

Proposed Marlborough Environment Plan

**Section 42A Hearings Report for Hearing Commencing
26 February 2018**

Report dated: 20 November 2017

**Report on submissions and further submissions
Topic 5: Landscape – Technical Mapping, Values
and Overlays**

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List of Abbreviations

BML	Boffa Miskell Limited
CMA	Coastal Marine Area
CTA	Coastal Terrestrial Area
DOC	Department of Conservation
HALF	High Amenity Landscape and Feature
HNC	High Natural Character
MDC	Marlborough District Council
MEP	Proposed Marlborough Environment Plan
MHWS	Mean High Water Spring mark
MPI	Ministry of Primary Industries
MSRMP	Marlborough Sounds Resource Management Plan
NPSFM	New Zealand Coastal Policy Statement 2010
NZCPS	National Policy Statement for Freshwater Management 2014.
ONC	Outstanding Natural Character
ONF	Outstanding Natural Feature
ONL	Outstanding Natural Landscape
ONFL	Outstanding Natural Features & Landscape
RMA	Resource Management Act 1991
VHNC	Very High Natural Character
WARMP	Wairau Awatere Resource Management Plan

1. Introduction

My name is James Bentley. I am a Principal Landscape Architect employed by Boffa Miskell Ltd, based in Christchurch. I am a registered member (2010) of the New Zealand Institute of Landscape Architects (NZILA) as well as an elected chartered member (London, 2002) of the British Landscape Institute (CMLI). I hold a post-graduate diploma (2000) in Landscape Architecture as well as a Bachelor of Arts with Honours Degree in Landscape Architecture (1998) from the Cheltenham and Gloucester College of Higher Education (now the University of Gloucestershire) in the UK. I am also a member of the Resource Management Law Association (RMLA).

I have practised as a landscape architect for over 15 years on a wide range of projects including landscape and visual effects assessments, territorial landscape studies, coastal and river-focussed natural character studies and research projects. I am the key author of the Marlborough Landscape Study 2015 (which is an update following consultation of the 2009 version) and co-author of the Natural Character of the Marlborough Coast Study 2014.

I have also undertaken a natural character study for both the Nelson and Waikato regions and been involved in reviewing Tasman District Council's coastal natural character assessment as well forming part of the review panel for the Northland Natural Character appeal.

I have been involved closely in developing a methodology for coastal natural character assessments, being invited by the Department of Conservation to present the Marlborough Coastal Study as part of a workshop in September 2011. A follow-up workshop was held in November 2015 where I co-presented key findings of where natural character assessments had developed since the Marlborough workshop. In September 2014, I was one of a number of landscape architects from around the country who were invited to discuss methodologies for natural character and landscape specifically regarding a spat catching site in Wainui Bay, Golden Bay. Shortly after this, I presented to the Hauraki Gulf Marine Spatial Plan working group concerning aquaculture and natural character.

I have also written a paper for the Ports and Coasts Conference in 2015¹. As a result of this work and my involvement with the above, I am very familiar with the latest thinking around methods of natural character and landscape, as well as being familiar with the landscape and coastal environment of Marlborough and the Marlborough Sounds.

In preparing this report, I have read the relevant chapters of the MEP, the related section 32 reports, and the supporting technical reports identifying the natural character and landscape values of the District. This includes the reports, the *Natural Character of the Marlborough Coast* [2014], *Natural Character of Selected Marlborough Rivers and their Margins* [2014] and *Marlborough Landscape Study* [2015].

1.1 Code of Conduct

I confirm that I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note and that I agree to comply with it.

I confirm that I have considered all the material facts that I am aware of that might alter or detract from the opinions that I express, and that this evidence is within my area of expertise, except where I state that I am relying on the evidence of another person.

I am authorised to give this evidence on the Council's behalf.

2. Scope of Hearings Report

This report is prepared in accordance with section 42A of the Resource Management Act 1991 (RMA).

¹ Bentley, JA [2015] Landscape, Natural Character, Aquaculture and the NZKS Supreme Court Decision

In this report, I assess and provide recommendations to the Hearing Panel on submissions made on Topic 5 – Natural Character, and specifically submissions made on technical mapping of the overlays relating to natural character.

In particular, this report contains my assessment of submissions on the following aspects of the MEP as they relate to natural character:

- Volume 3 – Appendix 1: Values contributing to areas with outstanding natural features and landscapes and areas with high amenity
- Volume 4, Overlays regarding landscape and areas of high amenity

As submitters who indicate that they wish to be heard are entitled to speak to their submissions and present evidence at the hearing, the recommendations contained within this report are preliminary, relating only to the written submissions.

For the avoidance of doubt, it should be emphasised that any conclusions reached or recommendations made in this report are not binding on the Hearing Panel. It should not be assumed that the Hearing Panel will reach the same conclusions or decisions having considered all the evidence to be brought before them by the submitters.

This report also relies on, and is intended to be read in conjunction with, the related s42A report of Mr Maurice Dale on Topic 5 – Landscape. Mr Dale's report specifically responds to submitters requests concerning Objectives, Policies and Rules concerning landscape and areas of high amenity.

Furthermore, there is a separate Section 42A report dealing specifically with the natural character overlays and associated values.

3. Background to the Marlborough Landscape Study

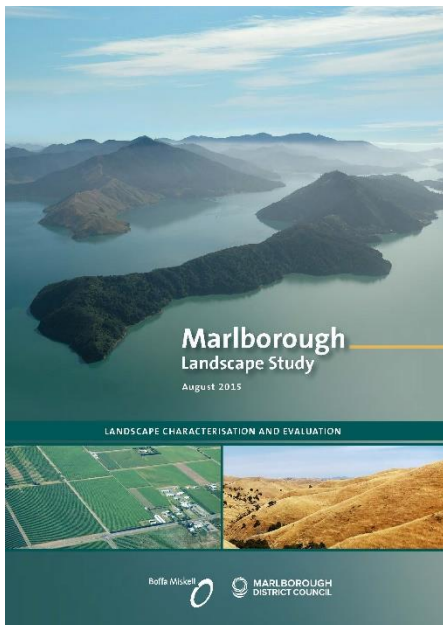


Image 1 Marlborough Landscape Study, BML, 2015

MDC commissioned BML to undertake a full review of the existing landscape studies that had been prepared for the region which underpinned the Marlborough Regional Policy Statement (RPS), the Wairau Awatere Resource Management Plan (WARMP), and the Marlborough Sounds Resource Management Plan (MSRMP). The landscape review was undertaken in order to provide greater consistency in the above-mentioned *plans*, and to incorporate changes in the understanding of landscape since the original landscape studies of the 1990's.

The Landscape Study was carried out in three stages. The first stage comprised a regional landscape characterisation, by which the region's landscapes were classified into broad land-types and character areas, drawing from land typing analysis conducted by Landcare Research.

The second stage comprised an evaluation of the district's different landscape values, including the identification of landscapes in accordance with Sections 5, 6 and 7 of the Resource Management Act (RMA) 1991. This second stage resulted in the '*Marlborough Landscape Study 2009*'.

The third stage of the Landscape Study involved engagement with affected landowners and stakeholders, most notably on the conclusions of the second stage. This consultation was firstly targeted at affected landowners (i.e. a landowner who had outstanding natural features or landscapes, or landscapes and features with high amenity on their land). Consultation then extended to target other interested stakeholders. Following this, an updated version of the Marlborough Landscape Study was prepared in 2015.

As stated within the Landscape Study, landscapes within Marlborough are highly varied, with different characteristics and values. Landscape character areas with broadly homogenous characteristics that are distinctive from adjacent landscapes can be identified and mapped. Boundaries between these character areas can be best defined through geomorphological analysis. Seascape are inherent in this consideration.

Landscape can be spatially extensive in Marlborough and contain internal variety that are referred to in descriptions and, where appropriate, mapped as smaller landscapes and or features areas. Landscape character areas also provide a logical framework for understanding the range of landscapes and their amenity values that the study team has identified and described so that appropriate resource management mechanisms can be tailored to them to maintain and enhance those values. Landscape character areas also provide a spatial context for 'special' landscapes that require additional protection.

BML provided a first draft report, outlining the landscape characterisation stage to MDC in May 2009 for review and comment. The findings were discussed and the thinking for the second evaluative stage outlined.

In September 2009, a second draft of the report was completed, which included both the characterisation and evaluation parts of this Landscape Study. Immediately following the release of the second draft, a workshop was held in early October 2009 and attended by three landscape architects who were unfamiliar with the project but familiar with Marlborough's landscapes: Di Lucas, Frank Boffa and Liz Gavin (nee Kidson). The objectives of this workshop were to:

- discuss the philosophy of the Landscape Study to date, including its direction and outline of the methodology;
- discuss the approach to identifying Outstanding Natural Features or Landscapes (ONFLs) and other landscape values in Marlborough, including natural character;

- discuss landscape values of originally identified and potential ONFLs (exchange knowledge, identify omissions/errors etc.), and
- define a threshold, which should be met to qualify as an ONFL in Marlborough.

Following this peer-review exercise, the report was updated to a third and final draft. The draft was introduced through presentations to Councilors of MDC, to Federated Farmers, and to a combined meeting of the Sounds Advisory Group and the MDC's own Landscape Group in November 2009. Some internal comments were received from MDC and targeted groups, including the Department of Conservation (DOC). These comments were addressed and the pre-consultation version of the Marlborough Landscape Study 2009 was finalised in February 2010. This version of the Landscape Study was the basis on which Stage 3 was conducted.

MDC used the *Marlborough Landscape Study 2009* for the purposes of consultation with affected landowners. The landowners to be consulted were identified by overlaying the identified ONFL areas and selected VALs (Visual Amenity Landscapes - which have been re-termed High Amenity Landscapes and Features for the 2015 version of the Study) on a property ownership cadastral map.

