King Salmon has already lodged. The suggestion is intended as a practicable suggestion as to process.

The New Zealand King Salmon Co. Ltd (Quentin Davies) - Submitter #: 18 Submission Point : 83

An alternative the Council may wish to consider is whether or not to allocate space without any express reference to "authorisations".

Such an approach would be open to the Council by virtue of s.165H. The criteria for the allocation of space would be that there would not need to be public notice of the offer of authorisations. In the circumstances where authorisations were being granted to a clearly identifiable party that would appear to be unnecessary. The submission is made on the basis that what is proposed may well result in a better outcome in terms of administrative efficiency. It does not detract from the material which King Salmon has already lodged. The suggestion is intended as a practicable suggestion as to process.

M35A.2.1.1 - Circumstances under which the Method will Apply

Jonathon Hall - Submitter #: 19 Submission Point : 42

Oppose these plan changes in their entirety, as they are not a fair allocation method (reasons given previously in the submission).

The New Zealand King Salmon Co. Ltd (Quentin Davies) - Submitter #: 18 Submission Point : 77

An alternative the Council may wish to consider is whether or not to allocate space without any express reference to "authorisations".

Such an approach would be open to the Council by virtue of s.165H. The criteria for the allocation of space would be that there would not need to be public notice of the offer of authorisations. In the circumstances where authorisations were being granted to a clearly identifiable party that would appear to be unnecessary. The submission is made on the basis that what is proposed may well result in a better outcome in terms of administrative efficiency. It does not detract from the material which King Salmon has already lodged. The suggestion is intended as a practicable suggestion as to process.

M35A.2.1.2 - Alternative Allocation Method

Jonathon Hall - Submitter #: 19 Submission Point : 43

Oppose these plan changes in their entirety, as they are not a fair allocation method (reasons given previously in the submission).

The New Zealand King Salmon Co. Ltd (Quentin Davies) - Submitter #: 18 Submission Point : 78

An alternative the Council may wish to consider is whether or not to allocate space without any express reference to "authorisations".

Such an approach would be open to the Council by virtue of s.165H. The criteria for the allocation of space would be that there would not need to be public notice of the offer of authorisations. In the circumstances where authorisations were being granted to a clearly identifiable party that would appear to be unnecessary. The submission is made on the basis that what is proposed may well result in a better outcome in terms of administrative efficiency. It does not detract from the material which King Salmon has already lodged. The suggestion is intended as a practicable suggestion as to process.

M35A.2.1.2.1 - One Private Plan Change Request

Jonathon Hall - Submitter #: 19 Submission Point : 44

Oppose these plan changes in their entirety, as they are not a fair allocation method (reasons given previously in the submission).

The New Zealand King Salmon Co. Ltd (Quentin Davies) - Submitter #: 18 Submission Point : 79

An alternative the Council may wish to consider is whether or not to allocate space without any

express reference to "authorisations".

Such an approach would be open to the Council by virtue of s.165H. The criteria for the allocation of space would be that there would not need to be public notice of the offer of authorisations. In the circumstances where authorisations were being granted to a clearly identifiable party that would appear to be unnecessary. The submission is made on the basis that what is proposed may well result in a better outcome in terms of administrative efficiency. It does not detract from the material which King Salmon has already lodged. The suggestion is intended as a practicable suggestion as to process.

M35A.2.1.2.2 - More than One Private

Jonathon Hall - Submitter #: 19 Submission Point : 45

Oppose these plan changes in their entirety, as they are not a fair allocation method (reasons given previously in the submission).

The New Zealand King Salmon Co. Ltd (Quentin Davies) - Submitter #: 18 Submission Point : 81

An alternative the Council may wish to consider is whether or not to allocate space without any express reference to "authorisations".

Such an approach would be open to the Council by virtue of s.165H. The criteria for the allocation of space would be that there would not need to be public notice of the offer of authorisations. In the circumstances where authorisations were being granted to a clearly identifiable party that would appear to be unnecessary. The submission is made on the basis that what is proposed may well result in a better outcome in terms of administrative efficiency. It does not detract from the material which King Salmon has already lodged. The suggestion is intended as a practicable suggestion as to process.

M35A.2.1.2.3 - Offers not Taken Up

The New Zealand King Salmon Co. Ltd (Quentin Davies) - Submitter #: 18 Submission Point : 82

An alternative the Council may wish to consider is whether or not to allocate space without any express reference to "authorisations".

