







# Tasman Aquatic Multi-Sport Development Trust



## Proposal Update 2016

## **Executive Summary**

The facility is a purpose built flat water park on the stretch of water known as the traverse that sits between Rabbit & Rough Island which will be able to cater for a number of sports, events and general public activities. It would be the first purpose built facility in New Zealand which could provide a venue for training, recreation and events on a daily basis.

An independent feasibility study funded by funds raised by the Tasman Aquatic Multisport Development Trust (hereafter "the Trust) showed that there were no roadblocks to this development. None of the goals and objectives initially put forward by the Trust has had to be changed following the findings of the feasibility study.

After the TDC council turned down the application to build the facility on Rabbit Island itself, the trust believes the Traverse is a location that overcomes the objections of a facility on Rabbit Island.

Based on the information available the engineering of the park does not pose significant issues. Known Maori culturally sensitive areas are being respected and will continue to be so.

There is significant support in the sporting community for the development which will be the aquatic equivalent of the Saxton complex.

## Introduction

The Tasman Aquatic Multisport Development Trust (TAMDT) continues to pursue the aim of providing a community based, internationally recognised, all weather flat water park suitable for rowing, sprint kayaking, water skiing, triathlon/duathlon, Waka-ama, and other sporting and recreational uses for the community.

When the park was first discussed with the TDC it was well received but the Trust was sent off with the task of proving that the concept was feasible and the Trust capable. We believe we have achieved that goal. We commissioned an independent feasibility study of the concept. The resultant feasibility study has very similar outcomes to the Trust's initial suggestions and the Trust accepts the suggestions made by the study.

The aims of the park have not changed since the inception of the idea.

A recent feasibility study undertaken by Tonkin & Taylor confirmed that Moturoa/Rabbit Island, Rough Island area was the most suitable site for the park out of 18 possible venues.

## What is the facility all about?

Nationally there are no purpose built flat water courses. All the courses in New Zealand are constructed on lengths of rivers or on lakes. Since the water bodies are naturally in valleys the wind tends to funnel down them making the pursuit of training and competition a gamble on the weather. Locally in Nelson the rowing club has to use the Haven, weather and tides permitting. The water skiing clubs have to wait for a combination of high tide and low winds if any training is to take place. The sprint kayaking fraternity have to wait for calm days as do paddle boarders and so the list goes on. As a result flat water sports cannot develop their full potential or hold regattas and tend to have a low degree of development in the region. A course that can provide water that can be used daily in almost any conditions would be highly prized by anyone with an interest in their particular flat water sport and would be the envy of other regions.

The facility is a purpose built flat water park which will be able to cater for a number of sports, events and general public activities.

Added to the fact that sporting activity could take place on a daily basis regardless of weather is the park location. It is in the centre of the country; it has good access; an airport; 4500 beds available and numerous campsites for accommodation and all the services immediately on hand, and unlike WOW cannot be lost to the bigger cities when it becomes successful. No other facility in New Zealand, indeed throughout Australasia offers this combination.

The facility would be constructed such that it would be accessible by bicycles, pedestrians, and the physically disabled. On a day to day basis the public would have free access and it is

hoped they would take advantage of the recreational aspects offered by the facility much as they would any reserve or park. Sporting Clubs could train and individuals practice as was convenient to them, a situation not available to them at present.

On a day to day basis the park will hold sufficient water for training and recreational activity. Water will continue to flow into and out of the park on the tide ensuring a healthy aquatic system. Should an event take place a gate will be dropped (see engineering structures) when the water is at high tide and the water level kept high until the completion of the event.

## What we know and intended changes

Many of the goals and aims of the park are unchanged from the original project outline submitted in 2009. In no particular order the original aims were as follows:

1. The park must be available to as many flat water sports as possible.
2. The park must be able to be open to the public, free of charge and used for casual and recreational activity when not in use for an official event (competitions or official training camps).
3. It must have as little environmental impact as possible indeed it should have a net benefit.
4. It must be built to international standards for as many flat water sports as possible.
5. It should be usable in all weather.
6. It should be close to amenities and services.
7. It must have easy access to water for filling.
8. It must not be able to stagnate in any way.
9. It must respect Maori history and customs

To these original aims a number of additional aims have been added or elaborated upon:

10. The facility should make every effort to be self sustaining.
11. The facility should attempt to join up with the Tasman Loop Cycle Trail.
12. Any motor boats accessing the park will have to meet sound emission standards.

## Feasibility Report

The Trust raised all funds for Tonkin & Taylor to undertake a feasibility study of the proposed park.

The study had three main tasks:

- 1- identify the best site in the region under a number of criteria;
- 2- identify community views on the proposal and
- 3- assess any potential "show stoppers" which could effectively derail the development. These "show stoppers" focused primarily on environmental, technical, regulatory and community issues. The study investigated the issues to a depth which was sufficient to determine if there were major pitfalls.

A summary of the report is as follows:

1. The study found no major issues with the proposed development.
2. Of 18 potential sites in the region, the optimal location is in the Moturoa / Rabbit /Rough Island zone.
3. Of 30 sporting/outdoor bodies approached for comment on the facility 23 responded. Of those, 22 indicated that they believed that the park would be a wider community benefit.
4. Most organisations indicated that the primary benefit would be for training, local and regional events.
5. Most organisations indicated that they would use the park on a weekly basis.

## **Park positioning in the region**

The position on Rabbit Island is now significantly more accessible to the daily users in the region. In the past those that wanted to row had to travel from as far as Motueka to Nelson. This is a trying experience for parents who have to have their children at training at 6am, 6 days a week

As is mentioned above, a course which can almost guarantee that sporting people from distant areas can hold their respective regattas (since it is an all weather course) associated with the fact that it is central in the country and has all the conveniences of services, accommodation, airports etc that the Tasman region has to offer will be well attended. Recently in a single year rowers from Nelson have travelled to Lake Ruataniwha on five occasions (an 11 hour trip one way) only to have the weather stop all activity with regattas being cancelled on four of those occasions.

## **Community benefits**

As mentioned above the benefits to the community are many. They range from providing a recreational area for the public, which will hopefully be rich in natural flora and fauna. It should be family friendly so that families feel attracted to the park for family days. The general attraction of calm water will also generate it own public users such as scouts or swimming training for kids.

The sporting attraction should extend from the weekend “wannabe” to the dedicated sports person and everything in between. There should be no reason why “joe average” should not be able to utilise the park alongside elite athletes.

It is also hoped that the park will be able to cater for the physically disabled who would like to either simply visit for the therapy of the area, to actually training and participating in sports such as the adaptive and blind rowers.

In short, there should be something for everyone.

## **Economics**

It is difficult to determine exactly what a facility like this would generate for the region financially. It is easy to get carried away and come up with sensational numbers which can be disputed.

It is also difficult to estimate where various sports will be and what events will be occurring at the park in ten years time. It is suggested that the availability of the park will generate clubs, competitive regattas and other events much like the increasing activity seen at the Aquatic Centre and Saxton Field. There will no doubt be increased activity and events held by the likes of the skiing club which cannot hold events at the moment with current facilities. There would definitely be Nelson rowing regattas which would attract nationwide interest.

The Trust has been given reassurances that if the park were to physically meet the requirements and show capability in terms of holding events then events will be allocated to the park.

## **Engineering information**

The hydrology and refined engineering design will be developed in the resources consent stages. Some general discussions with hydrologists and engineers indicate that the concept is essentially sound and that they can make predictions and develop designs with confidence.

Following is a sequence of diagrams showing the day to day exchange and holding of water. This allows for the water to remain fresh and also for sufficient water to be held for continuous usage on a day to day basis.



The first diagram shows the situation where both gates are held up and the course can drain completely for maintenance.

Diagram 1

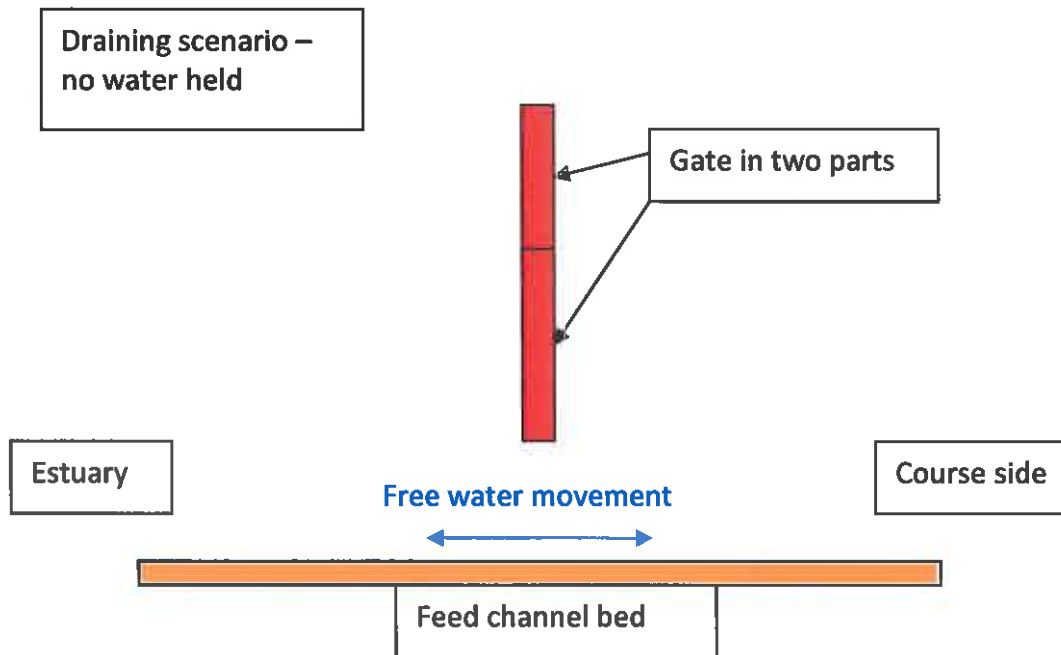


Diagram 2 shows the bottom gate closed and the tide filling the course.

Diagram 2

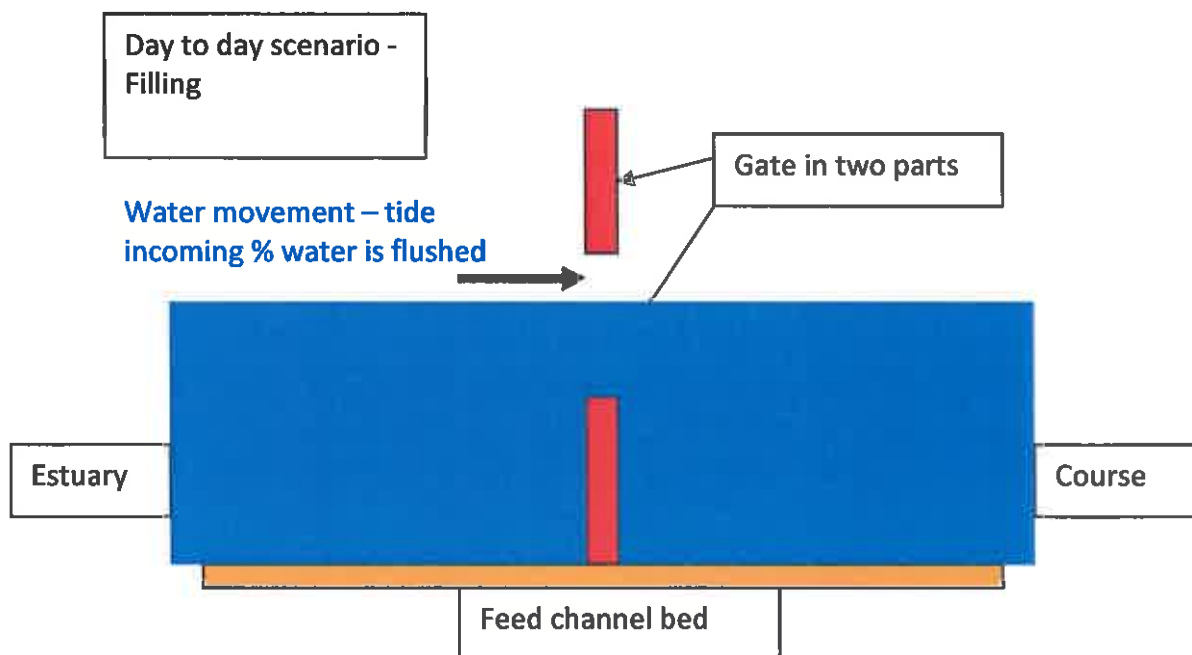


Diagram 3 shows the tide now having turned and the water draining back out. The bottom gate section is closed

Diagram 3

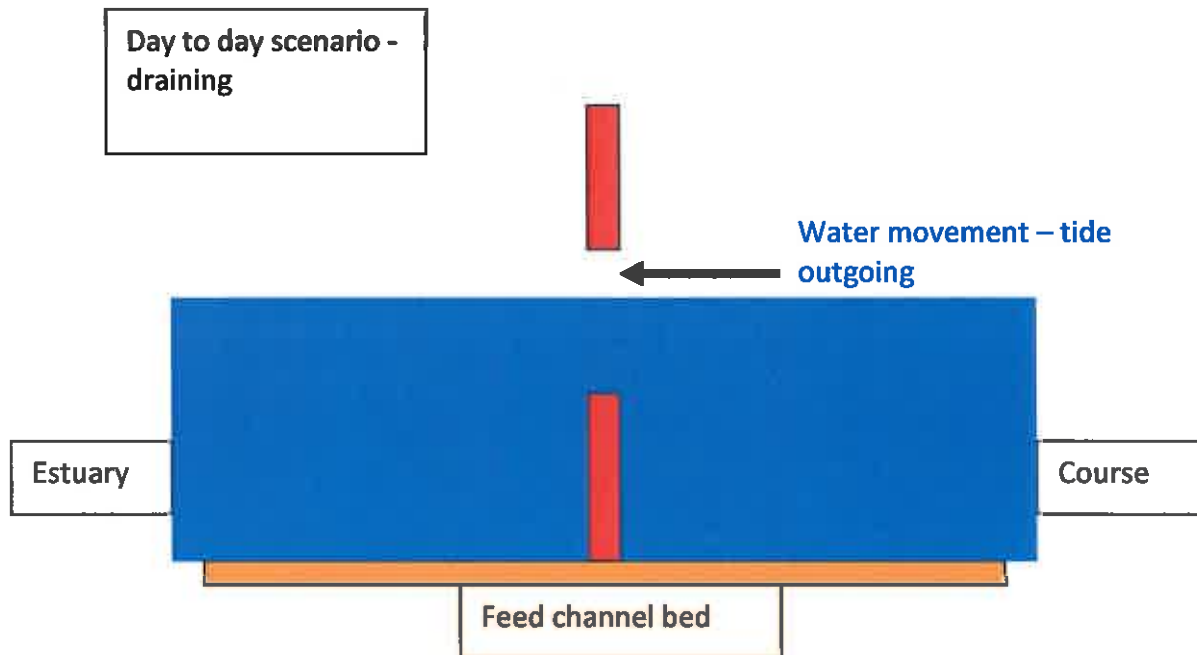


Diagram 4 shows the tide now drained out but the water is retained in the course to a depth of perhaps 1.5m by the lower gate. This allows for day to day activity and also for the water in the course to be flushed twice daily on the tide.

Diagram 4

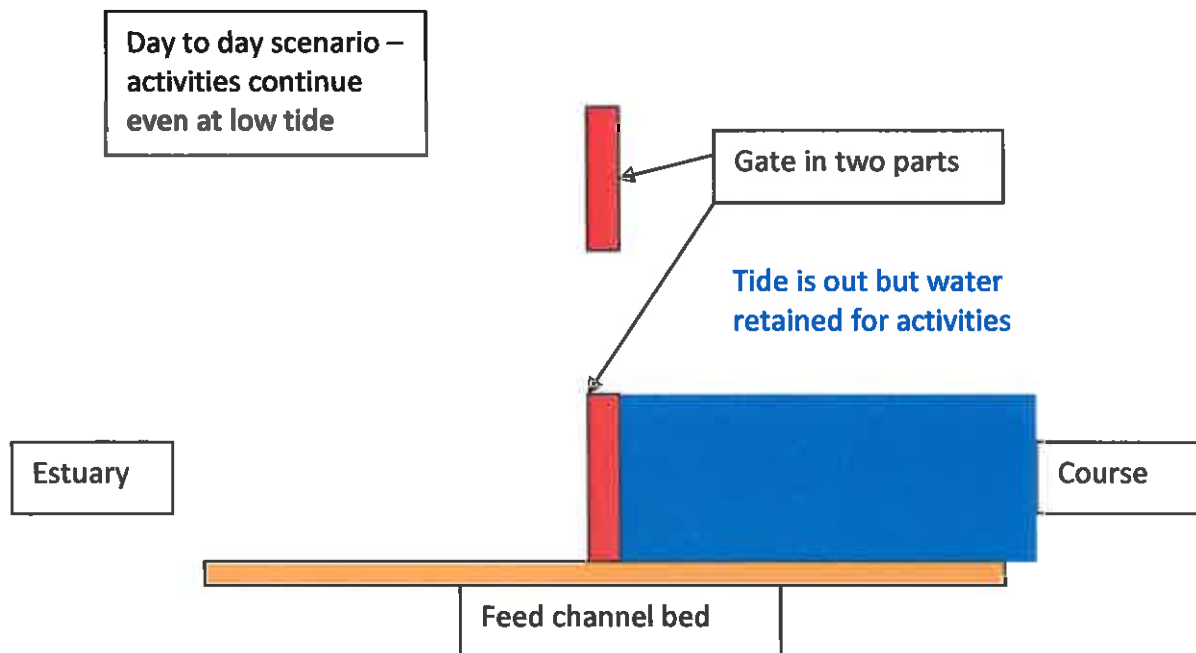
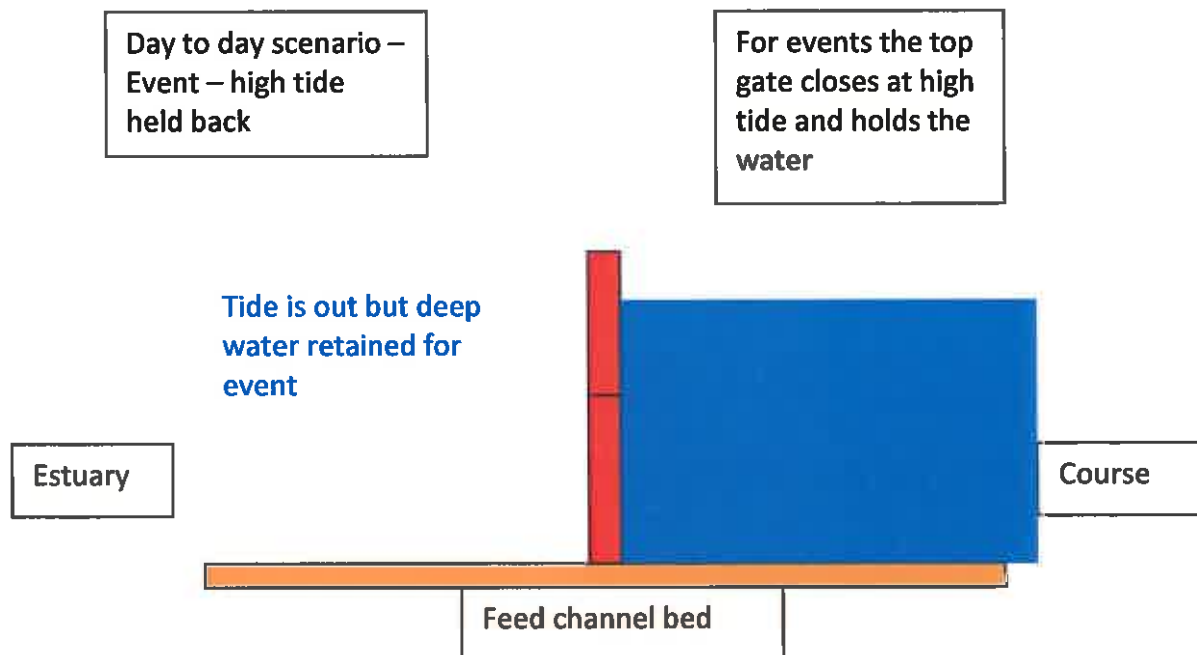


Diagram 5 shows the situation when the water is retained at high tide for events which require a minimum depth of water i.e. 2.5m



With this method the water in the system will remain fresh and exchanged on each tide. During events when deep water is required the top gate is closed at high or spring high and the event can take place.

## Addition to submission by the Tasman Aquatic Multisport Development Trust

After our submission we received this question from Anna Gerraty Policy Advisor Community Development at the TDC.

Do you have any information about how your proposal would affect the land areas of the islands that you could include with your submission please? There are maps in the Draft Plan showing the different reserve statuses (i.e. Recreation Reserve areas and Local Purpose (Plantation) Reserve areas). It would be helpful if you could describe how your proposal would affect the reserves on Moturoa/Rabbit Island and/or Rough Island, if at all. I can't tell whether you're planning to keep the natural contour of the Traverse, for instance, or would want to eat into the land areas of either island to make a straight course? And how would spectators be involved, where would they park and watch the race from etc? How would the natural coastal margins be affected? The Draft Plan aims to restore these over time.

### Overlay of Shoreline modification to Rough Island



Our proposal would be to leave the Shoreline of Rabbit Island untouched but modify the shoreline of Rough Island to create enough water space for the Water Sport Park to be able to hold events.

The Rough Island Shore need not be a straight line but could be contoured to give a natural look. It is hoped to have as natural an edge as possible which will be attractive, support aquatic birds, invertebrates and absorb any wave energy.

Facilities needed would be a area set aside at the western end of Rough Island in the zone that is marked as recreation Reserve as a boat park for boats to be stored when not in use for either training or regattas, and this area could also double as a transition area for the sport of Triathlon between a swimming leg and bike leg of a race.



***A proposed amphitheatre area for triathlon transition or other activities***

A walkway & cycle track along the length of the park could be created that links into the cycle tracks of the region and again Triathlon could use this for both cycle and the run leg of an event.

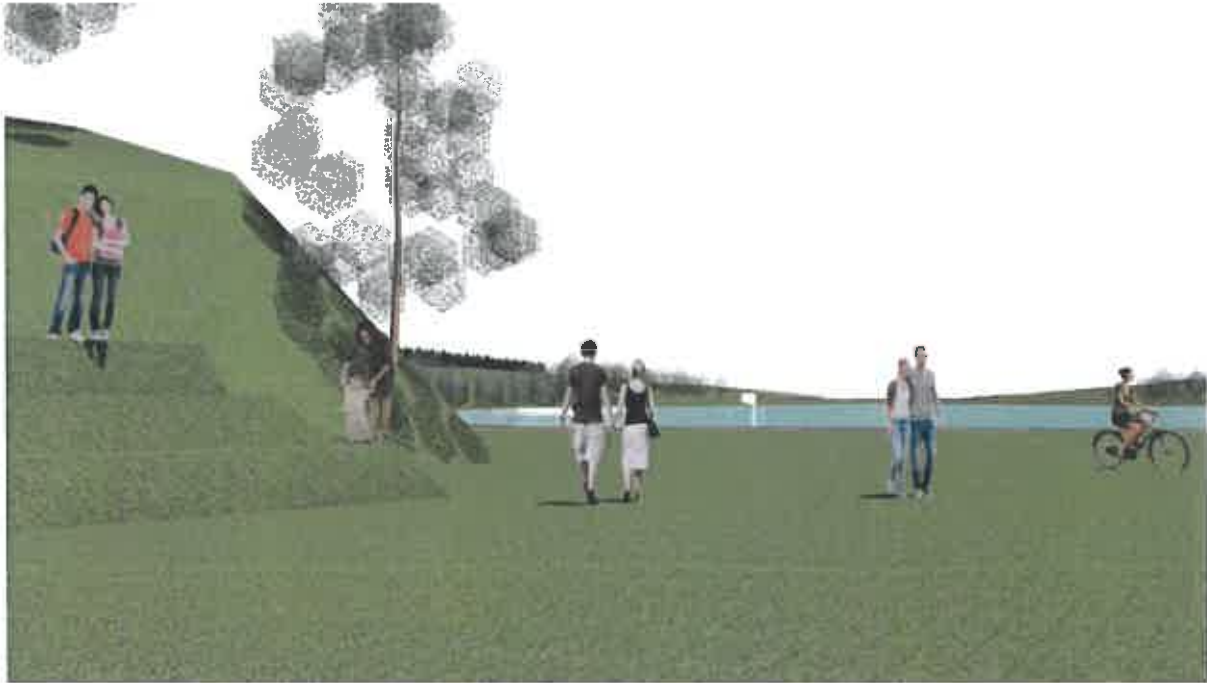
Coaches of all of the different water sports that would use the water park would find the cycle track very useful for coaching their athletes, thus eliminating the need for motor boats to be on the water.

Permanent Structures at the Start and finish line would be a "nice to have" but portable facilities could be used by constructing leading into an event and removed after the end of the event.

These would be for the Race Officials being the starters and at the finish line a "Judging Tower" and event management building.

A spectator viewing area could be created at the western end and finishing line area on Rough Island more as a picnic area and raised terraces to enhance the view down the Traverse.





***A suggested view of the terraced edge of the park and entrance***

The Public could also use the walkway/ cycle track to view activity on the water, smaller picnic areas could be created along the shoreline.

Car parking for the public could be facilitated jointly with the existing parking for the Equestrian Park.



## Comments on Neighbourly thread

### Proposal in TDC Motoroa/Rabbit Island management plan : To spray biosolids onto up to 56 Ha of Rough Island

Tim Dodgshun from [Hope](#)

If you walk your dog or dogs on Rough island , go to the TDC website [tasman.govt.nz/feedback](http://tasman.govt.nz/feedback) and download a copy of the Motoroa/Rabbit Island Draft management Plan. Go to pages 44-49 and read what they'd like your opinion on and look at the diagrams which indicate that they are proposing to spray biosolids on nearly half of the island on an area where a large number of us regularly walk our dogs. There are few enough areas in the district where our dogs can run free, and this is certainly one we don't want contaminated with partially treated sewage. For the benefit of both your health and that of your dog/s make a submission to the TDC on their web page just as soon as you can, and help put a stop to them even contemplating this stupidity.

Cheers,

Tim Dodgshun

Shared with [Hope](#) + 12 Other Neighbourhoods in Notice Board

[2 Likes](#) [2 Thanks](#)

7 days ago

[Brent Palmer](#) from [Richmond](#)

Not that I agree with the TDC doing this Tim but I understood this was something they have always done at Rabbit Island. Are you meaning Rough Island, because we are not allowed dogs on Rabbit Island? Looks like they want to apportion about a 1/3 of Rough Island to Biosolid Application. This is the public's chance to have a say.

[Like](#) [Thank](#) [Reply](#) [Save](#)

7 days ago

[Tim Dodgshun](#) from [Hope](#)

Yes Brent it's Rough Island I'm referring to. Cheers, Tim

[Like](#) [Thank](#) [Save](#)

7 days ago

[Tom Taylor](#) from [The Brook](#)

It's not "partially treated sewage" but treated sewage sludge which is not toxic and will have a very low level of pathogens - check out [www.nrsbu.govt.nz...](http://www.nrsbu.govt.nz...) for details. It's been used as fertilizer in the Rabbit Island timber plantations since 1996 and is very effective - see [www.nrsbu.govt.nz...](http://www.nrsbu.govt.nz...) It's also a renewable resource thanks to all of us doing our bit ("bums on seats" you might say). Having said that I don't like the idea of it being used on Rough Island (as Brent points out it appears to be about 1/3 of the area - see change no. 10 "Potentially allowing biosolid application to take place on up to 53 hectares of land on Rough Island in the future. Part 2, Section 4.2" ) as I can't see much point though if anyone knows what it would do to improve the area I would be happy to reconsider. Digested sewage biosolids are a good fertiliser for forestry particularly under these conditions where the soil is not too flash even though they may not have the optimum NPK, in particular they improve soil structure which commercial fertilizers don't.

