

**ENVIRONMENTAL SERVICES COMMITTEE MEETING HELD ON
WEDNESDAY 21 OCTOBER 2015 AT MEMORIAL HALL SUPPER
ROOM, ESPLANADE, KAIKOURA.**

AGENDA

- 1. Apologies**
- 2. Matters of Importance to be raised as Urgent Business**
- 3. Environmental Services Report** ***page 10***
 - Building**
 - Resource Planning**
 - Resource Consent Update List**
 - District & Environmental Planning**
 - Environmental Services Budget Report** ***page 19***
- 4. Block Offer 2016** ***page 20***
- 5. Urgent Business**

• Building

There were 11 building consents with a combined construction value of \$1,913,940.00 issued during September 2015. These consents were for:

- 3 dwellings
- 1 consent for 3 relocated dwellings
- 1 heater
- 2 residential alterations
- 1 shed
- 2 visitor accommodation consents – Glamping site and Pure Pods
- 1 garage

We currently have 10 consents being processed.

Building consent revenue for September was \$12,565. Revenue year to date is \$45,841.

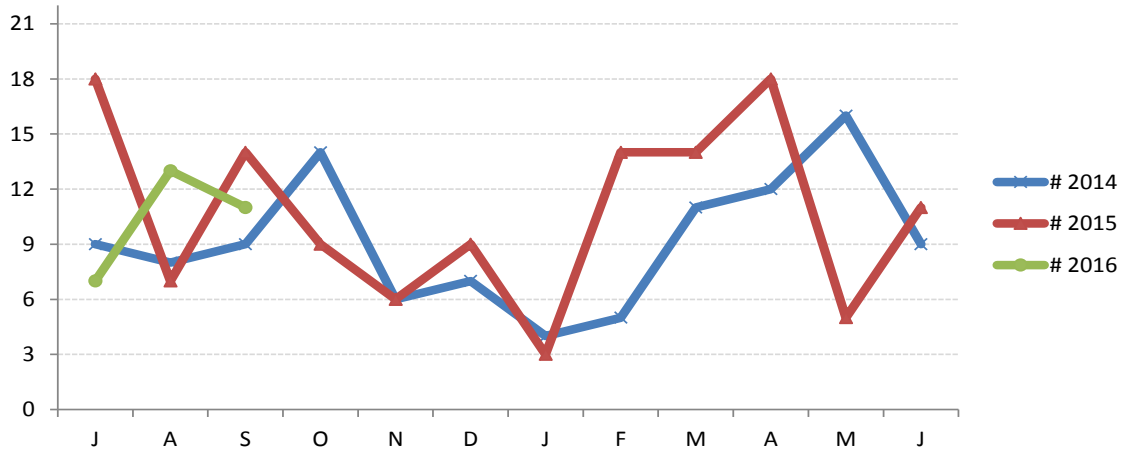
11 Land Information Memorandums and 3 Code Compliance Certificates were issued in the month of September 2015.

September was a busy month for processing in the Building Department as people start to plan for spring and summer projects.

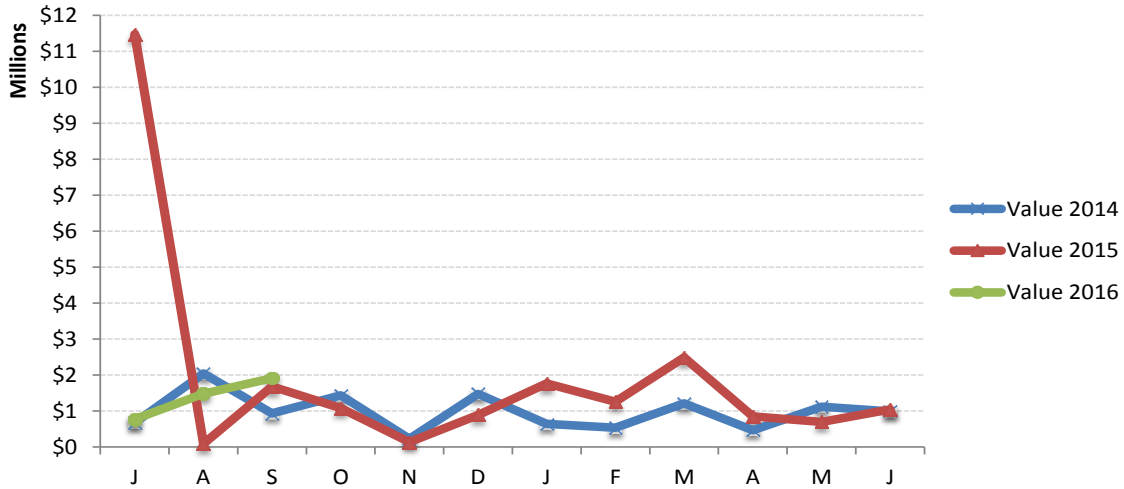
The Building Control Officer attended an interesting series of seminars covering updates to building products, information on the Licenced Building Practitioner Scheme and fire safety amongst other topics.

