28 March 2011

Offshore Islands Regional Coastal Plan
Conservation House
18-32 Manners Street
P O Box 10420
WELLINGTON 6143

Dear Sir/Madam

PROPOSED REGIONAL COASTAL PLAN: KERMADEC AND SUBANTARCTIC ISLANDS

The Southland Conservation Board (the Board) is a statutory body appointed by the Minister of Conservation and established by the Conservation Act 1987 and its functions are set out in Section 6 of that act, and in the National Parks Act. The Board’s area of jurisdiction is the Southland Region, including the Subantarctic Islands, and its functions include advocacy in regard to all conservation-related matters at any public forum or in any statutory planning process.

The Board has been consulted during the development of the proposed regional coastal plan, but still has some concerns which are raised below.

The Board supports the need for a regional coastal plan for the Subantarctic Islands. In particular, the Board strongly supports the need for an integrated approach between the Sub Antarctic Islands Conservation Management Strategy (CMS) and the proposed regional coastal plan for the islands. The islands themselves have the highest level of protection as Nature Reserves and the Board is of the view that the coastal environment is deserving of a similarly high level of protection.

The Board does not support the proposal for the Environment Protection Agency (EPA) to consider proposals of national significance that overlap or are adjacent to the boundary of the coastal marine areas of the Subantarctic Islands. The EPA is set up under the Resource Management Act and has not been set up specifically to consider matters of national significance in relation to conservation or the Conservation Act. The proposed approach to use the EPA would take the decision-making out of the hands of the agency that currently manages conservation land on behalf of all New Zealanders. The decision-making is potentially being passed to those who have little or no knowledge of the islands and their values – this could have a serious negative impact on the management of the high conservation values of the Subantarctic Islands and their marine coastal area.

In the section on cultural and historic heritage, the Board would like to see discussion of the need to increase public awareness of the Subantarctic Islands and their coastal environments through interpretation at a location away from the islands.
Under tourism (p. 12) the Board would like to see acknowledgement of the position regarding yachts in the Subantarctic Islands similar to that provided on page 21 of the section on the Kermadec Islands.

The Board is extremely concerned that oil spills, pollution and shipwrecks in the Southern Ocean has the potential to not only devastate both the marine and land areas, but that because of the remoteness of the area, it would be practically impossible to deal with those environmental impacts. To this end, the Board seeks that a conservative approach be taken with shipping.

The Board would like to see a stronger position taken on artificial light pollution and its effect on night flying sea birds.

The Board understands that Department officials have been working together to ensure that as far as possible the proposed Coastal Plan and the existing Sub Antarctic Islands CMS are congruent, especially as there is overlap between high and low spring tides. As you will know, the CMS for the Sub Antarctic Islands is in the early stages of being reviewed. It would thus be useful if any new information gathered in the process of reviewing the CMS could be incorporated in the Proposed Coastal Plan and we seek that you consider how this could be best accomplished.

The Board wishes to be heard in support of its submission.

Yours sincerely

[Signature]

Robin McNeill
Chairman