

Submission on Variation 1 of the Marlborough Environment Plan
From
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Introduction

This submission is made on behalf of The Port Underwood Association Incorporated (the Association) membership of which is open to persons having a meaningful interest in Port Underwood. Membership consists of permanent and part-time residents, bach owners, forestry owners, commercial fishers and marine farm owners. Current membership is 117 with each typically representing a household or family group. This represents approximately 90% of the households in Port Underwood. Members rely on the Association to keep them informed of the developments in the Port Underwood area. We do this through newsletters, emails, meetings and personal discussions.

The Association is also charged with representing the members' views which are gathered through meetings, emails, personal discussions and surveys, and to act on their behalf in matters which affect the area.

The members have made the Association aware that there is a limit to the total amount of area that should be occupied by marine farming in Port Underwood due to the cumulative effects on marine habitat, visual aspects, recreational use, other commercial users, navigation, rural and natural character, and domination of a natural area by industrial structures.

Summary

The Port Underwood Association supports parts of Variation 1 of the Marlborough Environment Plan as discussed below. We support the consideration to strike a balance between the desires of the commercial sector and the desires of the local communities. We do not fully support the assignment of a Controlled consent status to existing farms.

Support for general statements in Variation 1

The Port Underwood Association **supports** a number of statements made in Variation 1. These include:

There is continuing and growing demand for coastal space and resources for commercial activities such as marine farming. While recognising the benefits of marine farming in Marlborough, it is important to make sure that this activity occurs in appropriate locations and is well managed to ensure the sustainable management purpose of the RMA is achieved.

The proposed new spatial layout is aiming to strike a balance between maintaining the current amount of marine farming (measured by consented surface area) so that the benefits of that existing investment can continue to be received by the community, but to layout those marine farms in a more optimal manner.

The Council have decided to be more stringent than the NESMA in areas identified as inappropriate for marine farming and have made marine farms in areas identified as inappropriate a prohibited activity.

Issue 13N – There is uncertainty about the future of marine farming in Marlborough. For the industry, there is uncertainty about the process and outcome of any future resource consent application when existing resource consents for marine farms expire. For the community there is uncertainty about the future location and potential growth of marine farming, and whether or not existing marine farms in current locations are resulting in adverse effects on uses and values of the coastal environment.

Issue 13O – If not managed well marine farming has the potential to have adverse effects, including cumulative adverse effects, on other processes, values and uses of the coastal environment.

Support for Objectives Policies and Rules

Objective 13.21 – Provide for marine farming in appropriate locations while protecting and maintaining the values of Marlborough's coastal environment.

The Association **supports** Objective 13.21 and therefore the associated policies.

Objective 13.22 – Marine farms are operated sustainably, kept in good order, and individual and cumulative adverse effects are addressed.

The Association **supports** Objective 13.22 and therefore the associated policies.

The Association **supports** the rules that are derived from the above objectives and policies.

Allocation of space for AMA's

The community of Port Underwood, through the Port Underwood Association, has a long history of reviewing marine farming activities in Port Underwood. **In our view**, ~~We have determined that~~ there are places that are acceptable for marine farming and we have opposed applications where we believe they are not acceptable.

In the most recent survey of the membership in late 2019 we found that 91% stated that new marine farming sites should be opposed, 6% were neutral, and 3 % disagreed somewhat to opposition. In relation to expansions of existing marine farming sites 94% opposed and 6% were neutral. In relation to renewals of existing marine farms 22% said they should be opposed, 28% were neutral, and 50% disagreed that they should be opposed.

Based on the history of the communities' views, the latest survey, and discussions at recent Association AGM's we support the **spatial spacial**-allocation of Aquaculture Management Areas in Port Underwood as shown in map 14 of the proposed Variation 1.

Points of concern about Variation 1

There are some members of the Association that have concerns about the use of a Controlled consent status for marine farms which are a private activity that takes place in a public space. This concern is based on three factors.

- The requirement that a consent with a Controlled status must be re-granted in the future which in effect establishes a perpetual occupation.
- The Controlled consent status creates an inability of the community to have input into future reviews.
- The Regulatory Impact Statement for the NES: Marine Aquaculture comments on the Controlled and Restricted Discretionary activity statuses and notes that *a controlled activity status is appropriate where: "... the effects of aquaculture are well understood, and planning has been undertaken to determine that aquaculture is appropriate ..."*.

The Association notes that within the proposed provisions, it is stated numerous times that the *effects of aquaculture are not well understood at this time.*

The Association **does not** support the Controlled Consent process.

The Association considers that the **Restricted Discretionary** is the more appropriate activity status for existing farms.

We wish to attend and support this submission at a public hearing should that opportunity arise.