[Like](#) [3 Thank](#) [Reply](#) [Save](#)

7 days ago

[Tony Flewellen](#) [Neighbourly Lead](#) from [Tahunanui](#)

Yes, I agree with Tom. This sewage has actually been treated as far as sewage can be. The resulting, relatively inert components, commonly called sludge are simply the insoluble mineral components of sewage. Everything else has been removed through "treatment". Consider what you have left after an open fire and this product is pretty much similar. It is the "ash" of sewage. Any odour is gone as soon as any liquid component evaporates. Bit of a storm in a teacup as far as I'm concerned. Certainly no danger to dogs or humans as long as you obey signage. Seems

like this Rough Island option is a matter of last resort and even then will only occur occasionally. Lets not become all "outraged" about something that is actually at the cutting edge of processing.  
[Like 1](#) [Thank](#) [Reply](#) [Save](#)

1 day ago

[Malcolm Furness](#) from [Richmond](#)

If they can't use rough island they will have to use another area and this will be costly and reflect in your rates.

It is harmless to you and your animals if you obey the signage

[Like](#) [Thank](#) [Reply](#) [Save](#)

20 hours ago

[Darrel Newton](#) from [Toi Toi - Washington Valley](#)

This is not a new thing. They have been spraying Biosolids for sometime now. They sprayed some about this time last year and the 6hr Midwinter Breakout had to be rerouted. Can't recall anyone complaining then so why now?

**Dennis Gibbs from Richmond**

The TDC consults. That is democracy. Use this privalige and respond. Power to you!

**To all users of Rough Island**

**Adrienne Matthews from Hope**

If you use Rough Island like I do as a fantastic dog walking and exercise area, please consider putting in a submission against the TDC's proposed plan to spread biosolids on a large part of it, therefore considerably reducing the area available to use. [www.tasman.govt.nz...](http://www.tasman.govt.nz...)

Shared with Hope + 13 Other Neighbourhoods in Notice Board



## NELSON AIRPORT LTD SUBMISSION TO TASMAN DISTRICT COUNCIL

Tasman District Council (TDC) has resolved to review the Moturoa/Rabbit Island Reserve management plan. This submission has been prepared in response to the Council's call for feedback.

### **Background:**

Nelson Airport is situated approximately 3 km from the eastern end of Rabbit Island. Nelson Airport currently has 6 airlines operating with on average 40-50 scheduled movements per day carrying approximately 850,000 passengers per year. This is forecast to reach 1 million passengers by 2020. The largest aircraft currently in regular use at Nelson is the ATR72-600 which carries 68 passengers and 3 crew. The General Aviation sector (light aircraft and helicopters) also account for approximately 13,000 movements per year.

NAL is required by the Civil Aviation Rules to establish an environmental management programme to minimise or eliminate wildlife hazards to aircraft operations at Nelson Airport, including bird strike. NAL's aerodrome designation inclusion in the Nelson Resource Management Plan (NRMP) enables it to manage and maintain grassed areas within the boundaries of the designation to avoid aggregation of birds and to satisfy airport operational requirements.

Outside of the boundaries of NAL's aerodrome designation, non-statutory guidance and government policy requires NAL, Nelson City Council (NCC) and Tasman District Council (TDC) to proactively work together to manage activities in the vicinity of the airport in order to reduce bird strike risk to as low as reasonably practicable. This requires NAL, NCC and TDC to work together on the most appropriate provisions to be included in the Nelson Resource Management Plan (NRMP) and Tasman Resource Management Plan (TRMP).

The Civil Aviation Rules do not impose any binding obligations on local authorities in relation to managing the risk of bird strike. The Civil Aviation Authority (CAA) has however issued non-statutory guidance for wildlife hazard management, including in areas in the vicinity of airports, outside the immediate control of an aerodrome operator<sup>1</sup>.

This guidance material states:

*"The CAA encourages local authorities to protect aerodromes in their areas to ensure the long term sustainability of the aerodrome, the safety of the aircraft operations, and the safety of persons and property. In*

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<sup>1</sup> Guidance material for land use at or near aerodromes, Civil Aviation Authority, June 2008.

*addition to the required obstacle limitation surfaces, other areas can be specifically zoned to assure that future uses of the land are compatible with airport operations and to protect persons and property.”*

The guidance material identifies the need for proper planning by the controlling authority of activities in the vicinity of airports that may be a potential source of wildlife hazard, including wildlife refuges and artificial and natural water bodies. The guidance material requires consultation with the aerodrome operator as early in the planning of such activities as possible. The guidance material also recommends that an ornithologist/biologist evaluates the ecological conditions in the vicinity of airports and management options to reduce bird strike hazard.

This non-statutory guidance is relevant to the planning functions of local authorities under the Resource Management Act 1991 (RMA). It directs local authorities to plan for, and consult with aerodrome operators in relation to, activities in the vicinity of airports that may be a potential source of bird strike hazard.

### **National Airspace Policy**

The Minister of Transport has also issued a National Airspace Policy<sup>2</sup>.

This national policy identifies the importance of integration between airspace and land use planning in the case of hazards which extend beyond the immediate vicinity of aerodromes<sup>3</sup>.

The national policy states:

*“The government expects the aviation sector and local authorities to proactively address their respective interests in any future planning. Local authorities should facilitate the adoption of rules and designations in regional and district plans that recognise new and modified aircraft arrival and departure paths, including timely completion of all submission and hearing procedures.*

*To avoid or mitigate incompatible land uses or activities and potential obstacles or hazards that will impact, or have the potential to impact on the safe and efficient operation of aircraft, regional and district plans should have regard to the applicable Civil Aviation Rules. Airport authorities and local authorities should work together in a strategic, cooperative and integrated way to ensure that planning documents (including those under the Resource Management Act) appropriately reflect the required noise contours and/or controls and approach departure paths that take account of current and projected traffic flows.*

*Resource Management Act planning tools (including plan rules and designations, should as far as practicable seek to avoid the establishment*

<sup>2</sup> National Airspace Policy of New Zealand, April 2012.

<sup>3</sup> Ibid, page 5.



*of land uses or activities and potential obstacles or hazards that are incompatible with aerodrome operations or create adverse effects."*

This National Policy is also relevant to the carrying out of local authority planning functions under the RMA. It directs local authorities to proactively work with aerodrome operators to include the appropriate provisions in resource management plans to manage bird strike risk in the vicinity of airports.

**Bird strike risk:**

CAA currently designate Nelson Airport as a low risk for bird-strike, however with an upwards trend. Nelson Airport approach and take-off paths and circuits are all over estuarine areas which have recognised populations of birds of which a number have been identified by Nelson Airport Ltd as posing significant risk to aircraft operations at Nelson Airport. Recently the numbers of South Island Pied Oystercatchers in particular have risen dramatically on the airfield, and at times the grass vectors have become unsafe to use. This is because either the bird presence is a risk in itself or that the use of the grass vectors will move the risk to the rest of the airfield, and particularly to the main runway, by the consequent bird disturbance. The high tide shorebird roost at the eastern end of Rabbit Island is important in terms of managing this risk at Nelson Airport as the birds using this site are a population that variously roosts on the Bell island shellbank, Sand Island, Rabbit Island and Nelson airfield. Any increase in disturbance at the east end of Rabbit island potentially increases the bird strike risk at Nelson Airport, either by forcing the birds to settle more permanently on the airfield or creating greater bird movements between Rabbit Island and the airfield.

Disturbance of birds roosting/resting in this area has a direct safety effect on the flight path with many of the birds being of single size or flock density to have the potential to cause catastrophic strike if disturbance occurred in the path of an aircraft.

Restricting access to roosting sites at the eastern end will allow birds to rest undisturbed, resulting in fewer mass take-offs that could potentially affect air traffic.

**Therefore Nelson Airport Ltd advocates that recreational activities on the eastern end of Rabbit Island should be prohibited.**

# Submission on Draft Moturoa/Rabbit Island Reserve Management Plan

From:

**Nelson Transport Strategy Group NELSUST Inc.**

[www.nelsust.co.nz](http://www.nelsust.co.nz)

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Nelson 7010

Peter Olorenshaw Convenor

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## PUBLIC INFORMATION STATEMENT:

We are happy that our submission is included in reports available to the public.

## INFORMATION ABOUT NELSUST:

We are an incorporated society of 260 people who have wider sustainability interests as well as transport strategy.

## 1. Introduction

We support the draft plan but would like to have added to it the provision for a log barging facility at the South Eastern side of Rabbit Island to Port Nelson as shown on the attached Log Barging Proposal.

## 2. Reasons for Inclusion of Log Barging

**2.1 Reducing Richmond Traffic** - Getting 35,000 trucks per annum off Gladstone Road and the Richmond deviation, helping to reduce road congestion on these routes

**2.2 Improving Rocks Road** - Getting 35,000 trucks per annum off Rocks Rd, Tahunanui Whakatu Drives, helping to reduce road congestion on these routes

**2.3 Improving Efficiency of Log Shipping** - All logs exported from Port Nelson are currently at least double handled and some that are stored further away from the logship berth, are triple handled. With our log barging, the majority of the logs would be loaded directly from the trucks onto the barges, reducing the double handling. When the log ships come in, the barges would be taken to tie up on the seaward side, of the logships tied up at Port Nelson, and loaded with the ships cranes, but from the other side. The barging would be tidal, but for a 2 day turnaround the logships require, that gives four high tides to move barges.

**2.4 Freeing up Port Land** - Some 10-15% of valuable Port Nelson land is currently used for the low value use of storing logs. The log barging would free up this land for more productive uses.

**2.5 Nelson Southern Link Investigation includes this as an option** - but we would like to note here that whereas the NSLI says the roads would need to be upgraded to state highway standard, we don't think this would be necessary: Logtrucks almost always come from roughly formed gravel roads where they pick up the logs in the forests.

### **3. Reasons Log Barging from Moturoa is not incompatible with reserve status**

**3.1 Proposed Area is not in Bird Nesting or Maori Historical Site** We note that the actual siting of the log barging is West of the Eastern Bird Nesting area and West of the nearest Maori archaeological site

**3.2 Moturoa is already a Forestry Area** - The existing land use of this area is forestry with the associated forestry trucks. There would be more forestry trucks than presently use these roads, but it is only a difference in quantum, not type of use. Some have suggested that Moturoa is a recreational area only. But this is not the case where we are proposing the log barging. Here the existing land use is forestry and biosolids disposal, not recreational.

**3.3 Proposed Area is Minimally Used** - Although the estuary to the South East of Moturoa has in the past been used for waterskiing, it is our understanding it is little used for this now. It is infact little used for anything other than commercial forestry and biosolid disposal.

**3.4 Minimal Structures Proposed** - The only structures proposed are piles to tie the barges and floating ramp to and temporary (removable) office, tearoom and toilets. If for whatever reason log barging had to cease, almost all of the infrastructure is floating and able to be onsold and moved to another location. The minimal buildings could be transported away and the piles removed.

**3.5 No Tall Structures** are proposed. The logs would be handled by front end loaders with claws as they are now at Port Nelson, rather than by cranes. There wouldn't be anything ion the skyline higher than a single story building or indeed a half grown forestry tree.

**3.6 Environmental Effects** Any sewerage load from a couple of toilets would be minimal compared to effect of the present biosolid disposal there. Other effects on land would be insignificantly different from logging operations.

Effects on the seabed would be minimal as no dredging is needed or proposed. The only imposition on the seabed would be the few piles that corral the barges and the barges resting on the seabed at low tides.

**3.7 Log Trucks to & from Moturoa not at Visitor Times** - In general the log trucks would be going to and from the Log Barges during the working day, not during weekends and public holidays which are the heavy use times by the public.

**END**

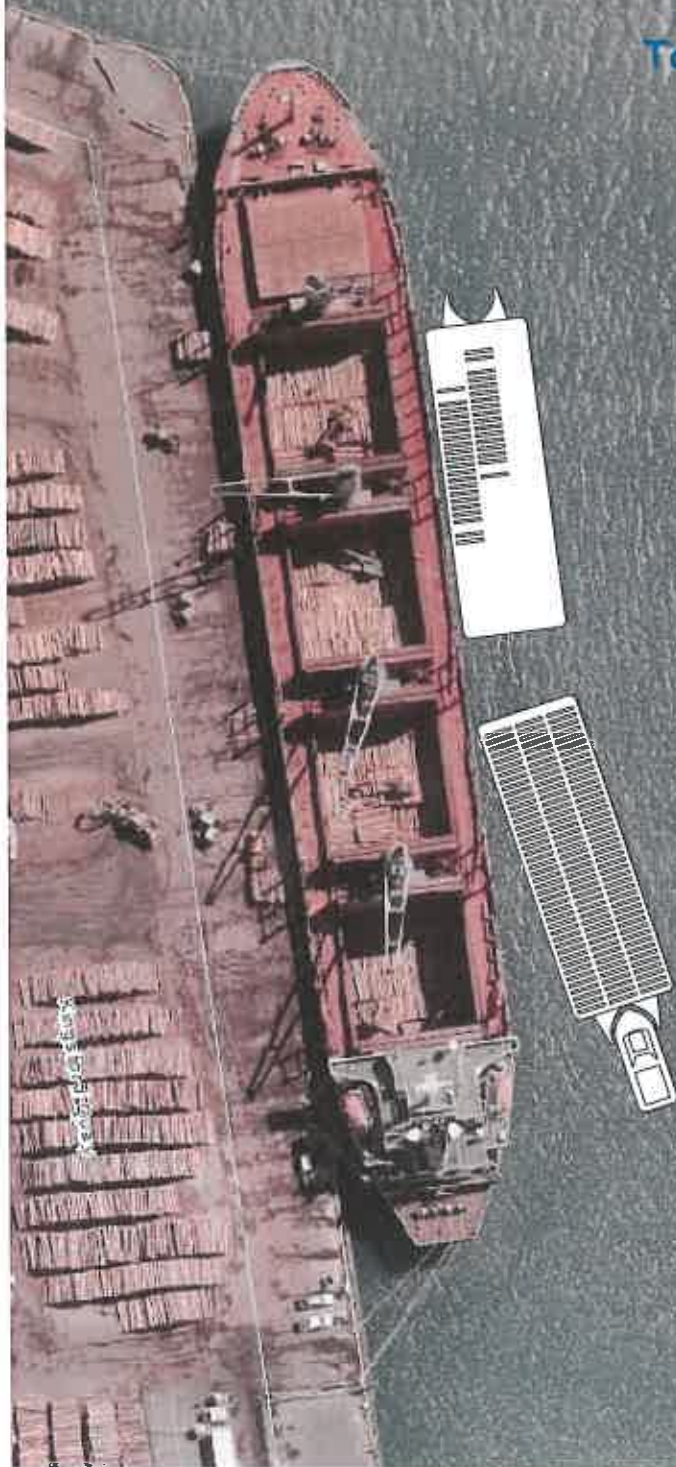
Please find accompanying Log-barging Proposal



# Log Barging Proposal

to get export log trucks off  
Tahunanui Drive & Rocks Roads

Nelsust April 2011



## **Log Barging Proposal**

A study into the possibility of reducing heavy traffic through Tahunanui and around Rocks Rd by barging logs directly to ships in port.

**Nelsust Inc. April 2011**

### **Introduction**

This Proposal is to ask NCC, TDC and Port Nelson to commission a fuller study into barging logs to ships at Port Nelson from Rabbit Island. Trucks carrying export logs from the south of Nelson to the port would be diverted to Rabbit island.

Our aim is to reduce heavy traffic around Rocks Road, through Tahunanui and also Richmond, by getting log trucks off these roads. By this means we can take 35,000 log trucks per annum off these roads. Whilst we are not pretending this is all or even most of the heavy traffic on these roads it is 35,000 of the most intimidating trucks.

Unlike other means of getting trucks off these roads, this proposal could have a zero cost. It involves releasing most of the 15% of Port Nelson land currently allocated to log storage, freeing it up for more lucrative uses.

### **Proposal**

The proposal is for logs from the arriving log trucks to be loaded directly onto barges attached to a floating wharf. No cranes would be required, The large log loaders currently used at the port would grab a load of logs, drive down a ramp down from the shore to a floating wharf (another barge) to which two barges are tied up (end on) to each side. (see attached images) The only elements that will be in the estuary bed itself would be some 20 timber piles. The barges and floating wharf would be free to float up and down with the tides, but be held in place from sideways movement by the piles. No fixed wharf is envisioned. This floating wharf arrangement is similar to how "The Straitsman" was loaded at Port Nelson until about 2000.

The barges would moved at high tide with dedicated tugs with a maximum 2 metre draft. They would require not much more than the equivalent of twin 300 hp engines and could be converted fishing boats. The barges we propose using are manoeuvred by the tugs from a wedge-shaped stern key, a system called Articulated Tug Barges (see appendix for further information). This system of tug/barges not only allows very good control of the barges by the tug, but allows very rapid attaching and releasing of barges.

The logs would be barged to the log ships in Port Nelson, ready for loading when the ships are docked. Double handling that is currently done on valuable port land would be reduced: a lot of the logs could be loaded directly from log trucks onto barges at Rabbit Island, with no further handling until the log ships' cranes lift them on board from the seaward side, when they are tied up at port. Only once the barges are full and the log ship is yet to come in would logs be stored on the ground at Rabbit Island. Please find attached pictures of the overall route and detail at Rabbit Island and at Port Nelson.

We are anticipating using four 45 x 15m barges, some or all of which may be tied up at Rabbit Island Depot at any one time. Barge movement needs to be near a high tide to



easily manoeuvre to and from the Rabbit island site and around Blind Channel (alongside Tahuna Beach). The site at Rabbit Island has 4m depth 25m out from shore at the lowest high tide. The barges would be moved to and from Rabbit Island at high tide slack periods, 2 hours either side of high tide, day or night when the log ships come in.

In terms of the environmental impact, no dredging is required or proposed: the effect on the inter-tidal zone and associated bird life appears to be minimal and certainly less than the existing water ski boats. The effect on the view from Monaco would also be minimal as the distance is significant, at least 2.30 km. There are two low lying islands between Monaco and the potential Rabbit Island barging site. It seems the floating wharf and support structures would be against the backdrop of the taller pine tree plantations on Rabbit Island, so would not create a new skyline profile.

Rabbit Island is a significant recreational area, but in fact a lot of it is used for commercial forestry and sewerage biosolids dumping. The proposed marshalling area and floating wharf site borders what used to be a water ski area, but this is little used now. The road we propose to use goes past the sewerage spreading depot and appears to be of little recreational value.

We propose to (initially at least) to focus on the transshipment of logs, which makes the great majority of export heavy traffic along the coast to Port Nelson. In future the range of products and materials the barges could transport could be extended. This might need cranes, warehouses, and similar structures for marshalling the materials for export, and import. They could be largely screened by mature trees on the Eastern side towards Nelson Airport and Monaco Peninsula.

The facility may need to include and upgrade of existing Rabbit Island forestry roads and a fenced, stabilised marshalling yard near the wharf. Except for the support buildings and the perimeter fencing, most of the capital cost is in equipment. If there were a failure in this technology, or a severe reduction in exports, or some other reason to liquidate, there is very little sunk cost that could not be sold off - the barges, floating wharf, ramp and other equipment could easily be sold.

### **Conclusion**

We have asked Cawthron for a rough estimate of the costs of an Environmental Impact Statement and an Economic Feasibility Study, for this project. There are many variables, but the approximate cost for these two studies would be around \$100,000.- Barges could be working relatively quickly, and relatively economically, improving our waterfront without more urban roading. Barging is a long term solution, which reduces urban congestion. For less than a 1/4 of the cost of the Southern Link, log barging could get 35,000 of the most intimidating trucks off Tahunanui and Rocks Roads without shifting them over the hill and through another urban community.

END.

attachments:

Overall Map showing whole route (colour A3)

Aerial Image showing barges at Log Ship in Port (colour A3)

Aerial Image showing barges being loaded at Moturoa - Rabbit Island (colour A3)

## **APPENDIX:**

### **People and Organisations Consulted**

(that is not to say any or all of them wholeheartedly support the proposal)

Navel Architect

Ship Inspector

Tug Master

Nelson Harbour Master

Port Nelson Chief Commercial Officer

Port Nelson Infrastructure Officer

NCC environmental officer

TDC environmental officer

Ornithologist

Local Iwi (feedback not available at time of printing)

### **Articulated Tug - Barges**

**DESCRIPTION-** A system of integrating tugs with barges so they are not rigidly connected, but free to swivel (articulate) about the connection axis. The barges have a notch at the stern (or structures added to the stern) to accept the bow of the tug. The tug is attached to the barge by hydraulic rams from the sides of the bow into the sides of the notch of the barge. The tug and the barge can thus pitch independently about the articulated joint. One system that appears promising is where the tug has a ram either side with a spiky "helmet" on the ends. These connect to a rack of spikes on the barge.

**ADVANTAGES -** Ideal for short haul, confined channel runs like this, no dealing with heavy hauling hawsers, no (or few) crew required, very fast turn around times with very quick and easy connection and disconnection, superb manoeuvrability and control of the barge. Pilot certified skippers would be required for this length of vessel, but this is just a matter of upskilling and certifying the skipper(s).

### **Barge Costs**

See following spreadsheet.

Barges could be made here in Nelson but appear to be very much cheaper in Singapore and Japan. They are available there for around NZ\$750,000, We have assuming quarter of a million to get them here by deck cargo, to fitout each with articulated barge ends, log stakes etc

### **Channels and Depths**

We have measured the depth of water at the proposed site at Rabbit Island and there is 4m depth at the lowest high tide (neap tide) 25m off shore. We are working on 2m max draft for tug and loaded barges.

The channel was again checked at a lowest low tide (spring low tide) and there are appears to be no significant obstacles to high tide manoeuvrability. There may be issues at neap tides with barges or parts of barges sitting on the bottom at an angle.

### **How might this happen - Where would Funding Come From?**

Ballpark Capital costs are shown in the spreadsheet below, but in summary: the capital costs should be less than \$10m. Most of that is in barges, tug, floating wharf and ramp. Unlike roading costs, all of these are not sunk costs, but readily saleable and moved elsewhere should the need arise. Furthermore it could be argued that there is a \$11.2m benefit to the port company freeing up prime port land compared with a few hectares of

forestry land that are valued at less than \$0.2m. (govt. valuations)

**Why would trucks take logs to the port via the barges?**

NCC & TDC own the port, they could require that all logs from the South of the city come via the barges. If there is no nett cost to the Port operations and no nett cost to trucking companies, why wouldn't they?

**Where do we get our figures from?**

**NUMBER OF BARGES REQUIRED:**

A log ship takes of the order of 30 k tonnes of logs for a full load. Normally less than 1/2 the load is from any one port so this =15kt logs. We have made the assumption that 3/4 of the logs exported from the port come from the South of the city, so this = 11kt per ship of logs to be barged. Each one of our 45x15m barges would take of the order of 1000 tonnes of logs. The turn around time for log ships needs to be less than 3 days, so working on 2 days turn around and only being able to move loaded barges at high tides, that gives us 2 days x 2 high tides/day = 4 tides to move barges. 11 barges carrying 1kt each are required so we need 11 barge loads / 4 tides = 2.8 barges - We have budgeted for 4 barges to give some overcapacity margin.

**TRUCKS NUMBERS of Rocks Rd & Tahuna drive:**

Log exports in 2008-9 were 726,127 tonnes, if we assume 2/3 of these are from the South and allowing for return trips with an empty truck, that gives us 726,127 tonnes / 29 tonnes of logs per truck and trailer x 2/3 from the South x 2 to allow for the return trip, that gives us 33,385 trucks per annum.

If we assumed 3/4 of the logs came from the South that gives us 37,558 per annum

Heavy Vehicles presently account for 6% of the traffic around Rocks Rd. Over the last 10 years the numbers of these vehicles has increased even while the total vehicle numbers have stayed constant. There are presently 1200 Heavy Traffic Vehicles per day around Rocks Rd according to the Arterial Study, a lot will be lighter delivery trucks without trailers, but what proportion of them are log trucks that we can get off that road?

1200 Heavy Vehicles/day x 365 days/ year = 438,000 Heavy vehicles per annum. The log barges could take 33 to 38,000 of these trucks of these roads which = between 8 and 9 % (depending on assumptions of proportions of logs from the south rather than the North)

**Barging other things:**

Although this proposal is just for logs we see there is some potential for it also to be used in the transfer of sawn timber and MDF to ships and perhaps backloading imported Urea. These initiatives could get a further 44,000 trucks off Nelson roads.

PTO for costing spreadsheet

Capital Costs of Log Barging Proposal					
Item - Costs in NZ\$000's	NZ\$ In Japan	Shipping to NZ & Modifying	Number required	Subtotal	Comments
Barges each	750	250	4	4,000	Dredgebrokers.com
Floating Wharf Barge	600	200	1	800	Dredgebrokers.com
Tug (converted fishing boat)	600	150	1	750	Dredgebrokers.com
		\$1000's Each	Number required		
Piles		5	20	100	estimated
Ramp		50	1	50	estimated
Shore ramp edge		20	1	20	estimated
levelling		200	1	200	estimated
Roading		0	0	0	use roads as they are
Site Office, weighbridge		200	1	200	estimated
Front end loaders (reuse port ones)		0	2	0	
Value of Rabbit Island land not in forest		0	1	0	Assumed same as port land cost
Credit for Port Land freed up		0	1	0	Assumed same as rabbit island
Contingency	20 %			1,224	
<b>Total Ballpark Capital Cost</b>				<b>7,344</b>	<b>NZ\$000's</b>
<b>Port Land Valuations</b>					
31 Graeme St	2.00	million	estimated		
30 Cargeek St	1.17	million	both lots		
10 Low St	3.85	million			
22 Rogers St	1.52	million			
45 Wildeman	2.70	million	both lots		
<b>Total</b>	<b>11.2</b>	<b>million</b>			
Rabbit Island & Rough Island	10.3	million			
Percentage of this for proposal	0.52	%			
<b>Total</b>	<b>5.4</b>	<b>thousand</b>			

End of appendix (3 colour A3 images on following pages)



**Proposed Log Barging Route Moturoa - Rabbit Island to Port Nelson**

Log Barging Proposal Nelsust April 2011





**Barge Loading area at South East end of Moturoa - Rabbit Island** Log Barging Proposal Nelsust April 2011 *page 7 of 8*



Barge being Manoufred alongside Logship in Port while another barge is being unloaded Log Barging Proposal Nelsust April 2011 page 8 of 8

**Reply to Log Barging comments from NFL & PNL:**

Nelson Forests and Port Nelson Limited only had a day to read and consider the proposal so it is not altogether surprising that some initial comments might be negative, but I would like to answer them anyway.