Author: Building Administration Officer
Endorsed by the Acting Chief Executive Officer

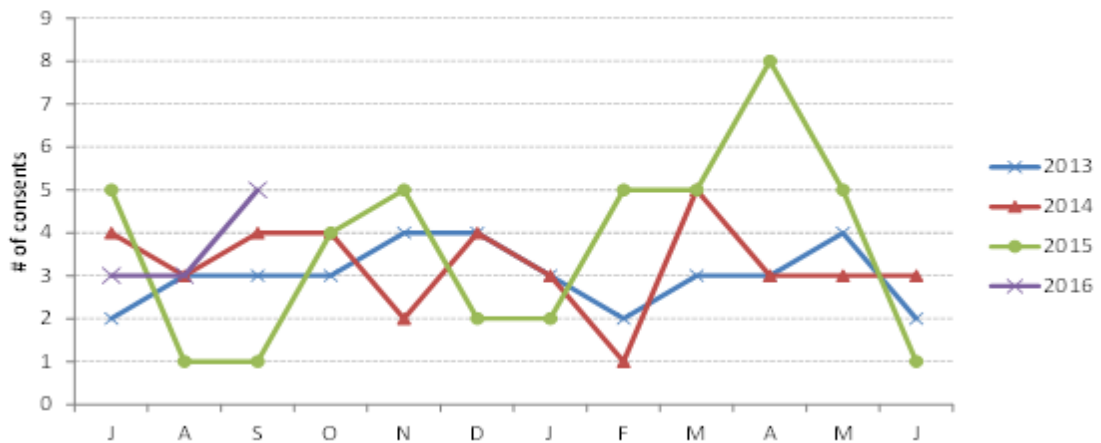
of Building Consents Issued



Value of Building Consents Issued



Resource Consent Applications Received



- **Resource Planning**

Resource Consent Update: From 1 September 2015 to 14 October 2015

Five land use applications were received in the reporting period.

Resource consent revenue for September was \$3,391. Revenue year to date is \$16,372.

Limited notification for the Waikoura Springs Ltd application to operate a chicken farm has closed with one submission in opposition.

Request for completion certificates on subdivisions has increased. Anecdotally, this seems to be since the revision of the Development Contributions Policy.

Public enquiries are steady; however, these continue to be varied in nature.

Author: District Planner
Endorsed by the Acting Chief Executive Officer

- **Resource Consent List Update**

RESOURCE CONSENT UPDATE FOR THE PERIOD FROM 1 SEPTEMBER 2015 TO 14 OCTOBER 2015.

Resource consents decisions issued:

Type of Consent	Applicant	Address of Activity	Number of New Lots / Guests
Land Use –Visitor Accommodation –create 20 lot camp ground	M Boyd	Donegal House, Schoolhouse Road	20 vans
Land use – Visitor Accommodation -4 guests	A & T Blunt	Blunts Road	4
Land Use -Convert visitor accommodation to residential use	Timothy & Sonya Jenkins	12 Margate Street	
Land Use –Commercial activity in rural zone	Heritage New Zealand	62 Avoca Street, Fyffe House	
Subdivision: 2 lot Subdivision & Land use – non complying recession & digging in archaeological area	J Kennedy	149 South Bay Parade	
Land use – non complying recession & digging in archaeological area	W 2 Limited	28 Avoca Street	
Land use – Earthworks in Archaeological area	Johannes Kreisel	153 South Bay Parade	

Active consent applications currently in process:

Type of Consent	Applicant	Address of Activity
Land use-non complying boundary	Greg & Mary Ashwell	184 Ludstone Road
Land use-non complying boundary	Br & DE Thompson	8 Miromiro Drive
Land Use -Extensive farming – Chicken farm	Waikoura Springs Ltd	90 Mill Road

Consent applications awaiting receipt of further information requested from applicant or on hold:

Type of Consent	Applicant	Address of Activity
Land Use – Earthworks in Archaeological Sites	Kaikoura District Council	Global Consent for Kaikoura District
Land Use – Visitor Accommodation	P Hammett	61 South Bay Parade
Land Use- Visitor Accommodation 8 Guests	Br & Page	148 Torquay Street
Land Use- Visitor accommodation and Non-compliance with Height Standard	N Mitchell	13 Swyncombe Place
Subdivision: 2 lot Subdivision	P & S Thomas	1946 Inland Road
Land Use – Non complying boundary setback	J & P Turner	26 Moa Road

• District & Environmental Planning

National Legislation

Broadband

No change from last meeting, awaiting feedback from Central Government.