Such an approach would be open to the Council by virtue of s.165H. The criteria for the allocation of space would be that there would not need to be public notice of the offer of authorisations. In the circumstances where authorisations were being granted to a clearly identifiable party that would appear to be unnecessary. The submission is made on the basis that what is proposed may well result in a better outcome in terms of administrative efficiency. It does not detract from the material which King Salmon has already lodged. The suggestion is intended as a practicable suggestion as to process.

M35A.2.1.2.4 - Cancellation or Expiry of Coastal Permits

Kenneth Roush - Submitter #: 14 Submission Point : 27

Part (i) states that if a permit is not granted to the existing holder, regardless of any reason for not granting the permit it will be offered by tender.

There may be conditions or new knowledge that has arisen since the granting of the original permit that makes it inappropriate to reissue a permit for this space. The wording of this section does not allow the cancellation of the use of this space without re-tendering.

M35A.4 - Information Requirements

Jonathon Hall - Submitter #: 19 Submission Point : 47

Oppose these plan changes as they postpone to a later date very important rules and requirements which need to be in place before any new AMA Zones are established.

M35A.5 - Maps

Pelorus Wildlife Sanctuaries Limited (Richard Smith) - Submitter #: 27 Submission Point : 58

Oppose the wording of this rule.

Believe that the wording is misleading and contrary to Schedule 1 and 1A to the Act.

Alphabetical index of Submitters (by surname) for Plan Change 16

Submitter No	Submitter	Address
3	Bilbrough Family Trust (Ian & Jacqui Bilbrough)	27 Roseneath Place Christchurch 8022
1	Black - Campbell	14 Kilkelly Close Tawa Wellington
15	Chaucer Bay Family Trust (Mr E J Matla)	10 Willowbrook Place Fendalton Christchurch 8052
13	Coard - Anthony John	6 Regal Gardens Kilbirnie Wellington 6022
32	Cox - Robin	5 Regent Place Blenheim 7201
10	Deep Trust (Quentin Wilson)	11 Rama Crescent Khandallah Wellington 6032
33	Dolphin Watch Ecotours (Dan Engelhaupt)	PO Box 197 Picton 7250
26	East Bay Conservation Society (Ben Wybourne)	21b Percy Street Blenheim 7201
24	East Bay Conservation Society (Mark Denize)	C/- Jean Hadley 21B Percy Street Blenheim 7201
7	Friends of Nelson Haven and Tasman Bay Inc (Gwen Struik)	PO Box 365 Nelson 7040
29	Fyvie Management Limited (Stephen Waring)	PO Box 7628 Christchurch 8240
12	Grigg - David	424 Port Underwood Road Whatamango Bay RD 1 Picton 7281
23	Guardians of the Sounds (Peter Beech)	316A Waikawa Road Waikawa Picton 7220
20	Hall - Frances	Bay of Many Coves Private Bag 411 Picton 7250
21	Hall - Glenn	Private Bag 411 Picton 7250
19	Hall - Jonathon	Bay of Many Coves Private Bag 411 Picton 7250
2	Marine Farming Association (Graeme Coates)	PO Box 86 Blenheim 7240
25	Marlborough Aquaculture Limited (David Clark)	Wisheart Macnab & Partners PO Box 138 Blenheim 7240
6	Marlborough Environment Centre Inc (Steffan Browning)	PO Box 218 Blenheim 7240
36	Meach - P	50 Hector Street Seatoun Wellington 6022
9	Minister of Conservation (Steven Wynne-Jones)	Department of Conservation PO Box 5 Nelson 7042

Submitter No	Submitter	Address
11	Ministry of Fisheries (Dan Lees)	Private Bag 14 Nelson Mail Centre Nelson 7042
28	Newman-Hall - Lynn	33 Motuhara Road Plimmerton Wellington 5026
22	P - Rene	Private Mail Bag Rai Valley D'Urville Island 7145
27	Pelorus Wildlife Sanctuaries Limited (Richard Smith)	C/- Julian Ironside Fletcher Vautier Moore PO Box 3029 Nelson 7050
17	Port Gore Group (Cliff Marchant)	PO Box 15043 Wellington 6243
35	Port Underwood Association Inc. (Eric Jorgensen)	PO Box 153 Picton 7250
16	Queen Charlotte Wilderness Park Community (Ron Marriott)	Rural Bag 363 Picton 7250
8	Robyn Vidak & Carney Soderberg	PO Box 45 Picton 7250
14	Roush - Kenneth	Ocean Bay Private Bag Blenheim
34	Royal Forest and Bird Protection Society NZ, Inc. (Andrew John)	Chair Marlborough Forest & Bird Society Ngakuta Bay RD 1 Picton 7281
4	Stroh - Annette	PO Box 38 Havelock 7150 Marlborough Sounds
30	Te Ohu Kaimoana Trustee Limited (Craig Lawson)	PO Box 3277 Wellington 6140
18	The New Zealand King Salmon Co. Ltd (Quentin Davies)	C/- Gascoigne Wicks PO Box 2 Blenheim 7240
31	Totaranui Limited (Jane du Feu)	PO Box 349 Blenheim 7240
5	Wilkins - Norman & Linda	25 Bay Street Petone Lower Hutt 5012