1. First is that this is not about productivity gains for the Port or for Nelson Forests. What it is about is not reducing profitability or productivity while improving urban roads. Essentially there is nothing in it for Nelson Forests, that is not the point. We think there is quite a lot to be gained by Port Nelson, but that needs to be confirmed (see below)
2. If NFL or PNL don't find log trucks intimidating I suggest they cycle around Rocks Rd a bit more. Until women and children feel comfortable cycling, numbers of people using this healthy active means of combating obesity while they get to work and school will not increase enough to make a real dent in car congestion.
3. Nelsust and I personally am a forestry fan. I have planted and tend over a thousand forestry trees on our land. We think forestry has a great future in NZ and want to see it maintain its profitability. As an architect I use timber wherever I can in preference to other materials.
4. The additional 35,000 trucks turning across the Appleby highway are the 35,000 trucks that won't be travelling through the urban streets of Richmond, through Tahunanui and past the school, along Rocks Rd. We think on balance this is a huge road safety increase.
5. We agree that log trucks are of the order of 1% of the traffic around Rocks Road. But cars are actually easy to deal with as well as being less intrusive. Under realistic fuel prices, the arterial study is showing that car numbers around there will decrease substantially anyway (we have worked it out as 17% decrease with a 100% fuel price increase over 2006 levels). Travel Demand Management would decrease it another 5%, and that is before we have a really good commuter bus service or the Rocks Rd Cycle-Walkway Boulevard. Cars are going to decrease around there anyway. We have looked at ways of reducing trucks around there and logging being far and away the biggest export truck traffic, log trucks are a good place to start.
6. Additional Noise from barge discharge when the barges are further away on the seaward side of the log ships would seem to be unlikely, but this is something the more in depth study could look at.
7. Visual Aspects of Barges going past Tahuna. We are talking once or twice a month at 3 high tides some barges going past. This is a working port, it could equally be argued that the barges moving about provide interest, just as people are interested to see ships coming in and out of port.

8. Additional costs of breaking the cartage we think is spurious. The logs at the moment are triple handled – the log trucks take them to the valuable port land, a loader unloads them into a stack, when the log ships come in a loader loads up a truck with logs and it is driven over to the ship. When it gets to the ship they are unloaded (handled a third time) by a loader onto a rack ready for the ships cranes to lift them off. What we are proposing is that the barge journey replaces the port truck journey and that the third handling with the loader is not required. In fact for some of the barged logs it would be better than that, as the barges could be loaded directly off the trucks at Rabbit Island when the logs corresponded to the next log ships preferred log grade.

9. We challenge the contention that it would take 4 days to load a log ship. We used figures provided by the Port Infrastructure Manager as to size of ships and numbers of logs per ship from Nelson. We would only need 11 barge loads per ship, 4 would be loaded ready and waiting when the ship came in, the next high tide another 4 could be there, the third high tide, another 4. As there are two high tides per day, this equals a day and a half. Detailed figures are in the appendix of the report, what part of our figures are wrong? Perhaps the Port company do not realise that the logs from the north of the city would still be loaded from the wharf as they are now – making up between  $\frac{1}{4}$  or  $\frac{1}{3}$  of the ship load. It is difficult to believe it really is radically slower loading logs off a barge than off a wharf. It is difficult to believe there isn't some way of using dunnage – perhaps flexible dunnage to separate the logs into easily stropped bundles when they are loaded onto the barge. Then they would be just as fast to load onto the ship as they are off the wharf onto the ship. Again this is something the more in depth study could look at.

10. We accept that the area of log storage and marshalling at Rabbit Island would need to be consistent with the numerous log grades, but when you know ahead of time what grades will be required for the next log ship, we can see no reason why you can't preload the barges, grades separated by dunnage.

11. Whether forestry trucks and large wheeled loaders need anything other than a gravelled surface for the marshalling yards is perhaps open to question, but we accept the cost of the marshalling yards might be dearer than our initial figures. Even if they were a million more, it is not a significant change in itself to the economics of the proposal.

12. The barges we propose are on sale for the prices we show on our proposal. We do not accept that another 8 more barges and larger ones at that would be required. See below a NZ\$692k barge in Japan of the size we are talking about. Our estimate of \$300k for the costs of getting them here and adding the stern superstructure for the articulated tug connection is the sort of thing that the full study would go into.

13. In subsequent conversation Port Nelson it was stated that they don't actually have any pressing use for the 51/2 hectares of land, that could be

freed up from log storage being transferred to cheaper Rabbit Island land. It appears they are happy to use \$15 million worth of land to store logs on. As far as the Port company is concerned, log storage is quite lucrative. What does this say about a) the drag on profits for the forestry companies having to pay significant amounts for log storage and b) the lack of ambition or vision on the part of the port company to drag in much more productive uses to this valuable central land. We are not talking residential uses here, but additional vessel servicing and marine support industries. We think this could be a significant opportunity for the port as well as a saving in log storage costs for the forestry companies as well as a significant decrease in the most intimidating heavy traffic on our urban roads.

Please see following pages for barge prices.



45 m x 16 m x 3.0 m (148' x 52' x 10') Deck Barge

http://www.dredgebrokers.com/Barges\_Cargo/110149-BC/Barge.html

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### File 110149-BC



### 45 m x 16 m x 3.0 m (148' x 52' x 10') Deck Barge

This Deck Barge was built in 09/2007, it is ready for inspection and delivery.

Located in Japan

Price for Deck Barge: ¥ 46,000,000 (JPY)

#### Technical Details

##### Principal Dimensions and Characteristics

Length Over All:	45 m	148 feet
Molded Beam:	16 m	52 feet
Molded Depth:	3.0 m	10 feet
Year Built:	2007	

*All details on these pages are given in good faith and are believed to be accurate but no warranty of accuracy or completeness or suitability for purpose is either stated or implied. Prices are subject to change without notice.*



The screenshot shows a web browser window with the title "XE: (JPY/NZD) Japanese Yen to New Zealand Dollar Rate". The address bar shows the URL "http://www.xe.com/ucc/convert/?Amount=46000000&From=JPY". The page features the XE logo and navigation menu. A prominent Google Ad for a \$75 free trial is displayed. Below the ad is the "CURRENCY CONVERTER WIDGET" for JPY to NZD, showing a conversion of 46,000,000.00 JPY to 692,815.12 NZD. A "Quick Links" section provides additional resources like historical rates and a travel expense calculator.

**Google Ad:** Attract new customers with a \$75 free Google advertising trial.

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Converter: Rates | News | Info

Mid-market 2011-04-10 08:52 UTC

**46,000,000.00 JPY = 692,815.12 NZD**

Japanese Yen / New Zealand Dollar

1 JPY = 0.0150412 NZD | 1 NZD = 66.4858 JPY

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Peter Olorenshaw  
Convenor Nelsust  
29/4/11

**Tasman District Council**  
**Review of Moturooa/Rabbit Island Reserve Management Plan**  
**David Sissons submission on the draft Management Plan**

27 June 2016

Tasman District Council publicly notified the draft Moturooa/Rabbit Island Reserve management plan on Saturday 7 May 2016. Public submissions on the draft Plan were invited. Thank you for the invitation. Here is my submission.

**I would like to be given the opportunity to speak to the Hearing Panel in support of this submission.**

I would prefer to be given a speaking spot immediately following the Waimea Inlet Forum, because, while preparing the Forum's submission, I found several additional matters which were not direct concerns of the Forum, but which I thought were worth bringing to the attention of the Hearing Panel.

The matters are as follows:

#### **LEGAL DESCRIPTION AND EXTENT OF THE RESERVE**

Congratulations are due to the Council for acknowledging that the entire reserve is vested in TDC.

The legal description on page 63 reads: *"The land has no certificate of title. It comprises Islands No 3 (Rough Island), No 4 (Bird Island) and No 5 (Rabbit Island), .... Excluded from these is a public road (Ken Beck Drive), made legal by proclamation.... The three Islands are bounded by the mean high water mark"*.

The illustration on page 69 is a survey plan showing the three islands. Each island has a natural boundary, as opposed to an immovable boundary. The boundary is the high water mark.

Thus the reserve covers all of the land on these three islands above mean high water springs (MHWS).

Objective 1 on page 58 starts with the words *"To re-survey the reserves to reflect the current physical extent of the Islands ..."*

This is supported by Policy 2 on page 58, which reads *"Progressively re-survey the reserves to ensure appropriate alignment with the current physical extent of the Islands. This should be considered in the context of further changes that may occur through erosion and/or accretion."*

Explanatory text on page 58 explains the thinking behind these. It does not match with the last sentence of the legal description on page 63. There is no "uncertainty" about the boundaries of the reserve – they are the line of MHWS.

I submit that it is unnecessary and would be counter-productive to re-survey the reserve boundaries. They already move with any changes in the MHWS.

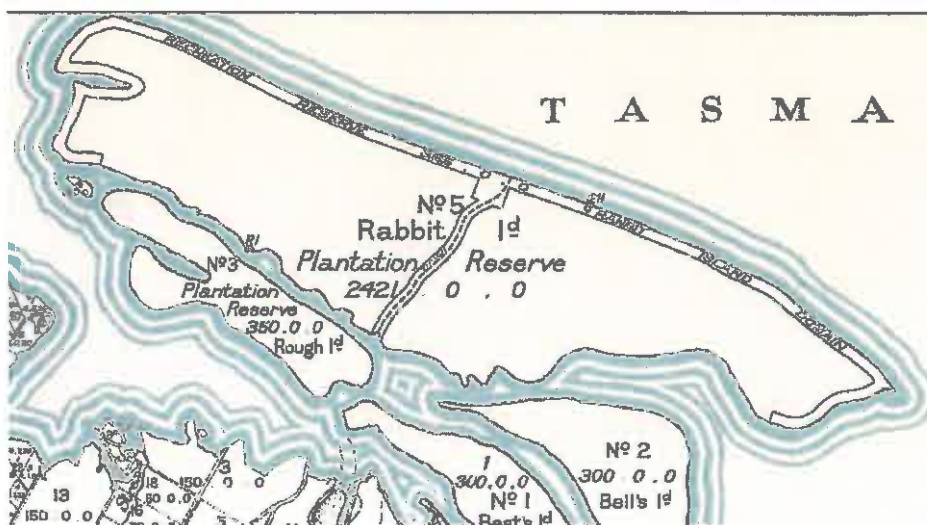
If they were re-surveyed, they would then become fixed survey lines, which would have to be regularly re-surveyed to adjust them according to both the doctrine of accretion and s13 (3) of the Marine and Coastal Area (Takutai Moana) Act 2011. The extra survey costs would only achieve what is already achieved without cost at present, and they would soon become out of date and need to be repeated. This LINZ guideline gives details: <http://www.linz.govt.nz/regulatory/20711>

It may be worth including somewhere in the plan an explanation of the effect of the Marine and Coastal Area (Takutai Moana) Act 2011 on areas where the sea or the Inlet eat into the reserve, especially that Act's Section 13. Section 13 (3) will become increasingly significant as sea level rises.

I submit that the first part of Section 8 Objective 1 on page 58 be deleted and the explanatory text be modified to remove all reference to uncertainty about the land parcels.

Some people looking at the maps in the draft management plan have been confused by the depiction of the reserve boundaries not following MHWS, which makes it look as though areas of accretion, notably on the north-western and eastern end of the front beach, are outside the reserve. Similarly, areas where the sea has encroached, notably at Greenslade Park and at the eastern end of the front beach, appear to show bits of sea bed to be in the reserve, when they are not.

I believe that the boundaries as shown are simply the lines drawn when Lands and Survey drew the plans on which the Council's cadastral mapping is based. Most of the line round Rabbit Island definitely dates back before 1928, as the shoreline of Rabbit Island, except for along the Traverse, is the same as that shown on a [Lands and Survey map](#) of that date. The shoreline of Rough Island differs, so it must have been re-mapped at a later date. Careful study of the various plans referenced in Appendix 3 of the draft management plan would probably reveal just when the lines date back to. This is academic, however. My point is that the lines do not represent the current boundaries of the reserve, which follow the line of MHWS, as noted on page 63.



*Illustration 1: Part of 1928 Lands and Survey map of Waimea District*

I submit that the outer boundaries of the reserve as shown on the various maps be adjusted to follow the line of Mean High Water Springs that can be seen on the aerial photos used in the maps.

## CHANGES TO RESERVE CLASSIFICATION

Because the reserve boundary is always moving naturally as the line of MHWS changes, the management plan needs to address the effects on internal boundaries between the areas classified for recreation and for local purpose (plantation).

Boundaries between classifications are required by the Reserves Act, but it does not require them to be formally surveyed, and they are generally no more than indicative lines drawn on a plan, or defined by description.

Thus there may be the opportunity to define the inland boundary, between the coastal strip classified for recreation that wraps around the west, north and east sides of Rabbit Island and the area classified for local purpose (plantation), as being 100 metres inland from MHWS, widening to 300 metres at the central part of the main beach. In this way it will move with natural changes in MHWS, so ensuring that the strip classified for recreation does not get eroded away, but also that any accretion will add to the area classified for local purpose (plantation) rather than to the area classified for recreation.

I do not have access to old L&S and SO plans. L&S Plan 1/371 and S.O. Plans 1211, 8255 and 10157, referenced in the 2015 reserve classification notice (NZ Gazette 29 Oct 2015) and on pages 82 to 85 of the draft management plan, may reveal whether the inland boundary is in fact already defined in that way – if it is a wobbly line, rather than a series of straight lines between survey pegs, it is simply a fixed distance inland from MHWS, and hence it already moves with MHWS. Anyway, this line can easily be changed if and when the classifications of the different parts of the reserve are reviewed and adjusted, as is proposed, by drawing a new SO plan.

**I submit that** the inland boundary of the coastal strip classified for recreation that wraps around the west, north and east sides of Rabbit Island should NOT be 're-surveyed', but instead it should be defined as being a line 100 metres inland from MHWS, widening to 300 metres at the central part of the main beach, which can move with natural changes in the line of MHWS. This definition should also be included in any formal amendment of the reserve classifications, such as discussed on page 58. Any accompanying plan of the internal boundaries should show clearly that these ones will move in response to natural changes.

**I submit that** Policy 2 on page 58 be amended accordingly.

## INLET AT WEST END OF RABBIT ISLAND

There's one part of the reserve boundary I would like to consider in more detail. The former inlet at the western end of Rabbit Island, near Bullivant's Island, is now dry land used for pine plantation, even though most of it is still below MHWS and it is shown on the maps in the draft management plan as intertidal foreshore. This is because it has been cut off from the sea by the construction of a shoreline causeway road across its mouth. I do not know the history of this causeway. If it was an unauthorised reclamation, then I believe that it may (depending on how you interpret relevant legislation) have made the former inlet into unoccupied Crown Land, technically administered by LINZ, rather than Council reserve.

I consider that the best and most ecological treatment of this area would be to remove the causeway road and allow the tide back into this area, and then to re-establish a coastal vegetation sequence in and around it. This is already specifically provided for in the draft management plan, in the top paragraph of the right hand column on Page 26. It is carried through generically to Policies 6, 7 and 8 of Section 2 (Page 28).

In doing this, the area below MHWS would once again become intertidal foreshore, the same as the rest of the reserve's foreshore. The anomaly created by the construction of the causeway would be reversed.

The causeway can be replaced by a boardwalk to carry the cycle trail over the restored intertidal mudflat.

**I submit that** the causeway be removed and the inlet at the west end of Rabbit Island be restored, as an action in the proposed Habitat Protection and Restoration Plan. This action is already provided for in the draft management plan and I support its Policies 6, 7 and 8 of Section 2 (Page 28). There will then be no need to explore or change the legal status of this bit of land.

I suspect that exactly the same issue and resolution may apply to the formerly intertidal area called the Tic Toc on Rough Island. I will discuss that area later in this submission.

## **NAMES OF FEATURES**

The plan uses the new bicultural names of features as required by the recent Te Tau Ihu treaty settlements. Rough Island is not on the list. However, I have long understood the Maori name of Rough Island to be Motuiti. Iwi may prefer the plan to refer to it as Motuiti / Rough Island.

When the signage was redesigned as part of implementing the 1991 plan, a problem arose because, while the whole reserve was called Rabbit Island, only Rabbit Island itself was called Moturoa. This is why there is still a sign saying "Welcome to Moturoa" outside the forestry base beside Ken Beck Drive on Rabbit Island – because it would have been incorrect to move it back onto Motuiti.

**I submit that** iwi be consulted with a view to changing the name Rough Island to Motuiti / Rough Island throughout the document.

## **BIOSOLIDS**

Pages 44 to 49 of the draft plan deal very well with the activity of biosolids application. I support the Waimea Inlet Forum's submission about biosolids disposal on Rough Island.

However, there is no mention of biosolids in the section on Key Outcomes Sought for the reserve, on page 9 of the plan.

**I submit that** a summary section be added after the section "Commercial Forestry Outcomes" on page 9, entitled "Biosolids Application Outcomes".



## BOAT RAMPS

I support the Waimea Inlet Forum's submission that there should not be any additional boat ramp around the reserve.

I would like to see the discussion on page 15 rewritten to align better with the proposed policy on page 21.

I submit that the discussion on page 15, which includes the sentence *"Any development would need to avoid any damage or destruction of archaeological sites"* be amended to use similar words to those used in policy 8 on page 21 - *"ecological values, archaeological sites and wāhi tapu will not be disturbed, damaged or destroyed by the activity"*.

## TYPOS ON PAGE 14

There are two typos in the right hand column on page 14.

*"i. cycling/walking/running on a network or roads and trails located on the western half of the Island;"*

The "or" should be "of".

*"Riders generally park their horse float in the Old Domain area of the Recreation Reserve and ride through access point one (equestrian access way) to the beach"*

I think this is the wrong access way number – there is no number on the sign, but its position is correct for access point 15.

## ONE WAY ROADS, CAR PARKING AREAS, CAMPING, ETC.

Policy 6 b) on page 18 says *"One-way roads may be upgraded to two-way roads, where practicable"*.

Widening roads in the recreation areas (which are the only areas where they are one way) would increase vehicle speeds and thus make them more dangerous. It is much better to keep these roads only one lane wide. Almost all of these roads are only informally one way. It doesn't matter if vehicles travel the "wrong way", because all of the vehicles are travelling slowly due to the narrow and winding alignment, and they can pass approaching vehicles by both vehicles slowing right down and driving partly on the grass berm.

Hence Policy 6 b) conflicts with Policy 6 a) to encourage slow speeds.

I submit that Policy 6 b) be deleted.

Policy 6 d) on page 18 says *"Defined car parking areas should progressively be provided alongside picnic areas"*.

Almost all visitors to the reserve arrive by car, and they recreate using the car as a base. Many picnic

and recreate right alongside their cars. That is part of the appeal of Rabbit Island.

To emphasise that this is a recreation area, not a parking area, and hence also to keep vehicle speeds down, people should be encouraged to park their cars right where they wish to recreate. There should **NOT** be defined parking areas.

**I submit that Policy 6 d) be deleted.**

Policy 9 on page 18 says "*Camping is prohibited*". The term usually used by the Council is "*overnight staying*". For consistency that term should be used here. How does one tell if visitors in a campervan during the day are camping or not?

Policy 4 g) on page 22 uses the words "*Staying overnight*".

One of the main purposes of closing the reserve from dusk to dawn is to prevent staying overnight. This is already provided for in Policy 1 on page 17.

**I submit that the word "camping" in Policy 9 on page 18 be changed to "staying overnight".**

## **TOILETS**

Policy 12 on page 21 provides for the installation of further toilets as required. The details of when and where to place them will no doubt be part of the proposed Recreation Work Plan.

Two places would benefit from new toilets:

1. By the reserve entrance on Rough Island, near to the bridge over over the Waimea Inlet. This is a very well used parking area by trail cyclists, walkers, dog exercisers and, in season, whitebaiters. The area adjacent to the parking area is often used as an informal toilet and can become quite polluted.
2. At the landing at the west end of Rabbit Island opposite Mapua, near where the ferry picks up and lands passengers.

**I submit that the Panel might like to flag these sites for inclusion in the proposed Recreation Work Plan.**

## **NO DOGS POLICY**

I note footnote 14 on page 27. What about Disability Assist Dogs, as defined in the TDC dog control bylaw and allowed by s75 of the Dog Control Act 1996? Should they be added to the footnote? What about other dogs allowed by the Act, such as police dogs and search and rescue dogs? I think the easiest is to simply refer to the TDC dog control bylaw.

**I submit that policy 11 on page 28 be rewritten to read something like this: "*Continue to prohibit dogs from Moturooa/Rabbit Island and Bird Island, even in cars, in accordance with the Tasman District***

*Council dog control bylaw 2014 or later amendment”.*

## **CLIMATE CHANGE, SEA-LEVEL RISE & COASTAL PROCESSES**

I strongly support the discussion and associated Objective and Policies requiring the use of soft engineering and adaptation to coastal erosion and sea level rise, rather than hard defences, in Section 5.3 (pages 50 to 53).

**I submit that the intent of Policy 2 on page 53 be made stronger by replacing the word 'promote' with the word 'use', thus: “Use soft engineering and adaptation to coastal erosion, rather than hard defences”.**

Previous management plans have led to re-routing the eastern part of the road that used to run behind the main beach, so that it is no longer at risk from coastal erosion. It has been very successful.

**I submit that the re-routing exercise be progressively extended to the eastern part of this roadway, before it becomes threatened.**

## **HISTORY OF THE RESERVE**

On page 64 you say you will be adding a Māori history of the Islands. Page 65 is titled Past & Present Day Use of the Islands, but it has almost no pakeha history, stating that *“the reserves on the Islands were rarely used until the 1920’s”*. If you are going to devote space to the Māori history, I do think you should also do more to acknowledge the pakeha history.

**I submit that one or two paragraphs of brief summary be added to the text on page 65 to show that there is a relevant history of pakeha use of the reserve.**

This is what I know of the pakeha history. It is not properly referenced, so I would advise you not to quote it directly, but just summarise it. I could do better researched history for you if you want me to, but detail is not really needed for the management plan.

Perhaps of greatest importance is the significant part played by the islands in the establishment of New Zealand's horse racing industry. Henry Redwood is generally recognised as the founder of horse racing in New Zealand – the 'Father of the New Zealand Turf'. He kept his racehorses in stables on the Appleby Straight (now SH60), probably from 1850. The brick building was relocated to the corner of Sundial Square and McGlashen Avenue in Richmond in recent years.

He exercised and trained the horses on the front beach at Rabbit Island, and hence the current use of the front beach by riders has a long and distinguished pedigree.

I understand that when the tide was too high to use the front beach, he used the Tic Toc, a long strip of hard sand running along the south side of Tictoc Road on Rough Island, which was inundated only on very high tides. [See this article](#) which refers to his use of the Tic Toc. I believe that the name Tic Toc is the sound of the horses' hooves on the hard sand. Hence the location of the adjoining equestrian park also has heritage significance.

I'm a bit short of sources for this information, but the Nelson Historical Society may know more.

I did a quick search of a few old Nelson newspapers using Papers Past. It was not comprehensive, and I'm sure a more careful search would reveal more. I found that:

3. The Rabbit Island beach was used for [horse racing in 1856](#), a big crowd of people travelling there by land and by sea.
4. It was also a popular destination for pleasure boat excursions on public holidays in the late 1850s and the 1860s.
5. In this period the island was also used by parties of sportsmen, most probably shooting rabbits.
6. The 1867 New Year picnickers enjoyed refreshments in "the old camping ground", suggesting that it was also used for camping.

I haven't researched the rest of the nineteenth century, but no doubt the place remained a popular destination. On Arbor Day 1906, 2,000 trees were planted there, 250 of them "surrounding the wellknown camping place" on the north-eastern end of the Island. It was hoped that picnickers would not interfere with the trees. Thus camping and picnicking were well established activities, and that is probably what led to the establishment of the recreation reserve in 1910.

The planters travelled there by land. Page 65 of the draft plan says "*Access to the Islands was via the sea until more recent times*", but, as far as I can see from old newspapers, access by land, fording the low tide channel, was commonplace. Henry Redwood's horses would not have gone by sea in the 1850s, they would have been ridden there from his stables. The 1919 plan on page 67 of the draft management plan implies that at that time (1919) the access route crossed Bests Island and the tip of Bell Island, but the 1928 Lands and Survey plan shows that by 1928 it ran from the end of Cotterell's Road.

[A newspaper article in 1905](#), about Maori skeletons discovered on Rabbit Island, referred to two people who lived in huts on Rough Island. Joseph Darby, a fisherman, lived there for 24 years until his death (the Land Board had leased 50 acres at the east end of Rough Island to Joseph Darby in 1881). Anthony Weler was the other resident. The article ends by saying that Henry Redwood resided on Rabbit Island for many years, but was "at present staying in Richmond". (The name Henry occurs in at least two generations of the Redwood family)

## THE TIC TOC

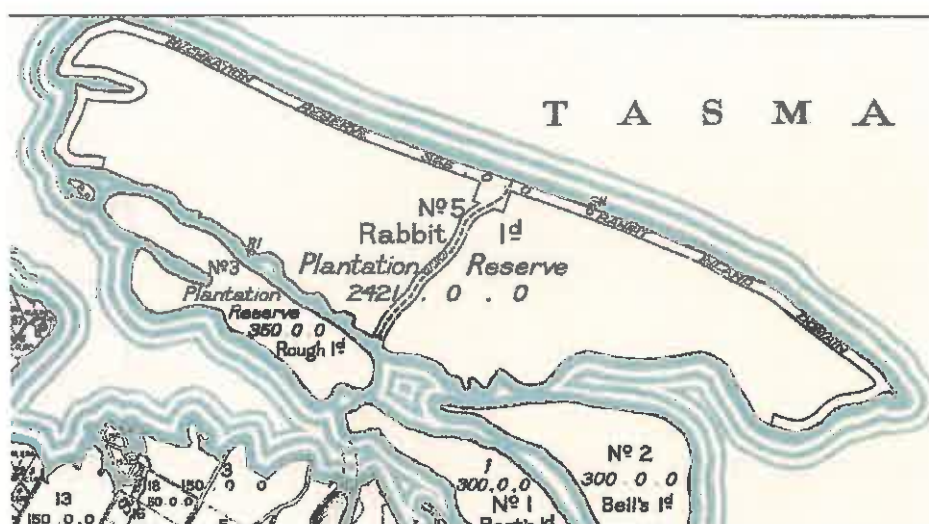
Policy 7 on page 53 says "*Investigate the possibility of reinstating the natural tidal flush into the low-lying area located between Tictoc Road and the Rough Island events and equestrian park, to restore the ecological integrity of this wetland area*".

The Tic Toc has been cut off from the sea by the construction of a shoreline causeway road across its mouth. There is a vehicle barrier by the western end of the causeway, so vehicle access is not a priority.

Most of the existing rank tall fescue grassland, with encroaching willows and blackberry, would most likely naturally revert to a bare sand flat as a result of removal of the causeway and re-introduction of salt water, thus restoring the heritage of the Tic Toc as the place where Henry Redwood trained his racehorses in the 1850s.

If coastal walking access is needed, the causeway can be replaced by a boardwalk over the restored entrance to the sand flat.

As with the inlet area at the west end of Rabbit Island, discussed above, the Tic Toc will then revert to intertidal foreshore, as shown on the 1928 cadastral map.



*Illustration 1: Part of 1928 Lands and Survey map of Waimea District*

This is already specifically provided for in the draft management plan, in the top paragraph of the right hand column on Page 26. It is carried through generically to Policies 6, 7 and 8 of Section 2 (Page 28).

