**Organization:** Port Underwood Association

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**Submission to the Regional Policy Statement Review**

**From the Port Underwood Association Incorporated**

**Introduction**

This submission is made on behalf of The Port Underwood Association Incorporated (the Association) which became an Incorporated Society in 1995 with membership open to persons having a meaningful interest in Port Underwood. Membership consists of permanent residents, part-time residents, bach owners, forestry owners, commercial fishers and marine farm owners. Each membership usually represents a couple or family group which may include a number of individual persons and the current membership of 118 is estimated to be approximately 260 adults. Members rely on the Association to keep them informed of the developments in the Port Underwood area and to act on their behalf in matters which affect the area.

Membership of the Association has been increasing through the years and members take an active interest in the Association and its activities. This is an indication that local people feel the Association is portraying an accurate picture of their views and concerns. Members are increasingly more active and showing more direct concern for what is happening in the local community of Port Underwood.

One of the purposes of the Association is to give the members a voice on community planning matters and changes pertaining to the Port Underwood area. This process is carried out by a Committee which is elected by the general membership and has the constitutional power and obligation to act appropriately on behalf of the membership. In this capacity the Committee informs the members at large about upcoming events and significant developments and would request that the members contact the Committee with their opinions.

In the matter of this Regional Policy Statement review the Association committee has kept the membership informed of the processes and encouraged them to be actively involved. The opinions expressed in this submission are a result of a survey of the members taken expressly for the RPS review plus the knowledge attained by the committee members in regard to the feelings of the membership gleaned over years of discussions with the members.

**General comment:**

We commend the Council on the quality of these discussion papers which in general are comprehensive and identify the issues well. In most cases we agree with the range of issues identified and options for response. Our responses are in line with submissions that the Port Underwood Association has made over the years on individual resource management issues.

There is a high level of agreement in the Port Underwood communities about the need to preserve the qualities and values which the members of Port Underwood Association have come to the Marlborough Sounds for and we see the Regional Policy Statement as a vital means to protect these values.

Some of these values can be threatened by ill conceived types of activities. While we do not expect the district to remain static, changes have to be sustainable. In more remote parts of the Marlborough District like Port Underwood it is even more important to retain the remaining rural and natural character, the sense of isolation; those factors that create the special feel of the area. Well-balanced policies are needed to achieve this. In some cases physical separation of uses is necessary to manage the overall landscape sustainably.

**Discussion paper 1 quality of life**

**Comments on issues and options**

**Part 5 – 1 Quality of life** – We agree on most of the issues and options put forward with the following comments. The matters listed are to be strived for; however they can be incompatible with each other at times. For example, development may affect the amenity values of the area or someone’s effort to use current resources to earn an income may adversely affect the environment. It should be emphasized with this listing of issues which enhance the quality of life that when conflicts occur among these factors the environment and existing amenity values should have priority.

**Part 5 – 2 Property rights** – We agree with the importance of property rights of private landowners however it needs to be emphasized that along with those rights goes responsibility for the effects that actions by the landowner have on the surrounding area and the community. The RPS needs to continue to state that wider public interests, as expressed in statutory plans, may prevail over individual expectations where the latter cause unacceptable effects. This is in line with the principles of sustainable management.

**Part 5 – 3 Use of resources in public ownership** – While the RPS can note that publicly owned resources are valuable for the wellbeing of the province, it must also note that a balance has to be struck to prevent the overuse or over appropriation of those resources to the detriment of the local community where those resources are located.

**Part 6 -1 Air quality** – We agree with the issues and options as discussed and feel that air quality should be a part of the RPS.

**Part 6 – Heritage** – We agree with the issues and options as discussed and specific sites should be protected within Council plans either by way of public reserves or specific covenants again with respect to private property rights. Areas within Port Underwood would include historic Maori and Pakeha sites and graveyards.

Much of the heritage that is valued by locals is associated with historic and/or cultural heritage lands. In some areas within Port Underwood it is possible to observe the changing land uses of different occupations; Maori Pa sites and associated land use (middens and pits) to whaling sites then to pastoral farming. These sites are unique. When coupled with other natural settings, for example, Whites, Robin Hood, Ocean, Kakapo, Ngakuta, and Cutters Bays etc, plus the view shaft from Port Underwood Road out to the Port, especially onto Horahora Kakaho Island, and Horahora Kakaho Island they create a good case for the heritage register to include heritage landscapes encompassing both heritage and natural features.

