

Partners:

Brian Fletcher LLB  
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9 October 2019

Marlborough District Council  
15 Seymour Street,  
Blenheim

E-mail: Peter.Johnson@marlborough.govt.nz

Attention: Peter Johnson,  
Senior Resource Management Officer

### **U190438 - The NZ King Salmon Co. Ltd - Notification**

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1. We refer to your email to us today, where you have asked whether NZ King Salmon has a view on what length of time should be allowed for public submissions to be made on this application.
2. NZ King Salmon is of the view that the 20 working day period specified in s97(2) is sufficient in this case, for a number of reasons<sup>1</sup>.
3. First, NZ King Salmon has engaged in extensive consultation, both pre and post lodgement of this application. It has discussed the detail and has provided copies of the application to numerous parties.
4. Second, the application has been in the public realm<sup>2</sup>, since lodgement in early July. Given the extensive media attention<sup>3</sup>, paired with ongoing consultation, NZ King Salmon considers that its application is well-known.
5. Third, interested parties have had a substantial amount of time to read and consider the application material, and/or to discuss the details with NZ King Salmon. They have had time to think about the application. Many have likely already formed a view. Further, people will be expecting public notification and therefore have been able to prepare for that, given the application requests public notification<sup>4</sup>.
6. Fourth, parties such as the Salmon Working Group<sup>5</sup> have asked for the move to the open ocean. The general shape of the proposal has been discussed for some time.
7. Fifth, the application, while comprehensive is not particularly large. It is comparable with other medium scale developments.

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<sup>1</sup> Though we acknowledge the ability to use s37 to extend time periods under the Act, we don't consider it necessary to do so here.

<sup>2</sup> On Council's website.

<sup>3</sup> And attention at recent conferences such as the Aquaculture Conference in September, and the Cawthron Open Ocean Symposium in August.

<sup>4</sup> Making it a statutory requirement per s95A(2) and (3)(a).

<sup>5</sup> As referenced in the application itself.

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8. NZ King Salmon considers it unlikely that the majority of interested parties would need more than 20 working days to provide their view.

Yours faithfully

**GASCOIGNE WICKS**

A handwritten signature in blue ink, consisting of several loops and a long horizontal stroke extending to the right.

**Quentin Davies | Amanda Hills | Emma Deason**

Partner | Associate | Staff Solicitor

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## Peter Johnson-5472

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**From:** Peter Johnson-5472 <Peter.Johnson@marlborough.govt.nz>  
**Sent:** Wednesday, 9 October 2019 7:52 AM  
**To:** Emma Deason | Gascoigne Wicks  
**Cc:** Quentin Davies; Amanda Hills | Gascoigne Wicks  
**Subject:** U190438 public notification

Hi Emma,  
Presuming the information you provided yesterday is sufficient to proceed to notification, does NZKS have a view as to what length of time should be allowed for public submissions to be made on the application, given the length and technical nature of the application?  
Regards,  
Peter