During the identification and mapping in the pre-consultation phases of the Landscape Study, private land was not accessed. Areas were mapped using aerial photographs and topographical maps, at a mapping scale of 1:50,000. After identification, the affected landowners were written to with the offer to attend a meeting as well as individual site visits to verify the existence (or otherwise) and extent of, landscape values on their land.

The ONFLs were reviewed in relation to private land over the years 2011-2015. When site visits were invited by the landowner, the study team was able to better understand site specific characteristics and values, through ground-truthing and understanding the subtle nuances of the land, resulting in some refinement in the character description and evaluation of some ONFL mapped areas.

The targeted engagement and site visits took place over all identified ONFL areas. I, (James Bentley), undertook all engagement in the Southern Marlborough areas identified as ONFLs. ONFL identified included the Roberston, Bryant and Richmond Ranges, the Wairau Lagoons and Southern Wairau Hills, the Main Divide and Molesworth Station, the Inland Kaikouras, Chalk Range and Limestone Coast. Landscape architect Liz Gavin, of Canopy Landscape Architects undertook engagement within the Marlborough Sounds. All visits were accompanied by MDC Planner, Emma Richardson. In addition, other MDC representatives, including councilors, attended community meetings. This was a significant undertaking for MDC.

As a result of this engagement, the extent of a number of ONFLs identified in the pre-consultation 2009 version of the Study were refined. No whole areas were deleted, however a few small areas, notably in the Marlborough Sounds, were amended and/or added. The principal changes that took place were around boundaries and how these made sense to people on the ground.

Some further changes to the seascape areas of the outer Marlborough Sounds have also been made, separate from the consultation process. These changes were prompted by the publication of the *Natural Character of the Marlborough Coast: Defining and Mapping the Marlborough Coastal Environment* (2014). This work was undertaken by BML and Canopy. Further mapping was also prompted by relevant court case decisions, that occurred between 2010 and 2015. These included: *Port Gore Marine Farms v Marlborough District Council* [2012] NZEnvC72; *Environmental Defence Society Inc v The New Zealand King Salmon Co Ltd* [2014] NZSC38.

4. Methodology Critique for Landscape & Natural Character Studies

Submitter 401/66, 401/71 Aquaculture New Zealand, Submitter 426/67, 426/72 Marine Farming Association Incorporated, Submitter 716 Friends of Nelson Haven and Tasman Bay Incorporated, Submitter 868/1, 868/2 Kenepuru and Central Sounds Residents Association Incorporated.

There have been a few submissions that query parts of the methodology used for both landscape and natural character. The following section addresses the matters contained within the submissions. This section is also duplicated within the Landscape Overlay Section 42A Report, due to the cross-over and close relationship of the matters raised between landscape and natural character.

Background

The Marlborough Landscape Study and the Coastal Natural Character Study have both been critically considered, discussed, appraised, peer reviewed and refined throughout the Marlborough Environment Plan review process. It can appear that Marlborough (or more specifically, the Marlborough Sounds) is one of the most hotly contested landscapes in this country in terms of resource management.

Following the Supreme Court's New Zealand King Salmon decision, the two studies have been further amplified, to ensure that the values and characteristics that underpin any mapped overlay (along with existing modifications) is fully explained. The background process behind these studies is outlined in Section 3 of this Section 42A report.

Of those submissions listed above, only one (a joint one with 716 and 868) provides a technical review from a landscape architect (Dr. Steven). Regarding this submission, Dr Steven raises several concerns in relation to the validity and reliability of the landscape and coastal natural character studies undertaken by BML to support the Proposed Marlborough Environment Plan (PMEP). The thrust of these concerns can broadly be summarised under the following seven points:

1. The assessments fail to give adequate distinction between the concepts of 'landscape' and 'natural character'.
2. The Natural Character of the Marlborough Coast Study has taken account of attributes which fall outside those relevant to this assessment
3. The Marlborough Landscape Study provides inadequate definitions and application of scale in relation to 'seascapes' and 'features'.
4. The application of High Amenity Landscape forms an unnecessary double classification
5. The evaluation of landscape importance applies a top down GIS approach which does not adequately take account of human perception and community values
6. The evaluation of aesthetic landscape attributes is too limited in its application.
7. Landscape evaluation incorrectly takes account of regional or district comparators when determining whether an area qualifies as 'outstanding'.

I respond to each of these points below.

1. Definitions of Natural Character and Landscape

Dr Steven takes issue with the definition of landscape and natural character through his paragraphs 12 to 18.

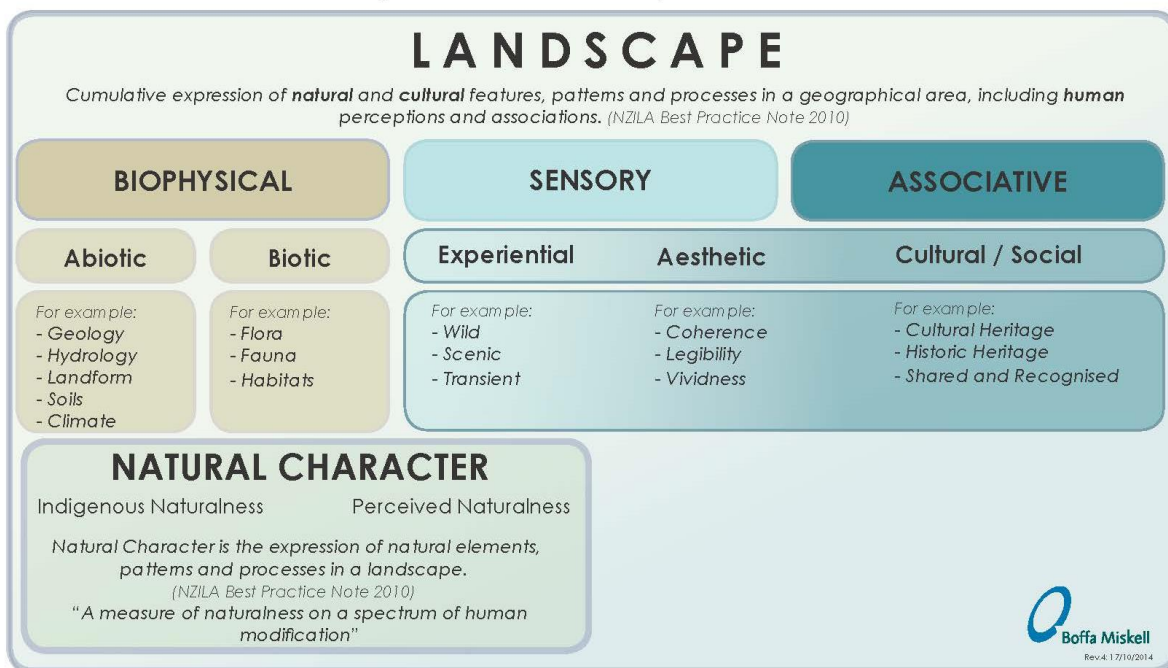
The Marlborough Landscape Study and Coastal Natural Character Study have been guided by the RMA and the NZCPS (2010) in applying an understanding of landscape and natural character. The distinction between

these concepts is explicitly acknowledged through these separate evaluations,² the findings of which have been set out in separate reports.

Essentially Natural Character is a sub-set or component of landscape. Landscape can be understood as encompassing three broad attributes, namely biophysical, sensory and associative³. Natural Character is essentially concerned with 'a measure of naturalness' which includes the biophysical and part of the sensory components of landscape.

Since the Marlborough assessments were completed, BML have prepared a model to help explain the relationship between the concepts of natural character and landscape. Essentially this shows how an understanding of landscape may encompass broader aspects which relate to human perceptions and associations, whilst an understanding of natural character forms a more specific measure of human modification and relates more specifically to the condition of an area or place.

The Relationship Between Landscape and Natural Character



Landscape

On pages 14 and 15 through to 19 of the Marlborough Landscape Study a thorough discussion outlines the concept of landscape and how it has been applied in the New Zealand context under the Resource Management Act (RMA).

I note in the Friends of Nelson Haven and Tasman Bay Inc. submission that they agree with the extent of the outstanding natural landscape overlay within the Marlborough Landscape Study. This is generally supported by them as being in accordance with Part 2 of the RMA and because it gives effect to the NZCPS, in particular Policy 15 of the NZCPS, however they disagree with some of the assessments⁴.

² They are distinct topics, each with their own attributes and considerations – something which is reflected in the New Zealand Coastal Policy Statement 2010 ('NZCPS') which states that natural character is not the same as natural features and landscape, or amenity values.

³ This is a grouping of the Pigeon Bay factors and consistent with current best practice, as outlined within the NZILA's Landscape Assessment and Sustainable Management 10.1 [2010].

⁴ Friends Submission page 45. This is in some way contrary to their decision sought, which expresses that the criticisms (and recommendations) raised by Dr. Steven be fully recognised and that the MEP is amended accordingly. If analysis is retained, extent of the outstanding natural feature and landscape overlay to be increased and extension of ONL seascape to be at least 750m from MHWS.

A definition of landscape is also included within the Marlborough Landscape Study which is consistent with NZILA's Statement of Philosophy, namely ... "*the physical and characteristic products of the interaction between human societies and culture with the natural environment...*". Therefore, I disagree with Dr. Steven that the Landscape Study's understanding of landscape is unambiguous or invalid. Whilst Dr Steven hints at a failing of the profession at large to establish a definition, this is no fault of the study.

Natural Character

Section B of the Coastal Natural Character report outlines how the study has first interpreted natural character, and secondly what it comprises in terms of resource management practice.