Canterbury Regional Council

Natural Resources Regional Plan – Air Section

The Officers Report has been produced and hearings have been set from 27th October until 27th November. Kaikoura District Council is scheduled for 25th November 2015.

Land and Water Regional Plan – Plan Change 4

A submission has been made on Plan Change 4 which seeks to provide greater protection for water supplies which service fewer than 25 people and which the public have access too. A copy of the submission is attached. It is asked that the submission be endorsed if changes are necessary these can be made at the hearing.

Recommendation

That the Environment Services Committee endorse the submission on the Land and Water Regional Plan – Plan Change 4.

Earthcheck

Data has been lodged for the Annual Earthcheck Benchmarking program. Preparation for the annual audit has now commenced.

Whalefest

A reminder that Whalefest is being held on 13-15 November in Kaikoura. Barbara Todd and Jody Weir on behalf of Kaikoura Ocean Research Institute are driving this event. We are now working with schools on ocean waste education and to come up with a logo for their own reusable bags.

Water Fountains

Signage is being prepared to support the water fountains that have been installed around town.

Author: District Planners
Endorsed by the Acting Chief Executive Officer

Form 5
Submission on publicly notified proposal for policy statement or plan

Clause 6 of First Schedule, Resource Management Act 1991

To: Environment Canterbury

Name of submitter: Kaikoura District Council

This is a submission on the following proposed policy statement (*or on the following proposed plan or on a proposed change to the following policy statement or plan*) (the **proposal**):

Submission on Proposed Plan Change 4 to the Canterbury Land and Water Regional Plan.

The specific provisions of the proposal that our submission relates to are:

All aspects of plan change four which relate to the changes proposed for Group and Community Drinking water supplies.

Our submission is:

The proposed changes fail to give effect to the Canterbury Regional Policy Statement in particular:

Policy 5.3.2 – Development conditions (Wider Region)

To enable development including regionally significant infrastructure which:

(1) ensure that adverse effects are avoided, remedied or mitigated, including where these would compromise or foreclose:

(d) the protection of sources of water for community supplies;

Policy 7.3.6 – Fresh water quality

In relation to water quality:

(1) to establish and implement minimum water quality standards for surface water and groundwater resources in the region, which are appropriate for each water body considering:

(a) the values associated with maintaining life supporting capacity, ecosystem processes and indigenous species including their associated ecosystems, and natural character of the waterbody;

(b) any current and reasonably foreseeable requirement to use the water for individual, marae or community drinking water or stockwater supplies, customary uses or contact recreation;

(c) the cultural significance of the fresh water body and any conditions or restrictions on the discharge of contaminants that may be necessary or appropriate to protect those values; and

(d) any other current or reasonably foreseeable values or uses;

Policy 5.3.2 refers to “community supplies” as opposed to community drinking water supplies, the later being a technical term. The difference is reinforced by the method which states:

*“The Canterbury Regional Council, Will: (2) Set out objectives, policies and may include methods in regional plans to control the adverse effects of development on water bodies, including their value as sources of **drinking water**;”*

Emphasis added

Policy 7.3.6 directly refers to marae. The current proposal does not provide any specific protection for marae supplies.

Although the Section 32 analysis suggests that issues can be addressed by Rule 5.115, the rule does not address existing and consented supplies. Rule 5.115 applies only where new consent is sought. The Section 32 does not address commercial activities which are located on supplies of less than 25 people and have been established for a number of years.

In discussion with Environment Canterbury the suggestion has been to address the issues in the sub-regional chapter. Although the approach may be possible, a void is created until the sub-regional chapter process is started in 2018. In addition to this Kaikoura District Council is aware of other councils with similar concerns.

Given the current planning framework discussions have occurred with the Kaikoura Zone Committee. The view is that essentially complex systems don't follow rules and a rule framework can lead to perverse outcomes.

The 2km separation distances currently provided in the plan is a good example of this. The 2km is upstream with a 200m buffer any groundwater supplies which meander may only effectively be protected by a little more than 200m.

Permitted activities are necessary for a range of anticipated activities and the large buffer distances makes it difficult for anticipated activities to occur.

