



Proposed Marine Occupancy Charges – Background Comment

Dear Members

Introduction

In my last Chatline, I noted that the Marlborough District Council (Council) is reviewing its suite of planning documents. As part of that process, the Council has released a discussion paper and associated background information as to why it proposes to introduce Occupancy Charges for the private use of the coastal marine area by the likes of marine farmers, jetty/boat shed owners and private boat moorings. The Council has requested submissions on its proposal and charging regime.

On behalf of the Association, the Committee intends to make a submission. We would like to highlight the proposal and seek feedback from you. We also encourage you to consider making your own submission – the more the merrier!

Why Now?

Under the existing plans, the Council has the ability to introduce coastal Occupancy Charges. For various reasons the Council has held off. However, it seems any legal uncertainties have been resolved and with the assistance of consultants Council has finalised its proposed methodology, pricing regime, who will be caught and who will be exempt. The current planning review is thus seen as a suitable time to put the proposal before the community.

Who Will Be Affected?

Persons holding a permit/licence to occupy a specified part of the coastal marine area for a private mooring, boat shed, jetty or marine farm. There will be a range of exemptions for the likes of the Waikawa marina and public jetties. Community groups operating a jetty not already listed as exempt should seek a specific exemption.

Kenepuru & Central Sounds Residents Association Inc.

President
Vice President
Vice President
Secretary
Treasurer
Chairman Roding Committee

Ross Withell
Adrian Harvey
Andrew Caddie
Stefan Schulz
Robin Bowron

withell@clear.net.nz
mountstokes@xtra.co.nz
andrew.caddie@xtra.co.nz
kcsra@pws.co.nz
info@thenikaus.co.nz

Annual Charges

A range of annual charges has been proposed. For a mooring \$55, for a large jetty (greater than 84 sq metres) \$200, for a small boat shed \$250, for a large mussel farm (up to 16 hectares) \$1200. Charges have been essentially set on an area basis. Thus for a mooring a swing radius of 28 metres was used. Charges may be reviewed annually.

What Will Be Done With the Money?

In a nutshell, the money collected will be used to promote the sustainable management of the coastal marine area (the seaward side of the shoreline). This could include various monitoring schemes, related research, education and the costs of the Council undertaking formal RMA and strategic planning.

Is This Work Necessary?

The King Salmon inquiry process highlighted the disturbing lack of knowledge and science around the most basic hydrological aspects of the Sounds environment. To fill this gap the Council has commissioned NIWA to research and prepare a hydrodynamic model of the Sounds. In a recent resource consent application for a new mussel farm the Association and other submitters pointed to the lack of scientific data as to the adverse ecological impacts of marine farming. The Commissioner adjudicating the case noted that *“The opinions of all the ecologists in this case, together with the concerns felt by all the submitting organisations is a wake-up call (if any is needed) about the need for wide scale coordinated monitoring [of] the effects of marine farming in the Sounds”*.

Do We Agree?

Clearly, the Council is well behind in this area and it will take time, effort and money to catch up. Accordingly, the Committee agrees, in principle, as to the use of coastal Occupancy Charges for the purpose of monitoring and research. However, we have a number of issues of fairness with the proposed charging regime.

Equity Between Users?

You do not have to be a rocket scientist (although a calculator is handy) to work out that marine farmers are getting off quite lightly compared to private moorings or jetty permit holders. On an area basis, private moorings are being charged out at the equivalent of \$15,000 per hectare compared to marine farms at \$162 per hectare. If you were to assess it on the basis of points of anchors on the seabed, a similar proportionate discrepancy is highlighted. This difference is due in part to the fact that the Council's consultants believe the net private benefit for a mooring is greater than the net private benefit for a marine farm (mussel and other).

We suggest that the likes of mooring charges be reduced to about \$30 or marine farmers pay more. Your views?

Who Should Pay the Bigger Share?

As currently proposed, private coastal marine area permit holders will pay 75% of the proposed budgeted expenditure and Marlborough ratepayers will pay 25%.

We suggest this should be more like 50% each. After all, the Sounds is the jewel in the Marlborough District crown! Your views?

Other issues

In discussion members of the Committee have challenged the use of area as the basis for charging. Arguably a permit for a marine farm is akin to a pastoral lease. So why not charge based on the value of the property right - the transferable right to occupy the sea area for farming (marine)? After all the Council has a database of marine farm values. **Your views.** Others have questioned an annual charge for moorings. Wouldn't it be less administrative cost and hassle to the Council if, say, a fee of \$55

was charged every three years? You may have other comments/suggestions – **lets hear them.**

What You Can Do

We recommend and urge you to read the Council's brochure on Occupancy Charges and the two supporting papers from the Council's consultants (Boffa Miskel and Executive Finesse Limited). These can be found on the Council's website at

<http://www.marlborough.govt.nz/Your-Council/RMA/Review-of-Resource-Management-Documents/Coastal-Occupation-Charges.aspx>

Then use the Council response form to make your own submission and/or let the Committee know what you think and why. A simple email to me or another Committee member is fine.

Submissions close on Friday 22 August.

Yours faithfully

Ross Withell
President
Kenepuru and Central Sounds Residents' Association