For the avoidance of doubt, the definition adopted for natural character is the definition that was agreed to at a DOC-run workshop in 2011, which involved a wide range of resource management practitioners, local authorities and government bodies. The definition that was endorsed at that meeting, is a slight variation of the definition outlined by the Ministry for the Environment in 2002:

Natural Character is the term used to describe the natural elements of all coastal environments. The degree or level of natural character within an environment depends on:

- 1. the extent to which the natural elements, patterns and processes⁵ occur; and*
- 2. the nature and extent of modification to the ecosystems and landscape/seascape.*

The degree of natural character is highest where there is least modification.

The effect of different types of modification upon natural character varies with context and may be perceived differently by different parts of the community".⁶

A comprehensive analysis of case law and established practices coupled with interpretation of the New Zealand Coastal Policy Statement 2010 (NZCPS) is included. Natural Character has been defined on page 13. This definition was the result of a Department of Conservation workshop in 2011 involving many landscape architects, resource management practitioners and government bodies⁷. The definition was heavily debated and the workshop well documented. I note that Dr Steven was not a participant at that workshop.

The definition used for the Coastal Natural Character report adopts this definition⁸. I therefore do not understand or agree with Dr Steven's statement that '*no clear, unambiguous operational definition is offered*⁹'.

Based on this, I can confirm that both the Marlborough Landscape Study and the Natural Character of the Marlborough Coast Study have clear, unambiguous definitions that have been applied appropriately to both reports.

Based on this, I would recommend that this part of the submission be declined.

2. Natural Character Evaluation

Dr Steven discusses in his paragraphs 27 through to 44 coastal natural character evaluation.

As mentioned above, a definition of natural character has been included in the Natural Character of the Marlborough Coast Study. There is agreement between Dr Steven and myself that natural character is a

⁵ For the purposes of interpreting the NZCPS 2010 Policy 13.2, 'elements, patterns and processes' means: biophysical, ecological, geological and geomorphological aspects; natural landforms such as headlands, peninsulas, cliffs, dunes, wetlands, reefs, freshwater springs and surf breaks; and the natural movement of water and sediment.

⁶ NZCPS 2010 Guidance Note Policy 13: Preservation of natural character, Department of Conservation, page 11

⁷ Department of Conservation (October 2012) Natural Character and the NZCPS 2010 National Workshop – Summary of Discussion and Outcomes, page 19.

⁸ Boffa Miskell et al (June 2014) Natural Character of the Marlborough Coast, page 13.

⁹ Steven (20 August 2016) Review of Landscape & Natural Character Chapters etc; paragraph 12.

condition, or state of the coastal environment, assessed with reference to how much or how little human modification to natural elements, natural patterns and natural processes is evident¹⁰.

In Paragraph 33 of Dr Steven's report, he criticises the evaluation process that BML has taken, almost inferring that experiential matters included in the NZCPS are invalid. BML has taken a very measured approach in how experiential aspects of natural character are included, and this is explained over a number of pages within Section D of the Coastal Study (specifically the tables on page 24 and 25).

Dr Steven at paragraph 34.4 takes issue with the use of the word 'value' within the Coastal Study. Applying the terms 'evaluation' or 'value' has not meant the determination of natural character has blurred a clear distinction between landscape and natural character assessment.

As stated, there is agreement, that natural character is primarily concerned with the condition or modification of the coastal environment, irrespective of the importance that humans have placed on such areas. This is consistent with the definition of intrinsic value as defined in the RMA:

***intrinsic values**, in relation to ecosystems, means those aspects of ecosystems and their constituent parts which have value in their own right, including—*

(a) their biological and genetic diversity; and

(b) the essential characteristics that determine an ecosystem's integrity, form, functioning, and resilience

Natural character can therefore be interpreted under the RMA as being primarily concerned with determining the level of modification which are primarily related to the intrinsic values of a place. Consequently, the term evaluation is entirely appropriate when considered in this manner.

Outstanding Natural Character

Discussion around how Outstanding Natural Character has been determined is contained within Dr Steven's paragraphs 35 through to 44.

The methodology for how Outstanding Natural Character (ONC) was assessed is contained on page 28 and discussed further in Section F, commencing on page 262.

Dr Steven takes issue that the methodology applied is contradictory, where ONC areas are also areas of High and Very High levels of natural character.

As stated earlier, natural character is a condition and is rated on a spectrum of very low to very high (i.e. a seven-point scale)¹¹.

In association with thresholds used to evaluate natural character, there appears to be a distinction in approaches adopted by BML and inferred by Dr Steven when determining whether an area qualified as having outstanding natural character. BML's approach requires relooking at areas of at least high natural character to determine whether such areas qualify as outstanding in the context of the district or region under consideration. The approach identified by Dr Steven applies an absolute evaluative scale through which it is unclear of the relationship or consideration of natural character in terms of the region's natural environment. This difference in terms of NZCPS can be expressed as follows:

¹⁰ Steven (20 August 2016) Review of Landscape & Natural Character Chapters etc; paragraph 28

¹¹ This seven-point scale was provisionally approved in High Country Rosehip Orchards Limited and Mackenzie Lifestyle Limited and *ors v Mackenzie District Council* [2011] NZEnvC387, paragraph 93. This seven-point scale has been utilised by many landscape and natural character studies and helpfully places moderate in the middle from very low (very low levels of naturalness) to very high (very high levels of naturalness).

Table 1: Difference between absolute and relative scale

Absolute Evaluation Scale

Very Low	Low	Low-Moderate	Moderate	Moderate-High	High	Very High	Outstanding
NZCPS 13(1)(b) applies							NZCPS 13(1) (a) applies

Relative Evaluation Scale

Very Low	Low	Low-Moderate	Moderate	Moderate-High	High	Very High
NZCPS 13(1)(b) applies						NZCPS 13(1) (a) may also apply

The absolute scale approach places outstanding natural character at the extreme, most natural end of the scale, i.e., above the Very High range, and close to pristine. This approach is suggested by Dr Steven in his Figure 2, page 9. The relative scale approach adopted by Boffa Miskell, identifies that the term outstanding as a comparative evaluative term meaning to stand out, be exceptional and pre-eminent. This requires a reassessment of the highest rated areas to determine whether they qualify as having outstanding natural character in the context of the district and / or region assessed.

In determining whether areas of high or very high natural character may also stand out as being outstanding at the regional scale, the Boffa Miskell study has provided a clear statement and threshold used to judge whether such areas may also qualify as outstanding. This requires that areas of outstanding natural character must:

'exhibit a combination of natural elements, patterns and processes that are exceptional in their extent, intactness, integrity and lack of built structures (the 'clutter' factor) and other modifications compared to other areas in the Marlborough Region'¹².

Based on this, I consider that the understanding of the difference between the concepts of high natural character and outstanding natural character has been clearly applied and appropriate in the context of informing a regional council's responsibility to consider issues on a regional basis. Furthermore, I consider that the way in which naturalness has been measured and the term ONC applied, is explicit and again in line with best practice.

I note in paragraph 40 Dr. Steven surmises having read the quote from the Study in paragraph 39 that ONC must combine both terrestrial and marine components in the coastal environment. The quote states that:

"assessments should combine both terrestrial and marine components so that important sequences of ecological naturalness (such as from the top of a ridge above sea level to the bottom of the adjacent sea and interconnected systems) are considered."¹³

The assessment process addresses/ takes account of these relationships but does not impose that ONC must combine both terrestrial and marine components.

¹² Natural Character of the Marlborough Coast, 2014, page 262

¹³ Boffa Miskell Natural Character Study page 28.

Based on this, I would recommend that this part of the submission be declined.

3. Landscapes, Seascapes and Features

These three terms are discussed more explicitly on page 20 of the Landscape Study. It appears that Dr Steven has issues with all of these definitions, even though they have been clearly defined and articulated within the Marlborough Landscape Study. Submitters 401 and 426 also query how landscapes have been determined.

Inherent in both studies is an understanding that 'seascapes' form part of the regional jurisdiction which has been taken account in both landscape and natural character evaluation.

There appears some confusion with Dr Steven's understanding of page 21 of the Landscape Study and how areas have been mapped. These mapping techniques, which represent six different methods, are explained with regards to mapping Outstanding Natural Features, Outstanding Natural Landscapes and High Amenity Landscapes¹⁴.

The mapping of seascapes has been guided by the work undertaken within the Coastal Natural Character Study, however this was not the only guiding principle. The explanation under Diagram six should be read: *'Whilst the land based ONFLs are mapped using approaches 1-5, the extent of seascape ONFLs was guided by the UK's definition as well as the work undertaken in the Marlborough Coastal Study'*¹⁵.

The Friends submission¹⁶ states that the seaward extent of ONLs and ONFs be extended to 750m offshore. Whilst it would be good to have a standard rule which relates to a default offset, each coastal extent is specific and has been considered separately, apart from where the seaward extent extends into Tasman Bay and Cook Strait, where approximately a 2km offset margin has been provided from the nearest area of land or rock. Within the more enclosed parts of the Sounds, some areas will have different extents.

With the understanding that both landscape and natural character methods are different, there is a close relationship between them, which has been explained earlier. Any spatial extent of the seascape ONL has referenced the Marlborough Coastal Study's abiotic, biotic and experiential aspects of natural character.

I disagree with Dr Steven premise that the identification an ONF in the Marlborough Landscape Study automatically excluded seascapes¹⁷. The inclusion of the seascape depends on the landscape context and attributes of the feature being identified and the attributes/character of the seascape. Seascapes can be co-identified as part of an ONF if part of an inlet, lagoon, bay or cove as they are interrelated and inextricably connected. Seascapes may gain some of their aesthetic/natural character attributes from the land/sea relationship and vice versa. The perception of the sea in a coastal environment is most often framed by land. In turn, the presence of the sea contributes to the natural and aesthetic components of the land.

Based on this, I would recommend that this part of the submission be declined.

¹⁴ Marlborough Landscape Study, page 21.