**Other issues**

A member of our Association has brought forward three issues, night time lighting, recreation policies, and tourism policies (policies attached), that pertain to the Marlborough area including Port Underwood. The Port Underwood Association supports the inclusion of these issues in the Regional Policy Statement.

**Suggestion for Regional Policy Review**

**Night-time Lighting**

We would like to put forward the issue of night-time lighting for consideration in the Marlborough Regional Policy Statement review.

Night-time lighting should be included in the Regional Policy Statement because it affects safety, security, economy and environment and how this lighting is used will determine whether it is beneficial or detrimental. It therefore is a regionally significant issue.

**Objective of the lighting issue**

To develop guidelines for the design and installation of outdoor lighting which will minimize the causes of glare, light trespass and sky glow while providing a comfortable, visually effective, energy efficient and safe outdoor environment. Additionally the use of outdoor lighting should not interfere with the beauty and quality of the Marlborough night sky

**Safety**

Lighting is used for safety to illuminate the areas where people are moving, both by foot and in vehicles. This can include street lighting, lighting in public places, and lighting around dwellings and businesses.

Proper lighting is shielded to direct the light output to the desired location. Improper lighting allows the light to beam out in unnecessary directions which causes glare and hinders the ability to see what is supposed to be illuminated. This is readily depicted when you are driving at night. Your vision of the roadside is adequate when no other cars are present but as another car approaches the glare from the oncoming headlights makes it harder and harder to see the roadside.

**Security**

Lighting is used for security to deter the criminal element.

As with the safety issue, improper lighting creates glare which lessens the ability to see activities in the shadowed areas rather than enhancing the view of activities.

**Economy**

Lighting is used by business activities for advertisement illumination, product illumination and premises illumination. Sports and public events are increasingly being held at night.

The use of proper lighting can be more economic to operate than improper lighting. The use of properly shielded lighting puts all of the light output in the desired direction rather than spreading it out over useless areas. This means that a lower energy consumption bulb can be used to provide the same amount of illumination in the appropriate area. The timing of the usage of the lighting can create a large energy savings as well. It is wasteful to illuminate advertisements, products, or buildings late at night when few people are around or the business is closed. Motion sensor and timer activated lighting can be more economical in that illumination only occurs when it’s needed. Sporting and public events should be encouraged to take place in daylight hours.

The selection of the appropriate type of bulb can make a significant difference to the amount of energy used as different types of bulbs use more or less energy for the same lighting output.

The energy saving effects mentioned above are also applicable to lighting used for other purposes such as safety and security.

**Environment**

Lighting is used in an environmental setting to highlight trees, landscapes and buildings.

Again, appropriate low wattage, properly shielded lighting is better than glaring floodlights.

As population density increases, such as when new subdivisions are created in areas that were previously lowly populated, improper lighting destroys the ability to see the night-time sky. This is a significant environmental effect. The beauty of the dark, clear Marlborough night sky needs to be preserved. There is a growing world wide recognition that the night sky environment is to be treasured and protected. I believe there is a movement to get the Lake Tekapo/Mt. John area recognised as a world heritage site because of its pristine night sky.

Similarly night-time landscape and amenity values in rural and sounds areas can be affected by glaring and inappropriate outdoor and indoor lighting.

Light trespass is also an environmental effect that should be reduced as much as possible whether it originates from the streetlight shining into a lounge or the neighbour’s security light shining into a bedroom.

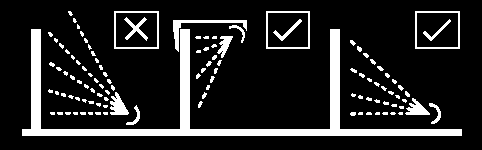
**Issues to be addressed**

Issues that could be addressed in the Regional Policy Statement could include the recognition of the importance of proper lighting, the type of lighting and light shielding to be used, and the recognition that limits need to be placed on skyward light output and lighting that trespasses onto neighbouring properties.