**I strongly support Policy 7 on page 53, for heritage reasons as well as for ecological reasons. I consider that the best implementation would be to remove the short length causeway road that cuts the Tic Toc off from the Inlet and allow the tide back into this area, and then to re-establish a coastal vegetation sequence around it. In addition, I support Policies 6, 7 and 8 of Section 2 (Page 28), which also provide for this action.**

**I submit that the words "and heritage significance" be added to Policy 7 on page 53 after the words "restore the ecological integrity".**

Thank you again for the opportunity to comment on the draft management plan.

David Sissons

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**Tasman District Council**  
**Review of Moturoa/Rabbit Island Reserve Management Plan**  
**Waimea Inlet Forum Submission on the draft Management Plan**

29 June 2016

Tasman District Council publicly notified the draft Moturoa/Rabbit Island Reserve management plan on Saturday 7 May 2016. Public submissions on the draft Plan were invited.

Thank you for giving the Waimea Inlet Forum the opportunity to comment on the draft Plan.

**We would like to be given the opportunity to speak to the Hearing Panel in support of this submission.**

Our comments are as follows:

**We support the draft plan.** It is an excellent document. We congratulate the Council on preparing such a comprehensive, clear and environmentally sensitive plan.

Its Section 2: Environment draws extensively on our earlier submission.

Notably, it adopts our recommendation that a Habitat Protection and Restoration Plan be prepared. This is to be one of seven operational work plans, two of which already exist, and five new ones which are proposed.

Our wish to see the reserves' shorelines revegetated is carried into the policies, which include: "Implement an ongoing programme of habitat restoration, including integrated weed and pest management and fire protection" and "Progressively create a buffer of indigenous vegetation along the Islands' coastal margins. Priority should be given to locations with existing habitat remnants and areas of coastline alongside existing recreational tracks."

Our concern that the plan should anticipate sea level rise are reflected in a policy to "Recognise and provide for the effects of sea level rise and climate change, particularly in relation to native species whose habitat is the Inlet margin, where sea level rise projections show that extensive inland migration will be required over the next few decades."

Our concern to protect the inlet, wildlife from disturbance by recreationalists is reflected in various policies, including one to "Limit recreational use of the eastern end of Moturoa/Rabbit Island"

We find the amount of detailed discussion and background information to be very useful in explaining the intent of the objectives and policies.

We would welcome any chance to contribute to the preparation of the Habitat Protection and Restoration Plan, and indeed we would be very pleased to help with the actual work of habitat protection and restoration.

In this submission we recommend that the Council make three changes to the draft management plan, as follows:

**1: The proposed reorganisation of the mountain bike tracks around the western half of Rabbit Island.**

The draft plan proposes to close the existing bike tracks within the forest, and replace them with one bike track following around the shoreline from the Ken Beck Drive causeway over the Traverse to the Mapua ferry landing. The western half of this already exists. The plan proposed to extend it along the Traverse shoreline to Ken Beck Drive, instead of its present route along Higgins Road. The extension is across very low-lying land, which our earlier submission's sea level rise plan identified as land that will become inundated. This area is very suitable for inland migration of shoreline habitat. Putting a track through it is likely to disturb the wildlife, and the track will be regularly flooded by high tides, as are parts of the existing track close to this area, which could lead to calls to raise the level of the track, which would in turn prevent the inland migration of the shoreline habitat. Furthermore the proposed location would disturb any use of the intertidal area by feeding birds.

There is already an informal worn track around this shoreline, which does not follow the indentations of the high tide line, but cuts across the soft mud and sarcocornia beds of the intertidal area. This activity is lowering their natural values and should not be encouraged.

**We submit that this track should continue to run along Higgins Road, set back from the current shoreline, to allow for shoreline retreat as the sea level rises. In a few years the pines between Higgins Road and the shore will start to succumb to increasingly saline ground conditions. They should be felled before then, and an indigenous coastal vegetation sequence established to replace them.**



**2: The boat ramps.**

The draft plan proposes an upgrade or development of a boat ramp(s) on the islands, "in a location where ecological values, archaeological sites and wāhi tapu will not be disturbed, damaged or destroyed by the activity"

A new boat ramp anywhere along western end of Rabbit Island facing the Mapua channel would be disruptive of wildlife and, by requiring a new road to give access to it, would likely increase the recreational pressure on the colonies of gulls and oyster catchers around that part of the island.

Any significant upgrade of the launching area at Hunter Brown is likely to increase its use, and so to contribute to further disturbance of natural values in and around this important ecological area, which the plan identifies as a Significant Native Habitat area, but we consider that a carefully designed development could include measures that would restrict the extent of the increased activity and improve the protection of the existing natural values of both the terrestrial (totara forest) and the intertidal areas.

**We submit that the plan should say that there will not be any additional boat ramps in the reserve, and that any upgrade of existing launching areas will include active measures that prioritise the restoration and on-going protection of the natural values which surround them.**

### **3: Additional area for biosolids disposal on Rough Island.**

We consider that in principle biosolids disposal in pine forests is a good idea, because it makes good use of the nutrients in the region's sewage, rather than dumping or flushing them away, and monitoring has not found any adverse effects on the Waimea Inlet. We accept that other proposals in the draft plan will reduce the area of Rabbit Island available for biosolids disposal, and we encourage the Council to allocate additional areas in compensation.

New areas for biosolids do not need to be within the Moturoa / Rabbit Island reserve. They could be in the Council's other forests, or indeed in private forests.

Future restoration and extension of the existing high natural values of Rough Island, notably the totara forest of Hunter Brown and the wetland area (both identified in the plan as Significant Native Habitat areas), and restoration of the natural values of the Traverse and the Tic Toc, could run the risk of being compromised if the central part of the island were used for biosolids disposal.

**We submit that the plan's proposal for biosolids disposal on Rough Island should occur only if the activity is controlled and reviewable, to ensure that it would not compromise the opportunity to restore and revegetate most or all of Rough Island's natural values at some future date.**

Thank you again for the opportunity to comment on the draft management plan.

***for the Waimea Inlet Forum***

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### **Rabbit Island Rowing and Water sports facility**

Supporting the current vision that Rabbit Island be a destination for “low key outdoor recreational facilities”, I submit that plans for a rowing course be included within the recommended changes and plans for defined use activities. A rowing course would build upon the naturally occurring water channel between Rabbit Island and Rough Island which would be widened, straightened and deepened as necessary to meet the specifications for a functioning regatta course. I would like to see a specific area defined on the plans for the current 10 year plan cycle, for potential future development of a rowing course, even if TDC budget constraints mean it can't be built immediately. I perceive a risk that unless a rowing course is intentionally provisioned for in the use plan then alternative use plans will grow up incrementally and eventually preclude a rowing course from ever becoming a possibility. The spirit of the current vision statements for Rabbit Island should be maintained such that the 12 planned changes to the plan do not become synonymous with, or become the de-facto definition of what the vision means in the long term.

The merits of a rowing venue are numerous and have the potential to benefit the region far beyond what is probably realised. Each of these merits will be explored in turn.

### **Rowing Venues in New Zealand – some background**

Rowing in New Zealand occurs on all sorts of stretches of water with one common feature: calm water. Venues includes rivers, lakes, and harbours. Some regional regattas are held on lakes or rivers but the more important regattas are always held in one of two venues. Lake Ruataniwha near Twizel in the South Island, or Lake Karapiro outside of Cambridge in the North Island. All rowers wanting to compete in the major regattas must travel to one or other of these two venues. Every year the national championships alternate between Twizel and Cambridge to share the burden of travel cost evenly between North Island crews and South Island crews. Neither Twizel or Karapiro are close to any major population centre so significant travel costs are incurred by everyone for every regatta. In the height of the rowing season (summer), rowing regattas are held regularly at these two venues. If it were not for restrictions relating to hydro lake requirements, even more regattas could be held (Twizel). Every regatta attracts many hundreds of rowers. The national regattas such as North and South Island Championships, National Championships, or the high school Maardi cup regattas attract up to 2500 rowers plus coaches, family or spectators. Masters competitions further add to this. Major regattas are held over the course of a full week to allow for heats, repechage, semi-finals and finals.

Rowing regattas are not just a sporting event, they are an economic event in their own right. Most competitors at rowing regattas travel from out of town for the regatta. Visiting crews require accommodation and meals for the duration of the regatta.

### **Geographic location**

Rabbit Island is a particularly suitable venue for a rowing course on several accounts:

1. The natural channel between the two islands provides a confined area that would produce consistently calm water for training and racing. The pine trees on Rabbit Island provide a natural barrier from wind along the entire length of the course, combined with the fact that the Tasman region generally is not a particularly windy location to start with.
2. The proximity to population centres would make a Rabbit Island regatta course unique in New Zealand. The course would be easily accessible for crews from Nelson and Tasman districts which collectively represents more than 90,000 people. This is compared to Twizel

(1200) and Cambridge (19,000), the other two towns which are close to rowing venues. It is easy to envisage new regattas being organised for “top of the south” crews.

3. The addition of a third national grade regatta venue in New Zealand would open up scope to lower the cost of travel for a large number of competing crews. Particularly those from the North Island since they do not have to travel so far south. Rabbit Island would become a third alternative to lake Karapiro and Ruataniwha.

#### **Rowing: A high profile national sport**

New Zealand Rowing enjoys enormous success on the international stage as measured by world championship medals and Olympic medals. The grass roots rowing program through New Zealand high schools is what ultimately feeds this success at the national team level. While Nelson city currently has a rowing club which serves those living in the immediate vicinity of Nelson port, there are large population bases in Richmond, Motueka and surrounding areas who are practically excluded from rowing because of distance and logistics. A regatta course at Rabbit Island would open up huge opportunity to encourage even more participation in rowing, particularly through the school system.

Rowing is very popular in the high school system but there is also a substantial club rowing and masters rowing fraternity also.

#### **The Economic impact of regattas**

Regattas attract hundreds of participants and for national events up to 2500 rowers attend, plus support and family. Most crews are from out of town and require accommodation and food for seven nights or more. The economic impact of a regatta is quite substantial and it is difficult to envisage any specific use activity at Rabbit Island that could match the economic benefits that a rowing venue could attract. This economic impact is substantial even before accounting for the other water sports that can make use of the same facility. Canoeing and kayak are two other water sports which could benefit from the facility and have their own independent following.

Regattas in The Tasman district serve as a showcase for the region generally and while the specific economic impact of regatta attendees can be estimated, there is likely to be a wider economic impact related to associated trips or activity that can be attributed to rowing visitors.

#### **Promoting sport participation**

A rowing venue opens up a whole new sporting opportunity for a significant population base in the Nelson Tasman region. Rowing is a particular sport that opens up opportunities for student scholarships at international universities which for some can be a fantastic opportunity.

#### **Technical and Engineering aspects of a rowing course**

Substantial preliminary work has already been conducted by others into how a rowing venue could be constructed at Rabbit Island. This submission is not going to duplicate this work already done or attempt to summarise the work already done by others. At a highest level the pre-existing water channel between rough island and Rabbit Island would need to be straightened, deepened and perhaps widened in some places. Given that the water course has always been a natural feature of the island, the course is not a substantial deviation from what already exists.

#### **Improvements and infrastructure**



A rowing venue would require some infrastructure. There would need to be road access, parking, for boat trailers and cars, boat sheds, boat racks, start pontoons (perhaps), toilet / shower blocks. Hospitality support / kitchen. These improvements are not considered to be incompatible with the current vision of Rabbit Island and actually add amenity.

A camping facility to accommodate rowers during regattas is another consideration perhaps separate from the merits of the course itself.

Many of the infrastructure elements that would support the rowing course such as roading, would also open up opportunity for more cycle trails. Plantings that have been suggested could be planned in ways that are sympathetic to the new layout that a rowing venue would mean. In other words, plantings could be planned in a way that anticipates a rowing course eventually being built.



PAR-10-02-22  
DOC-2823268

4 July 2016

Tasman District Council  
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Richmond 7050

Email: [info@tasman.govt.nz](mailto:info@tasman.govt.nz)

Dear Sir or Madam

**Draft Moturoa/Rabbit Island Reserve Management Plan**

Please find enclosed a submission in respect of the above publicly notified draft management plan for the Moturoa/Rabbit Island reserves. This follows on from the Department of Conservation's initial comments on the management plan review, dated 22 February 2016 (copy attached).

The Department of Conservation does not wish to be heard when the Council considers submissions. However, please contact the undersigned if you wish to discuss any of the matters raised in the submission.

Kind regards

Lionel Solly  
Senior Ranger, Community

DDI 03 546 3162 | Email [lsolly@doc.govt.nz](mailto:lsolly@doc.govt.nz)

## Reserves Act 1977

**To:** Tasman District Council

**Submission on:** Draft Moturoa/Rabbit Island Reserve Management Plan, May 2016

**Name:** Mark Townsend, Operations Manager, Department of Conservation

Pursuant to section 41(6) of the Reserves Act 1977, and acting upon a delegation from the Minister of Conservation, I make the following submissions in respect of the above.

My submission is structured as follows:

- (i) The questions posed on Council's submission form are addressed, where relevant.
- (ii) Submissions and comments on other matters, and on specific provisions of the draft management plan, are then set out using the same system of headings, numbering and page numbers as that contained in the draft management plan.

The following abbreviations are used in the submission:

The Department/DOC	Department of Conservation
The Plan	Draft Moturoa/Rabbit Island Reserve Management Plan
RA	Reserves Act 1977
The reserves	Rabbit Island Recreation Reserve and Local Purpose (Plantation) Reserve
TDC/Council	Tasman District Council

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### GENERAL SUBMISSION

Thank you for the opportunity to comment on the Draft Moturoa/Rabbit Island Reserve Management Plan. I commend Council's commitment to this process and the work that has gone in to the preparation of the Plan. The Plan is a useful document that:

- (i) sets out the context, history and issues associated with management of the reserves; and
- (ii) establishes a vision and approach for managing the reserve to address those issues as far as practicable.

I generally support the approach and provisions adopted in the Plan, unless specific submissions or comments (as set out below) state otherwise. The implementation of this document is considered important in achieving TDC's responsibilities under the RA.

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## VISION & KEY OUTCOMES SOUGHT

I support the Vision and Key Outcomes set out in Part 1 of the Plan, including, in particular, the Environmental and Cultural Outcomes on pages 7-8. These provide context and direction for management of the reserves, and will be particularly important when considering activities and uses that are not explicitly addressed elsewhere in the Plan (as provided for in Part 2, Section 6).

## KEY CHANGES PROPOSED BY THE DRAFT PLAN

**1** *Change the layout of cycling/walking trails through forested areas on the western half of Moturoa/Rabbit Island ... The intention is to provide one trail around the coastline and a shorter loop option via Barnicoat Road. Public access to the interior of the forest plantation on Moturoa/Rabbit Island will be restricted – i.e. by permit only. Part 2, Sections 1.1 and 4.1*

I have no preferred view on this matter. I would however submit that the location (and construction) of any cycling/walking track around the coastline adjacent to the Traverse should:

- (i) Have regard to predicted sea level rise and associated risk of tidal inundation; and
- (ii) Not compromise opportunities for restoration of the island's coastal margin and inland migration of shoreline habitat.

**2** *Development of a Grade 2 mountain bike park on Moturoa/Rabbit Island, adjoining (i.e. west of) the existing mountain bike track in Conifer Park. A large portion of this area was logged in 2015 and will be managed for both forestry and recreational purposes for at least one more rotation of plantation forest. Part 2, Section 1.1*

I have no preferred view on this matter, but please note comments on recreational activities in the Department's letter of 22 February 2016 (paragraphs 6.1 – 6.5).

**3** *Provision of a link track for horse riders only, along the eastern side of Ken Beck Drive. This is to provide safe riding access between the Rough Island events and equestrian park and the front beach on Moturoa/Rabbit Island. Part 2, Section 1.1*

I have no preferred view on this matter, but please note comments on recreational activities in the Department's letter of 22 February 2016 (paragraphs 6.1 – 6.5).

**4** *Provision of an alternative route for horse riders along Monaco Road at high tide, primarily to avoid damage to bird nesting and roosting areas on the eastern end of the front beach of Moturoa/Rabbit Island. This alternative route will only be available for use by horse riders. Other than Monaco Road and Boat Ramp Road, access to plantation reserve areas on the eastern half of Moturoa/Rabbit Island will be by permit only, from the Forest Manager. Part 2, Section 1.1*

I support this provision as a means to avoid adverse effects to important bird nesting and roosting areas on the eastern end of the front beach of Moturoa/Rabbit Island. Appropriate signage will be required to direct horse riders to the alternative route at high tide; and occasional monitoring would be recommended to gauge use and compliance.

**5 Potential upgrade or development of a boat ramp(s) on the Islands, to meet the needs of boat owners in the District. Part 2, Section 1.1**

Any proposal to upgrade the existing boat ramps, or to develop new boat ramps on the islands, should ensure that they don't compromise the protection and enhancement of natural habitats and cultural values; or the restoration of natural habitats where planned. This will be particularly important in relation to the existing boat ramp at the western end of Rough Island, which is located within one of the Significant Native Habitats and in an area with recorded archaeological sites. Any proposed upgrade would need to be carefully designed to avoid adverse effects on the natural and cultural values at this site; but could result in better management of existing use and vehicle activity, in particular. In this respect, I support the wording of Policies 7 and 8 in Part 2, Section 1.1 of the Plan (page 21).

**6 Potentially closing the eastern half of Moturoa/Rabbit Island for one day each winter, to enable an organised game bird hunting event to take place, for balloted hunting of pheasants and/or Californian quail. Part 2, Section 1.1**

I have no preferred view on this matter.

**7 Progressively providing additional recreational amenities (e.g. information 'hubs', toilets, picnic tables, gas barbeques and shade sails) over time, to meet increasing visitor demands. Part 2, Section 1.1**

I have no preferred view on this matter, but please note comments on recreational activities in the Department's letter of 22 February 2016 (paragraphs 6.1 – 6.5).

**8 Potentially providing the opportunity for one of the riding arenas in the Rough Island events and equestrian park to be partially covered, to enable groups such as Riding for the Disabled to continue riding lessons on wet days. The proposed structure would have a roof supported by poles (no side walls) and be designed to blend in with the surrounding landscape. Part 2, Section 1.2**

I have no preferred view on this matter.

**9 Restricting access to forestry areas for firewood collection. Council is proposing an alternative to the current practice, where groups apply for permits to cut firewood on the Islands. In future, the forestry contractor would deliver logs to offsite locations for non-profit groups to cut into firewood. Part 2, Section 4.1**

I have no preferred view on this matter.

**10 Potentially allowing biosolid application to take place on up to 53 hectares of land on Rough Island in the future. Part 2, Section 4.2**

Any proposal for biosolid application on Rough Island should ensure that the application area does not include, and is subject to appropriate setbacks from, the following:

- (i) Identified Significant Native Habitats;
- (ii) Areas identified as actual or potential sites for future restoration activities (including restoration sites associated with the Waimea Community Dam);



- (iii) The coastal margin and waterways (including the Traverse);
- (iv) Land subject to tidal inundation (taking sea level rise into account);
- (v) Sites of archaeological and cultural significance; and
- (vi) Māhinga kai areas.

When such matters are taken into account the area available for biosolid application on Rough Island may be somewhat less than the 53 ha stated in the Plan.

Similar considerations should also apply to the existing biosolid application areas on Moturoa/Rabbit Island, when applying for new resource consents for that activity.

I note that most of these matters are recognised and addressed in Part 2, Section 4.2 of the Plan. I generally support the provisions in that section of the Plan, including, in particular, Policies 3 and 5 (pages 48–49), subject to minor amendments to incorporate all of the matters identified above.

**11 *Progressively restoring some of the coastal margins of the Islands with locally-sourced native plant species, to help secure habitat for indigenous species of the Waimea/Waimeha Inlet. This is particularly for those threatened by sea-level rise. Appropriate planting will also provide shelter and shade for people using recreational tracks and trails that follow the coastline. Part 2, Sections 1.1 and 2.1***

I support this proposal, for the reasons stated in the Department’s letter of 22 February 2016 (paragraphs 3.1 – 3.7 and 5.2(i)).

**12 *Investigating a change of reserve classification for specific areas, including a new status of Scenic Reserve for some of the Significant Native Habitat areas. Part 2, Sections 2.2 and 8***

I support this proposal, for the reasons stated in the Department’s letter of 22 February 2016 (paragraphs 7.1 and 7.2). I would however request that the wording used in the Plan be amended to reflect an intention to change the reserve classification of these areas, rather than just investigating or considering this<sup>1</sup>. Such changes would be consistent with the wording used in Objective 1 and Policy 1 in Part 2, Section 8 of the Plan (page 58).

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## OTHER MATTERS

Specific comments on other matters are set out below.

### Part 2, Section 2 Environment

For the avoidance of doubt, I support the Objectives and Policies in this section of the Plan, subject to the amendments and comments that follow.

<sup>1</sup> As suggested in Policy 2 in Part 2, Section 2.1 (page 28) of the Plan; and Policy 1 in each of Sections 2.1.1, 2.2.2 and 2.2.3 (pages 31–33).

## Part 2, Section 2.1 Overview of Ecological Values

1. The text in this section<sup>2</sup> states that a Habitat Protection and Restoration Plan should be prepared for the islands and implemented over a period of years. I support this intention. However, the Habitat Protection and Restoration Plan is not explicitly referenced in the objectives and policies that follow. I would therefore ask that an additional Policy be included in respect of this matter. The Habitat Protection and Restoration Plan should be prepared in consultation with relevant stakeholders, including iwi, the Department of Conservation and the Waimea Inlet Forum.
2. The Plan should make provision for animal pest control being undertaken by voluntary groups, for example as referenced in Part 2, Section 2.2.4 (page 33). This may form part of the Habitat Protection and Restoration Plan referred to above.
3. Provision should also be made to implement biosecurity monitoring and a response plan for the incursion of pigs to the islands.
4. Objective 1 in this section (page 28) refers to enhancing and maintaining māhinga kai areas for overall ecosystem health and cultural integrity. Whilst I support this objective, it may be better located in Part 2, Section 3 of the Plan (Cultural).
5. Policy 1: I request that this Policy be amended to read: *“Actively protect and manage each of the six ‘Significant Native Habitat’ sites in accordance with the relevant policies specified in Part 2, Sections 2.1 and 2.2 of this Draft Plan.”*

This meaning of ‘actively protect’ may also require some clarification in the explanatory text.

6. Policy 2: Refer to comments on ‘Key Change’ 12, above.
7. Policy 4: I support the intent of this Policy, but Council is asked to note that all areas of indigenous native habitat should be valued as seed sources as long as they can be verified as occurring naturally within the Inlet.
8. Policy 9(b): Refer to comments on ‘Key Change’ 1, above.
9. Policy 12: I support this Policy, for the reasons set out in the Department’s letter dated 22 February 2016 (paragraph 3.6(viii)). Council should note that discussions during the resource consent process for the Waimea Community Dam signalled a preference for restoration at the eastern end of Rough Island, in the area adjacent to the Rough Island wetland. This would dovetail with Policy 2 in Part 2, Section 2.2.2 of the Plan (page 32). Council should ensure that re-forestation after the harvesting of pines in this area does not compromise the potential for restoration, if required for this purpose.

## Part 2, Section 2.2.1 Tōtara-Kanuka Forest Remnant

1. Policy 1: Refer to comments on ‘Key Change’ 12, above.

<sup>2</sup> E.g. under the headings for ‘restoration opportunities for coastal margins and intertidal habitats’ and ‘weed and pest control’

2. Policy 2: I request that this Policy be amended to read: *“Continue to expand the overall size of the forest remnant, by revegetating adjacent land with eco-sourced indigenous species and, where possible, creating sequences of indigenous vegetation from estuary margin to forest. When the western block of plantation forest on Rough Island (which occupies land classified as Recreation Reserve) is harvested, consider expanding the tōtara-kanuka forest restoration project into this area, starting with the coastal margins adjoining the Traverse.”*
3. Policy 4: I request that this Policy be amended to read: *“Minimise the number of tracks through the forest remnant, including vehicle tracks around individual trees.”<sup>3</sup>*

#### **Part 2, Section 2.2.2 Rough Island Wetland**

1. Policy 1: Refer to comments on ‘Key Change’ 12, above.

#### **Part 2, Section 2.2.3 Intact Coastal Vegetation Sequence**

1. Policy 1: Refer to comments on ‘Key Change’ 12, above.

#### **Part 2, Section 3.1 Iwi Association with the Islands**

1. Policy 2 (page 37): This refers to ‘a restoration work programme for the islands’. It would be helpful to clarify whether this would form part of the *Habitat Protection and Restoration Plan* referenced in Part 2, Section 2 of the Plan; or, if not, how the two would be integrated.

#### **Part 2, Section 4.1 Forestry**

1. Objective 1 (page 42): Council should note that the objective to harvest ‘similar timber volumes each year in perpetuity’ will be subject to retirement of areas proposed for restoration of indigenous habitats (identified in Part 2, Section 2 of the Plan) and any adjustments to forestry management needed to accommodate the effects of sea level rise, coastal erosion and tidal inundation.
2. I support Objective 4 and Policies 4, 5 and 13 (pages 42–43), which complement and support the objectives and policies in Part 2, Sections 2 (Environment) and 3 (Cultural) of the Plan.

#### **Part 2, Section 4.2 Biosolids**

1. Refer to comments on ‘Key Change’ 10, above.

#### **Part 2, Section 6 Other Management Issues**

1. I generally support the management intentions and provisions included in this section of the Plan, subject to the following comments.
2. There is currently a marine mammal burial site on Moturoa/Rabbit Island.<sup>4</sup> This site (or a suitable alternative), and access to it, should be retained; and the Plan should make provision for this accordingly.

<sup>3</sup> The largest tōtara is isolated from the rest and is often used as a vehicle turn around spot.

3. Specific provision should also be made for educational use and events, such as the Enviroschools 'Moturoa Mission'<sup>5</sup>.
4. Policy 3 (page 55): I request that the second sentence of this Policy be amended to read "... *They shall be located and designed to an appropriate architectural standard and with due regard to the risk of coastal erosion, sea level rise and tidal inundation ...*"

#### **Part 2, Section 8 Changes to Reserve Classification**

1. Refer to comments on 'Key Change' 12, above.

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I do not wish to be heard in support of this submission.

Dated at Nelson this 4<sup>th</sup> day of July 2016



**Mark Townsend**  
Operations Manager, Motueka  
Northern South Island Region  
Acting pursuant to delegated authority

Address for service: Department of Conservation  
Whakatū / Nelson Office  
Private Bag 5  
Nelson 7042

Attn: Lionel Solly

<sup>4</sup> See information provided with the Department's letter dated 22 February 2016

<sup>5</sup> <http://www.stuff.co.nz/nelson-mail/news/77965623/Nelson-Enviroschools-Moturoa-Mission-a-success>



PAR-10-11-08-01  
DOC-2694598

22 February 2016

Strategic Policy  
Tasman District Council  
Private Bag 4  
Richmond 7050

Email: [info@tasman.govt.nz](mailto:info@tasman.govt.nz)

Dear Sir or Madam

**Moturoa/Rabbit Island Reserve Management Plan Review**

Please find enclosed comments on behalf of the Department of Conservation (the Department) in respect of the above.

Please contact me if you have any questions in relation to these comments, or would like to discuss any matters further.