¹⁵ Reference to Decision [2017] NZEnvC 147 Western Bay of Plenty District & Bay of Plenty Regional Council v Port Blakely Limited et al (or the Matakana Island decision) is helpful. At paragraph [82] Approaching the text of s 6(b) with the RMA's purpose and the guidance of the High Court and the Supreme Court in mind, we note that features and landscapes are not the same thing. In broad terms and in the context of the RMA we think one may generally speak of a feature as a single element of natural and physical resources while a landscape is usually a collection of such elements. The Environment Court has previously held, relying on a dictionary definition, that a feature is a distinctive or characteristic part of a landscape³³ and therefore that an outstanding natural feature is a distinctive part of a larger landscape which is an outstanding natural landscape [Wakatipu Environmental Society v Queenstown-Lakes DC Decision No. C 129/2001]. But with respect, that cannot be a fixed relationship: the scale of elements is necessarily relative and a feature may be so large, as in the case of a mountain or an island, that it can encompass one or more landscapes while retaining its overall integrity as a feature. A feature may also be relatively small, such as a particular geological formation, whereas one would ordinarily not characterise a similarly small area as being a landscape. In some cases, an outstanding natural feature may exist in splendid isolation without an outstanding natural landscape around it, while in others it may be outstanding because of its relationship to other features or the landscape, whether those other things are outstanding or not. It follows that we think that the text of s 6(b) should be considered in terms of principles rather than rules or definitions.

¹⁶ Friends Submission page 45.

¹⁷ Stevens paragraph 66, 66.1, 66.2 & 67

Scaling

Differentiating natural features and landscapes is largely a result of scale. The Marlborough Sounds could be defined as a landscape in its own right within the broader Marlborough Region, or comprising a series of landscapes.

Landscape is therefore about scale, and specifically about how humans perceive scale and therefore how they experience it. Landscape is a human construct as understood by people and the scale at which landscapes should be identified as a resource management tool. The perception of the landscape is not generally formed by a single glance but a progression of views.

The Marlborough Landscape Study took a practical stance by stating that at a regional level, the Marlborough Sounds is a landscape of the Marlborough Region. At a closer, more district-scale analysis, the Marlborough Sounds can be said to have two broad landscapes, one associated with the outer sounds and one associated with the inner sounds, with the difference outlined in the body of the text. This is the scaling that has been determined for this study.

The Study goes on to say, that as landscapes can nest with each other, there are further landscapes within these two identified areas in the Sounds, however, for the purposes of this study, these smaller areas will be referred to as 'features within either the outer sounds or inner sounds landscapes'.

The landscape study has taken a very practical decision over the scale of the landscapes for Marlborough. There are numerous ways in which landscapes can be delineated, such as by river catchment, by visual catchment or by more abstract means to name a few. Due to the complexity of the Marlborough Sounds specifically, and for the purposes of capturing relevant values and characteristics of an area, the two areas of the Inner and Outer Sounds were determined each as landscapes. It is true that smaller landscapes exist, such as within Queen Charlotte Sound, however determining where that landscape stops and starts can be complicated and at times requires a practical resolution especially as the perception of a landscape can change from where you might experience it from (i.e. within a boat, or on the Queen Charlotte walking track). For this reason, I reject Dr Steven's use of the definition of landscape as "*a portion of land or territory which the eye can comprehend in a single view, including all its natural characteristics*"¹⁸ as being too simplistic.

Therefore, for the purposes of this study, the two landscapes in the Sounds were identified. Resource users for specific proposals can use this report as guidance towards identifying where their own landscape would sit, where broader characteristics of the Inner or Outer Sounds might be pertinent.

More fundamental to this is whether landscapes or features qualify as outstanding under Section 6(b) of the RMA and Policy 15 of the NZCPS. The Marlborough Landscape Study has identified these within Section D of the Study. The Study has clearly indicated that where features are listed, which landscape they are apart of.

Where an ONF sits within an ONL, the mapping is all encompassing – such as D'Urville Island. For other areas, features are described and mapped and can include headlands, islands, waterbodies, peninsulas, capes, bluffs, coves, bays, inlets, lagoons, ridgelines and notable areas of vegetation. In Section D, groupings of features have been included, such as in the Whangarae Inlet and Okiwi Bay grouping, (where headlands, embayments, hills and vegetated mountain slopes have been described and mapped). They are features of the outer sounds landscape. In much the same way as the upper slopes of the Inland Kaikoura Range are features of the broader Awatere Valley landscape. For clarity, the table below indicates which ONF is part of which landscape:

¹⁸ Stevens paragraph 71.

Table 2: ONFs and their associated landscape

ONF #	Description	Landscape
2	D'Urville Island/ Rangitoto Ke Te Tonga including French Pass	Outer Sounds Landscape
3	Rangitoto Islands, Stephens Island and Trio Islands ONFs	Outer Sounds Landscape
4	Chetwode Islands, Titi Island and Sentinel Rock ONFs	Outer Sounds Landscape
5	Port Ligar, Forsyth Island and Kaitira headland ONFs	Outer Sounds Landscape
6	Maud Island, Mt. Shewell, Fitzroy Bay and Eastern Tawhitinui Reach ONFs	Inner Sounds Landscape
7	Islands of Croisilles Harbour and Northern Coastline ONFs	Outer Sounds Landscape
8	Whangarae Inlet and Okiwi Bay ONFs	Outer Sounds Landscape
9	Tennyson Inlet and Northern Nydia Bay ONFs	Inner Sounds Landscape
10	Havelock (Pelorus) Estuary, Mt. Cawte and Northern Hills ONFs	Inner Sounds Landscape
11	Forested ridges of Craill Bay ONFs	Inner Sounds Landscape
12	Cape Jackson, Cape Lambert and Alligator Head ONFs	Outer Sounds Landscape
13	Mt. Stokes and surrounds ONFs	Part of both Inner and Outer Sounds landscape
14	Arapawa Island and East and West Heads ONFs	Outer Sounds Landscape
15	Exposed Eastern Coastline ONFs	Outer Sounds Landscape
16	Islands of North-Eastern Queen Charlotte Sound including White Rocks and the Brothers	Outer Sounds Landscape
17	Northern lands of Inner Queen Charlotte Sound ONFs	Inner Sounds Landscape
18	Mt. Robertson ONFs	Part of both Inner and Outer Sounds landscape
19	Mt. Duncan/ Mt. Rutland/ Mt. Cullen	Mt. Richmond Landscape
20	The Wairau Lagoons	Wairau Plains Landscape
21	White Bluffs/ Te Parinui o Whiti	South Marlborough Coastal Landscape
24	The Chalk Range	Mountainous Interior Landscape
25	The Inland Kaikoura Range	Mountainous Interior Landscape

In many situations, where modifications (such as forestry or aquaculture for example) was found to have a large enough negative effect on the values of the feature to the extent that such areas no longer stood out as being exceptional in the context of the region, these modifications were excluded from the mapping¹⁹. It is

¹⁹ Reference to Decision [2017] NZEnvC 147 Western Bay of Plenty District & Bay of Plenty Regional Council v Port Blakely Limited et al (or the Matakana Island decision) is helpful. At paragraph 167 of that decision, the following was noted: *The listing could also be more specific about the character, intensity and scale of the effects of current activities,*

considered that the ongoing effects of development in the Sounds will continue to affect the values and breadth of mapping of ONLs and ONFs, however at this point in time, their effect has been taken into account.

Based on this, I consider that both studies have been very clear on scaling and therefore I recommend that this part of the submission is declined.

4. High Amenity Landscape

The inclusion of areas of High Amenity Landscapes and Features (HALF) (previously termed Visual Amenity Landscapes in older versions of the Marlborough Landscape Study) essentially recognises the need to manage particular parts of the district that are highly valued but fall short of reaching the threshold of being outstanding. Some landscapes may also be very important in terms of their associative values but do not exhibit the predominance of natural attributes that an ONL is required to display due to extensive modifications (which can include historic and current land uses). Features and landscapes that do not meet the criteria for being ranked as 'outstanding' can nonetheless be required to be "maintained and enhanced" either as "amenity values" or part of the wider "environment" under S.7(c) or S.7(f). Councils therefore have obligations to provide for these areas. This concept is first discussed on page 19 of the Marlborough Landscape Study.

Recognition is made within the Marlborough Landscape Study that the Marlborough Sounds, despite being partly modified, is a significant part of the broader Marlborough Region and holds generally high levels of amenity throughout. As a result, it was confirmed that for resource management purposes, all of the Sounds should be identified and recognised as such at the regional scale. Within this area, at the more refined 'district' scale, parts of the Sounds also reach the threshold of 'outstanding' and have been identified as 'landscapes' and 'features' separately.

Based on this, I therefore support the retention of the HALF and the geographical extent shown. Notwithstanding this, I agree with Dr Steven that the hatch used to display this in the MEP overlays does create 'visual noise' and should be simplified, or included as a separate landscape layer that can be turned off.

The values listed on page 168 of the Landscape Study are focussed towards aesthetics, visual appreciation and experiential aspects. There will of course be some double-up with the ONF and ONL tables, however the qualities listed assist to interpret those broad amenity-focussed qualities.

From a policy perspective, despite the whole of the Sounds being considered a HALF, this is an RMA Section 7 matter, where RMA Section 6(b) matters 'trump' these. Therefore, there is no 'double-up' or confusion in terms of policy or land management practices, simply an understanding that the Sounds are, from a landscape perspective, a special place in Marlborough.