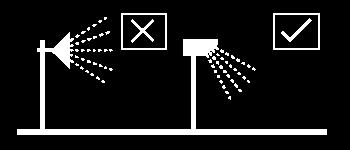
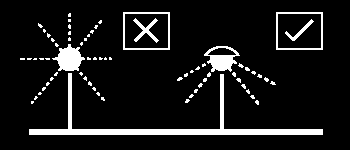
Different areas in the region should be designated with different requirements such as commercial, sports, urban residential, rural residential and environmentally pristine areas.

**Examples of lighting installations**

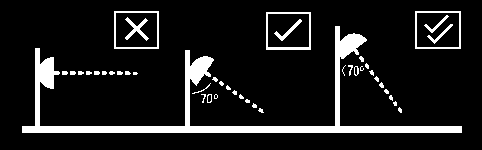
Direct light downwards wherever possible to illuminate its target, not upwards. If there is no alternative to up-lighting, then the use of shields and baffles will help reduce light spill to a minimum.



Use specifically designed lighting equipment that once installed minimizes the spread of light near to, or above the horizontal.



To keep glare to a minimum, ensure that the main beam angle of all lights directed towards any potential observer is kept below 70 deg. It should be noted that the higher the mounting height, the lower can be the main beam angle. In places with low ambient light, glare can be very obtrusive and extra care should be taken in positioning and aiming.



**Submission to include policy on Recreation in Regional Policy Statement**

There are a number of references to recreation in the RPS Review discussion papers but yet the issue of recreation is not addressed on its own. Recreation involves a large number of Marlborough residents as well as visitors. There are a significant number of public and private facilities as well as a considerable amount of money, both public and private, devoted to recreation.

Recreation is widespread throughout Marlborough, involves a variety of resources which may lead to conflict in usage and has the potential for cumulative impacts. It therefore is a regionally significant issue that needs to be addressed in the Regional Policy Statement.

Recreation has a diverse face which reflects the many diversities of the people who participate. This face is constantly changing as new activities are introduced and as the population evolves through ageing and financial changes as well as shifting visitor demands.

Both the national and local governments promote recreation for the health and enjoyment of the citizens but there is potential for conflict in several areas. These may include the over use of environmentally sensitive areas or the depletion of the recreational resource (as with fishing). Car traffic and parking can be problematic. Noise and glare from lighting at night time events can be offensive. The over encroachment of private recreational businesses into public spaces may not be appropriate. Large scale events will most likely inconvenience some people.

A recreational policy should promote sustainable recreational activities which do not cause adverse effects on the amenity values or physical character of the area. It should list those factors which may cause conflict and suggest methods for dealing with those conflicts.

Recreation and tourism policies should also seek to address a balance between the potential for conflict between these two different activities. Tourism is a business and, amongst other things, these business activities in Marlborough utilise public property and facilities. The extent to which this occurs should not be at the expense of recreational pursuits. There may be a need to set aside areas of Marlborough for recreational activities only. There is much to lose if outdoor pursuits and recreation are subtly privatised.

As Blenheim is expanding perhaps there is a need to look to the future and set aside more public “green belt” areas for passive recreation such as walking or picnics that is equitably distributed and conveniently located. We don’t want to get in the situation where people need to travel long distances to enjoy nature.

**Submission to include tourism in the Regional Policy Statement**

Tourism is an industry that reaches many aspects of the Marlborough community. It is financed and is financially beneficial to national and local governments as well as private businesses. It involves public and private facilities and public and private land.

This interaction with the public domain, potential for conflicts and potential for cumulative effects makes it a regionally significant issue and it should be included in the Regional Policy Statement.

Marlborough has become a destination for domestic and international travellers through its climatic and geographic attributes, heritage sites, and industries such as wine making and aviation. The ferry port is also an important source of visitors.

There is a significant amount of money spent by tourists on goods and services, attractions, and accommodation. There is also a significant amount of local council money spent on promoting and sustaining the tourism industry. Is there a role in the RPS to address the balance of public versus private funding, promotion, and infrastructure establishment for this industry?

The high quality of the natural environment in Marlborough is a large drawcard for the global environmentally aware travellers who are wanting undisturbed clean natural surroundings. However the increase in tourist numbers and those wanting “high adventure experiences” places pressure on those natural areas. It also creates the potential for conflict with recreational users.