Drinking water (regardless of size of the supply) is a target of CWMS. For the Kaikoura Zone of greatest concern are supplies which public have access to and places which provide accommodation, food or beverages. We must provide good safe water. For the Kaikoura Zone this includes coastal camping grounds, accommodation, restaurants and Marae. Rural golf courses Canterbury-wide may also be an issue. All though all supplies which public has access to are tested, a more proactive approach is suggested to complement testing requirements and provide better certainty to users of small supplies.

The suggested proactive approach requires direction in three areas:

1. Creating a collaborative consensus and mindset
2. Providing greater individual responsibility
3. Providing 'backstop' rules

Focusing on the backstop rules and looking at the areas with greatest risk the following sites required greater protection:

1. All premises which require licences or a Food Control Plan under the Food Act 2014
2. All camping grounds registered under the Camping Ground Regulations 1985
3. All properties which provide for accommodation for 5 persons or more
4. All existing Council Water Supplies which may be used for domestic use
5. Marae

Information on the location of such premises can be found with discussion from Ministry of Primary Industries and Territorial Authorities.

Some risks will still exist for private dwellings and accommodation providers of fewer than 5 persons however this an area which is best addressed by individual responsibility.

I seek the following decision from the regional authority:

1. Ensure;
 - a. All premises which require licences or a Food Control Plan under the Food Act 2014.
 - b. All camping grounds registered under the Camping Ground Regulations 1985
 - c. All properties which provide for accommodation for 5 persons or more.
 - d. All existing Council Water Supplies which may be used for domestic use
 - e. Marae

Are provided with the same level of protection as community drinking water supplies as outlined within Schedule 1 of the Land and Water Regional Plan.

2. Link the above 5 activities types to Schedule 1 to ensure they have a drinking water protection zone.
3. Provides for actives outlined in rules 5.7 6(g), 5.8 3(g), 5.10 2(b), 5.14 4(b), 5.16 2(b), 5.20 2, 5.22 2(b), 5.22 4(a), 5.24 5(b), 5.27 6(b), 5.29 3(f), 5.31 1A, 5.33 1(c), 5.36 1(c), 5.39 1(b), 5.71 2, 5.75 2(a), 5.77 4(a), 5.82 1(c), 5.85, 5.90 (b), 5.91 4(b), 5.95 2(f), 5.98 8(b), 5.101 2, 5.109 3 and 3A, 5.119 5 and 8, 5.179 2(b), and 5.181 5 be permitted activities within a drinking water protection zone which are created by a-e above where the written approval of the owner/occupier which is responsible for any of the activities a-e above has been obtained and supplied to the Regional Council.

I wish to be heard in support of my submission.

- * If others make a similar submission, I will consider presenting a joint case with them at a hearing. It is intended that, if required, joint evidence will be provided at the time of the hearing.

.....
Signature of submitter
(or person authorised to sign
on behalf of submitter)



Date 12 October 2015

(A signature is not required if you make your submission by electronic means.)

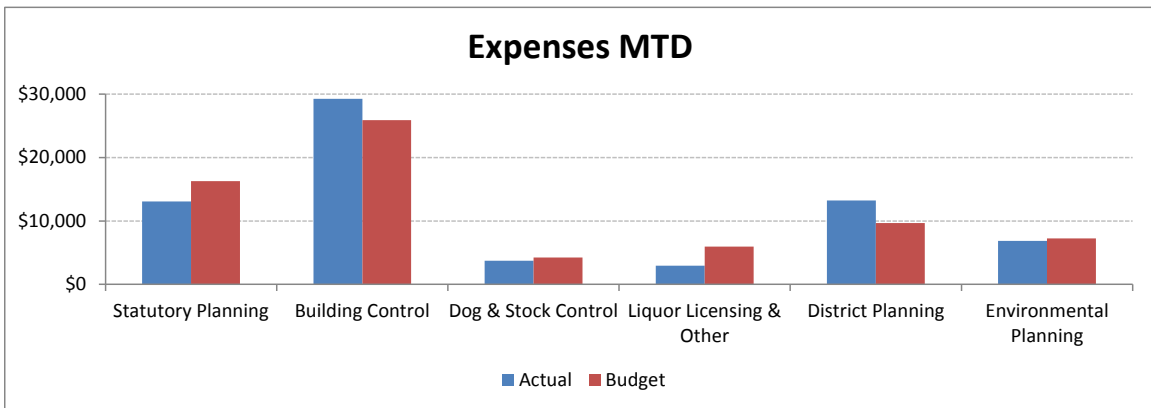
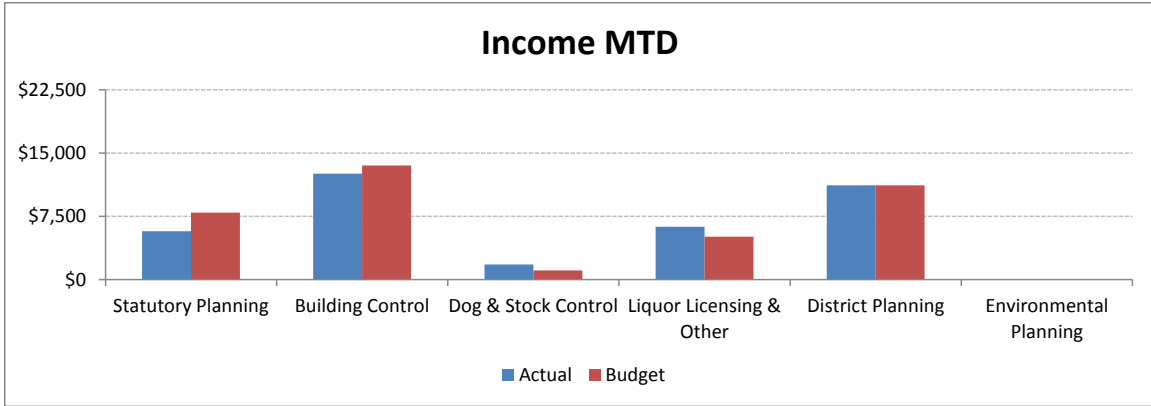
Address for service of submitter: Kaikoura District Council
PO Box 6
KAIKOURA