5. Top Down GIS approach and human perception and community values

Dr Steven mentions in paragraph 73 through to paragraph 77 that the method used to assemble the landscape values that underpin any ONL or ONF should use the method outlined within the Man o'War decision²⁰ (or the top down approach), where the following applies:

- *Identify the relevant landscape/s*
- *Determine whether a landscape is a natural landscape, and if so, how natural (with reference to the scale of the natural character given above)*
- *Assess whether any landscape, as a natural landscape, is also outstanding*

to provide some sort of baseline against which ongoing activities can be assessed in relation to the attributes and values to be protected. This approach should attempt to distinguish between:

- a) those effects which create no real detraction from the values and attributes for which the ONFL is scheduled and so may be regarded as not being adverse; and*
- b) those effects which may be tolerated as existing uses but ought not to be allowed to continue otherwise or be allowed to be replicated by any new activity.*

The Marlborough Study has taken this approach, especially regarding smaller scale (or more isolated) development within broader areas of outstanding landscape.

²⁰ Decision [2015] NZHC 767 Man o'War Station Ltd v Auckland Council

Dr Steven outlines that the method undertaken by the Landscape Study on page 21 of that study utilising the identification of the values (or the bottom up approach), is somehow incorrect, implying that the spirit or meaning of landscape has somehow been missed.

What Dr Steven has failed to mention is the comprehensive Landscape Characterisation phase of the Study, where detailed descriptions of the baseline of the region has been described. Although landscape character areas are not landscapes per se, the descriptions provided inform how areas of landscape are recognised by people, such as the Outer Marlborough Sounds Landscape. This is further articulated within the ONL/ONF section of the Study, where each grouping of features, such as within the table for the Rangitoto Islands, Stephens Island and Trio Islands, which state (at the top of the table) that these features *'are located within the north-western part of the Outer Sounds ONL'*. Table 1 (within Section 3 of this discussion earlier) clearly outlines which landscape each part of the Sounds specifically is a part of.

Through the biophysical descriptions of the landscape, a level of naturalness is determined to warrant whether the ONL or ONF is sufficiently natural.

The GIS mapping component was only one part of the overall decision of whether an area reaches the threshold of being an ONL or ONF (or the third step in the Man O War decision). Discussions, workshops, knowledge and further background research including community participation during the consultation phase further amplified the essence of people's perception of landscape.

So, whilst I acknowledge that the Landscape Study has articulated the GIS layers and given the impression of a bottom up approach, the technique employed for this Study is consistent with the Man O War decision, which is both logical and sensible.

I acknowledge that there are a variety of methods of assessing and mapping ONLs and ONFs, however the method used for the Marlborough Landscape Study utilises best practice and has been applied throughout the country.

6. Aesthetic Value

Dr Steven considers the factors under 'Sensory Values' are *'a grossly inadequate framework to apply to the assessment of aesthetic quality'*²¹.

The application of sensory values used in the Landscape Study is consistent with NZILA Best Practice and draw from case law which have previously considered how sensory and aesthetic values may be evaluated²².

Dr Steven considers that as aesthetic values have not been mapped, that how can this attribute of landscape be validated.

As a result of the Landscape Study, it was determined by the study team that large parts of Marlborough's landscape were considered to hold high aesthetic values. Aesthetics was also at the forefront of many of the comments received by the community during the discussions, workshops and the consultation mentioned above which helped frame the authors understanding of people's perception of landscape. As a consequence, areas of High Amenity Landscapes were mapped, including the whole of the Marlborough Sounds. Throughout the consultation process with affected landowners, aesthetic values were also discussed (amongst others) and this term and these values were clearly understood by landowners. Where necessary, amendments to the Study were made.

I note that The Marlborough Landscape Study is a working document and its notification enables this process to continue, with the community continuing to have an opportunity to comment and provide feedback on their perception on the aesthetics of landscapes that can be incorporated into the document.

Based on this, I would recommend that this part of the submission be declined.

²¹ Steven (20 August 2016) Review of Landscape & Natural Character Chapters etc; paragraph 97

²² Including Decision C180/99 Wakatipu Environment Society v Queenstown Lakes District Council

7. The application of regional comparators when determining Outstanding Natural Landscapes

The Man O War High Court Decision referred to in the submission of Dr Steven was subsequently appealed to the Court of Appeal. The Court of Appeal has since clarified that the question of whether or not a landscape may be described as outstanding necessarily involves a comparison with other landscapes. Whilst this confirmed that a national comparator is not necessary for a landscape to be judged outstanding, it also highlighted that regional councils should determine whether a landscape in question is outstanding in regional terms. In essence this clarified that ONLs need to be outstanding in terms of the region's natural environment²³. In doing so there is no reason that a landscape judged to be outstanding in regional terms should not be protected as a matter of national importance²⁴.

Based on this, I would recommend that this part of the submission be declined.

Specific mapping areas raised by Dr Steven

I will raise each of Dr Steven's specific mapping areas within the relevant geographic area.

²³ Decision [2015] NZHC 767 Man o'War Station Ltd v Auckland Council, paragraph 93

²⁴ Decision [2017] NZEnvC 147147 Western Bay of Plenty District & Bay of Plenty Regional Council v Port Blakely Limited et al (or the Matakana Island decision): Paragraph 119 states that the broad question of whether a particular feature or landscape, when all its attributes are considered, stands out so obviously from others in the district or region that there is no need for expert debate about its status. Paragraph 158 states that the feature/landscape needs to be compared to other identified outstanding landscapes/features to determine when taken individually and considered in the context of the regional coastal environment the landscape/feature being assessed is at least the equal of those features or landscapes.

5. Analysis of submissions

There were approximately 500 submissions received on provisions relevant to the landscape overlay topic.

Of these submission points, there were a number that were seeking the same or similar relief. In these cases, these submissions and where possible, these have been grouped together.

Several individual submitters who used a common format, requesting the same relief, have been grouped, where necessary under the relevant geographic area to avoid unnecessary repetition and duplication.

Only the joint submission of 716 and 868 retained any technical supporting analysis. The remaining submissions were understood to be supported only through a lay perspective.

5.1 Pre-hearing meetings

There has been no pre-hearing meeting for this topic.

5.2 Structure and organisation of this report

Due to the amount of submissions received concerning landscape matters, specifically Volume 3 Appendix 1: Values contributing to areas with outstanding natural features and landscapes and areas with high amenity', and Volume 4 maps (or overlays concerning landscape), it was decided to organise the report into broad geographic areas. Whilst there were a few submissions that focussed on broad aspects, the vast majority of submissions concerned specific parts of the Marlborough Region. Based on this, this report is organised into the broad areas identified on page 107, 145 and 167 of the Marlborough Landscape Study. An example of the Marlborough Sounds 'areas' is contained below. Whilst ONLs and ONFs overlap areas and extend across many areas, these will be commented on specifically, where required, however, for the most part, the majority of submissions appear to comment on specific parts, noticeably the 'boundaries' of ONLs and ONFs.

Within each Landscape Area (and they are simply that, not landscapes, character areas or units), and depending on the amount of submissions received within each area, separate sub-areas have been identified, broadly centred on specific bays or stretches of coastline which share commonalities. Submissions have therefore been 'grouped' as much as possible both geographically and where possible, by matter raised.

For reference purposes, the 'Marlborough Landscape Study: Landscape Characterisation and Evaluation', Boffa Miskell, August 2015, will be termed the 'Landscape Study' within this report.

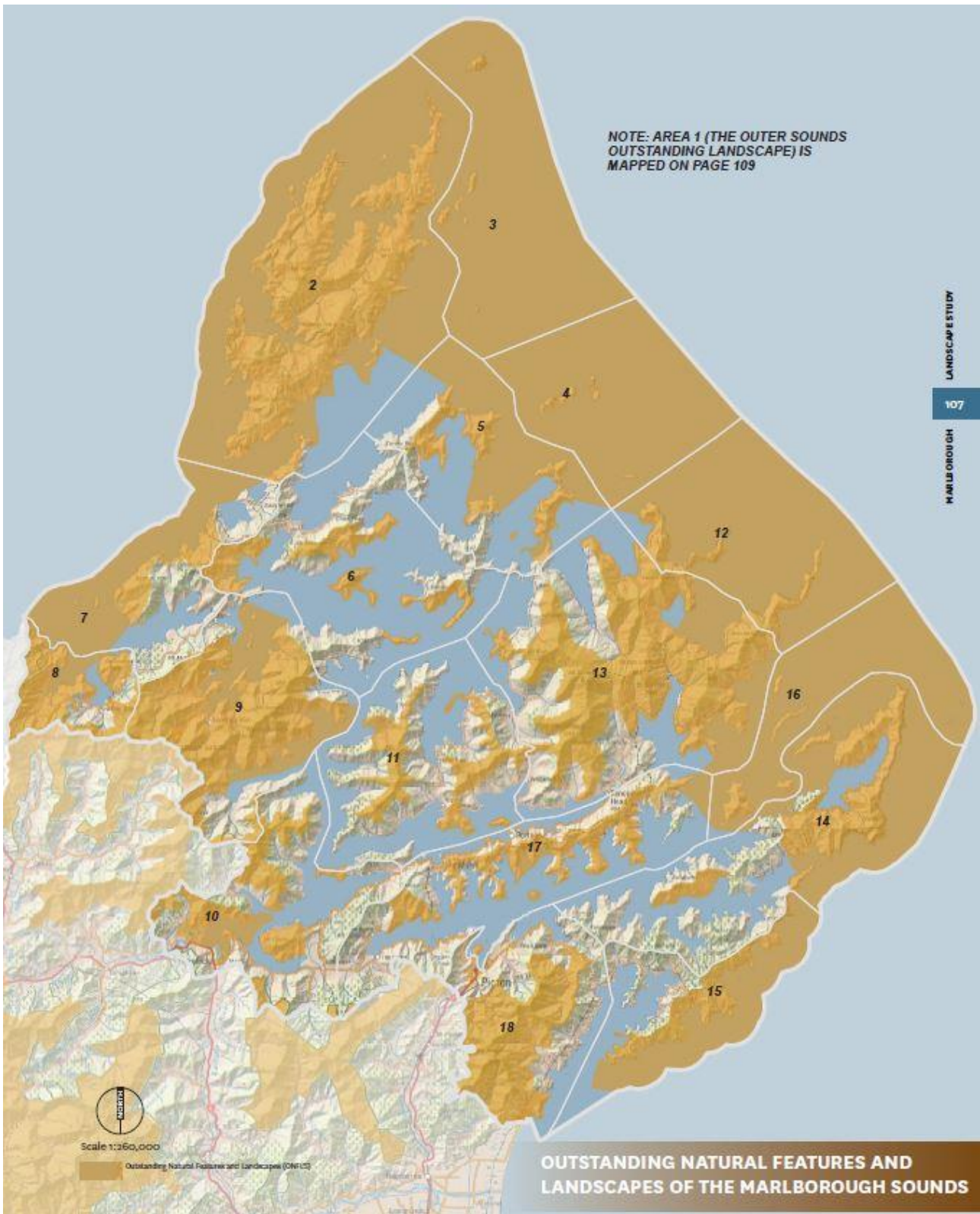


Image 2 Submission areas of the Marlborough Sounds as they have been geographically organised in this report.