A tourism policy should promote sustainable tourism activities which do not cause adverse effects on the amenity values or physical character of the area. In doing so it should recognise and protect the rights of recreational users as a higher priority than tourism. It should also describe the role of local government, community, and private involvement.

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**Discussion paper 2 – Townships and small settlements**

We note that the Growth Study for Townships and Small Settlements recognised Port Underwood. As such we will make limited comment on this discussion paper, the majority of our feedback on growth related issues features in discussion papers 3 & 4.

In general we would note that the issues identified as relevant for urban areas also exist within the communities of Port Underwood also.

In some cases we are faced with de-facto urban development through either non-complying resource consent applications or, in the case of Oyster Bay, a private plan change to re-zone. Pressure for subdivision and development of land will only increase in the future.

**Issue 2 – Water supply and management** - We submit that developments of residential or lifestyle type allotments within Port Underwood are not born of a need for housing. They are lifestyle choices. Therefore any and all costs of upgrades, expansion of services, or correcting a compromise to the quality of existing services must be met by the developers, as is currently being more commonly accepted in other areas of New Zealand.

**Issue 3 – Retaining and enhancing character -** We agree with the issues and options described in the paper. It is desirable to have as much certainty as possible regarding how and what future development and land use changes can occur. As such conditions around land use and development must, as far as practical, be clearly and stringently defined and enforced.

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**Discussion paper 3 – Rural issues**

**Comments on issues and options**

**Issue 1.2 – Land use changes –** In general we agree with the issues and options as discussed. It would be the perception of many members of the Port Underwood Association that areas of rural land in the Marlborough Sounds have attained a status which goes beyond that of merely being a working environment. Particularly areas that have laid fallow for a number of years and are reverting to bush have become an asset to the amenity value of the area. They also have important ecological and ecosystem values and thereby are very important in mitigating some of the adverse effects of the increasingly intensively used other production areas of the rural landscape. These are predominantly public values, but in the future may become increasingly valuable to their private owners through programmes or markets for carbon storage, ecosystem services etc. It therefore is good management to take a precautionary approach to the management of change in rural areas.

The RPS should acknowledge that while regard needs to be given to property owner’s rights, unforeseen effects may require a constraint on which activities are permitted as time progresses. It should also acknowledge that rural land users must accept responsibility for side effects from their activities that impact on areas outside their land boundaries and be responsible for correcting any damaging effects.

**Issue 2 – Marlborough’s natural features and landscapes**  - In general we agree with the issues and options discussed. Areas of rural land need not reach the status of outstanding landscape to be worthy of protection in some manner. For example we would advocate for the recognition of the western coastline of Port Underwood as an area of significance. From Opihi Bay in the north down the western side past Robinhood Bay and on down to Rarangi this stretch of coastline incorporates gentle curving sandy beaches, small secluded bays, harsh surf pounded gravel beaches, broad flat land running down to the water, protected bush covered slopes, and dramatic weathered cliffs at the sea’s edge. In other words, in a very short distance it incorporates just about all of the land/sea interfaces that make up the Marlborough Sounds. And it is close and easily accessible.

As noted within Issue 2.2 (page 15) we reinforce that consideration needs to be given to the impacts of these types of activities – subdivision, use and development – “even in areas which aren’t identified as outstanding, but which may nonetheless have landscape value”. As more development occurs the importance of recognising and protecting such landscape areas increases.

**Issue 3 – Amenity conflicts -** We agree with the issues and options discussed but highlight that amenity conflicts are inextricably related in a large number of cases to decisions to grant applications for subdivision.

We also offer a high degree of support for the RPS to recognise that maintaining rural amenity values be an important component of community wellbeing in terms of achieving the sustainable management purpose of the RMA.(as referred to page 22, options under issue 3.2). We believe that this element has been too easily set aside in the past.

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**Discussion paper 4 – The future of the Marlborough Sounds**

**Comments on issues and options**

**Issue 1 – What is the community’s vision** – We believe that the vision of the Marlborough Sounds has changed in the last ten years to encompass a recognition that the beauty and special characteristics that make the area unique can become compromised and degraded unless protection of those values are afforded at the very highest levels of policy such as the Regional Policy Statement and subsequent Resource Management Plans. There will always be different views of what the Sounds should be and if a vision statement tries to accommodate all viewpoints it will become vague with little actual direction. In this case it should be the vision of existing Sound’s landowners and communities which have the highest priority as they are the ones most directly affected.