Kind regards



Lionel Solly  
Ranger, Community

DDI 03 546 3162 | Email [lsolly@doc.govt.nz](mailto:lsolly@doc.govt.nz)



## Comments on Moturoa/Rabbit Island Reserve Management Plan Review

The Department supports the development of a new reserve management plan for Moturoa/Rabbit Island, Rough Island and Birds Island.

Some specific matters that should be addressed in the management plan are set out below.

### 1. Rabbit Island Reserve Management Plan (updated 2001)

1.1 Some of the management objectives and policies in the existing Rabbit Island Reserve Management Plan (updated 2001) remain fit-for-purpose and should be retained (either as currently worded, or with only minor amendments); whilst others require more significant re-wording, or are no longer appropriate and should be deleted. Some specific examples are referenced in the sections that follow. Departmental staff are happy to meet with Council officers to go through the provisions of the existing management plan in more detail; please contact Lionel Solly (contact details above) if you would like to arrange this.

### 2. Consistency with other strategies, management plans and policies

2.1 The new management plan should recognise and be consistent with other strategies, plans and policies that have been developed over the last few years. Four that are of particular relevance are noted below:

- (i) **Tasman District Council Reserves General Policies, September 2015**  
<http://www.tasman.govt.nz/policy/plans/parks-and-reserves-management-plans/>

The Reserves General Policies document has been prepared to consolidate policies that apply to all reserves owned and/or administered by the Tasman District Council. This allows a consistent approach to reserve management and removes the need for policies to be repeated in omnibus or site-specific management plans.<sup>1</sup>

The relationship between these policies and those in the Moturoa/Rabbit Island Reserve Management Plan needs to be clearly stated, so that there is no ambiguity over their application.

Whilst it will not generally be necessary (or desirable) to repeat General Policies in the reserve management plan, there will be instances where General Policies:

- (a) require site-specific interpretation; or
- (b) do not adequately address site-specific issues.

In these instances, site-specific policy direction should be provided in the reserve management plan. Again, the relationship between these policies and the General Policies should be clearly stated – e.g. whether the policies in the reserve management plan take precedence over, or are additional to, any particular General Policy.

- (ii) **Tasman District Council Open Space Strategy 2015-2025**  
<http://www.tasman.govt.nz/policy/strategies/open-space-strategy-2015-2025/>.

The intent of this Strategy is to help maximise the benefit the environment, residents and visitors gain from Council's investment in the District's open spaces by responding to changes in demand resulting from population growth and age profiles,

<sup>1</sup> Tasman District Council Reserves General Policies, page 5

as well as seeking to better link existing areas of open space for improved ecological values and recreation access. The Strategy also aims to make the most of Council's relationships with other providers and managers of open spaces (such as the Department of Conservation and Ministry of Education), and the many volunteer agencies which work to protect and enhance our natural resources and improve access to recreation settings. The Strategy is a companion document to the Tasman District Council Reserves General Policies.<sup>2</sup>

Management of Moturoa/Rabbit Island should contribute to achieving the Vision (section 6.1) and Desired Outcomes (section 6.2) of the Open Space Strategy. The reserve management plan should also give effect to Actions 18, 19 and 21-23 in section 7.3 (Natural Heritage); Action 27 in section 7.4 (Partnerships); Action 31 in section 7.5 (Landscape and Historic Heritage Values); and Action 32 in section 7.6 (Resilience).

(iii) The Waimea Inlet Management Strategy

<http://www.tasman.govt.nz/policy/strategies/waimea-inlet-management-strategy/>

This Strategy brings together the communities of Tasman and Nelson and the many groups who have an interest in, and a commitment to, the Waimea Inlet and its sustainable future. It is an inter-agency strategy that includes the Tasman and Nelson councils, statutory agencies, non-statutory groups and organisations, businesses and residents. The Strategy is intended to guide the Council's decision-making across all departments influencing not only statutory resource management but also provision of infrastructure, services and all areas of council involvement.<sup>3</sup>

The Strategy identifies issues and opportunities relating to the Inlet, provides a Vision for the Future<sup>4</sup>, and sets out a number of actions or matters to be addressed to achieve the Vision.<sup>5</sup>

The Moturoa/Rabbit Island reserves should be managed in a way that helps to achieve the Vision and outcomes sought in the Waimea Inlet Management Strategy.

(iv) Waimea River Park Management Plan (August 2010)

<http://www.tasman.govt.nz/policy/plans/parks-and-reserves-management-plans/>

The Waimea River Park Management Plan acknowledges that the Waimea River Park has hydrological and ecological links to the Waimea Inlet, and that management of these two areas should be integrated wherever possible.<sup>6</sup> This should also be acknowledged in the Moturoa/Rabbit Island Reserve Management Plan, with corresponding objectives and policies to promote integration where appropriate.

<sup>2</sup> Tasman District Council Open Space Strategy 2015–2025, pages 7-8

<sup>3</sup> Waimea Inlet Management Strategy, page 2

<sup>4</sup> *A vibrant place, richly appreciated by the community for its open space, natural and ecological values; happily remembered by generations for their activities, adventures and discoveries; a place where tangata whenua hold mana as kaitiaki of taonga; and a place to be shared with increasing respect.*

<sup>5</sup> See sections 5 and 6 of the Strategy (pages 9- 12).

<sup>6</sup> Waimea River Park Management Plan, section 4.6. See also Policy 48 in section 7.2 of that Plan.

### 3. Protection, enhancement and management of biodiversity values

- 3.1 Whilst much of the area covered by the reserve management plan is managed for plantation forestry purposes, or is otherwise dominated by introduced species, the reserves contain remnant pockets of indigenous vegetation and habitats for indigenous species. Some of these have been identified as 'significant native habitats' through the Native Habitats Tasman programme.
- 3.2 The islands lie within (and help define) the Waimea Inlet, which is the largest barrier enclosed estuary in the South Island, and recognised as an Area with Nationally Important Natural Ecosystem Values.<sup>7</sup> The Waimea Inlet is also considered to be of international importance for Variable Oystercatcher, South Island Pied Oystercatcher and Wrybill; of national importance for Bar-tailed Godwit and Red Knot; and a site of significance for breeding Variable Oystercatcher (with 6-10 pairs recorded).<sup>8</sup> Some of the shorebird roosting/breeding sites are on or immediately adjacent to Moturoa/Rabbit Island.
- 3.3 The Inlet has been identified as a priority 'Ecosystem (or Biodiversity) Management Unit' by the Department of Conservation, and the Department is currently developing specific conservation targets, objectives and management actions for the different ecosystem types present (broadly categorised as 'Estuary', 'Margins', 'Islets' and 'Waterways').
- 3.4 There is also significant potential for further creation and enhancement of indigenous habitats on and around Moturoa/Rabbit Island, Rough Island, Birds Island and the wider Waimea Inlet. Over and above the inherent biodiversity values gained in restoring the island margins, the re-creation and maintenance of riparian habitats will also provide ecosystem services by forming a vegetated buffer between plantation forest blocks and the Inlet, which could assist with the filtering of post-harvest sediment runoff, compared with the hard edges that are present now.
- 3.5 A number of restoration projects are already being undertaken by members of the Waimea Inlet Forum, with support from Council and the Department; and the Department has recently produced a restoration resource kit<sup>9</sup> to guide landowners, communities and other stakeholders through the steps required to correctly restore estuarine, riparian, wetland and terrestrial coastal sites in the Waimea Inlet. Such efforts should be provided for and encouraged in the reserves management plan.
- 3.6 Specifically, the reserves management plan should:
- (i) Recognise the biodiversity significance of the dune forest remnant at Hunter Brown Reserve and provide for appropriate management, which could involve a reserve status change (discussed further below);
  - (ii) Recognise the biodiversity significance of the Rough Island wetland and other significant native habitats on the islands, and provide for appropriate management of these;

<sup>7</sup> Schedule 25D of the Tasman Resource Management Plan.

<sup>8</sup> Shorebirds of Farewell Spit, Golden Bay and Tasman Bay (Rob Schuckard and David Melville, August 2013) <http://www.tasman.govt.nz/environment/coastal-marine/coastal-marine-biodiversity/shorebirds/>

<sup>9</sup> See <http://www.doc.govt.nz/our-work/waimea-inlet-restoration-project/>

- (iii) Recognise and protect important shorebird nesting and roosting sites, having particular regard to the issues and management recommendations set out in the November 2013 report by David Melville and Rob Schuckard.<sup>10</sup>
- (iv) Promote, wherever possible, the restoration (or regeneration) of natural estuary margins;
- (v) Require that plants used in restoration or revegetation projects are appropriate to the locality<sup>11</sup> and encourage eco-sourcing of plants<sup>12</sup> wherever possible.
- (vi) Recognise and provide for the effects of sea level rise and climate change, particularly in relation to estuary margin species where sea level rise projections show that extensive inland migration will be required over the next few decades;
- (vii) Prevent vehicles driving onto the estuary and its margins;
- (viii) Recognise and provide for the biodiversity compensation requirements associated with the resource consents for the Waimea Community Dam. The conditions of consent include a requirement for not less than 10 ha of coastal duneland forest/wetland/estuarine margin restoration on Rough and/or Rabbit Island. Areas chosen for restoration should be protected for this purpose, which is likely to involve a reserve status change (discussed further below).

3.7 The Department would support retention of Objective 6.3 (Natural and Cultural Features) and Policy 7.3 (Natural Vegetation and Wildlife) from the existing Reserve Management Plan, or provisions of similar effect. Policy 7.1.4 (Erosion) should also be retained, subject to an amendment specifying that preference will be given to planting indigenous species. Similarly, the intent of Policy 7.1.5 (Erosion) is supported, but should be strengthened so that damage to vegetation on shoreline dunes is not merely 'controlled', but is avoided or otherwise minimised. Policies 7.2.1, 7.2.2 and 7.2.3 (Fire) also remain relevant for the protection of indigenous vegetation and habitats.

#### 4. Marine mammal burial site

4.1 There is currently a marine mammal burial site on Rabbit Island.<sup>13</sup> This site, and access to it, should be retained; and the reserve management plan should make provision for this accordingly.

#### 5. Climate change adaptation (sea level rise etc)

5.1 Erosion is impacting the front beach of Rabbit Island, and this is likely to be exacerbated by projected sea level rise (causing both higher sea levels and an increased incidence of storm events). Sea level rise will also impact other low-lying parts of Rabbit Island, Rough Island and Birds Island, e.g. through tidal inundation and changes in salinity levels. Some areas are also affected by poor drainage and ponding after significant rainfall events, which may occur more frequently as a result of climate change.

<sup>10</sup> Effects of selected activities on shorebirds in Tasman District: Management issues and options for sites of international importance (David Melville and Rob Schuckard, November 2013)

<http://www.tasman.govt.nz/environment/coastal-marine/coastal-marine-biodiversity/shorebirds/>

<sup>11</sup> See Tasman Sandy Coast Ecosystem Native Plant Restoration List

<http://www.tasman.govt.nz/environment/land/biodiversity/restoration-planting-lists/tasman-bay-restoration-planting-lists/>

<sup>12</sup> Eco-sourced plants are those which are grown from seeds or propagules collected from naturally-occurring vegetation in a locality close to where they are replanted as part of a restoration or revegetation project

<sup>13</sup> See accompanying letter from Stephen Richards to Gavin Udy, which identifies the site along Beuke Road

5.2 The reserve management plan should take these matters into account, and provide for an adaptive response to the effects of sea level rise and climate change. Specifically, the management plan should:

- (i) Recognise and provide for the effects of sea level rise and climate change in relation to restoration projects, particularly for estuary margin species where sea level rise projections show that extensive inland migration will be required over the next few decades;
- (ii) Promote soft engineering and adaptation (to erosion), rather than hard defences;
- (iii) Ensure that coastal hazards and climate change are taken into account in the location, design and construction of all buildings, facilities and improvements, and that facilities and structures in high risk areas are designed to be removable; and
- (iv) Map areas subject to ponding/high water tables after significant rainfall events, and manage these to mitigate impacts.

5.3 The Department would support retention of the following provisions of the existing Reserve Management Plan, with some amendments (or provisions of similar effect):

- Objective 6.1 (Coastal Erosion) should be expanded to include the wider effects of climate change, including coastal erosion, tidal inundation, and changes in rainfall patterns;
- Policies 7.1.4 and 7.1.5 (Erosion), subject to the amendments noted above;
- Policies 7.1.3 (Erosion), 7.8 (Buildings and Facilities) and 8.3.1 (Buildings and Facilities), subject to amendments to recognise risks associated with other coastal hazards and climate change.

## 6. Recreational activities

6.1 Moturoa/Rabbit Island and Rough Island are regionally important for a range of predominantly low-impact outdoor recreational activities; and the reserves management plan should continue to provide for these activities (much as at present).

6.2 There may be scope for limited further development for existing or emerging recreational activities (e.g. mountain biking), and the management plan should provide clear guidance on:

- (a) What recreational activities are appropriate;
- (b) Where such activities are appropriate;
- (c) How the activities will be managed; and
- (d) How proposals for new activities (not anticipated by the plan) will be dealt with.

6.3 The Department believes that the focus should be on low impact activities that don't require significant new infrastructure.

6.4 The reserves management plan should also recognise the potential for conflict between different activities – both between different types of recreational activity, and between recreational activities and the protection/enhancement of biodiversity values – and should include provisions to manage such conflicts, e.g. by separation of activities in space and/or time.



- 6.5 The Department would support retention of Objective 6.2 (Public Recreation) and Policies 8.1 (Public Access) and 8.2.1 – 8.2.6 (Activities) from the existing Reserve Management Plan, or provisions of similar effect.

## 7. Reserve classification and boundary amendments

- 7.1 The current reserve classifications<sup>14</sup> are not particularly appropriate for those sites that are (or could be) protected and managed primarily for biodiversity values, since the Reserves Act states that such features or values shall be managed and protected (only) to the extent compatible with the principal or primary purpose of the reserve. Council is therefore encouraged to change the reserve classification for areas:

- (i) with significant biodiversity values, such as the significant natural habitats referenced above; and/or
- (ii) where the primary purpose is for restoration and management of indigenous habitats

to provide these areas with better protection and a more appropriate legislative status.

- 7.2 This also applies to areas that will be restored as part of the biodiversity compensation package required for the Waimea Community Dam. In this respect, Council is reminded that the Commissioners' decision on the resource consent applications for the Dam stated that:

*"... we strongly recommend to the TDC that should existing reserves be chosen for elements of the biodiversity package, then the primary purposes for those parts of the reserves containing the biodiversity package sites should be changed in accordance with Section 24 of the Reserves Act to permanently protect the biodiversity values that are to be established and maintained."*<sup>15</sup>

- 7.3 Council should also note that the land parcels that make up the reserves do not always align with the physical boundaries of the land itself. There are thus places (particularly at the western end of Rabbit Island) where part of the land area lies outside the gazetted reserves. Conversely, there are places (particularly at the eastern end of Rabbit Island) where the land has eroded and the boundaries of the gazetted reserves now extend into the coastal marine area. This is illustrated by the following snapshots from Top of the South Maps ([www.topofthesouthmaps.co.nz](http://www.topofthesouthmaps.co.nz)), which show the boundaries of the Rabbit Island Recreation Reserve at the western and eastern ends of Moturoa/Rabbit Island, respectively (the Local Purpose (Plantation) Reserve is not shown).

<sup>14</sup> Recreation Reerve under section 17 of the Reserves Act 1977, and Local Purpose (Plantation) Reserve under section 23 of the Reserves Act

<sup>15</sup> *Decision of Independent Commissioners Rob van Voorthuyzen (Chair) & John Lumsden, Appointed by Tasman District Council, On an application for resource consents by Waimea Community Dam Limited. Decision dated 26 February 2015. Section 7.2.11, page 20.*



**7.4 This could result in some uncertainty over the status and management of:**

- (i) areas that are not within the gazetted reserves, and which presumably are not covered by the reserves management plan;
- (ii) those parts of the reserves that now lie in the coastal marine area (below MHWS); and
- (iii) areas that are inappropriately classified for their current purpose and use, such as the beach at the eastern end of Rabbit Island which is within the Local Purpose (Plantation) Reserve.

- 7.5 There may then be some benefit in re-surveying the reserves to ensure appropriate alignment with the current physical extent of the islands. This should be considered in the context of further changes that may occur through erosion and/or accretion.
- 7.6 The Department notes that Bullivants Island (at the western end of Rabbit Island) is referenced in the current management plan (Policy 7.6), but does not appear to be included in the management plan review. We understand that it is not gazetted as reserve and its tenure may require investigation. It is obviously closely associated with Rabbit Island and there would be some benefit in bringing the two areas under one integrated management regime. This should be subject to further investigation.

**Attachments:**

Letter from Stephen Richards (Tasman District Council) to Gavin Udy (Department of Conservation) identifying dolphin burial site on Rabbit Island (refer para 4.1 above).

# HAVE A SAY

You are invited to make a submission on the Draft Moturoa/Rabbit Island Reserve Management Plan.

Submissions close at 4.00 pm on Friday 8 July 2016.

You can view the Draft Plan and make a submission online at: [www.tasman.govt.nz/feedback](http://www.tasman.govt.nz/feedback) or in hardcopy at Tasman District Council offices and libraries.



To Anna GERRARD, TDC.  
9300 Planning.

KEY CHANGES PROPOSED		DO YOU SUPPORT THE KEY CHANGES PROPOSED IN THE DRAFT PLAN?		YOUR COMMENTS
		YES	NO	
1	Change the layout of cycling/walking trails on the western half of Moturoa/Rabbit Island.	✓		OK ONLY IF FORESTRY SAFETY IS REALLY AT RISK. NEW PROBABLY CONSTRUCTED TRACK REQUIRED FROM CAUSEWAY ON KEN BECK TO FAULKNER TRACK BACK FROM TIDE, INSIDE FOREST EDGE.
2	Development of a Grade 2 mountain bike park, west of the existing mountain bike track in Conifer Park.	✓		PRESUMABLY IN THE LIGHT GREEN AREA DOWN TO COOPER ROAD. I.E RECREATION RESERVE TERRITORY.
3	Provision of a link track for horse riders only, along the eastern side of Ken Beck Drive.	✓		WOULD NEED MARKED CROSSING OF KEN BECK DRIVE AND BOAT RAMP ROAD + FENCED OFF FROM FORESTRY?
4	Provision of an alternative route for horse riders along Monaco Road at high tide.	✓		ALREADY AN ESTABLISHED ROUTE WITHOUT PERMIT BUT RIDERS STRAY ONTO OTHER FORESTRY ROADS!
5	Upgrade of existing, or development of new, boat ramp(s) on the Islands.	✓		UPGRADE EXISTING FIRST & SURVEY USAGE - NO OTHER PLACES SUITED TO LOW TIDE TIMES?
6	Closing the eastern half of Moturoa/Rabbit Island for one day each winter, to enable an organised game bird hunting event to take place.		✓	LETS NOT ENCOURAGE GUNS. FEW GAME BIRDS ANYWAY. BETTER CONCENTRATE ON PIG ELIMINATION!
7	Progressively adding recreational amenities such as toilets, picnic tables, gas barbecues, shade sails and information hubs.	✓		AS USE REQUIRES SUBJECT TO REGULAR SURVEY & FUNDS TO SUPPLY AND MAINTAIN IN GOOD ORDER.
8	Providing the opportunity for one of the riding arenas in the Rough Island events and equestrian park to be partially covered.	✓		SUBJECT TO USER PAYS & DOES PRINCIPLES, WITH COUNCIL PERMIT.
9	Restricting access to forestry areas for firewood collection.		✓	SEEMS PETTY TO ME AND INSPIRED BY O.C.H. RULES TO EXTREMES.
10	Allowing biosolid application to take place on up to 53 hectares of land on Rough Island in the future.	✓		DONT SEE ANY HARM IN IT UNLESS HEALTH HAZARDS ETC TO NATURE CAN BE PROVEN.
11	Progressively restoring some of the coastal margins of the islands with native plants, to improve habitat for indigenous species.	✓		VERY IMPORTANT, ESPECIALLY AS WILDING PINES ETC CLEARED FROM SEA DUNES. NEEDED TO LIFT WIND ACTION FROM
12	Investigating a change of reserve classification for specific areas. <small>ONLY IF LONG TERM</small>	✓		DRIVING ROUGH SEAS CAUSING EROSION. SADLY THE SCHEME PLANNED BY KR6 FOR THIS WINTER CURRENTLY BLOCKED

Comments on other aspects of the Draft Plan (attach additional sheets as required):

BENEFITS AND AT MINIMAL LEGAL COST BY T.D.C. PARKS. SEE ATTACHED PAGES  
INFORMATION/MAP BOARDS @ LAYING OUT ENDS OF KEN BECK DRIVE VERY IMPORTANT TO ADVISE VISITORS OF RULES & AMENITIES, ESPECIALLY DOGS!

KEEP RICHMOND BEAUTIFUL COMMITTEERABBIT ISLAND SEA BEACH FRONTAGE PLANTING 2016

The K.R.B. committee have approved funds for this planting and an order was placed with Titoki Nursery ( Tim Le Gros ) in December 2015. The choice of species was based on various information :-

T.D.C. plant species lists on their website

Advise from Tim Le Gros.

Observations of planting at Tahunanui done by N.C.C.

Coast Care website information on mid and back dunes.

K.R.B. experience from previous plantings at other sites.

This plan is to use Ngaio as the main species in a staggered row 1 to 2 metres apart at the back of the Marram Grass areas , but not closer than say 2.5 metres to the road. There are 500 Ngaio plants available for this, representing 500 to 1000 metres total length of planted strips. It is proposed that these will be to the east of Beuke Road, and in the 400m stretch towards the Mapua end on the sketch plan .

No carpet squares, mulch, sticks or protection sleeves are planned for these.

In addition, 10 other species are available to be planted with more Ngaio in 5 trial blocks of 60 plants each. Each trial block comprising :-

4	Knobby Clubrush	}	nearest the sea, 1 row
4	Sand Coprosma		
4	Muehlenbeckia		
4	Cottonwood	}	front / mid area, 1 row
4	Flax		
4	Toetoe		
4	Karamu	}	mid / back area, 1 row
4	Taupata		
4	Cabbage Tree		
4	Akeake	}	back area, 2 rows
20	Ngaio		

At 1 metre spacing , each plot would be approx. 12m x 5m and all plants marked with a stick for a survival / growth rate survey after 1, 3, & 6 months say to asses problems such as frost, rabbits & weeds. This would help with remediation and future planning. Please refer to page 2 sketch plans for the proposed trial plot sites numbered 1 to 5.

In the years ahead further plantings could be made by funding applications to a number of possible sponsors.

K.R.B. seeks the support and approval of this planting plan by T.D.C. Parks and Olsens forestry. Our volunteers will be available to start planting mid to late June to give the plants maximum time to develop site roots before the onset of dry hot weather.

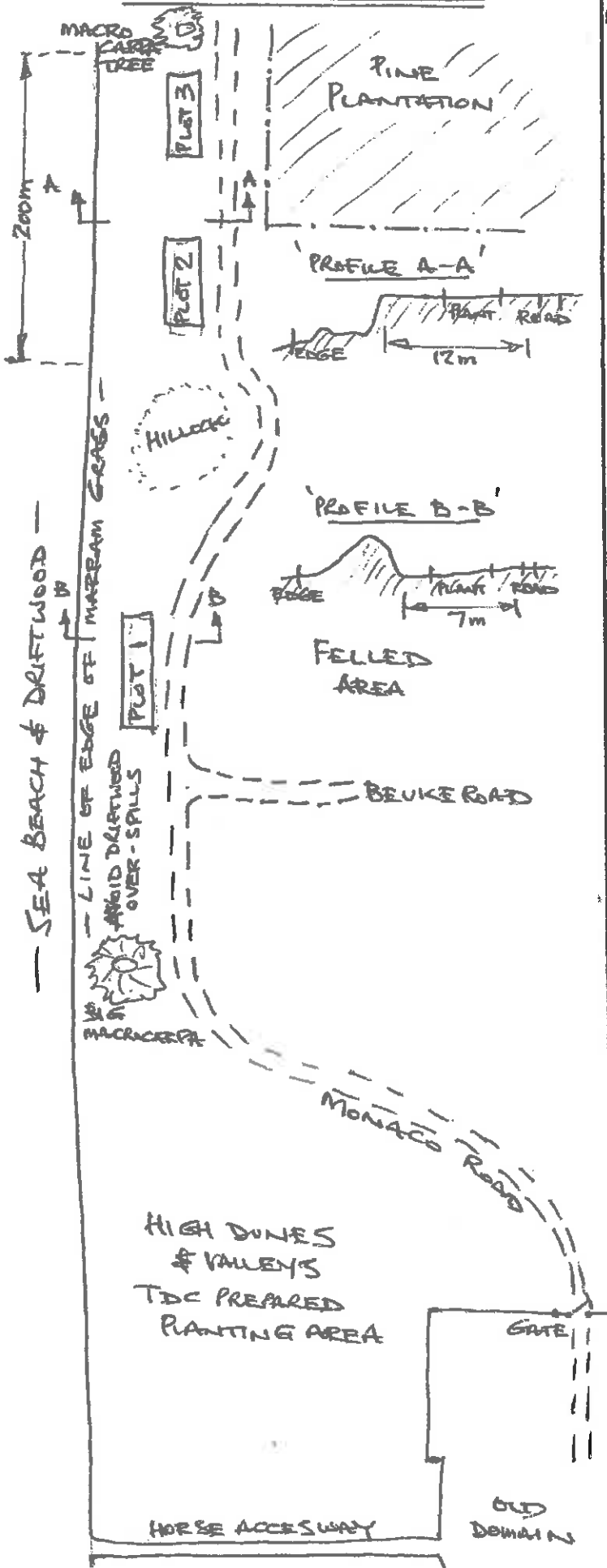
5/6/16 David Burt ph. 5440277 for K.R.B.