5.3 Key matters raised by submitters

Of those matters raised by submitters concerning landscape, the majority relate to individual or groups of mussel farms (or other forms of aquaculture), relevant to a site or geographic area. A smaller number of submitters raise matters concerning broader issues (such as a general discontentment with the mapping generally or queries relating to the methodology or consultation), and these are dealt with in Section 5.5 of this report. Very few submitters comment on landscape matters on a terrestrial basis, and where these are the case, a review has been undertaken.

5.4 New information

Since the completion of the Landscape Study in 2015, new and updated information has come to light. Much of this information has come from the Ministry for Primary Industries in the form of dredging, trawling and fishing data. This new data has been included in this report as **Figures 1, 2 and 3**. Because of this new and updated data, a review of the extent of the original natural character and landscape mapping (notably within the marine environment) would need to be made. However, as part of this process, no changes have been recommended to any areas of mapped natural character/ landscape where there is no supporting submission that underpins the reasons for remapping purposes. Where a submission point refers to a 'review' of a particular area, and where the MPI data reveals that a change ought to be made to the same area, changes have been made, and commentary around how the changes have occurred have been documented. Where no submission point has been made to an area where the MPI data clearly indicates a change, these have not been made, because there is no scope to do so.

5.5 Submissions: General Landscape Matters

Submitter 218/3 Salvador Delgado Oro Laprida, Submitter 369/14 Tony Hawke, Submitter 401/72, 401/244, 401/261 Aquaculture New Zealand, Submitter 425/767, 425/784, 425/785, 425/788 Federated Farmers of New Zealand, Submitter 426/68, 426/70, 426/73, 426/75, 426/76, 426/240, 426/252 Marine Farming Association Incorporated, Submitter 433/22 Port Marlborough New Zealand Limited; Submitter 479/268 Department of Conservation, Submitter 490/4, 490/3 Murray Lewis Waghorn, Submitter, 513/7, 513/8, 513/9, 513/10, 513/11, 513/12, 513/13, 513/14, 513/15, 513/16, 513/17 and 513/18 Helen Johnson, Submitter 544/1 Apex Marine Farm Limited, Submitter 648/47 D C Hemphill, Submitter 716/205 Friends of Nelson Haven and Tasman Bay Incorporated, Submitter 750/1 Goulding Trustees Limited, Submitter 764/1 HARO Partnership, Submitter 768/70 Heritage New Zealand Pouhere Taonga, Submitter 808/5 Kroon, Hanneke and Jansen, Submitter 839/7, 839/8, 839/9, 829/10, 839/11, 839/12, 839/13, 839/14, 839/15, 839/16, 839/17, 839/18 John Wilson, Submitter 842/1 Just Mussels Limited and Tawhitinui Greenshell Limited, Submitter 845/19 Kenneth R and Sara M Roush, Submitter 874/2 KPF Investments Limited and United Fisheries Limited, Submitter 890/1 Lloyd Sampson David, Submitter 903/7, 903/8, 903/9, 903/10, 903/11, 903/12, 903/13, 903/14, 903/15, 903/16, 903/17 and 903/18 Lewis Wilson, Submitter 962/52, 962/55 Marlborough Forest Industry Association Incorporated, Submitter 990/187 Nelson Forests Limited, Submitter 997/1 The New Zealand King Salmon Company Limited, Submitter 1042/18 Port Underwood Association, Submitter 1140/90-100 Sanford Limited, Submitter 1150/1 Shellfish Marine Farms Limited, Submitter 1160/1 St George Limited.

Submitters 479, 845, 1042 support all information and seek to retain as notified. **Submitter 768** requests that the historic heritage related associative values remain as notified.

Submitter 369 requests to review the mapping approach as it is very broad brush.

Submitters 218, 544, 750, 764, 842, 874, 890, 997, 1150, 1160 request for each area where there is an existing salmon farm may include an express statement to the following effect (following the approach in the proposed Auckland Unitary Plan at Chapter L, Schedule 7): "Some bays contain existing salmon farms, but this does not compromise [relevant area's name] current natural values."

Submitters 490, 513, 839, 903 seek that the level of mapping of outstanding natural features and landscapes in the vicinity of mussel farms be removed or request a relief that aquaculture does not affect the underlying values.

Submitter 425 requests that recognition of farm related modifications are retained in the schedule of values in Appendix 1. That Appendix 1 is amended so that the values include the primary production activities that have actively contributed to shaping the landscape. That the areas of high amenity value are deleted from the Appendix, and associated policies deleted from the Plan. That the maps contained within Appendix 1 are made clearer; that robust and objective criteria is used to identify ONFLs and that a landscape must meet all or most criteria to be classified as an ONFL; and that all ONFLs are ground-truthed and landowners with ONFLs mapped over private land consulted with; and that a robust cost benefit analysis of the identification of ONFLs over private land is included in the Plan; and that landowners with ONFLs identified on their property are provided with copies of the 'Marlborough Landscape Study August 2015'. This will ensure that landowners are well informed about the specialness of their land, and also aid in making decisions about land use and ways to avoid, remedy or mitigate and effects on values; and that where landscapes are mapped over farmland, that the values of farming and primary production are appropriately acknowledged.

Submitters 401, 426 request a review of the mapped areas against the various policies in the MEP. These submitters suggest that the wording in the values be similar to those listed in Auckland, Northland and Bay of Plenty's regional plans, similar to submitters 218, 544, 750, 764, 842, 874, 890, 997, 1150, 1160 above. Furthermore, these two submitters query the fact that the Marlborough Sounds is an ONL in a national sense and comment on the mapping extent of the ONLs (i.e. visual catchment approach). Other broader comments for these two submitters are contained in Chapter 4.0 of this report.

Submitter 716 requests that the criticisms and recommendations of Dr Steven be fully recognised and that the MEP is amended accordingly. If analysis is retained, extent of the outstanding natural feature and landscape overlay to be increased and extension of ONL seascape to be at least 750m from MHWS.

Submitter 648 requests to add a section to the Appendix that defines the criteria used to derive the values given, and specific guidelines showing how they were applied.

Submitter 808 requests that the Landscape overlays cannot be evaluated without the notified coastal marine farming provisions and marine farming zoning maps for coastal Marlborough. This Submitter also requests as part of the submission process for the Coastal Marine Farming Provisions and Zoning Maps after their notification, another round of submissions has to be allowed for all related parts of the MEP, such as Chapter 6 Natural Character, Chapter 7 Landscape, Chapter 8 Biodiversity and Chapter 13 Use of the Coastal Environment. The whole MEP is interrelated and one part cannot be considered in isolation. Further, this Submitter requests that large areas of the Marlborough Sounds are zoned as Outstanding Natural Feature, which is clearly done to avoid having to include the adjacent seascape. This is not in keeping with the definitions of Outstanding Natural Landscape and Outstanding Natural Feature. These should be reviewed and that anomalies where a "not ONL water hole" is surrounded by ONFL land or sea area should be reviewed and changed to ONL. Further, that more importance should be given to the presence of ecologically significant marine sites in the classification of an area as a ONF as opposed to ONL, as they should also be protected according to the NZ CPS. A seascape is not only the watersurface.

Submitter 962 requests that a pragmatic identification to ONLs be undertaken, as areas of highly modified land have been included. This submitter also queries the usefulness of Appendix 1 and that this should be reviewed to ensure that it can be meaningfully applied. Furthermore, **Submitter 990** requests the removal of commercial forests from the High Amenity Value Landscape - Marlborough Sounds Coastal Landscape.

Submitter 1140 requests to withdraw the layer (ONL) from the Plan, or amend according to the Sanford submission, refer to the table.

Submitter 433 requests the landscape overlay "Marlborough Sounds Coastal Landscape" to exclude those developed areas with urban zoning (such as the areas within this landscape that are zoned Port, Port Landing, Marina, Business 1, Urban Residential 2). Also, remove the Outstanding Landscape Feature overlay from the Port zone. *Note: This is specifically dealt with in the report prepared by Mr. Dale.*

Discussion

These submitters request a range of reasonably broad-level changes.

The methodology for how ONL and ONF values, characteristics and qualities are derived and applied are discussed in the methodology section of this report and further amplified within the Landscape Study. The MEP in Volume 3, Appendix 1 only lists values, characteristics and qualities that underpin a mapped ONL or ONF (and are directly copied from the Landscape Study). However, reference back to the Landscape Study is required to enable a greater understanding of how these areas were identified and mapped in the first place. Submitters raised concerns relating to modifications apparent in a landscape or feature (noticeably aquaculture). It should be noted that these modifications have been fully taken account of in the landscape study. A landscape or feature needs to be sufficiently natural to enable it to even qualify as being outstanding in the first place.