Telephone: 03 319 5026 ext 209

Fax/email: matt.hoggard@kaikoura.govt.nz

Contact person: *[name and
designation, if applicable]* Matt Hoggard, District Planner

Environmental Services Budget Report



Block Offer 2016

Introduction

Council has received a letter advising that the government has started consultation for Block Offer 2016. The Block Offer is a tender used to allocate petroleum exploration permits, including permits to explore for gas hydrates. New Zealand Petroleum and Minerals release specific areas for bids. These release areas are made up of blocks, and bidders can bid for one or more adjoining blocks. This allows bidders to define their desired permit area based on their own analysis of the data available.

New Zealand has run annual Block Offers since 2012. New Zealand Petroleum and Minerals select the release areas for Block Offers based on their prospectively and commercial interest and from 2013; companies have been able to bid for their own block outlines based on a map network system within each release area.

Before New Zealand Petroleum and Minerals announce the Block Offer:

- New Zealand Petroleum and Minerals first ask industry to nominate areas to include in the allocation, then consult with iwi and hapū in the proposed areas,
- New Zealand Petroleum and Minerals also discuss the proposed areas with local government. (Note that areas listed under Schedule 4 of the Crown Minerals Act 1991 are automatically excluded from the Block Offer).

Information gathered during consultation guides the Minister's decision on the final make-up of the Block Offer. This helps to ensure New Zealand Petroleum and Minerals identify sites of cultural, historical or environmental value. A report and recommendations are then provided to the Minister of Energy and Resources.

In the past Council has lodged submissions on the Block Offer process. The submissions have outlined concerns from effects of proposed exploration and drilling activities on the Kaikoura Coastal Marine Area. The submission on the Block Offer 2015 raised the new matters that have arisen since the past submissions were ratified. These new matters are the Kaikōura (Te Tai o Marokura) Marine Management Act 2014 and the formation of a Ministerial advisory Committee. The current submission has raised the issue of consultation with the advisory committee, and the research that has begun on the biological value of the Hikurangi Marine Reserve and the Sperm Whale habitat.

The 2015 block offer map shows a little bit taken out of the for the Pegasus and East Coast basins closest to Kaikoura which accounts for the northern outer tip of the sanctuary. However, this was not clear in the block offer map so was mentioned in the submission. New Zealand Petroleum and Minerals confirmed in an email that the area of the sanctuary was expressly excluded from the block offers. The current submission has raised the issue of the value of protection if effects from adjacent activities affect the protected areas.

As directed, the attached submission was prepared in response to the 2016 Block Offer consultation information. The submission will be lodged with New Zealand Petroleum and Minerals. The process from this point is that staff from New Zealand Petroleum and Minerals will consider the submissions, and a summary will be presented to the Minister for consideration.

The Process

Before New Zealand Petroleum and Minerals announce the Block Offers:

- they first ask industry to nominate areas to include in the allocation,
- then consult with iwi and hapū in the proposed areas,
- they also discuss the proposed areas with local government. (Note that areas listed under Schedule 4 of the Crown Minerals Act 1991 are automatically excluded from the Block Offer).