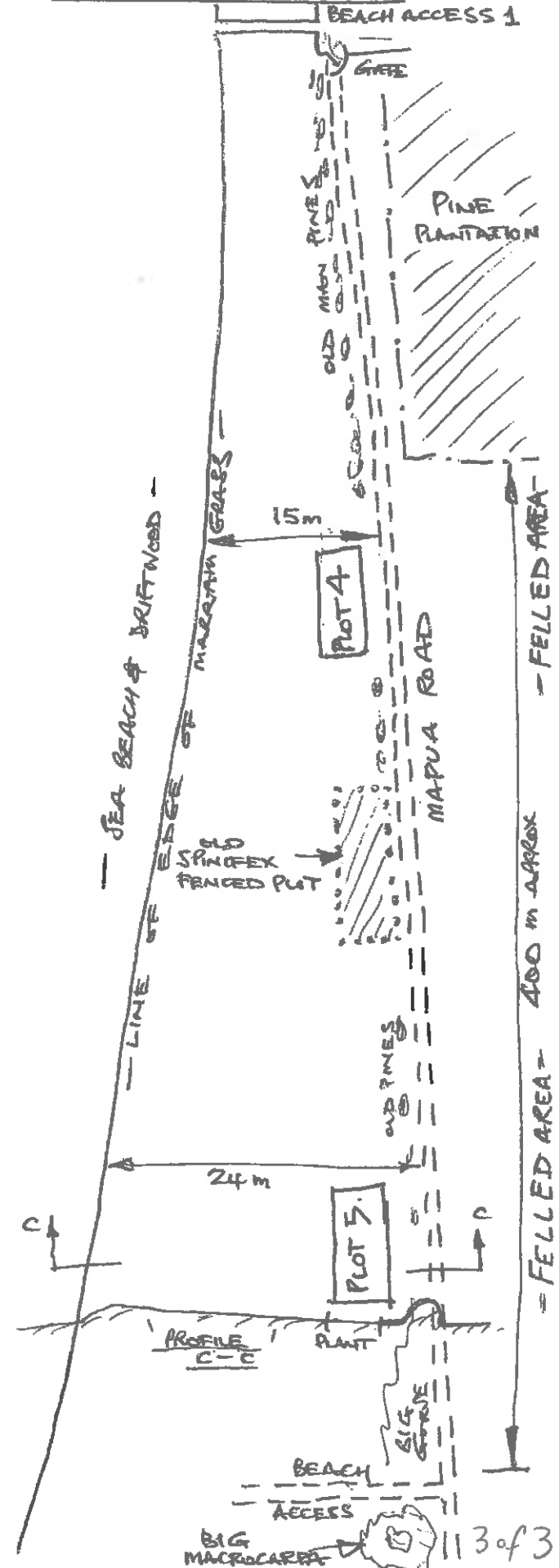
KEEP RICHMOND BEAUTIFUL - RABBIT ISLAND SEA BEACH 2016

PAGE 2. - SITE SKETCH PLANS - NOT TO SCALE

EAST - NELSON END



WEST - MAPUA END



***Friends of Nelson Haven and Tasman Bay (Inc)******PO Box 365, Nelson, 7040******Email: [em@nelsonhaven.org.nz](mailto:em@nelsonhaven.org.nz)******[www.nelsonhaven.org.nz](http://www.nelsonhaven.org.nz)***

To:

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RICHMOND 7050

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For: **The Friends of Nelson Haven & Tasman Bay Inc**

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NELSON

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**SUBMISSION ON THE DRAFT MOTUROA/RABBIT ISLAND MANAGEMENT PLAN**

The Friends of Nelson Haven & Tasman Bay (Inc) (the "Friends") have for many years sought a comprehensive forward-looking strategic plan for the holistic management of Waimea Inlet and its islands. Although this management plan for Moturoa/Rabbit Island, Rough Island and Bird Island does not cover the Inlet itself and does not therefore, meet that request, this document as drafted goes some way to achieving that outcome, and will be able to be an important part of such a holistic strategy. We hope that the quality of research and views expressed in the draft plan, and the processes that have been followed in getting the plan thus far, signal the Council's acceptance of a regime of management that appreciates the natural values, including biodiversity, natural character and processes, and landscape values, as well as the recreation values, that are associated with Waimea Inlet and its islands, and their margins.

We also endorse the text clarifying, and prior to, the Objectives and Policies in the Plan and request that it be retained.

Following are our comments, and suggested changes ("Relief Sought"), on the plan, as drafted.

**Preliminary comments:**

We support the use of "Moturoa", and would prefer in fact to have "Rabbit Island" renamed as such. We do, however, wonder why "Rough Island" should not similarly be renamed "Motuiti"?

**VISION:** We SUPPORT all 4 points as described. Bullet point 2 "*low key outdoor recreation opportunities in a natural setting from of development and commercialisation*" is of great interest to the Friends as we would not support "big box"-type activities such as that proposed for a rowing venue. In our view, this would be akin to putting The Warehouse into the Abel Tasman National Park: the fact that some may regard such an activity as an "asset", it does not meet the majority views of the public as expressed during the consultation process, and would lead inevitably to a fundamental change to Moturoa.

Another recent proposal has been to establish a log storage area at the eastern end of Moturoa, with logs transported there by road and then barged to Port Nelson. The adverse environmental effects of a proposal such as this in the coastal environment would not be environmentally sustainable; the effects on people's enjoyment of the reserves would also be degraded.

In bullet point 3 we also recognise that the importance of open spaces should not be overlooked – and of course the maintenance and enhancement of natural and cultural species.

We consider, however, that this point needs to have a more aspirational statement that would reflect

the requirements of the New Zealand Coastal Policy Statement (2010), as the islands are within the coastal environment.

**Relief Sought: Change bullet point 3 to read: *"Council safeguards processes and ecosystems, preserves natural character and protects natural features and landscapes. Council works with iwi and local communities to maintain, restore and enhance the islands' natural and cultural characteristics, and open spaces."***

#### **KEY OUTCOMES SOUGHT:**

**Relief Sought: Minor change to delete: *"use words to"*... (tautology)**

#### **Outcomes for all three islands:**

##### **SUPPORT**

#### **Recreational Outcomes:**

We do have some concerns about the degree of mountain biking activities that are proposed and supported on Moturoa: particularly when there are large numbers of competitors in events – limits may need to be placed on numbers. The recent mid-winter competitive event with around 500 riders, for instance, does limit other people's enjoyment of the recreation reserve areas. We note that also participants were invited to bring braziers and firewood (along with fire extinguishers) to this event: surely this does not comply with the current policies on Moturoa?

During the consultation period 88% of those visiting stated that they undertook activities associated with the beach area whereas mountain biking/cycling accounted for only around 30%. Council must ensure that passive recreational activities i.e. swimming, picnicking, barbecues, walking etc. are not degraded by, or in conflict with, cycling in whatever form, including the Grade 2 track if it is constructed. Such as activity may also put undue pressure on car parking.

**See also Key Questions for public consultation #2 and #7.**

We SUPPORT the creation of a coastal walking/cycling track on the western end of Moturoa but there needs to be separation of this track from the coastal edges which need to be enhanced by coastal and estuarine planting (including both sides of The Traverse).

**See also: Key Questions for public consultation: #1.**

#### **Environmental Outcomes:**

**SUPPORT:** with the following comments:

##### **Relief Sought:**

a. ADD: *"restored and enhanced"* after *"maintained"* in the 1<sup>st</sup> sentence; and ADD *"and is enhanced"* after *"The remnant coastal vegetation sequence remains intact"*.

b. ADD: *"A Habitat Protection and Restoration Work Plan will be prepared within 2 years of Management Plan approval in collaboration with environmental groups, iwi and other interested parties. This Plan will identify priority sites for restoration and enhancement and appropriate species for habitat and water quality; a weed and animal control/eradication programme; and mapping and sign posting of restricted and controlled access area, with appropriate monitoring programmes and biennial reviews"*.

c. ADD *"Council will consult on changing the status of parts of Rough Island (Motuiti) and Moturoa to Scenic Reserves (s. 19 Reserves Act 1977) within 5 years"*.

d. ADD *"The remaining eastern causeway is removed to facilitate natural water flows through The Traverse and enhance its natural character and ecosystems."*

We SUPPORT the restoration of the wetland area between the equestrian centre and TicToc Road AND buffers between the *"Rough island wetland"* and the forestry. We note also in relation to the latter that if a trap line is established around this wetland it should NOT become a track for general use (or for dog exercising).

#### **Cultural Outcomes:**

SUPPORT. We note however that there are other significant cultural activities associated with both major islands. For instance, Rough Island (Motuiti) was the site of a very early race track – the TicToc. This needs to be recognised in an appropriate manner (other than the road name).

## PART 2:

RETAIN Introduction to Objectives and Policies sections.

1. **Recreation:** here and elsewhere there is confusion about "*organised activities in the Rough Island Events and Equestrian Park*" ? Are the activities that may be undertaken here exclusively equestrian? Or is it intended that other events (that comply with the policies) can be contemplated? **Objective # 2** states that the islands should be kept free from commercial activities: we SUPPORT this but query the status of the equestrian events and activities. If fees are charged for participation then the activity is "commercial" by definition and a concession or permit fee should be charged. We presume that a formal document exists for this use of public land: this information, and whether it is "exclusive" use, needs to be included in the management plan.

**Relief Sought:** Clarify whether activities other than equestrian, that meet the policies of this Plan, may be considered; and include details of lease agreements with the equestrian group/s in the Plan.

**Roads & Tracks:** We support the intention to move roads and tracks away from coastal and estuarine margins. This report however states that this is for sea level rise and coastal erosion reasons.

The Friends suggest that there are other just as important environmental reasons: vegetation of these coastal/estuarine areas are important for providing habitat connectivity as well as resting, feeding nesting habitat for birds, lizards and invertebrates, natural character values including water cooling and sediment retention/filtration and for landscape and aesthetic reasons. For too long the Council has allowed tracks and roads to be created on the very edges of both the open sea and estuaries such as Waimea Inlet (see photos below – another example is on Rough island).



Riparian planting should be of a width that is going to be meaningful – at least ten metres and must include tall indigenous vegetation as well as hardy plant species. The activities that are proposed to be undertaken on the newish tracks on Moturoa e.g. Faulkner Track – will include cycling, running and walking – all activities that have the potential to disturb wildlife. On Rough Island if tracks are continued in the area of the Traverse, horse riding and dogs will increase disturbances – especially dogs off the leash. The Plan does not appear to envisage the construction of boardwalks and access points through areas of vegetation to the sea/estuary. Why not? A boardwalk to Bird Island has

potential.

#### **ISSUES AND OPPORTUNITIES:**

##### **Front beach of Moturoa:**

We SUPPORT text; but consider that rather than "*discouraging*" unauthorised motorised vehicles from driving on the beach, this Plan provides the opportunity to **prohibit** such access. In addition we do NOT SUPPORT motor bike races on the beach: such activities should not be approved by Council due not only to human health and safety issues but also for the damage caused to the intertidal area and disturbance to wildlife. This has already been done on other popular beaches in New Zealand.

**RELIEF SOUGHT: that unauthorised vehicles are "prohibited" on the beach and Council establishes a Bylaw to prohibit all unauthorised motorised vehicles on the beaches of Moturoa. Motor bike racing will be banned.**

This section of the Plan considers the application of biosolids to Rough Island: we do NOT SUPPORT this proposal as it is not sustainable. The fragile remnant wetland on Rough island is aquifer fed, and other aquifers run under both islands (more later in this submission).

##### **Objectives:**

1. SUPPORT 2. SUPPORT (but see above) 3. SUPPORT 4. SUPPORT

##### **Policies:**

1. SUPPORT - query why is access required at night? We think this is not appropriate and would constitute a very real fire risk, whether for training exercises or equestrian events.

2.- 4. SUPPORT

5. SUPPORT (a) (b) (c) note: estuarine edge vegetation on Faulkner Track as well as Rpough Island as buffer to The Traverse (as above),

6. SUPPORT especially (e) coastal erosion/sea level rise

7. SUPPORT note: **comments above re. Bylaw to prohibit beach access to unauthorised motorised vehicles**

9- 11. SUPPORT

12. SUPPORT: **ADD – "All structures must be in compliance with the Tasman Resource Management Plan and the Building Act."**

13 -15 SUPPORT

16. SUPPORT : **ADD "and estuary margins including The Traverse"**

17 SUPPORT **ADD "and replaced with appropriate native species for aesthetic and habitat purposes"**

18. SUPPORT

19.-21. SUPPORT

22. Game bird hunting – this activity does not appear to be compatible with the recreational (or forestry) use of Moturoa.

We note also in relation to signage that the existing signs need improvement. Perhaps consideration could be given to having discreet small roadside "pegs" colour-coded to indicate different areas of the Moturoa recreation reserve areas – the large area can lead to "lost children". We also note that the signage on Bird Island also needs to include "no dogs" – its proximity to Rough Island where dogs (on leashes) are permitted is likely to mean that there is some confusion.

Access for horses along Ken Beck Drive is problematic: weed seeds are likely to create more pest weed issues when spread in glorious horse manure. We note, however, that horses are already using this area as can be seen by the large volumes of horse manure along the grassed areas between Ken Back Drive and the cycle/walking track!



## **ROUGH ISLAND EVENTS & EQUESTRIAN PARK**

Comments made as above requesting details of the formal agreements between the equestrian group/s should be included in the introduction; and clarifying further who can use the Park (Policy 2 refers only to "outdoor recreation activities" – this is too broad (e.g. rugby/cricket; running races; school events?)..

Policy 4. Major organised events: as noted above, if entry fees are charged this is a "commercial" activity and Council needs to provide a permit/concession and charge the organisers (in relation to numbers and the fee charged – this must also cover vendors of food and beverages) – this needs to be referred to in Policy 5; such events will have amplified sound (f): how does this equate with the "noise-free" policy?

Policy 5-13 SUPPORT

Policy 14 & Policy 16: add "*or its successors*" after "*Community Development Committee*"

Policy 15 SUPPORT

Policy 16: the current buildings or facilities that are on the Park need to be listed. This Policy should also ensure that they are well maintained at all times.

**Relief Sought: list current structures and buildings; and maintenance being the responsibility of the Park's formal agreement holders.**

## **2. ENVIRONMENT**

### **2.1 OVERVIEW OF ECOLOGICAL VALUES**

This section is excellent and needs to be **RETAINED** in the Plan.

#### **Habitat restoration opportunities:**

We strongly **SUPPORT** the creation, maintenance, restoration and enhancement of indigenous habitats on the islands AND the restoration of the island's coastal margins. For their biodiversity value and ecosystem "services". We **SUPPORT** the establishment of buffers between the forestry blocks and the shoreline of Moturoa as well as edges of the Traverse (on both sides including on Rough Island). We **SUPPORT** also the change of status of some parts of both islands to Scenic Reserve.

#### **Restoration opportunities for coastal margins and intertidal habitats**

We strongly **SUPPORT** this section. The wetland between the Park and TicToc Road needs care: weed removal in particular should be undertaken. We note also that the small culvert does not cope with water flows in/or out – we suggest that either a much larger culvert is installed or alternatively a small bridge – we believe that this margin road should be closed and that walking access only permitted. Access to the Park is from the eastern side – this is sufficient.

Reference should be made here to the future removal of the eastern causeway to improve water flows, water quality, habitats and ecosystems and connectivity.

We strongly **SUPPORT** the preparation of a **Habitat Protection and Restoration Plan**, and **ACTION** being taken to avoid the **negative effects** of users of the Taste Tasman Trail and the ferry on the breeding of variable oystercatchers on the western part of Moturoa.

#### **Bird disturbance, predation and loss of habitat**

We strongly **SUPPORT** this section.

#### **Weed and pest control**

We strongly **SUPPORT** this section. We note however that this section (nor the Objectives or Policies) refers to the damage that is done by rabbits undermining the few remaining dunes and eating the marram/pingoa that (hopefully) will limit the damage caused by storm surges and sea level rise. The Habitat Protection and Restoration Plan should not only include the methods undertaken to reduce rabbit numbers but also be specific to predator species (mustelids, rats and



mice, cats etc) on not only birds but lizards and invertebrates.

We strongly SUPPORT Objectives 1-4.

We strongly SUPPORT Policies 1-12. However, the Policies need to include the preparation within 2 years of a **Habitat Protection and Restoration Plan**.

**RELIEF SOUGHT:** Change Policy 3 "*A Habitat Protection and Restoration Work Plan will be prepared within 2 years of Management Plan approval in collaboration with environmental groups, iwi and other interested parties. This Plan will identify priority sites for restoration and enhancement and appropriate species for habitat and water quality; a weed and animal control/eradication programme; and mapping and sign posting of restricted and controlled access area, with appropriate monitoring programmes and biennial reviews*".

AND renumber current Policy 3 and following.

## **2.2 SIGNIFICANT NATIVE HABITATS**

We strongly SUPPORT all of this section – Values and Issues and Opportunities.

**Objectives and Policies:** We strongly SUPPORT all of these sections. We also support the intention to create Scenic Reserves for some of the areas still in native forest and request the extension of these areas.

### **2.2.2 ROUGH ISLAND**

We strongly SUPPORT all of this section – Values and Issues and Opportunities. As noted above we support the recreation, restoration and weed control in the wetland between the Park and TicToc Road.

We strongly SUPPORT protection and preservation of the Rough Island wetland (adjacent to Ken Beck Drive) and the one by TicToc/Park, and status change to Scenic Reserve. We note that NEITHER should be included as Plantation Reserve, nor should they be covered by the area proposed for sewage sludge/biosolids. The Objective in this section needs to make mention of the wetland area (as above, by TicToc Road) and a policy provided to enable restoration.

### **2.2.3 INTACT COASTAL VEGETATION SEQUENCE**

We strongly SUPPORT all of this section – Values and Issues and Opportunities as well as the Objectives and Policies. We have noticed the damage caused by vehicles coming into this area -and suggest that the gate be erected as soon as possible and that deviations not be allowed.

### **2.2.4 SHOREBIRD BREEDING & ROOSTING HABITAT (MOTUROA/RABBIT ISLAND)**

We strongly SUPPORT all of this section – Values, Issues and Opportunities; and Objectives and Policies.

### **2.2.5 BREEDING SHAG COLONY**

We strongly SUPPORT all of this section – Values, Issues and Opportunities; the Objective and Policy.

## **3. CULTURAL**

We are not commenting specifically on this section, other than commenting that "Cultural Values" extend beyond tangata whenua/iwi issues: please incorporate other significant cultural issues such as the TicToc Race track etc.

## **4. FORESTRY AND OTHER USES OF LOCAL PURPOSE (PLANTATION) RESERVE**

#### 4.1 FORESTRY

We note that Council can use of 10% (or "*as much as Council considers necessary*" – this is in the 1979 Act quoted in the draft plan ) of the net profits from, in this case, exotic forestry activities, for purposes other than recreation. Section 80 of the Reserves Act 1977 that these funds shall be used (inter alia) for "*maintaining, protecting, and developing*" the reserves. We respectfully suggest that this management plan could consider exactly what portion of the 10% (which seems to us to be rather miserly anyway, as well as able to be reduced!) should be spent for "recreational purposes" and **how much for restoration/enhancement, an integral part of "*maintaining, protecting and developing*".** Consideration also needs to be given by Council to increasing this percentage: times have changed – both recreation and environmental interests have increased since 1979 and as the urban population increases, the demands on this funding to be used on the land that has been the source of it, will also increase. It is also unlikely that the "community" had no say in the allocation percentage either before the legislation was gazetted or on any annual plan/or the ten year long term plan process.

We also consider that there should be staged reduction in the exotic forestry plantations and a gradual restoration of the coastal native forest. This would go some way to stabilising remnant dune areas (which mitigate against storm surges) and recreating a more "natural" area. Sediment caused by post-harvesting operation rainfall events need to be reduced in order to protect the ecosystems of not only the Waimea Inlet but also Tasman Bay. Forestry roads should be moved away from coastal and estuarine edges.

In relation to the above we do NOT SUPPORT Objective 1. which anticipates similar timber volumes "*in perpetuity*".

**Objective 2:** We do NOT SUPPORT – as noted above the use of a portion of the net profit can be used for other purposes not solely recreational purposes. This will not affect Objective 2(ii).

**Objective 4:** SUPPORT

#### Policies:

**Policy 4 & 5.** SUPPORT

#### 4.2 BIOSOLIDS

The Friends continue to have concerns about the continuing application of biosolids to Moturoa, and the proposal for to biosolid application to include Rough Island. We are aware that the aquifers under the islands have the potential to be contaminated by heavy metals and other contaminants and are very surprised that Cawthron reports indicate no contamination of the Inlet, and that Council testing returns satisfactory results for groundwater. The lack of any specific regulations, despite the discharge requirements under the Resource Management Act is appalling. We support iwi concerns.

#### **Rough Island: Key Question**

We do NOT SUPPORT the proposed biosolid application on 53ha to Rough Island.

#### **Objectives & Policies**

**Policy 3:** Exclusion Areas SUPPORT. Extensions required, including ALL of Rough Island

**Policy 4:** Note: the Friends are to be regarded as an affected party and should be consulted during the resource consent process for any new biosolid applications, including for Rough Island. We have been involved in many NRSBU proposals.

**Policy 5:** Buffer Zones: SUPPORT

**Policy 7:** SUPPORT

#### **5. Hazards:**

#### **5.2 CONTAMINATED SOILS**

**This placement of chemicals from the Fruitgrowers Chemical site onto land near Barnicoat**

**Road South, Moturoa, could be a "time bomb". If Council records show the precise location then testing of the soil should be undertaken to confirm that the sites (at least two ponds) were, in fact, capped. Mere supposition is not good enough.**

### **5.3 CLIMATE CHANGE, SEA LEVEL RISE & COASTAL PROCESSES**

We strongly **SUPPORT** all of this section – **Issues & Opportunities; Objectives and Policies**. The requirements of the NZCPS must be honoured with hard engineering avoided, and planned retreat undertaken. Clearly we appreciate that sea level rise will help restore some important wetland areas. We do consider however that not enough attention has been given to the potential for storm surges and dramatic changes caused by these in conjunction with increased flood flows from the Waimea River on the islands of the Inlet. As noted above the damage caused by rabbits needs to be controlled as well as vehicles on beaches including the banning of motor bike racing. Vehicles on beaches pack down the sand reducing grain size and natural seepages through the "gaps" and adding another (mostly unseen) factor to the effects of climate change, and sea level rise.

### **6.0 OTHER MANAGEMENT ISSUES**

We **SUPPORT** on-going consideration of status changes i.e. from Recreation Reserve AND Local Purpose (Plantation) Reserve to Scenic Reserve.

We **SUPPORT** banning of aircraft including drones over the reserves.

**Evaluating new proposals:** As noted above, we do **NOT SUPPORT** major development on either of the major islands nor the rowing proposal.

We **SUPPORT the Objectives & Policies:** we note however that use of the islands for army manoeuvres is simply not appropriate, nor overnighing or the use of dogs on Moturoa. We note the recent demand for "gung ho" exercises that emulate army/navy manoeuvres – these certainly should not be permitted.

### **7.0 REVIEW OF RESERVE MANAGEMENT PLANS & UPDATES TO OPERATIONAL WORK PLANS**

We support the **Issues & Opportunities** section and the **Policies** but request that timely reviews are undertaken with full public consultation and not left to lie until well overdue and are no longer in keeping with the communities of Nelson and Tasman's and visitors' aspirations.

We wish to be heard.

*Helen Campbell*  
for Dr Gwen Struik  
Chairperson  
The Friends of Nelson Haven & Tasman Bay (Inc)



07 July 2016

File ref: 33002-093

Draft Moturoa/Rabbit Island Reserve Management Plan  
Tasman District Council  
Private Bag 4  
Richmond 7050

Email: info@tasman.govt.nz

**HERITAGE NEW ZEALAND POUHERE TAONGA SUBMISSION ON DRAFT MOTUROA/RABBIT ISLAND RESERVE MANAGEMENT PLAN**

1. Thank you for the opportunity to submit on the Draft Moturoa/Rabbit Island Reserve Management Plan (the Draft Plan). Heritage New Zealand Pouhere Taonga (Heritage New Zealand) is an autonomous Crown Entity with statutory responsibility, under the Heritage New Zealand Pouhere Taonga Act 2014 (HNZPTA), for the identification, protection, preservation and conservation of New Zealand's historical and cultural heritage. Heritage New Zealand is New Zealand's lead heritage agency.
2. Heritage New Zealand wants to congratulate the Tasman District Council for taking a proactive approach in managing the important cultural and historical heritage values of Moturoa/Rabbit Island (the Reserve). It is an area with a long history of occupation. Accordingly, there are many recorded archaeological sites and there is a high potential for currently unrecorded sites being uncovered in the future.
3. Heritage New Zealand's feedback on the Draft Plan is set out below.

**Objectives and Policies: Cultural**

*Overall*

4. First, the material covered in this chapter also addresses the significant historical values of the area. This should be reflected in the title for the section, being "Cultural and Historical".
5. It is also important to correctly reference the different types of archaeological sites. Based on the HNZPTA, Heritage New Zealand recommends using the terms 'recorded archaeological sites' to refer to known sites and 'unrecorded archaeological sites' to all other sites. These two terms should be used consistently throughout the Draft Plan.

*Wāhi Tapu, Archaeological Sites & Taonga*

6. The risk of damage to unrecorded sites from earthworks, and the construction of buildings, is significant. Importantly, just because an archaeological site is recorded, does not implicitly give it more value than an unrecorded site. Accordingly, it is important that unrecorded sites are appropriately protected.
7. Heritage New Zealand considers that the objectives and policies in section 3.2 do not give proper recognition to undiscovered sites. To manage the risk of the accidental discovery and

potential damage to unrecorded archaeological sites, works involving earthworks or the construction of buildings in the Reserve should be accompanied by an archaeological assessment. This assessment would identify any new sites, assess effects on recorded sites, and assess if there is reasonable cause to suspect unrecorded sites are present. Along with informing when an archaeological authority is required (where recorded sites are affected or unrecorded sites are suspected), the results of the assessment should be incorporated into project design.

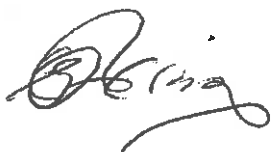
8. While an accidental discovery protocol can be an effective way of managing the risk of unrecorded sites, it can cause confusion between the requirements in the accidental discovery protocol and those set out through the archaeological authority process. Conditions attached to an archaeological authority address accidental discovery and include provisions for involvement of tangata whenua. To avoid confusion and duplication, where an archaeological authority has been received, it should take precedence over any accidental discovery protocol. For the Council's reference, attached is a draft accidental discovery protocol prepared by Heritage New Zealand.
9. Considering the coastal nature of the Reserve, any accidental discovery protocol should also address the situation where archaeological sites are uncovered through natural processes; e.g., coastal erosion.
10. Finally, the public should be made aware of the illegality of damaging or modifying archaeological sites.
11. To give effect to the changes above, Heritage New Zealand proposes the following amendments:

Section	Proposed change <u>Underline = new addition</u> <del>Strikethrough = removal</del>
Issues & Opportunities: Accidental Discovery	There is a high risk of accidental discovery occurring on the Islands. An accidental find is when taonga, kōiwi or wāhi tapu are revealed e.g. through earthworks or erosion. The Accidental
	Discovery Protocol advised by Tiakina te Taiao and Iwi Trusts is to be used in these instances, to mitigate any damage to and/or fossicking of these culturally sensitive sites. <u>However, where an archaeological authority has been obtained, this takes precedence over the Accidental Discovery Protocol. Archaeological assessments can also provide information about whether there is reasonable cause to suspect unrecorded sites are present.</u>
Issues & Opportunities: Protection of wāhi tapu and taonga	Continual management of these wāhi tapu sites, urupā and kōiwi and taonga, and protection of these values from further disturbance and destruction, is a concern and high priority for iwi. The twelve recorded archaeological sites <u>and other sites identified in the future</u> are best protected by keeping the ground surface undisturbed and by preventing the establishment of large growing trees. The Heritage New Zealand Pouhere Taonga Act 2014 also requires the protection of previously unidentified

	sites that may be accidentally revealed. To reduce damage by fossickers, new sites should not be publicly identified.
Objective 2	To retain, protect and conserve <del>existing recorded</del> <u>recorded and unrecorded</u> archaeological sites.
Policy 1	<u>Where an archaeological authority is not required, Apply the Accidental Discovery Protocol for the Islands, as advised by Tiakina te Taiao and Iwi Trusts, for all activities on the Islands and where archaeological sites are uncovered through natural processes.</u>
New Policy	<u>Ensure any activities involving earthworks or the construction of buildings are designed to minimise risks to unrecorded archaeological sites, including requiring an archaeological assessment for these activities.</u>
New Policy	<u>Provide information to the public on archaeological requirements, including the illegality of damaging or modifying an archaeological site.</u>

12. Heritage New Zealand does not wish to be heard at a hearing in support of its submission, but is willing to answer any questions Council may have.