It must be understood that a landscape does not have to be 'pristine' to be considered outstanding. Indeed, culturally modified landscapes and features can be considered as outstanding, so long as it is considered to be sufficiently natural²⁵ and that it passes the 'outstanding' threshold test (see page 21 of landscape study). Therefore, where isolated areas of modification appearing in an otherwise unmodified broader landscape or feature, that specific modification is included within the mapped overlay, even though at a very localised scale, it appears quite unnatural. Where modifications have been included within ONLs or ONFs, they have been noted in the evaluation commentary after the listed values. An example of this is the Port Ligar headland, which does contain areas of modification however, is, on the whole, considered to be sufficiently natural to be considered outstanding.

Where larger areas of modification are apparent (such as large areas of forestry, concentrations of aquaculture, houses, tracks etc. – and combinations of those) a decision had to be made if the area is sufficiently natural for ONL status, even though there may be other aspects of landscape (such as aesthetic or associational attributes) that may be evident. An area can be recognised more for one attribute than another, therefore it is imperative that a list of values is provided for each mapped or identified area. This means that future changes (or threats) to that area can be appropriately considered based on what makes the area outstanding. The Coastal Natural Character study can also assist in providing an analysis of how natural an area is, but is only one tool for considering this.

The landscape values, characteristics and qualities that underpin each mapped ONL and ONF area have been sourced from a variety of reference material, which are listed within Appendix 1 (page 182-183) of the Landscape Study. They are not exhaustive. Some of this material is more generic, while other reports can be very specific to certain areas. The criteria (or attributes) as to how the values, characteristics and qualities of an area were derived for ONL and ONF identification, are outlined within the methodology contained within pages 16 to 21 of the Landscape Study. The identification and mapping of ONLs and ONFs has occurred at a reasonably fine scale (1:50,000 and where consultation has occurred with specific landowners, a much more refined scale used) and therefore is not considered to be 'broad-brush'.

Then an overall judgement was formed, considering all of the landscape values, characteristics and qualities and whether a particular landscape or feature reaches the outstanding threshold.

Specifically, some areas may be considered special simply due to the combination of biophysical, sensory and associative factors, while not all of the values were outstanding. This is where second-tier landscapes (and features) as 'High Amenity Landscapes and Features' have been identified, such as the Marlborough Sounds in their entirety. High Amenity Landscapes and Features (HALF) are not outstanding landscapes, but they of higher value than other rural, un-identified landscapes. The HALF are often more culturally modified landscapes that are noted for their sensory and aesthetic qualities. Parts of the Marlborough Sounds are considered to be ONLs or ONFs, however the whole Marlborough Sounds Coastal Environment is considered to be HALF.

Based on this, I therefore do not agree with Submissions 401 and 426, where they state that the identification of Marlborough's landscape values is inconsistent with the wording in Policy 7.1.1, since this is the basis of the methodology used. Further analysis of the policy direction is contained within the planning

²⁵ Refer to Appendix 2 of this report

report of Mr. Dale. Furthermore, and as included within the methodology component of this report, I reject the criticisms and recommendations of Dr Steven.

Regarding references to the fact that the Marlborough Sounds has been identified as an ONL at a national scale is recognition of its importance as a whole nationally, and I accept that no specific policy can reflect that. In many ways, the fact that all of the Marlborough Sounds is considered ONL/ONF and HALF (and not the third tier of landscape, i.e. ordinary with no overlay) recognises the importance of the Sounds as a composite whole, on a national, regional and local basis.

Therefore, I confirm that all modifications within the Marlborough Region have been considered when identifying and mapping ONLs and ONFs, including forestry. There is no need to identify aquaculture specifically in the schedule of values (as being a modification), as a number of other modifications may also be found in some areas. Furthermore, in terms of Submitter 433's concerns, I refer to the planning report prepared by Mr. Dale.

In terms of ground-truthing, an opportunity for each affected landowner was offered by MDC between 2011 and 2015 to meet with a council planner and a landscape architect to discuss the process and extent of mapped ONL or ONF on their land.

All of Submitter 1140's comments have been discussed under the relevant geographic sections following this part of the report.

The extent of the seaward boundaries of the ONL and ONF vary, according to what is being protected and the values to be protected. I therefore cannot accept the blanket 750m offset proposal put forward by Submitter 716. In some instances, the extent is several kilometres, and in others only a few metres. Each area is mapped according to the values that underpin the particular ONL and ONF, and where seascapes form an important component of this, they have been appropriately recognised. There have been a few areas where I have recommended the extent of an area of seascape to be 750m and these are based on a case by case scenario.

Regarding the maps in Volume 4, I agree with Submitter 425 that the colours and graphics used could be sharpened to better illustrate the mapped areas, as the cross-hatching used for the amenity overlay has made it difficult to read the ONL and ONF areas. Furthermore, I recommend that the maps in Volume 4 are enlarged, so that sufficient detail can be understood.

Recommendation

I recommend that the Landscape Overlay Maps in Volume 4 of the MEP are made sharper, clearer and increased in scale so that greater detail can be understood. No other changes are considered necessary.

5.6 Landscape Area 1: Outer Sounds

Submitter 401/262 Aquaculture New Zealand, Submitter 426/253 Marine Farming Association Incorporated, Submitter 486/1 Waitui Holdings Limited, Submitter 959/1, 959/4 Marlborough Aquaculture Limited.

Submitters 401, 426 request a reduction in the seaward extent of the ONL offshore into Cook Strait.

Submitter 486 requests to change the ONL (including seascape) to enable some limited aquaculture to occur on the western side of the inner part of Waitui Bay.

Submitter 959 requests a reassessment is undertaken in the Outer Sounds to recognise existing levels of activity and modification or record that aquaculture will not affect the relevant values.

Discussion

All of these submitters request a reassessment and change to the extent of the seascape ONL in the Outer Sounds.

As outlined within the table of landscape values regarding this ONL, the Outer Sounds, encompassing both the land and the sea retains rich biophysical, sensory and associative values. The extent of the mapped seascape is generally 2km off shore, and is measured from the outer most area of land (be it a peninsula, island or rock stack). This extent is also aligned with the extent of the mapping within the Coastal Study. Despite the differences in which the studies are assessed, the alignment nonetheless at this seaward point, assists in the gathering of values.

The extent of the Outer Sounds ONL has taken into consideration existing modifications. These modifications have been considered, with the scale of adverse effects against the values underpinning the broader landscape overlay. Decisions were then made as to what is included within the ONL mapping and this accounts for some parts of the sea to not be included (such as Forsyth Bay and Admiralty Bay).

Based on this, I do not consider that any amendment to the Outer Sounds ONL is required when specifically considering these submitter points²⁶. This is principally based on the lack of evidence provided stating that the values of the landscape do not meet the outstanding threshold.

Recommendation

That no change occurs to the landscape mapping or values identification in this area, other than those considered as part of the recommendations contained within Landscape Areas 2, 5 and 13 (below).

5.7 Landscape Area 2: D'Urville Island/Rangitoto Ke Te Tonga including French Pass

Submitter 574/13 Bryan Skeggs, Submitter 716/206, 716/207, 716/208, 716/209 Friends of Nelson Haven and Tasman Bay Incorporated, Submitter 874/10, 874/11 KPF Investments Limited and United Fisheries Limited, Submitter 1036/3 and 1036/4 Philip Wilson, Submitter 1118/1, 1118/4, 1126/1 Shane Gerard Thomas McCarthy, Submitter 1160/7, 1160/8 St George Limited, Submitter 1164/1 Tui Rosalie Elkington and Shane Gerald Thomas McCarthy, Submitter 1184/7 Talleys Group Limited.

Submitter 574 requests a review of this area and to provide appropriate justification for the extent and definition of its mapping. This submitter specifically seeks acknowledgement within the schedules that marine farms 8013 is not causing an adverse effect.

Submitter 716 requests the boundary of the ONFL is extended so that the seaward boundary is connected with adjacent French Pass and south-east D'Urville Island with northern Bulwer Peninsula and to amend the boundaries of the D'Urville Island ONFL overlays to include the entire Bay that is located further than 300 metres from shore.

Submitter 874 supports the mapping of inner Admiralty Bay and requests to remove the ONL from the south-eastern entrance to French Pass or record that aquaculture will not affect the relevant values.

Submitters 1118, 1126 and 1164 request that the natural character mapping in Catherine Cove – land and water (notably farms 8002 and 8004), be removed or record that aquaculture will not affect the relevant values. **Submitters 1036, 1184**, request the same, specifically where it affects farms 8003, 8006, 8007, 8631. *Note: I consider that these submitters may be referring to landscape matters here rather than natural character matters which are covered off separately in the Natural Character s42A report.*

Submitter 1160 supports the absence of ONL in Current Basin and requests to remove the ONL from the south-eastern entrance to French Pass; and the waters of Current Basin; or record that aquaculture will not affect the relevant values.

²⁶ Although, I have recommended some changes to the seascape part of the Outer Sound, which are contained in more detail within Landscape Areas 2 and 5 – Outer Admiralty Bay, and Landscape Area 13 – Guards Bay and Endeavour Inlet

Discussion

This part of the Outer Sounds ONL contains the feature of D'Urville Island and French Pass/ Current Basin. The values, characteristics and qualities as to why this entire island is mapped as outstanding is articulated within the schedule in Appendix 1 of Volume 3.

The identification is that D'Urville Island (as a whole, including its seascape) retains exceptional landscape value, despite parts of it being relatively modified. Modifications are listed at the end of the evaluation section of the text, after the list of values.

As discussed, a landscape or feature need not be 'pristine' to be considered an ONL or ONF. Further, land use practices and land cover are only one part of considering the merits of a particular landscape or feature and whether it crosses the outstanding threshold. Some modifications can continue to be considered acceptable within an ONL or ONF as they themselves are not necessarily adversely affecting a particular landscape value (such as pastoral farming for instance in noted locations on the island). Other structures, such as an individual marine farm within a larger area holding very high remote and natural values are less acceptable but able to be 'tolerated', as an exclusion would not make sense in the broader picture, when mapped at that scale.