Information gathered during consultation guides the Minister's decision on the final make-up of the Block Offer. This helps to ensure New Zealand Petroleum and Minerals identify sites of cultural, historical or environmental value. A report and recommendations are then provided to the Minister of Energy and Resources.

The consultation information states:

Offshore Release Area 15PEG-R1 covers 44,015 square kilometres covers parts of the Pegasus and East Coast basins.

These two basins are considered among New Zealand's most exciting. Both are prospective for oil, gas, and for gas hydrates. The Pegasus Basin is relatively unexplored, and the offshore East Coast Basin is under-explored.

Two permits were granted to Anadarko in the Pegasus Basin for Block Offer 2012. Last year's Block Offer saw three 15-year petroleum exploration permits granted in these basins to a joint venture between Chevron and Statoil, and one to OMV.

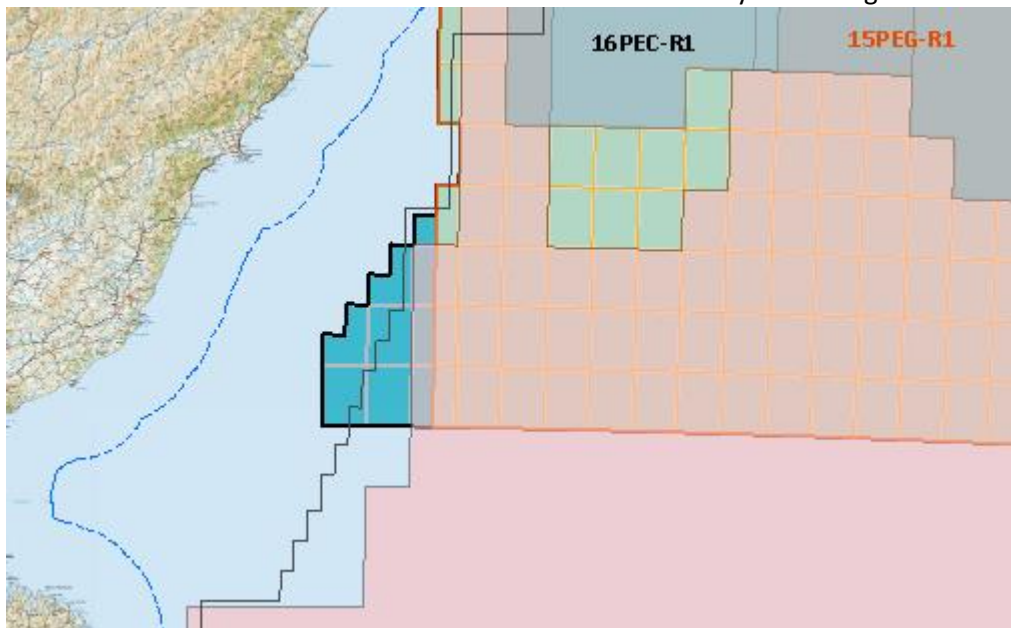
Recommendation

It is recommended that Council:

- ***Receive the information in the report***
- ***Support the submission on the New Zealand Petroleum and Mineral 2016 NZ Block Offer Consultation Document.***

Author: District Planner

Endorsed by the Acting Chief Executive Officer



New Zealand Block Offer 2016

Submission on Consultation Document

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Contact: Rachel Vaughan

Kaikoura District Council is happy to answer any questions in regard to this submission

About Kaikoura District - as background to our position

1. Kaikoura District is the smallest local authority in Mainland New Zealand. The Kaikoura District spans from the Haumuri Bluffs in the south to the Kekerengu valley in the north, covering 2,048 square kilometres of diverse landscape. Kaikoura District is located between the Pacific Ocean and the Inland Kaikoura Range. The Kaikoura District has wonderful environmental diversity and which ranges from sea level to snow capped mountain of 2,885 metres. The spectacular coastline provides excellent fishing, sporting and recreation for Kaikoura's residents and visitors. The Kaikoura Canyon, at around 1,300 metres deep, provides the natural habitat for the sperm whale, and is also host to over 200 species of marine life. The Kaikoura coastline also experiences a large number of migratory and visiting whale and dolphin species close to shore. The regular visitors include Southern Right Whale, Orca, Humpback, Sperm Whale and Dusky and Hector Dolphin Species.
2. Historically the District has thrived in the fishing, farming and forestry industries. Today Kaikoura is a world-class tourism destination, yet still maintains its fishing and farming heritage. The District boasts award-winning restaurants, cafés and accommodation facilities, wineries and modern small boat facilities.
3. Kaikoura's vision is to display responsible custodianship of its unique natural, social, cultural and built environmental resources, by ensuring the sustainable utilisation and management of these resources.
4. To strategically progress toward sustainability, members of the Community need a shared understanding of what sustainability is, and a compass to frame and guide decision-making and planning. In 2000, the Kaikoura District Council adopted the principles of Agenda 21, to guide its progress toward sustainability. This meant gaining an awareness of sustainability, and gaining a deeper understanding to plan toward a sustainable society. The commitment covers all aspects of sustainability, where the ultimate goals are social