It has been stated over and over that the Marlborough Sounds are the crowning glory of Marlborough. It therefore follows that it is imperative to protect the Marlborough Sounds from the degradation of the characteristics which make it so special. It must be recognised that every additional person, boat, foreshore structure, dwelling has a negative impact to one extent or another.

The members of the Port Underwood Association have listed some of those special characteristics of Port Underwood as including: low population density, isolation, tranquillity, clean air and water, recreational opportunities on land and sea, quiet, peace, beauty, viewing the wildlife on land and sea, enjoying uncrowded beaches, the feeling that it is still “raw New Zealand” and not another over-developed seaside holiday area. These characteristics are also available to visitors, and therefore add to the diversity of recreational experiences available in Marlborough.

This leads to a vision of the Marlborough Sounds as an area in which people can live and work and maintain a sense of relative isolation and tranquillity. A place that provides work and recreational opportunities but maintains a low population and visitor density. There is a growing perception that the Sounds are viewed as a potential “cash cow” in terms of growth and development opportunities. This attitude will inevitably destroy the very essence of the Sounds.

**Issue 2.1 – Effect of residential development on amenity and rural character values** – We agree with the issues and options put forward. In regard to Port Underwood the cause put forward most often by members of the PUA as being most detrimental to the current amenity values was over population through increased subdivision and associated downstream impacts.

Port Underwood is currently very much a rural type area with a low population density. With the high level of modifications occurring in other areas of the Sounds which have road access, we believe for a multitude of reasons that Port Underwood should retain that rural, low density character.

As higher density areas are established, the effects of the increased population carries beyond the immediate location of the building sites and impacts on the wider community. Some of those effects would include (but are not limited to) more traffic, more people using beaches beyond the bay or area of increased housing, more pets (uncontrolled dogs and cats affecting other users and wildlife), more boats and jet-skis, increased pressure on marine stocks, and more rubbish dumping. All of these effects are in opposition to the expectations and desires of those who live in rural areas of the Sounds (and expressed at least in part in the objectives of the current RPS).

The feeling is that current zoning standards allow for ample subdivision possibilities and no further zoning changes should be made. One dwelling per title (not allotment – this confusion/anomaly appears in several areas of these discussion papers) should become the building limit and strictly enforced. In Sounds areas further restrictions on ancillary building and structures should also be imposed.

In the matter of a non-complying application for subdivision, enforcement of the rules should be concerted and consistent. Deviation should be by way of extraordinary exception which shows benefit to the local community, and then only after rigorous application of the Resource Management Act with independent environmental and amenity impact studies into long term and cumulative effects. Within this context we again emphasis that the RPS should state that the opinions and submissions of the existing communities, within the rules and guidelines of the RMA, deserve greater prioritisation; particularly with regards to landscape and amenity values.

Conditions should be applied to new residential development with regard to integration with the existing environment in the way of design rules for developments that preserve the attributes of the area such as the rural or natural character, the landscape values, public access to beaches, etc. Additional elements to consider here are matters such as limiting the clearing of vegetation for dwellings and curtilages and screening of new dwellings for privacy to existing land owners.

As an aside, we note with interest the wide variation in the quality of resource consent applications for subdivision; particularly in areas of engineering reports, sewage and waste water disposal and –perceived- landscape and amenity value impacts. If a minimum standard of analysis could be applied in these areas it would ultimately allow for a more consistent decision making and public perceptions of what is acceptable and what is not.

**Issue 2.2 – Residential development in areas of instability and flooding** – We agree with the issues and options. However the threshold of acceptable risk must be set very high. Time after time we see disaster stories where flood prevention work has failed in extreme conditions. “Flooding is an act of God. Flood damage is an act of humans.”