Numerical index of Submitters for Plan Change 16

Participant No	Submitter	Address
1	Black - Campbell	14 Kilkelly Close Tawa Wellington
2	Marine Farming Association (Graeme Coates)	PO Box 86 Blenheim 7240
3	Bilbrough Family Trust (Ian & Jacqui Bilbrough)	27 Roseneath Place Christchurch 8022
4	Stroh - Annette	PO Box 38 Havelock 7150 Marlborough Sounds
6	Marlborough Environment Centre Inc (Steffan Browning)	PO Box 218 Blenheim 7240
7	Friends of Nelson Haven and Tasman Bay Inc (Gwen Struik)	PO Box 365 Nelson 7040
8	Robvn Vidak & Carney Soderberg	PO Box 45 Picton 7250
9	Minister of Conservation (Steven Wynne-Jones)	Department of Conservation PO Box 5 Nelson 7042
10	Deep Trust (Quentin Wilson)	11 Rama Crescent Khandallah Wellington 6032
11	Ministry of Fisheries (Dan Lees)	Private Bag 14 Nelson Mail Centre Nelson 7042
12	Grigg - David	424 Port Underwood Road Whatamango Bay RD 1 Picton 7281
13	Coard - Anthony John	6 Regal Gardens Kilbirnie Wellington 6022
14	Roush - Kenneth	Ocean Bay Private Bag Blenheim
15	Chaucer Bay Family Trust (Mr E J Matla)	10 Willowbrook Place Fendalton Christchurch 8052
16	Queen Charlotte Wilderness Park Community (Ron Marriott)	Rural Bag 363 Picton 7250
17	Port Gore Group (Cliff Marchant)	PO Box 15043 Wellington 6243
19	Hall - Jonathon	Bay of Many Coves Private Bag 411 Picton 7250
20	Hall - Frances	Bay of Many Coves Private Bag 411 Picton 7250
21	Hall - Glenn	Private Bag 411 Picton 7250
22	P - Rene	Private Mail Bag Rai Valley D'Urville Island 7145

Participant No	Submitter	Address
23	Guardians of the Sounds (Peter Beech)	316A Waikawa Road Waikawa Picton 7220
24	East Bay Conservation Society (Mark Denize)	C/- Jean Hadley 21B Percy Street Blenheim 7201
25	Marlborough Aquaculture Limited (David Clark)	Wisheart Macnab & Partners PO Box 138 Blenheim 7240
26	East Bay Conservation Society (Ben Wybourne)	21b Percy Street Blenheim 7201
27	Pelorus Wildlife Sanctuaries Limited (Richard Smith)	C/- Julian Ironside Fletcher Vautier Moore PO Box 3029 Nelson 7050
28	Newman-Hall - Lynn	33 Motuhara Road Plimmerton Wellington 5026
29	Fyvie Management Limited (Stephen Waring)	PO Box 7628 Christchurch 8240
30	Te Ohu Kaimoana Trustee Limited (Craig Lawson)	PO Box 3277 Wellington 6140
32	Cox - Robin	5 Regent Place Blenheim 7201
33	Dolphin Watch Ecotours (Dan Engelhaupt)	PO Box 197 Picton 7250
34	Royal Forest and Bird Protection Society NZ, Inc. (Andrew John)	Chair Marlborough Forest & Bird Society Ngakuta Bay RD 1 Picton 7281
35	Port Underwood Association Inc. (Eric Jorgensen)	PO Box 153 Picton 7250
36	Meach - P	50 Hector Street Seatoun Wellington 6022

\\mca....O:\Staff\working\folders\W-Q\Mca\Working\Drafts\PC16 & PC33\Template -Index pages for submissions MSRMP.doc Saved 16/07/2009 13:52:00