and environmental sustainability, and a vibrant economy is the means to ensure that we achieve these goals. As we strive toward social and environmental sustainability and a healthy economy in the long-term, we recognize that there will be short-term tradeoffs along the way. These tradeoffs must also be managed to ensure that critical aspects are not compromised.

5. Kaikoura District Council works closely with the Te Runanga o Kaikoura on a shared governance model. Both the community and the Runanga have raised concerns with the Kaikoura District Council regarding the impact of the petroleum and oil exploration on the coastal and marine environment around Kaikoura.
6. The Kaikoura Community formed a group to address issues in the Kaikoura Coastal Environment, this group is called Te Korowai o Te Tai o Marokura/Kaikoura Marine Guardians. In August 2014, Kaikōura (Te Tai o Marokura) Marine Management Act 2014 received royal assent. This legislation gave effect to the Kaikoura Marine Strategy. The purpose of the Act is to:

(a) recognise the local, national, and international importance of the coast and sea around Kaikōura (Te Tai o Marokura) as a consequence of its unique coastal and marine environment and distinctive biological diversity and cultural heritage:

(b) Provide measures to assist the preservation, protection, and sustainable and integrated management of the coastal and marine environment and biological diversity of Te Tai o Marokura:

(c) Acknowledge the importance of kaitiakitanga and local leadership:

(d) Establish an advisory committee to provide advice regarding biosecurity, conservation, and fisheries matters within a marine management area:

(e) Establish, within Te Tai o Marokura,—

(i) a marine reserve:

(ii) a whale sanctuary:

(iii) a New Zealand fur seal sanctuary:

(iv) various mātaītai reserves and taiāpure-local fisheries:

(f) Amend the Fisheries (Amateur Fishing) Regulations 2013 to provide specific regulation of amateur fishing in the marine management area.

7. The effects on marine mammals and other marine species and fisheries of exploration activities including seismic surveying are particularly challenging for the Block Offer 2016 areas off the Kaikōura coast. The internationally significant marine ecosystems of the Kaikōura Trench, and the whales and other wildlife that depend on this habitat and resources, are of crucial importance to the Kaikōura community, as is reflected in the Kaikōura Marine Strategy.
8. The 2016 Block Offer extends the Block Offer area to wrap around the biologically important Kaikoura Canyon. This area has been declared a marine reserve under the Kaikōura (Te Tai o Marokura) Marine Management Act 2014 and the whale sanctuary area has been declared.

The issue

9. The Kaikoura Community is concerned about the Block Offer process for Oil Permitting and Exploration in New Zealand. The principal concern relates to the blocks in the Pegasus Basin Great South Canterbury Basin which are on the East Coast of New Zealand. Of particular concern is the effect any seismic investigation and exploratory drilling in this area may have on the Kaikoura marine environment.
10. Locally the concern is with blocks on offer in the Pegasus Basin and the Great South Canterbury Basin, which could have effects on the Kaikoura coastline and marine environment. Kaikoura District Council recognize the past efforts of New Zealand Petroleum and Minerals to exclude the Te Rohe o Te Whānau Puha Whale Sanctuary and Ōhau New Zealand Fur Seal Sanctuary. However, the 2016 Block Offer is coming increasing close to the Te Rohe o Te Whānau Puha Whale Sanctuary and the Hikurangi Marine Reserve.
11. The Kaikoura District Council has little information on how the seismic testing, exploratory and drilling process may affect the coastal marine area in the District. Of particular concern are the marine environments that support both resident and itinerant marine mammals, sea birds and the highly productive marine ecosystems that contribute to the marine environment.
12. The Kaikoura District is highly reliant on the marine environment for the economic wellbeing of the District. The effects of seismic testing on marine mammals are unknown. If any drilling activity, including the seismic testing was to drive whales, dolphins or seals from our coastline, our marine tourism based economy would be destroyed. Any subsequent drilling accidents would cause additional devastation. The Kaikoura Community have worked hard toward sustainability and protecting the natural environment for future generations.
13. It is suggested that the 2016 Block Offer extension of the Pegasus Basin be put on hold until more is known about the biological importance of the Kaikoura Marine area. Some research work is already underway. The Department of Conservation will soon install permanent monitoring transects in the Hikurangi Marine Reserve. This is to measure the response to the creation of the Hikurangi Marine Reserve. Whale Watch Kaikoura in conjunction with the New Zealand Whale and Dolphin Trust has launched a three year project to study the submarine canyon of Kaikōura. The project aims to assess why the Kaikoura canyon is such a magnet for sperm whales.
14. The Kaikoura District Council also supports the work Maritime New Zealand has done on the Marine Oil Spill Response Strategy. However, Kaikoura District Council are concerned about the increased risks of an oil spill from the proposed new exploration areas off the Canterbury and Kaikōura coasts included in the 2012-2015 and now 2016 Block Offers.

