



Board of Inquiry- Proposed NZ Coastal Policy Statement  
c/- Department of Conservation  
PO Box 10 420  
Wellington 6143

email: [nzcps@doc.govt.nz](mailto:nzcps@doc.govt.nz)

Dear Sir/Madam,

**Submission on: Proposed New Zealand Coastal Policy Statement**

The New Zealand Marine Sciences Society (NZMSS) is a scientific society affiliated to the Royal Society of New Zealand. It comprises over 260 scientists, managers, policy makers, and students working in all aspects of marine science in New Zealand and overseas. Society members work for universities, Crown Research Institutes, and other research providers, as well as for various central and local government departments, agencies and non-governmental organizations. Our members, therefore, have a wide range of views and experiences on most issues confronting the management of New Zealand's marine environment. Our elected Council has the task of providing comments on marine science issues in the public realm, including government policy and marine conservation. This submission represents a consensus view of the NZMSS Council concerning the scientific issues related to the Proposed NZ Coastal Policy Statement. We note that the purpose of the New Zealand Coastal Policy Statement is to promote sustainable management of coastal environment, including use, development, and protection. It guides local authority planning, and therefore affects regional coastal plans and resource consents. We support the proposal but suggest the following changes are made.

1. **Expand Objective 7 on page 7 and policies 44-48 on page 23 to include all ecosystem services.** There are many aspects of the coastal ecosystem that are necessary to maintain ecological health and allow sustainable use but it is only water quality that is mentioned in the proposed NZCPS. We suggest that a more balanced approach would be to mention in this objective the need for maintenance of all aspects of the ecosystem to sustain ecosystem services. This balance should also be reflected in the policies listed on page 23.

2. **Expand the focus of Policy 1 on page 9 that defines the coastal environment to include coastal ecological processes as well as defining coastal places.** The coastal environment is more than a collection of coastal places; without the biogeochemical processes that take place there the coastal zone would not be able to sustain any use. It is important therefore that the definition of the coastal environment should refer to the biogeochemical processes that sustain coastal ecosystems.
3. **We applaud Policy 5**, which states that a precautionary approach shall be adopted when knowledge is limited and effects are potentially harmful.
4. **We also approve of Policy 7**, which notes that proposed activities affecting conservation land must take into account the purpose and status of the land. This policy gives the various groups grounds to make submissions to local authorities when the conservation estate is affected.
5. **In Policy 21, Cumulative effects, include reference to ecosystem services.** It is not clear that the term coastal process includes ecosystem services. We suggest a slight modification of this policy definition to ensure ecosystem services are clearly included. By ecosystem services we mean the natural biogeochemical processes that provide life sustaining waters and sediments that support fisheries, deliver oxygen, take up carbon dioxide, process and detoxify wastes, sustain recreational and tourism activities etc.
6. **Expand Policy 31, Indigenous biological diversity, to include areas of high regional or national biodiversity.** Some localities are regional or national hotspots of biodiversity. We suggest that these areas are specifically mentioned in this policy definition.
7. **Sea level rise and climate change.** We are concerned that the effects of sea-level rise and environmental changes associated with climate change are not adequately addressed in the policies regarding use and development (Policies 14-16). Policy 27, for example, does address the expected effects of climate change and sea-level rise. We would like to see Policies 14-16 explicitly address the same issue. We recognize that Policy 52 does require coastal hazard planning, and we think that to be internally consistent, such planning should also be included in Policies 14-16.
8. **Balance between construction of coastal protection and protection of historic sites.** We understand the purpose of Policies 55-57 (Historic Heritage), and we do not disagree. There will, however, be increasing numbers of cases where historic sites are at risk from natural coastal processes. Where a low-lying historic building, for example, is at risk from sea-level rise, there will be a balance to be struck between the construction of coastal protection on the one hand, and the possible loss of the historic asset on the other. How will councils know to which part of the NZCPS to give the most weight? We feel there is room for guidance as to priorities.
9. **Volume of removal of sand, shell and shingle.** Schedule 1.6 states that extensive

removal of sand, shell or shingle from the coastal marine area is to be a restricted coastal activity. We feel that the criteria are too generous, particularly in the light of sea-level rise, and we suggest that the volume threshold of 50,000 m<sup>3</sup> be reduced to 20,000 m<sup>3</sup>. We suggest a similar threshold change for S1.7 (depositing substances in the coastal marine area).

*Approved by the NZMSS Council 7<sup>th</sup> May 2008*

Yours sincerely,

Handwritten signature of Alison MacDiarmid in black ink.

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