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Submission Form (Form 5)

Submission on Proposed Plan Change 1: Regional Coastal Plan: Kermadec and Subantarctic Islands

[Form 5](#) Submissions on a Publicly Notified Proposed Regional Coastal Plan under Clause 6 of Schedule 1 of the Resource Management Act 1991.

Return your signed submission by 5pm 22 October 2025 via:

Email: planchange1@doc.govt.nz with subject line: Proposed Plan Change 1: Regional Coastal Plan: Kermadec and Subantarctic Islands

Post: Department of Conservation, Private Bag 3072, Hamilton 3240
Attention: Jesse Gooding, RSP Resource Management Team

All sections of this form need to be completed for your submission to be accepted. Your submission will be checked for completeness, and you may be contacted to fill in any missing information.

Full name: Keith McRobie_____

Phone: _____

Organisation: Southland Conservation Board_____
(*the organisation that this submission is made on behalf of)

Email:
southlandconservationboard@doc.govt.nz_____

Postal address:

Postcode: _____

Address for service: name, email and postal address (if different from above):

Trade Competition

Pursuant to Schedule 1 of the Resource Management Act 1991, a person who could gain an advantage in trade competition through the submission may make a submission only if directly affected by an effect of the proposed policy statement or plan that:

- a) adversely affects the environment; and
- b) does not relate to trade competition or the effects of trade competition.

Please tick the sentence that applies to you:

- ☒ I could not gain an advantage in trade competition through this submission; or
- ☐ I **could** gain an advantage in trade competition through this submission.

If you have ticked this box please select one of the following:

- ☐ I am directly affected by an effect of the subject matter of the submission
- ☐ I **am not** directly affected by an effect of the subject matter of the submission

Hearing Submissions [select appropriate box]:

- ☐ I wish to be heard in support of my submission.
- ☒ I do not 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.
- ☐ If others make a similar submission, I will not consider presenting a joint case with them at a hearing.

- In accordance with clause 7 of Schedule 1 of the RMA, the Council will make a summary of your submission publicly available. The contact details you provide will also be made publicly available, because under clause 8A of Schedule 1 of the RMA any further submission supporting or opposing your submission must be forwarded to you by the submitter (as well as being sent to Council).*
- Section 352 of the RMA allows you to choose your email to be your address for service. If you select this option, you can also request your postal address be withheld from being publicly available. To choose this option please tick the relevant boxes below.*

- ☐ I would like my address for service to be my email.
- ☐ I have selected email as my address for service, and I would also like my postal address withheld from being publicly available.

Signature:



Date: 29.10.2025

(Signature of person making submission or person authorised to sign on behalf of person making the submission – unless you are providing your submission by email).

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):

- *it is frivolous or vexatious:*
- *it discloses no reasonable or relevant case:*
- *it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:*
- *it contains offensive language:*
- *it is supported only by material that purports to be independent expert evidence but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.*

(1) The specific provisions of the Proposed Plan Change that my submission relates to are:		(2) My submission is that: <i>(include whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views)</i>		(3) I seek the following decisions from the Minister of Conservation. <i>(Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand your concerns.)</i>
Chapter/Appendix/ Schedule/Maps	objective/policy/rule/ standard/overlay	Oppose/support (in part or full)	Reasons	

Add further pages as required – please initial any additional pages

SOUTHLAND CONSERVATION BOARD

TE ROOPU ATAWHAI O MURIHIKU

20 October 2025

Attention: Jesse Gooding, RSP Resource Management Team

Tena Koe,

Submission: Submission on Proposed Plan Change 1 to the Regional Coastal Plan: Kermadec and Subantarctic Islands

The Southland Conservation Board (the Board) would like to formally provide a submission on the above proposed RMA Plan Change in alignment with the board's main principals:

Principle of Preservation and Protection

Decisions of the Southland Conservation Board shall be based on the principle of the preservation and protection of the conservation estate and all its natural and historic resources. Activities on the conservation estate, and any effects on its whenua and its indigenous flora and fauna, shall be considered in the context of this principle.

Principle of Advocacy

The Southland Conservation Board shall use its voice to advocate for the mauri / integrity and wellbeing of the natural environment of Aotearoa New Zealand including, but not limited to, her land, waters, ecosystems and biodiversity.

In accordance with the above principles the board wishes to submit on the four matters outlined below:

1. The board supports the change in vessel hull inspections and biofouling to protect the Sub Antarctic Islands marine environment and fauna and prevention of invasive marine species.
2. The board supports the restrictions of vessels into Port Ross, Auckland Islands/Maukahuka during the winter months. Being a key breeding site for Southern Right Whale/Tohorā breeding during this time.
3. The board has concerns about the plan change to allow vessels of over 125 meters to apply for a resource consent to access Perseverance Harbour. These concerns include impacts on the natural character values of the area including wildlife and the navigational safety for these vessels which could present risks to the areas values and wildlife.

a. Risk to wildlife and natural character values

Larger vessels accessing Perseverance Harbour comes with greater impacts due to the nature of the vessels increased size. These impacts would include increased impact to the seafloor from anchor size and increased chain weight and length. Increased nighttime light pollution impacts arise from vessel navigational lighting required under International Maritime Law; increasing bird strike risk of species such as Sooty Shearwaters/Tītī, Fairy Prions/Tītī wainui and Storm petrels/Takahikare-raro.

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Risk of increased potential for accidental spills or contamination into the marine environment with greater impact. Larger vessels and ancillary craft in Perseverance Harbour may hold the potential of coming into closer proximity to the important wildlife hotspots in the area such as the New Zealand Sealion/pakake colony at Shoal Point.

b. Navigational and vessel safety

Potential for increased navigational safety risks due to vessel size and increased wind catching ability in an area prone to high winds. The board acknowledges that there have been previous incidents by vessels over 125m that have been granted resource consent to operate in the Sub Antarctic. Greater vessel size also comes with more restricted ability to maneuver, and increased area required for anchoring and have increased area prone to catching wind.

c. Tourism Management and impacts on the Conservation Management Strategy

Larger vessels entering the area have the potential for larger visitor numbers putting pressure on the Conservation Management Strategy and its permit allocation system which is currently under stress with increased vessel numbers and volume in the New Zealand Sub-Antarctic.

4. The board has concerns about the restriction of ancillary craft restrictions. These concerns pertain to the navigational safety of not only the main ship but its ancillary craft. The board perceives that the navigational safety of the ship and its ancillary craft are best managed under the ships and their field team's safety and management systems, along with direction of harbormaster and their navigational plans for the area.

a. Increased ship proximity to shore

There is a concern that the 1000-meter limit from the main ship may increase the likelihood of vessels having to anchor closer to shore and therefore increase the potential for incidents to happen with the main ship particularly with changeable weather and wind conditions where vessels are prone to dragging anchors. Increased ship and ancillary craft.

b. Management of safety of ancillary craft

Safety of ancillary craft are usually managed by other ancillary craft in the area other areas in the Sub-Antarctic/Antarctica area. For example, Macquarie Island always has a requirement of 2 ancillary craft in the water: to ensure efficient management and safety of landing sites in challenging conditions.

The Southland Conservation Board welcomes the opportunity to contribute to this process and remains committed to the principles of kaitiakitanga and the protection of our natural and cultural heritage.

Please contact us if further clarification is required.

Nāku noa, nā

pp 

Keith McRobie
Board Chair

Serviced by the Department of Conservation

PO Box 743, Invercargill 9840

33 Don Street, Invercargill, New Zealand

Telephone (03) 211-2400, Email southlandconservationboard@doc.govt.nz