Yours sincerely



Claire Craig

General Manager  
Central Region  
Heritage New Zealand Pouhere Taonga

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Attachments

Attachment 1: Example Accidental Discovery Protocol



## Attachment 1: Example Accidental Discovery Protocol



HERITAGE NEW ZEALAND  
POUHERE TAONGA

### Heritage New Zealand Pouhere Taonga Accidental Discovery Protocol

This protocol **does not apply** when an archaeological authority issued under the Heritage New Zealand Pouhere Taonga Act 2014 is in place.

In the event that an unidentified archaeological site is located during works, the following applies;

1. Work shall cease immediately at that place and within 20m around the site.
2. The contractor must shut down all machinery, secure the area, and advise the Site Manager.
3. The Site Manager shall secure the site and notify the Heritage New Zealand Regional Archaeologist. Further assessment by an archaeologist may be required.
4. If the site is of Maori origin, the Site Manager shall notify the Heritage New Zealand Regional Archaeologist and the appropriate iwi groups or kaitiaki representative of the discovery and ensure site access to enable appropriate cultural procedures and tikanga to be undertaken, as long as all statutory requirements under legislation are met (*Heritage New Zealand Pouhere Taonga Act, Protected Objects Act*).
5. If human remains (koiwi tangata) are uncovered the Site Manager shall advise the Heritage New Zealand Regional Archaeologist, NZ Police and the appropriate iwi groups or kaitiaki representative and the above process under 4 shall apply. Remains are not to be moved until such time as iwi and Heritage New Zealand have responded.
6. Works affecting the archaeological site and any human remains (koiwi tangata) shall not resume until Heritage New Zealand gives written approval for work to continue. Further assessment by an archaeologist may be required.
7. Where iwi so request, any information recorded as the result of the find such as a description of location and content, is to be provided for their records.
8. Heritage New Zealand will determine if an archaeological authority under the *Heritage New Zealand Pouhere Taonga Act 2014* is required for works to continue.

It is an offence under S87 of the *Heritage New Zealand Pouhere Taonga Act 2014* to modify or destroy an archaeological site without an authority from Heritage New Zealand irrespective of whether the works are permitted or consent has been issued under the Resource Management Act.

Heritage New Zealand Regional archaeologist contact details:

Christine Barnett  
Central Region Archaeologist  
Heritage New Zealand Pouhere Taonga

**Attachment 1: Example Accidental Discovery Protocol**

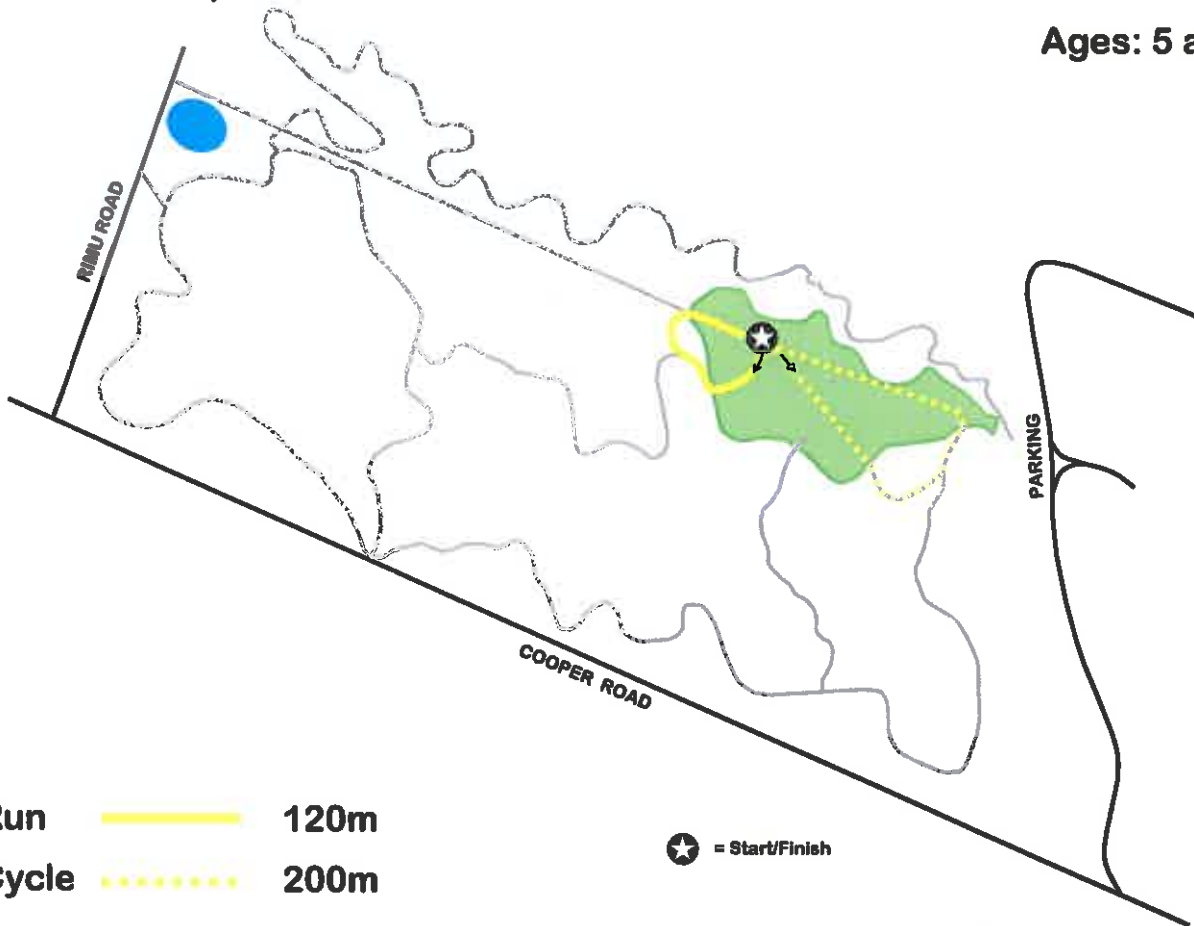
PO Box 2629  
WELLINGTON 6140

(04) 494 8323  
[cbarnett@heritage.org.nz](mailto:cbarnett@heritage.org.nz)

**CONIFER PARK, RABBIT ISLAND**

**NCHE 2014 CROSS COUNTRY COURSE**

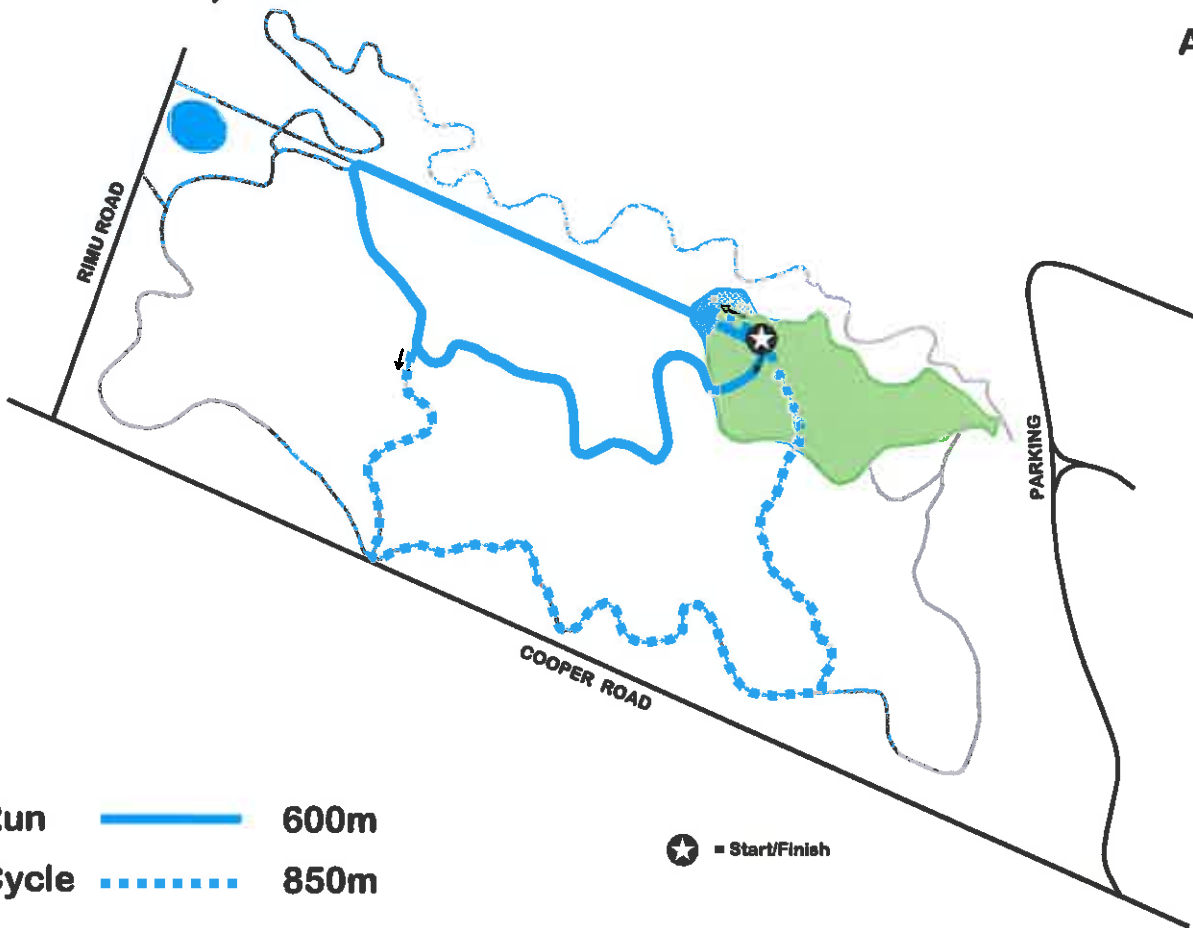
**Ages: 5 and under**



CONIFER PARK, RABBIT ISLAND

NCHE 2014 CROSS COUNTRY COURSE

Ages: 6 - 7



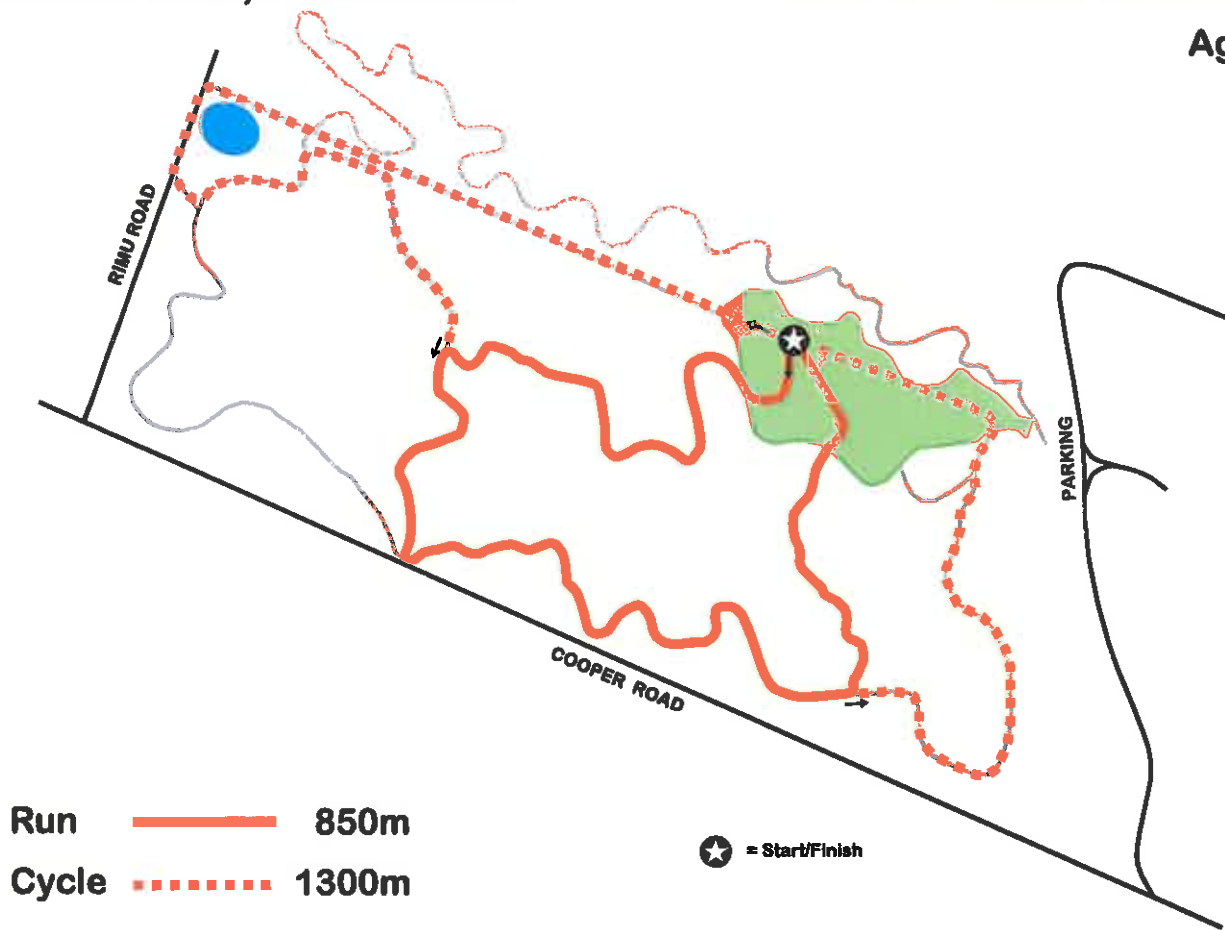
Run ——— 600m  
Cycle ..... 850m

★ = Start/Finish

CONIFER PARK, RABBIT ISLAND

NCHE 2014 CROSS COUNTRY COURSE

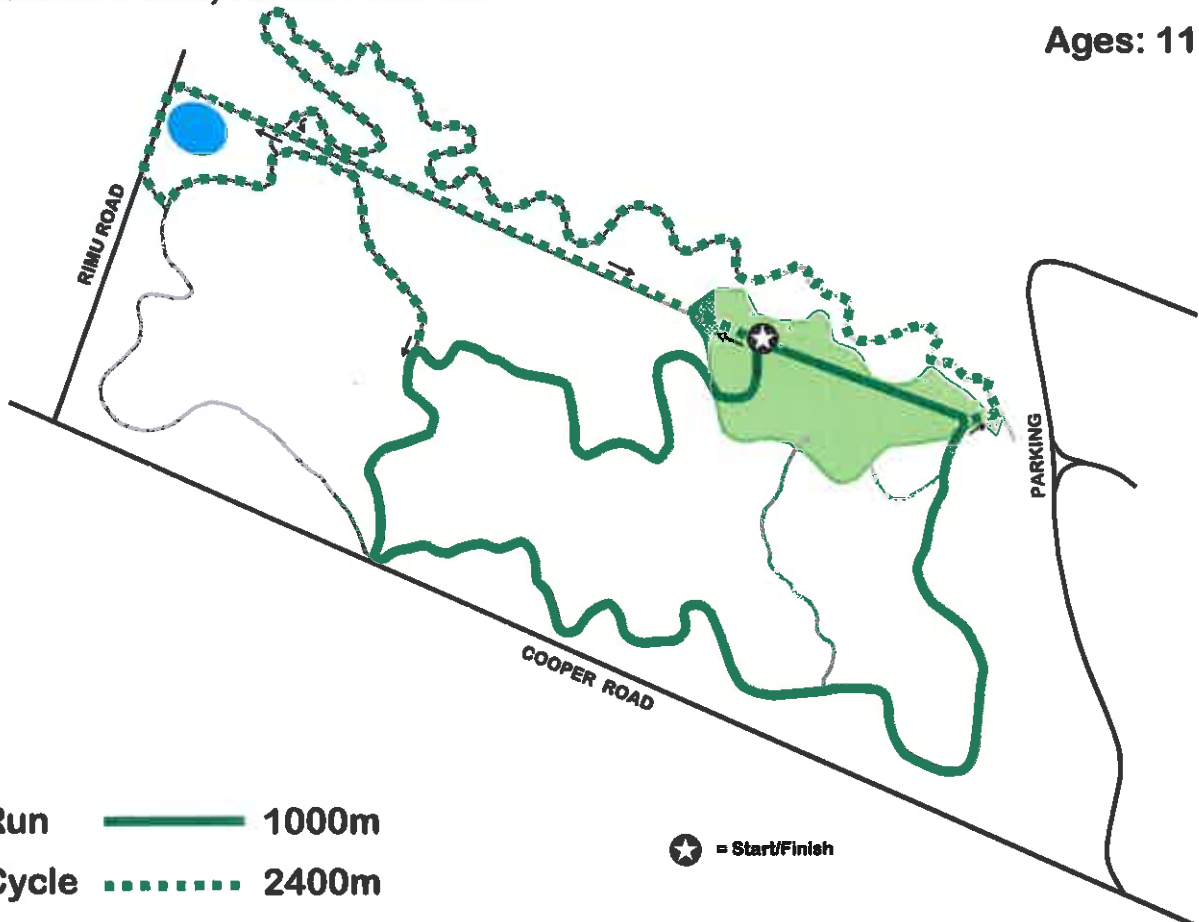
Ages: 8 - 10



CONIFER PARK, RABBIT ISLAND

NCHE 2014 CROSS COUNTRY COURSE

Ages: 11 and over



Run ——— 1000m  
Cycle ..... 2400m

★ = Start/Finish



## **Keep Richmond Beautiful submission to the Draft Moturoa/Rabbit Island Reserve Management Plan**

We are a voluntary organisation with approx. 30 members.

We have been active in planting areas of Moturoa and Rough Islands all this century and have built many picnic tables for the front beach area and Greenslade Park.

We support or have limited knowledge on all the 12 key changes in the draft plan, and have specifically commented on items 7, 11 and 12.

We totally support the Waimea Inlet Forum proposal not to have the proposed new south track at the shoreline, but further inland perhaps using Higgins Road as in their proposal. (The contact person for their submission, David Sissons is also a member of KRB.)

We have also commented on the pest trapping being done by the Rabbit Island Trapping Group, and trust it can continue.

Ron Argue  
Chairman of KRB



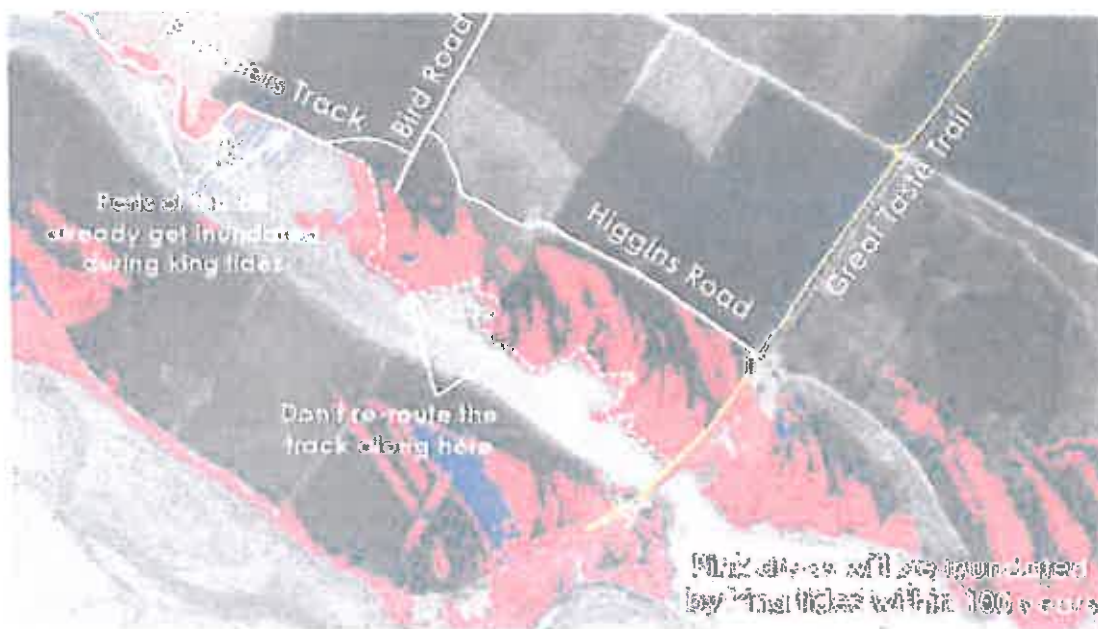
KRB fully supports this W.I.F track location proposal

1: The proposed reorganisation of the mountain bike tracks around the western half of Rabbit Island.

The draft plan proposes to close the existing bike tracks within the forest, and replace them with one bike track following around the shoreline from the Ken Beck Drive causeway over the Traverse to the Mapua ferry landing. The western half of this already exists. The plan proposed to extend it along the Traverse shoreline to Ken Beck Drive, instead of its present route along Higgins Road. The extension is across very low-lying land, which our earlier submission's sea level rise plan identified as land that will become inundated. This area is very suitable for inland migration of shoreline habitat. Putting a track through it is likely to disturb the wildlife, and the track will be regularly flooded by high tides, as are parts of the existing track close to this area, which could lead to calls to raise the level of the track, which would in turn prevent the inland migration of the shoreline habitat. Furthermore the proposed location would disturb any use of the intertidal area by feeding birds.

There is already an informal worn track around this shoreline, which does not follow the indentations of the high tide line, but cuts across the soft mud and sarcocornia beds of the intertidal area. This activity is lowering their natural values and should not be encouraged.

We submit that this track should continue to run along Higgins Road, set back from the current shoreline, to allow for shoreline retreat as the sea level rises. In a few years the pines between Higgins Road and the shore will start to succumb to increasingly saline ground conditions. They should be felled before then, and an indigenous coastal vegetation sequence established to replace them.



2: The boat ramps.

The draft plan proposes an upgrade or development of a boat ramp(s) on the islands, "in a location where ecological values, archaeological sites and wāhi tapu will not be disturbed, damaged or destroyed by the activity"

# DRAFT DOCUMENT

## Submission Form

### Proposed changes to Moturoa/Rabbit Island Reserve Management Plan

#### Once you have completed this form

Send by post to: "Proposed Changes to Moturoa/Rabbit Island", Tasman District Council, 189 Queen Street, Private Bag 4, Richmond, Nelson 7050

#### Submissions must be received no later than 4.00pm, Friday 8 July 2016

Anyone may make a submission, either as an individual or on behalf of an organisation. Please ensure all sections of this form are completed. You may either use this form or prepare your own but if preparing your own please use the same headings as used in this form.

---

#### Submitter details:

Name of submitter  
or contact person:

Belinda Heaphy

Organisation name:  
(if on behalf of an organisation)

Close neighbour to Rough Is and Rabbit Island. Member of the Nelson Triathlon Club

Postal address:

275 Redwood Rd, RD 1. Richmond, Nelson

Telephone number:  
(the best number to contact you on)

03-5442762

Email:

info@manukaisland.co.nz

I do not wish to be heard in support of my submission  
(tick one box)

Signature: Belinda Joan Heaphy

**Submission:**<sup>1</sup>

**Submission:**

*Please explain the nature of your submission stating whether you support or oppose the amendment and/or a specific part of the Plan. Please provide reasons.*

Change 1: **Oppose** – changing the layout of cycling/walking trails through forested area on the western half as it will limit the usage for community, particularly families with children to explore and enjoy smaller circuits in the forest. Their future choice will be a long ride around the Island or going back and forth on the same bit of track.

I support further opening up of both western and eastern ends of both Moturoa and Rough Island for public access to walk, run and bike.

Change 2: **Support** – the development of a grade 2 mountain bike park adjoining the existing tracks at Conifer Park is an excellent idea to help cater for the growing demand of community recreation usage at Rabbit Island

I do not support a further rotation of forestry in the recreational area west of Conifer Park

Change 3: - **Support** – a link track along the eastern side of Ken Beck Drive dedicated to horse riders makes good sense for this regular user group.

**Decision sought:**

*State clearly the decision sought or changes you would like to see. Please be as precise as possible.*

That the Council maintain and further develop existing cycling/walking trails.

Numerous sites around NZ were given by the community as great examples of getting a better balance between recreation and commercial forestry production. These examples include MacLeans Island and Bottle Lake in Christchurch, Rotorua's Whakarewarewa Forest and Hanmer Springs.

That Council adopt a policy of retiring to recreation reserve plantation blocks or parts there of as they are harvested. One thought is that of developing a 50 metre native/natural buffer recreation zone around the Island perimeter. This balances the Council's commercial needs with the community's recreation and environmental needs. This would create a long-term and planned solution to protecting an asset that 86% of the community survey respondents have said they want retained for recreation.

That the Council show it has a plan for this mountain bike park and a committed budget for its development to ensure it actually happens. This land is committed as recreation reserve so as such we support the Council replant this area into native once the existing pine trees are harvested. This will ensure the infrastructure developed will not be destroyed every harvest rotation and commit this area for recreation only.

At some stage these horses will need to cross Ken Beck Drive which is currently a 70km/h section of road.

Change 4: Support – An alternative routes for horse riders along Monaco Road makes sense to help protect nesting birds.

**Strongly oppose** – access by permit only to the eastern half of Moturoa/Rabbit Island as this again limits recreation vs commercialisation whereas the two need to work in partnership.

Change 5: - Support – potential upgrade or development of boat ramps as water sports, including fishing, continue to be amongst our region's most popular recreation activities.

Change 6: - **Support**– closing the eastern half of the island for 1- 4 days a year game bird hunt because of the high public use of the Island.

Change 7:- Support – progressively providing additional recreational amenities (but not playgrounds etc) as the Island continues to grow in popularity with a growing population. Information hubs will also help tell visitors about the unique and treasured area that they are enjoying.

No change to the proposed horse rider route.

The permit only entry on the eastern half is over kill given the forest harvesting is done once every 30 years. Past management of Forestry in the area worked hard to provision for all users. This approach worked even with the deposit of biosolids. Even given the changes to the Health and Safety Act this should still be available. Suggest that a perimeter path and internal tracks be made available for horse and recreation (walkers, runners and bikers) around the entire eastern from Ken Beck Road . We also suggest some more dedicated areas of access are made available outside of working hours.

We note the northern and eastern end of Moturoa/Rabbit Island has suffered extreme erosion over recent years and ask that Council investigates natural methods for helping to control this erosion. This could include our earlier suggestion of progressively introducing a 100 metre native buffer zone around the entire perimeter of both Islands.

Remove the word potential, develop a plan and lock in a budget to ensure this happens.

We also ask the Council to commit to working with interested parties on exploring the practicalities and costs of developing the currently under utilised Traverse channel between Rough and Moturoa Islands for water sports. Any long term development would need to be done in a manner that would not long term impact tidal flow.

The groups that would like to hunt game bird probably have the same wish to stop stoats and feral cats so that the end result is an increase in native birds. Perhaps the Council could work with the likes of DOC, Fish and Game to consider a calendar for hunting/trapping introduced birds/animals such as feral cats/rats that are recognised as a negative impact of indigenous species.

The Council needs to show a plan and committed budget for this purpose in the annual plan to ensure it actually happens. We suggest these be developed in consultation with recreation groups.

Change 8: - Support – potentially providing the opportunity for one of the riding arenas to be partially covered as it will continue to encourage community usage for the Island.

Change 9: - **Oppose** – as public access to firewood is a valuable community service, particularly to needy individuals and organisations who enjoy the opportunity to gather their own firewood. It's also a valuable source of fundraising for many community groups.