**Issue 3.1 – Forestry harvesting, Issue 3.2 – Wilding pines, Issue 3.3 Forestry impact on roading** – We agree with the issues and options. Forestry is an acceptable land use provided Resource Management Plan constraints and conditions are complied with. Aspects which require to be effectively prescribed, monitored and consistently enforced include:

(a) Roading – safety, maintenance, uninterrupted access, effective road sharing regimes on the Port Underwood road so that there are times when other users know they won’t meet logging trucks.

(b) Visual – especially after harvesting,

(c) Noise – particularly during summer holiday periods,

(d) Erosion – post harvest erosion exacerbates sedimentation of streams and seabed,

(e) Proximity – provision of a minimum buffer zone between forestry and residential areas, in the interest of minimising environmental impact and fire danger,

(f) Restoration – Provision requiring a return to a natural state upon expiry of the forestry program, if the area is not replanted in pines

(g) Bonding requirement to enable the undertaking of remedial action in the event that the operator is unable or unwilling to meet consent criteria, and full user charges for costs imposed by forestry.

(h) Require a full management plan before consent is granted to plant. This should contain best practices as well as all details on earth movement, planting and harvesting details. However it needs to be recognized that harvest plans may have to change with the passage of time as other surrounding conditions change.

A required buffer zone of native trees around the plantation may be effective in reducing some of the concerns listed above.

The above list of issues suggests that monitoring of current practices, which we understand is currently carried out by forestry operators, will need to greatly improve.

We believe, as with the fishing industry, all commercial forestry owners should be levied to fund the ongoing operational costs of compliance monitoring which must be carried out by an independent body. This would work in conjunction with bonding.

**Issue 4 – Use and occupation of coastal marine areas**  - We agree that it is a privilege to occupy public coastal space and there should be no expectation that this privilege will exist in perpetuity. If road access exists and boat launching facilities are reasonably close by, very important reasons should be required for building boatshed and jetties. In other situations communal jetties should be encouraged and moorings should be tied in to land ownership within the immediate vicinity.

Single mooring ownership tied directly to land ownership is vital to stop the continued proliferation of moorings within the Sounds. An example of this proliferation can be seen currently with one company in particular applying to place and hold a large number of moorings for commercial gain (leasing and renting) and must be seen as a worrying trend

Structures should conform to sizes and colours that are in keeping with the environment.

Commercial use of the Sounds coastal waters should not become the dominant activity. It must not over ride the greater benefit of the natural character and amenity values that undeveloped waters can provide.

**Issue 5 – Aquaculture in the Sounds** – we believe that all suitable aquaculture space in Port Underwood is already occupied. Any additional farms will see marine farms becoming the dominant regime to the detriment of other users and residents. There should be no further expansion of aquaculture allowed in Port Underwood and whenever renewal of existing resource consents is sought critical examination of previous performance in meeting consent conditions and environmental expectations in general should be a significant consideration, as should the cumulative effect of the activity in the area. In other words, careful management needs to be applied to the existing AMA’s and careful consideration needs to be applied to the appropriateness of extending current leases.

Exclusion of aquaculture should be the norm in areas where such marine farm provision would hinder or obstruct recreational activity.

Equally, marine farms which have a significant visual impact should be restricted to a reasonable distance away from the direct line of sight of existing Sounds Residential enclaves.

These points may also apply to other parts of the Sounds.

**Issue 5 – Depletion of wild fisheries in the Marlborough Sounds -** We agree with the issues and options put forward in conjunction with the following comments.

Whilst commercial dredges are larger and heavier than typical recreational dredges, recreational dredges still utilise tynes to rip the seabed and disturb scallops. Commercial operators also dredge within the confines of an enforced code of practise, severely limiting the areas they can dredge. This does not apply to recreational dredgers therefore the potential for recreational dredges to cause damage to important habitats is as great as commercial operators. If dredging is to be banned within the Sounds it must be all dredging.

We recognise that Council have responsibility for protecting habitats of indigenous fauna and maintaining indigenous biological diversity. In this context there needs to be far greater focus in the RPS on addressing land based activities that are having detrimental impacts on marine habitat. There are clear examples that this needs addressing when one considers the high levels of sedimentation that is building up in certain areas of the Sounds, including Port Underwood.

Recent studies have shown that the sedimentation can be analysed and the point of origin identified. Undertaking such work will be a valuable tool in understanding and managing the impacts of land based activities.