Relief sought

15. The Kaikoura District Council understands that the Block Offer process is well advanced, however, there are concerns around the following matters that the Kaikoura District Council would be grateful if the Minister would consider.
16. The Kaikōura (Te Tai o Marokura) Marine Management Act 2014 acknowledges the importance of kaitiakitanga and local leadership. The Block Offer process should be weighed against this Kaikōura (Te Tai o Marokura) Marine Management Act 2014 (hereafter *the Act*) and ensure the Block Offer process is in accordance with the provisions of the Act. Section 6 of the Act, allowed the Ministers' of Conservation and Primary Industries to appoint an advisory committee to give advice on the matters listed under Section 7. While petroleum exploration is not a matter to be considered under Section 7 of the Act, there may be effects on the matters listed in Section 7 from Petroleum and Mineral activities. The Minister is asked to fully consult with the advisory committee on Petroleum and Mineral activities or consult with the Ministers' of Conservation and Primary Industries.
17. The Minister is asked to consider the unique features and ecosystems of the Kaikoura Coastline and in particular how any activities in the adjacent areas would affect the unique marine mammals, the highly productive coastal environment and the aspiration of World Heritage status for the area.
18. The Kaikoura Community would request that the following issues be investigated prior to letting any further permits in the Pegasus Basin or the Great South-Canterbury area:
 - a. The impacts of any exploratory or drilling activity on marine mammals particularly in the proposed marine mammal sanctuary area outlined in the Kaikoura Marine Strategy.
 - b. The impacts of any exploratory or drilling activity, including seismic survey, on both the residential and migratory marine mammal species in the adjacent marine environments.
 - c. Any risk to drilling activity being interrupted by seismic activity. Particular attention should be given to any seismic activity in the plate subduction zones around New Zealand including the The Hikurangi Trench. Particularly the risk of oil spill associated with the seismic risk.
 - d. The risk from an oil spill, including the use of oil dispersants on Kaikoura's flora and fauna. Oil dispersants may be any chemical that is used during clean up of a petroleum based discharge including – the effects on marine mammals, the effects on mahinga kai and biological accumulation of the chemical used.
 - e. Effects associated with the transport of oil or oil dispersants due to tidal currents affecting sensitive environments around New Zealand's coastline or marine areas.
 - f. Effects of the activity including use of dispersants on areas of productivity around New Zealand's coastline or marine areas.

- g. The risk of the drilling activity, including use of dispersants, on Kaikoura's marine canyon. The Kaikoura Canyon has been found to be an area of very high productivity in New Zealand's coastline and marine area.
19. The introduction of offshore oil and gas exploration and drilling vessels and equipment from other maritime environments to the waters off the Canterbury and Kaikōura coasts has the potential to establish a new range of biosecurity risks. Environment Canterbury is the regulatory body for marine biosecurity and would need to have confidence that these risks have been addressed.
 20. Kaikoura District Council recognise the economic benefits to the whole country, and any indirect economic flow on benefits to the Kaikoura region as well as Marlborough. The Kaikoura Community aware that many of our tourism ventures rely on fossil fuels and the right balance needs to be struck for New Zealand as a whole as what areas are appropriate for certain activities.
 21. The Kaikoura District Council holds a concern that the NZ marketing brand used by Tourism NZ could be irreversibly affected by high risk off shore oil exploration and the cost to the Country as a whole could well exceed the short term financial gain from the mineral resources.
 22. The Kaikoura District Council respectfully request the Minister consider the detrimental impact oil exploration and drilling may have on Kaikoura's pristine natural environment. Damage to the natural environment in turn will damage the Kaikoura Community socially and economically.

The Kaikoura District Council would be happy to discuss these issues in more detail if required.