Change 10: **Strongly- Oppose** – allowing biosolid application to take place on up to 53 hectares of land on Rough Island as this will only further reduce the community usage of Rough Island and potentially ignores the 86% of survey respondents who said they wanted to protect recreation areas as they are. It is a heavily used area for dog walkers, horse riders and runners and runs closely to the estuary. These restrictions make application of bio solids on Rough Island an impractical suggestion.

Change 11: -**Strongly Support** – the restoring of all coastal margins of the island with locally sourced native plants as this invests directly to three of the major points contained in Council's vision for Moturoa/Rabbit Island. Remove the word 'some' from this statement.

The Council has a duty of care to address the erosion of sand dunes and coastal margins of the three islands by natural means eg planting native plants to help with this foreshore erosion. To stop planting of pine trees on Coastal margins should be an obligation under the Resource Management Act.

Whilst we approve this in notion we recommend the Council prepare a total recreation budget so such initiatives can be considered alongside other needs to ensure the Council spends its limited recreation resources for maximum public benefit.

This development will no doubt further increase usage of the existing forestry area around Rough Island and therefore is another reason to not allow bio solid application as sought in change 10.

This change reads as if this current practise is a hassle to the forestry managers. This disturbance needs to be balanced against great community good.

We are aware of new Health and Safety requirements but believe with good planning and a controlled setting there is no reason that the public couldn't continue to gather firewood.

The community has expressed concern about the practice of applying bio solid waste at Moturoa/Rabbit Island. Key issues raised include potential long-term environmental damage to the estuary and ground water. The public health hazards are also seen as a growing risk as an increasing number of people frequent the Island.

The Council is asked to review this process and explore cost effective alternatives. We do not support renewal of the biosolid contract when it is due for renewal in 2020

Concern was also expressed by a number of recreation organisations about the difficulty of planning activities on the island with the apparent "ad hoc" approach to bio solid planning and management and sought a much better level of communication.

The community seeks the Council goes further in this and considers a bigger, long term vision that sees a gradual re-establishment of native plants at Moturoa/Rabbit and Rough Islands starting with all recreation zoned areas and progressing around the entire margins of all three islands- Rough, Rabbit and Bird. .

In its natural state, our local Islands would have stands of Manuka, Kanuka and Totara and the nectar eating birdlife that feeds from them. The community expressed a long term desire for the Council to consider retiring commercial forestry at harvest cycles and replace with native plantings. Potentially a halfway point would be for the Council to consider a minimum 100 metre native buffer zone around both Islands.



**Change 12: - Support a change of reserve classification for specific areas and ensure they are preserved long term for the benefit of future generations and our local environment.**

The Council is asked to think broadly, boldly and long term about classifications changes.

This management plan need to reflect recreation and commercial forestry as equal partners. Such a partnership approach has been adopted successfully in Rotorua, Christchurch and other regions.

Therefore we would ask Council to consider establishing a committee to manage all activities on the island. This could comprise representatives from commercial, recreational, environmental and Iwi interests.

Factors for Council to consider as they reflect on this draft plan include: 1. Long term population growth will only increase recreation demand on the Island, 2. the total profit vs longer term environmental benefits for our region 3. The greater community good of gradually returning Moturoa/Rabbit Island to its natural state.

Outside of the 12 points proposed in this plan, two question we would like to know and have asked more than once with no satisfactory reply.

How much revenue does the commercial forestry on Rabbit Is/Moturoa and Rough Island generate for the Tasman District Council? How much money is spent on the three islands as per requirement for ongoing improvements?

**Thank you to TDC for the opportunity to comment on this draft plan.**

Draft Moturoa/Rabbit Island Reserve Management Plan Submission  
Tasman District Council  
Private Bag 4  
Richmond 7050  
info@tasman.govt.nz

7 July 2016

Dear Sirs,

**Submission on Draft Moturoa/Rabbit Island Reserve Management Plan**

I am writing on behalf of the Nelson/Golden Bay Branch of the **Ornithological Society of New Zealand (OSNZ)** with regard to the above. The Society is an organization dedicated to the study of birdlife and the dissemination of this knowledge. The Objects of the Society include, *inter alia*, 'To assist the conservation and management of birds by providing information, from which sound management decisions can be derived'.

We have read the *Draft Moturoa/Rabbit Island Reserve Management Plan* (hereafter Draft Plan) and wish to make the following submission.

Tasman District supports nationally and internationally important populations of a variety of birds, in particular species that live in the coastal environment. Of these, 18 species are listed by the Department of Conservation<sup>1</sup> as either 'threatened' or 'at risk'.

Policy 11 of the *New Zealand Coastal Policy Statement [NZCPS] 2010* states:

To protect indigenous biological diversity in the coastal environment:

(a) avoid adverse effects of activities on:

(i) indigenous taxa that are listed as threatened or at risk in the New Zealand Threat Classification System lists;

We are pleased to see that these bird species are recognised within the Draft Plan however we note that there is only one reference to the NZCPS 2010 (in relation to *Climate change, sea-level rise & coastal processes*, page 53). It would appear that the NZCPS should be a part of the overarching policy framework under which the Draft Plan is prepared.

However, overall, the Draft Plan addresses matters of safeguarding important bird populations in a balanced manner that, if implemented as reflected in Figure 3 of the Draft Plan, should support Policy 11 of the NZCPS. A number of specific matters are addressed below.

Hovercraft

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<sup>1</sup> Robertson *et al.* 2013. Conservation status of New Zealand birds, 2012. Department of Conservation.

Under the section on *Recreation, visitor use & management* it is stated that 'Unauthorised motorised vehicles will also be discouraged from driving onto the beach' (page 13). We would draw your attention to the potential use of the area by hovercraft. We have previously expressed concerns regarding hovercraft use in the coast environment resulting in adverse effects on birds (see e.g. our submission on Tasman District Navigation Safety Bylaws Replacement, March 2014). The section on *Recreational use, public access and protection of ecological values* (page 27) notes potential adverse effects on ecological values, however there appear to be no specific provisions in the Draft Plan to prevent the use of hovercraft within the Reserves. This appears to be an oversight.

#### Correction Page 14

It should be noted that horse riding may disturb roosting as well as nesting shorebirds and this should be included in the text.

#### Gamebird hunting

We note that it is proposed to allow hunting of game birds on one day during the hunting season in the Eastern half of Rabbit Island and that Fish & Game are suggesting that this should be on three weekends (<http://nelson.fishandgame.org.nz/newsitem/nelson-marlborough-both-barrels-jun-2016>) The proposed hunting activities should have no adverse effects on threatened birds provided that the hunts are organised over low tide periods when birds are not roosting on Rabbit Island.

#### Signage

We note that it is proposed to undertake a review of signage. OSNZ would be pleased to assist with the provision of information about birds for inclusion in any new signage (as we did for that prepared for the Great Taste Trail).

#### Horse riding on Monaco Road

Permitting horse access to Monaco Road should reduce disturbance to shorebirds in the Eastern half of Rabbit Island and would formalise the current situation. However, to ensure that the areas used by nesting Variable Oystercatchers and roosting birds are left undisturbed it would be beneficial to mark a single crossing point between the beach and Monaco Road opposite the junction with Corder Road and to deploy signage making it clear to riders that access further eastwards along the road is prohibited.

#### Figure 3 Recreational zones on front (northern) beach of Moturoa/Rabbit Island

The proposed zoning provides safeguards for important nesting and roosting areas for shorebirds, whilst permitting recreational activities on most of the open beach front. This balanced approach, if implemented, would support Policy 11 of the NZCPS.

#### Boat ramps

We note that Council is investigating options for boat ramps and that : 'Any development would need to avoid any damage or destruction of archaeological sites' (p. 15). It will also be important to consider potential adverse ecological impacts – in the case of birds these will not necessarily be limited to those in the immediate vicinity of the launch point, but could include impacts from increased boat traffic in the adjacent waters.

Overview of ecological values

We note that this section includes some information regarding The Traverse but makes no mention of the sponge gardens (Asher *et al.* 2008. *Waimea Inlet sponge gardens*. Prepared for Tasman District Council). In view of potential adverse effects, for example from runoff from the Reserves, it may be appropriate to include a reference to this feature.

Birdstrike risk

We note that the Draft Plan takes account of the potential birdstrike risk at Nelson Airport and consider that the proposed restrictions on activities in the Eastern half of Rabbit Island, especially to avoid disturbance to roosting shorebirds, are an important contribution to enhance aviation safety.

Aircraft

There have been occasions when helicopters have used the East End of Rabbit Island for training exercises. This is incompatible with the importance of this area for nesting and roosting shorebirds and does not comply with Policy 11 of NZCPS. Consideration should be given to designate this area as a no landing area, and in conjunction with air traffic control/CAA to designate it a no low fly zone. Draft Policy 5 (page 55) appears to cover this, depending on how one interprets 'the front beach of Moturoa/Rabbit Island'.

Bird names

In various places throughout the document Maori names are given for birds and in some, but not all cases, the English name is also given. To assist readers it would be helpful to include the English equivalent throughout as some names, such as poaka and karuhiruhi, are not widely known among the community.

Restoration planting

The proposed restoration planting, taking into account the potential effects of sea level rise and the need for managed retreat, will increase habitat heterogeneity for bush and forest birds, but needs to be planned to incorporate safeguards for shorebirds that use the more open beach areas for nesting and roosting.

Training exercises

These should be timed/located such that the Eastern part of Rabbit Island is left undisturbed throughout the year, not just the September to March breeding season. This is reflected in Draft Policy 7 (page 55).

Contaminated soil

Draft Policy 9 (page 55) should also include avoidance of damage to the capped contaminated soil areas – c.f. Section 5.2.

Appendix 4

Please note the following corrections:

The following three species that are currently listed as 'Relict' should be listed as 'Naturally uncommon':

Black Shag

Little Black Shag  
Royal Spoonbill

Overall the Draft Plan supports management to safeguard, and potentially enhance, threatened and at risk bird populations whilst allowing for continued recreational use of much of the reserve areas.

We wish to be heard. In terms of arranging a timetable for hearings, please be advised that I shall be overseas until 6 August and will be unavailable on 17 August 2016.

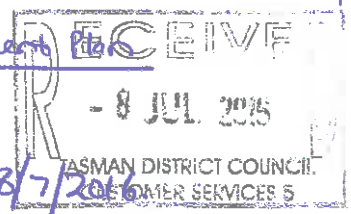
Yours faithfully



D.S. Melville  
on behalf of the Nelson/Golden Bay Branch  
The Ornithological Society of New Zealand

**Address for Service:**  
1261 Dovedale Road  
R.D. 2 Wakefield  
Nelson 7096  
Tel. 03-5433628  
Email: david.melville@xtra.co.nz

Submission to Draft Moturoa / Rabbit Island Reserve Management  
Tasman District Council.



Submitters : Maxwell Clark // Shona McBride

PH 5441484 410 Lower Queen Street, Richmond, Nelson 7020.

We wish to be heard in support of our submission.

We support : ① The retention of Rabbit Island / Rough Island under the TDC Management agreement currently with the Crown.

- ② Reclassification over total land area on Rough Island as a Recreation Reserve only.
- ③ When any significant areas of forestry is logged on Rabbit Island that the Public / Ratepayers are advised under the Special Consultation process into whether permission should be given to replant into forestry again (for next 25yrs) or utilised for Recreational Reserve only.
- ④ Utilisation of food and coffee carts at organised, controlled, permitted events on Rabbit / Rough Island for the duration of that event (usually daily)
- ⑤ Support proposal to give consideration to a Rowing venue between Rough and Rabbit Island.

We Oppose : Totally opposed to any Bio solids (Sewage Sludge) on any land (forestry or otherwise) on 53 Hectares of Rough Island.

Bio solids are : Smelly, offensive, have health risks, and the accumulation of heavy metals, such as arsenic and lead which also leads to excessive nitrogen build-up.

The Council would be in breach of the Health and Safety Act 2016 to put Bio-solid onto Rough Island / Land and forestry.

Nobody in 'a right frame of mind' would put Bio solid onto Rough Island.

The Forestry area adjacent to the Equestrian Park, is utilised by Horse Rider doing trail-riding, community walking or taking Dogs for exercise.

Lastly, the Rough Island classification states it is a Recreation Reserve primarily with a Temporary Forestry use. When the Forestry is logged it will be utilised as a Recreational Reserve.

Who would want or need a : "Smelly - health hazard - polluted area" for Recreation Reserve, in the future. No means No to Bio solids / Rough Island.

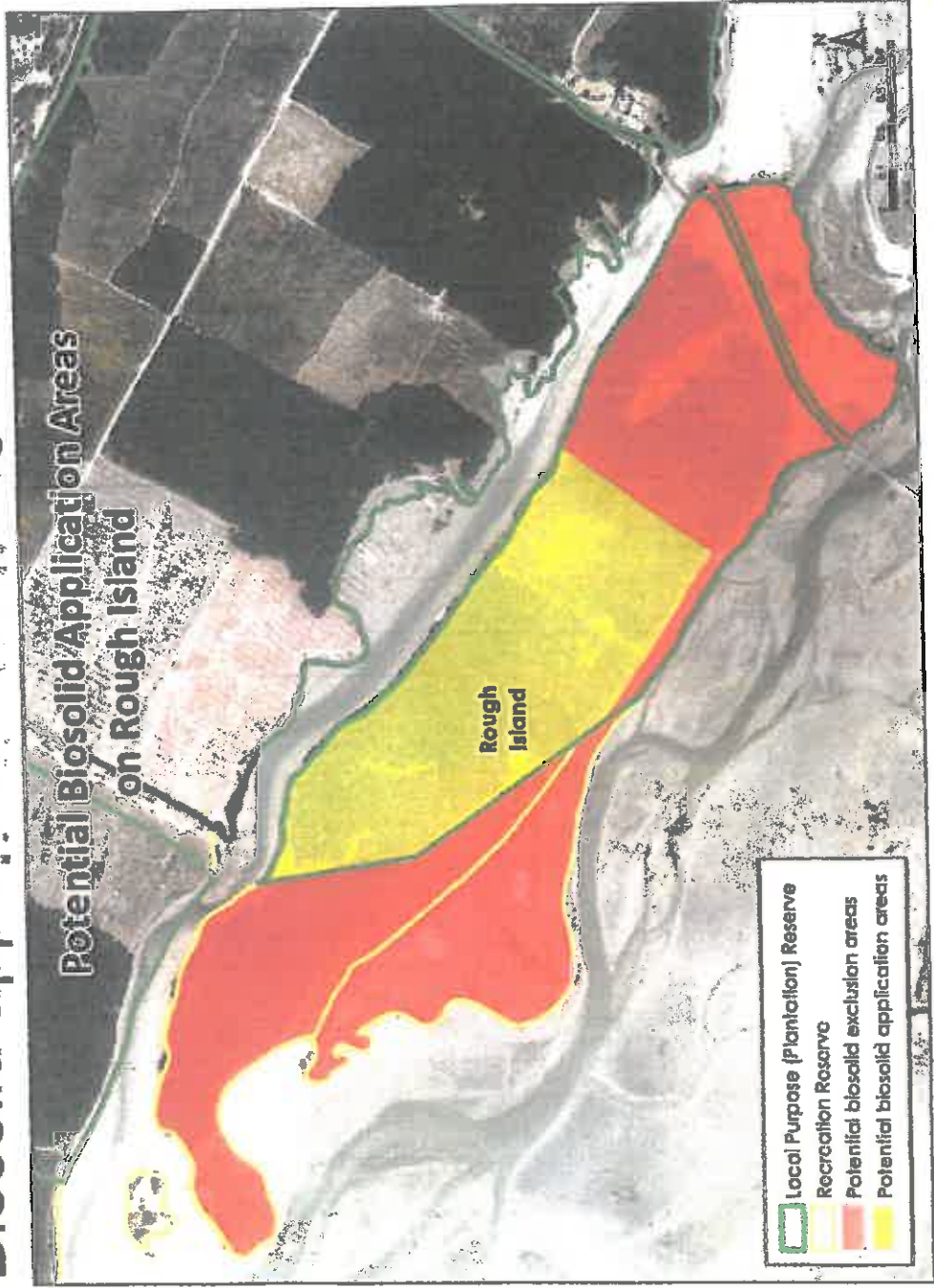
Maxwell Clark // Shona McBride  
Maxwell Clark // Shona McBride

Enclosed: Information /



# Key Changes Proposed

## (10) Biosolid application on Rough Island



### Island Council

For those of us that exercise and take our dogs or horses to Rough Island be aware that in the new Tasman District Council (TDC) draft plan for Rabbit Island/Moturoa, Rough and Birds Islands that the TDC has snuck in "potentially allowing biosolid application to take place on up to 58 hectares of land on Rough Island in the future." (See part 2 Section 4.2) This was not mentioned in the recent TDC survey of both Islands.

If biosolids are allowed to be put on Rough Island it will mean that there will be restrictions on access to large areas of the island. Let's make sure this doesn't happen. There are many issues of concern in the management of Rabbit Island /Moturoa. It would be great to see an investigative article, with input from environmental experts to look at things like the management of serious foreshore erosion, heavy metals from the biosolids leaching into the aquifer, the negative effects from biosolids on the commercial quality of the pines, effects of commercial forestry on the environment, restriction of recreation in areas marked for recreation etc.

We encourage people to put a submission in by July 8. (The TDC has simple-to-use forms that can be downloaded or picked up at Rabbit Island and TDC).

WELDON REAHEY, GRAHAM POSTLES  
 Appleby, June 20



9444



# The Nelson Mail

Established 1866

Tuesday, May 5, 1998

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20c

TOP OF THE NEWS NELSON

## Riders oppose sewage spread

### Equestrian area may 'face ruin'

A group of horse riders are fighting the Nelson Regional Sewerage Authority's bid to spray treated sewage sludge on Rough Island where they ride.

The authority has applied to the Tasman District Council for resource consent to expand its biosolid disposal programme from Rabbit Island to Rough Island because it is running out of space. Submissions on the proposal are due next Monday.

Nelson Riding Club vice-president Anne Davey, of Hope, said yesterday it was disgusting to have to put up with the offensive smell coming from new man waste spread on Rough Island.

A strong smell lingered in the air yesterday afternoon during the group's protest with placards at the reserve entrance.

It is a problem which has dogged the sludge disposal programme on Rabbit Island since spreading began in 1986.

Mrs Davey said it was disappointing one of the best riding areas in the region faced ruin because of the smell of effluent.

Tasman and Districts Equestrian Trust trustee Maxwell Clark said it was ridiculous to spread human waste on a popular public reserve and he suggested Ngawhara Valley as a better site.

The trust has spent about \$1.5 million setting up an equestrian park on the island. It opened late last year.

"It is non-sensical and non-offensive, why don't they (the authority)



Horse riders with placards and pegs on their noses, protest about the proposed spraying of biosolids on Rough Island. From left are Maxwell Clark, Anne Davey, Shona McBride and her daughter Tessa.

secret spraying it behind Sartori Field and see what happens?" he said.

Shona McBride, a Richmond rider, said she was concerned about health risks to her baby if she went to the area.

"Why do you tell someone to pro-

Accumulation of lead and arsenic was also a concern, he said.

Residents spoken to declined to comment but were planning to make a submission opposing the proposal, as was the trust.

The authority is seeking consent to spread 100-150 cubic metres of waste a hectare over 64 hectares of Rough Island twice in six years.

Authority engineer Mike Schruer said levels of nitrogen had built up more quickly than expected on Rabbit Island, forcing the authority to look elsewhere to spread the biosolids.

Other alternatives had been investigated but were unsuitable, although commercial forests could be used and the sludge had proved a good forestry fertiliser.

The amount of sewage needing disposal had increased more than expected and treatment had failed to reduce nitrogen levels. An improved aeration basin due to be in use by the end of the year would fix that problem, Mr Schruer said.

An upgrade to aerators would be complete by late next week and would significantly reduce the smell, he said.

Mr Schruer said the sludge was safe for immediate human contact.

"The workers' transmissions are an LSH requirement - they always set on the side of caution."

Heavy metal building was not a problem because local commercial industry discharge contained the same heavy metals as domestic waste.

He said local iwi supported the authority's land disposal of treated sewage.

Several iwi spokespeople were unavailable for comment today.

If consent was approved, Mr Schruer said spraying would begin as soon as possible.

- by Deldre Mussen

9444ii

## Submission to the Draft Rabbit Island Reserve Management Plan

### Members of the Good Wood scheme:

- Arlun Wells, Bay Firewood, Takaka-Collingwood Highway, 03 525 9560
- Paul Hogarty, Mariri Metal Recycling Ltd, Upper Moutere, 022 638 1796
- Mark Elvines, Mickey Rat Firewood, Brightwater, 03 542 3922
- Lynley, Motueka Firewood Deliveries, Motueka, 03 528 7231
- Baz Newport and Duane Whiting, Richmond Wood and Coal, Richmond, 03 544 6473
- Karen Wells, Tasman Firewood, Richmond, 027 428 4777
- Phil Wright, The Wright Firewood Company, Brightwater, 03 544 4350
- Kylie Stringer, Wholesale Firewood Richmond, 03 546 9595
- Richard Frizzell, Nelson City Council
- Adie Leng, Tasman District Council

The Good Wood Scheme is a partnership between Tasman District and Nelson City Councils and owners of commercial firewood supply businesses. The Good Wood Suppliers have voluntarily agreed to only supply well seasoned dry firewood to their customers, or to inform them of the drying time requirements if less dry, in order to achieve healthier air quality especially in our urban areas in winter.

Continuing to be a Good Wood supplier is undertaken in collaborative good will; choosing to offer and promote best use of firewood in order to support the shared community goal of having healthier air quality.

Good Wood suppliers agree to have Council staff regularly monitor the quality of the wood they sell.

**In regards to #9, we support,**

*YES: that access needs to be restricted to forestry areas for firewood collection*

We support this change as we believe that this will be safer and more transparent than the previous forestry on-site collection offer:

- It allows each non-profit group to more easily adhere to the same Health and Safety requirements that commercial firewood suppliers operate under.
- It will ensure that only the agreed non-profit permit holders are having free access to this wood supply

**We would like to add conditions to our agreement to this change.**

We would recommend that:

1. *Wood deliveries are made off-site to the non-profit groups only during the period September – October. We understand that the wood has already been seasoned before offering delivery.*
  - This will allow a reasonable period for the wood to be sold as the normal fine weather activity
  - It will ensure wood has had time to be stored and well dried before being burned the following autumn-winter season
  - The previous March-April period did not provide any guarantees for purchased wood to be dry before burning.

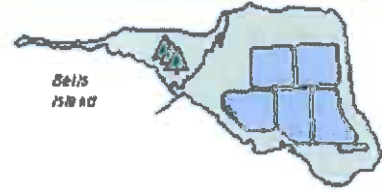
2. *There amount of wood being offered is limited to locally benefitting community non-profit groups.*
  - There are a large number of non-profit groups!
3. *The non-profit groups agree to the Good Wood parameters for sale of wood.*
  - The increase in poor air quality in winter, shown by air quality monitoring, is known to be mainly caused by residents burning wet wood.
4. *The health and safety requirements are adhered to by the non-profit groups*

Unfortunately, there are no regulations on non-commercial operators, who offer prices which undercut the commercial businesses because they do not have the overheads and health and safety requirements required of commercial operators.

We would like to collaborate with the non-profit groups offering firewood, so that we are all working in a more self regulated and monitored way to only offer well-seasoned wood that will easily dry in the reasonable time for our shared customers to burn to produce heat and not smoke.

18 July 2016

## Submission to Draft Moturoa/Rabbit Island Reserves Management Plan



### 1. Introduction

- 1.1. The Nelson Regional Sewerage Business Unit (NRSBU) operates and maintains the infrastructure that collects and treats wastewater from Nelson City and Tasman District. Its Wastewater Treatment Plant is located on Bell Island adjacent to Rabbit and Moturoa Islands.
- 1.2. The NRSBU has a consent to spray biosolids (treated sludge) of an approved standard into areas on Rabbit Island. This is the primary reason why the NRSBU is interested in contributing to the review of the Draft Moturoa/Rabbit Island Reserve Management Plan.

### 2. Submission

- 2.1. The biosolids programme has been operating since early 1996 and has improved the fertility and structure of the soil in the plantation forests on Rabbit Island without adverse effects to the environment. This practice has improved tree volume production by more than 30%, but a much more significant benefit has been a productive, sustainable and cost effective means of disposing of treated biosolids, which would otherwise require disposal as a waste product. The biosolids trial site has continued to produce valuable data about the impact of biosolids application on the soil and groundwater environments over a long term, which benefit other such proposals nationally and internationally.
- 2.2. Scion (formerly the Forest Research Institute) reported that the additional income per hectare from the standard application rate of biosolids compared with sites which have not had biosolids applied is about \$10,000 per hectare. This equates to potentially an additional income of up to \$8 million for the approximately 800 hectares of forest utilised for biosolids application.
- 2.3. The long term planning for the NRSBU Wastewater Treatment Plant has been done on the basis that the areas of Rabbit Island which are dedicated to recreational use would remain substantially the same in the medium term and that the plantation forests would remain available for the disposal of biosolids. The NRSBU undertook an investigation of alternative disposal methods and the only viable alternative was disposal to landfill. There are significant sustainability and cost issues with having to dispose of biosolids in a landfill.
- 2.4. The NRSBU believes that multisport activities can co-exist with biosolid spraying and that controls should be developed as part of this plan to gain the best value for all interest groups. This could be by the use of buffer zones in areas of public access. Buffer zones would limit areas of spraying, however



provided sufficient area is available for biosolid spraying this should not be a major impediment.

- 2.5. Currently approximately 800 hectares of forest on Rabbit Island is available for biosolid spraying. Any reduction in available hectares would require either sourcing other land to spray or consider alternative treatment/disposal options. Either way would incur capital investment.
- 2.6. Currently the biosolids are pumped via pipe to holding tanks on Rabbit Island. Alternative land for spraying would need to be in close proximity to Bell Island otherwise the required capital investment would escalate significantly.
- 2.7. The NRSBU supports allowing biosolid application to take place on up to 53 hectares of land on Rough Island. This would give the biosolid spraying operation greater flexibility in managing the co-existence with other users.
- 2.8. The very nature of biosolids disposal is that if capital investment was required it would be more cost-effective to invest to treat/dispose of the whole biosolids waste stream rather than a part of it. The NRSBU would prefer that the allocated area on Rabbit Island and Rough Island be retained for biosolid spraying.
- 2.9. The landfill disposal alternative would require the installation of a bio digester and sludge dewatering facility. The potential investment to undertake this is likely to be around \$10.0 million. Much more rigorous planning and evaluation of treatment and disposal options would be required before a final option and associated costs could be determined.
- 2.10. The annual cost to landfill biosolids is estimated at over \$600,000. The transportation to the landfill would generate up to 1,000 return truck movements per year with associated costs of \$250,000 per year.
- 2.11. The existing biosolids application programme has substantial environmental and economic benefits for the region and the potential loss of these benefits should be given appropriate consideration in the planned access to the forest and any extension of the recreation areas on Rabbit Island.
- 2.12. Any changes required to the sewage treatment technology and disposal methods used are likely to require significant lead time for planning and implementation and may involve significant capital and ongoing operational costs.

### **3. Final Comments**

- 3.1. The NRSBU is supportive of the Draft Moturoa/Rabbit Island Reserve Management Plan. Thank you for the opportunity to forward this submission. We would like to be heard on this submission, if possible.



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