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**Discussion paper 7 – Biodiversity and natural areas**

**Issue 1.3 – Farm development and subdivision -** We agree with the issues and options. Port Underwood has some areas identified as outstanding landscape. Other areas of extensive native vegetation on private land is valued for its contribution to natural character and amenity, so would be best managed by methods for protection of natural character and amenity through policies and rules on subdivision, etc. Other significant areas are protected through the Department of Conservation, e.g., Mt Robertson area.

One of the main threats is loss of the magnificent coastal cliff associations through weed infestation (wilding pines etc). This is also subject to loss through fragmentation by inappropriate subdivision.

**Issue 2.1 – Effects of activities on fresh water biodiversity, 2.2 – Loss of iconic species -**  We agree with the issues and options put forward. Poor forestry practices such as pushing slash into creeks, indiscriminate placing of forestry roads, etc has adverse effects on freshwater and terrestrial biodiversity and a potential adverse effect on marine biodiversity as well.

Lack of knowledge of the biodiversity is definitely an issue, especially with freshwater and marine biodiversity. There are almost no studies specific to Port Underwood. Much of the site-specific information is only in resource consent applications and methods should be found for making this information available where applicants agree to this. Port Underwood as well as all the other Sounds has small to medium-sized catchments draining to the sea, e.g. at Oyster Bay, Robin Hood Bay etc but nothing is known of the freshwater biodiversity in these catchments.

**Issue 3.1 – Marine biodiversity**  we agree with the issues and options put forward. We would put a strong emphasis on increasing research and monitoring in the form of baseline research so we know what we have and can then gauge what specifics may be affected by proposed activities and actually detect changes that take place. We would also emphasis the precautionary approach to developments since we are still pretty ignorant in how marine interactions take place and long term effects are not always recognised immediately.

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**Discussion paper 8 – Pest management and biosecurity**

**All issues**  We agree with issues identified. The general mix of policies summarised in the paper is good. Wilding pines and possums are probably the most significant pest issues in the Port Underwood area. They also affect the values of heritage areas and landscapes. Obviously it will not be possible to control wilding pines and other pests everywhere but the valued heritage areas should be priorities for control.

Complementary roles between the RPS and the Pest Management Strategy should exist. We support the use of the RPS to raise awareness of pest issues and to integrate/prioritise the interrelationship between pest management and other issues e.g. biodiversity management, but use the Pest Management Strategy for the detailed policies.

The aquaculture industry could play an important role in monitoring marine pest problems e.g. for presence of *Didemnum* in the Sounds, and for helping to prevent spread of marine pests.

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**Discussion paper 10 – Transport and access**

**Issue 2.3 – Safety and conflicts on Sound’s roads** – We agree with the issues and options put forward. The RPS should state that there is an obligation on the part of the Marlborough District Council to maintain Sound’s road to a proper level that meets the expectations of the users. There should be encouragement for heavy loads to be barged where appropriate facilities that do not create further environmental damage exist or can be created. We would note however that such barge sites require stringent monitoring of compliance. In fact, it would be necessary to evaluate each situation to determine the most environmentally friendly method of transport.

**Issue 5.1 – Public access** - We agree with the issues and options. In particular, continue the policy of providing the Queen’s chain along coastlines and rivers. However, do not force public access over private land.

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**Discussion paper 11 – Waste management**

**Issue 3 Waste management in the Sounds** – We agree with the issues and options put forward.

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**Discussion paper 12 – Natural and other hazards**

**All issues** We agree with the issues and options put forward. Through the RPS, Council should be encouraged to coordinate with Civil Defence for more education on all emergency problems not just earthquakes. For example, public meetings in the Sounds (with help of community associations) to keep people up to date on emergency procedures (also include forest fires).

Through the RPS, Council should be encouraged to support and promote the Neighbourhood Support system which can be very valuable during emergencies, particularly in the Sounds.

In relation to issue 5 we agree with the options identified but would go further. We think that merely “providing guidance on acceptable levels of risk when considering development in areas prone to instability” is insufficient. To manage expectations for all parties and add certainty to the consent process the RPS and underlying MSRMP should identify, certainly within the Sounds, areas where no building can occur. There are associated issues here with landscape and amenity values as well as pollution risks where building is occurring in such areas.