The exclusion of the northern waters of Admiralty Bay were initially based on the modifications associated with the benthic environment, however, on review of this area, by **Submitter 716**, I have carefully reappraised the values and mapping extent. This extent of water is framed by distinctive landforms, including the D'Urville Peninsula, Clayface Point (east of French Pass) and the defined ridge of the slender peninsula leading to Clay Point. Much of these are identified as part of the Outer Sounds ONL. When reconsidering the values of this area, they are strengthened by the interconnectedness of the seascape values, especially how the adjacent landform assists in framing this area. The unmodified surface of the sea is inextricably linked with the surrounding land, defining its edge and providing a visual connection that is connected more with the open Sounds, than associated with the more modified inner Admiralty Bay. Apart from one small mussel farm off the coast of the slender peninsula associated with Clay Point, the seascape retains high visual coherence.

The waters of Current Basin to French Pass exhibit outstanding levels of landscape value, principally due to the dramatic and high flow water associated with French Pass and the enclosed sheltered nature of this area. I therefore confirm that this part of the ONF/ONL mapping is correct.

Scale is an important factor, especially in the outer sounds. Whilst some parts of the terrestrial environment are mapped at a more refined scale, within the water, this is broader. With this in mind, I agree with Submitter 716 that the seascape of northern Admiralty Bay be included as part of the Outer Sounds ONL, which includes parts of the western facing slopes of Crichtons Hill.

Recommendation

Based on this I agree that the extent of the seascape be extended to include an area of the marine environment that extends from French Pass across to Whangapoto Point, and to include the western extent of the unmapped landform extending to Hapuku Rock²⁷. **Refer to Landscape Mapping Change 1: Northern Admiralty Bay.** The corresponding table that underpins the mapped area for Landscape Area 2, will also need to be updated as follows:

2: D'Urville Island/ Rangitoto Ki Te Tonga Including French Pass

Scale of Mapping and Assessment	The Marlborough Sounds is an ONL at a national scale. Within this wider landscape, D'Urville Island and French Pass have been assessed as ONFs at the district scale, when mapped and assessed at that scale. D'Urville Island is the largest island in the Marlborough Sounds and lies within the western part of the Outer Sounds ONL. French Pass, together with its associated waters, also lies within this western part of the ONL.
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²⁷ Part of this proposed recommendation to the mapping occurs within Landscape Area 5, although the 'bulk' is contained within this landscape area.

Mapping Approach	This area was mapped using the Contained Landscape Feature and Ridge Approach as well as the Seascape Mapping Approach.
Landscape Characteristics and Values Summary	
Biophysical	<ul style="list-style-type: none"> • The island has a unique ultramafic 'mineral belt' that traverses the length of the island. As a result of this mineral belt, unique vegetation flourishes. • Geopreservation sites include: D'Urville Island copper mines; prehistoric argillite quarries; Paddock Rocks; Greville Harbour sand dunes and coastal features; Greville Harbour boulder spit; French Pass submerged ridgeline and equalising waters; Mt. Ears prehistoric argillite quarry and Cape Stevens wind-funnelled sand dune. • A large proportion of indigenous land cover from coast to mountain tops, including lowland forest, is intact; and is one of the largest tracts of indigenous vegetation cover remaining in Marlborough. • There are numerous other biotic communities that include dune, spit, beach, lagoon, freshwater wetland, estuarine and alluvial that are all very distinctive and rare in the Marlborough Sounds. • Very strong currents occur in the vicinity of French Pass with dangerous eddies and undercurrents with strong tidal mixing. • There are abundant populations of native fish found around the island's waters and indented coves and harbours. • There are also native freshwater fish within D'Urville Island's freshwater ecosystems. • Minimal land and marine development with highly natural coastline. • French Pass contains a largely unmodified near-shore coastal marine environment with very sheltered shores. • High flow habitats are associated with Current Basin and French Pass. • Rocky outcrops are a feature of south western D'Urville Island. • The vegetated elevated slopes of central D'Urville Island illustrate one of the most extensive and exceptional tracts of lowland forest in the district. This tract, coupled with the largely unmodified marine environment and the waters of French Pass all hold outstanding levels of natural character. The remaining parts of D'Urville Island hold high and very high levels of natural character.
Perceptual (Sensory)	<ul style="list-style-type: none"> • Attractive harbours with sheltered intimate bays and calm waters. • Many visually interesting landforms such as D'Urville Peninsula and the waters at French Pass. • Key views to narrow passage and currents at French Pass from Channel and Collinet Points. • Exposed and dramatic western coastline including long-distance seascape views to adjacent islands. • The waters of French Pass are visually dramatic due to their strong current movement. • The submerged ridge at French Pass forms a distinctive reef. • Minimal land and marine development with highly natural coastline. High experiential values associated with remoteness and lack of modification. • <u>The extent of the seascape between D'Urville Island and the mainland reinforce the wild, scenic and remote values and high natural aesthetic character.</u>
Associative	<ul style="list-style-type: none"> • French connection - named after French Admiral Dumont D'Urville who sailed the Astrolabe through French Pass and just barely managed to get through. • Large proportion of DOC land. • Eco-tourism destination. • Historic development of argillite quarries to extract argillite for cutting tools and the importance of that resource to local tribal identity. • Early copper mines. • Early Māori settlement and activities.

	<ul style="list-style-type: none"> • Early European whaling and farming activities. • Heritage New Zealand plaque commemorates Captain Cook's last anchorage point in NZ in Whareata Bay.
Rating:	Outstanding Natural Features

5.8 Landscape Area 5: Port Ligar, Forsyth Island and Kaitira headland

Submitter 218/9 Salvador Delgado Oro Laprida, Submitter 401/263 Aquaculture New Zealand, Submitter 426/254 Marine Farming Association Incorporated, Submitter 544/8 Apex Marine Farm Limited, Submitter 546/21, 546/27 Aroma Aquaculture Limited, Submitter 563/6, 563/7, 563/8, 563/9, 563/10, 563/11, 563/13 Brent Matthew Dalley, Submitter 601/9, 601/10, 601/11, 601/12, 601/13, 601/14, 601/15 Christopher Redwood, Submitter 617/3, 617/5 Clearwater Mussels Limited, Submitter 688/38 Judy and John Hellstrom, Submitter 716/206, 716/207, 716/208, 716/209 Friends of Nelson Haven and Tasman Bay Incorporated, Submitter 726/19, 726/20 Canantor Mussels Limited and N. I Buchanan-Brown, Submitter 733/6, 733/7, 733/8 733/9, 733/12 Graeme L Beal, Submitter 750/6, 750/7, 750/9 Goulding Trustees Limited, Submitter 854/6, 854/7, 854/8, 854/10 Kathleen Mary Mead, Submitter 866/14, 866/15 Karen Donaldson, Submitter 867/14, 867/15 Karl Donaldson, Submitter 874/10, 874/11, 874/12, 874/13 KPF Investments Limited and United Fisheries Limited, Submitter 890/8 Lloyd Sampson David, Submitter 923/6, 923/7, 923/8, 923/9, 923/10, 923/11, 923/13 Margaret Dalley, Submitter 958/40, 958/58 Marine Farm Management Limited, Submitter 959/1 Marlborough Aquaculture Limited, Submitter 997/10 The New Zealand King Salmon Company Limited, Submitter 1018/2 P H Redwood and Company Limited, Submitter 1022/9, 1022/10, 1022/11, 1022/12, 1022/13, 1022/14, 1022/15 Patricia Redwood, Submitter 1056/7, 1056/8, 1056/9 Rob Curtis, Submitter 1060/20 Richard F Paine, Submitter 1098/8, 1098/9, 1098/10 Sandra Ann King, Submitter 1140/105, 1140/106, 1140/107 Sanford Limited, Submitter 1147/4, 1147/5, 1147/6 Shand Enterprises Limited, Submitter 1148/4, 1148/5, 1148/6 Shand Trust Partnership, Submitter 1150/7, 1150/8 Shellfish Marine Farms Limited, Submitter 1156/4, 1156/5, 1156/6 Southern Crown Limited, Submitter 1157/13 Southern Crown Limited, Submitter 1160/7, 1160/8 St George Limited, Submitter 1196/4, 1196/5, 1196/6 Tiracaan Limited.

Submitter 218 supports the ONL mapping of Clay Point and **Submitters 544, 617, 750, 890, 997** request to retain the mapping as proposed in Forsyth Bay and Waihinau Bay.

Submitters 401, 426, 617, 726, 874, 1060, 1150 request removal of the ONL overlay from the vicinity of Waihinau Bay, Port Ligar, Orchard Bay, Whakatahuri Bay, Waitata Reach or record that aquaculture will not affect the relevant values. **Submitters 1147, 1148, 1196** request a review of the outstanding natural landscape overlay mapping in Port Ligar, recognising the highly-modified land and ongoing human activity or record that aquaculture will not affect the relevant values.

Submitters 750, 997 request removal of the ONL overlay in Port Ligar and West Entry Point of Waitata Reach; or record that aquaculture will not affect the relevant values.

Submitters 546, 563, 601, 617, 733, 854, 866, 867, 923, 958, 1018, 1022, 1056, 1098, 1156, 1157 request removal of the ONL overlay from the vicinity of marine farm 8071, 8082, 8083, 8108, 8125, 8128, 8130, 8135, 8136, 8137, 8500, 8574 and 8590 in Forsyth Bay, Waihinau Bay, Port Ligar or record that aquaculture will not affect the relevant values.

Submitters 750, 997 supports the mapping as proposed in Forsyth Bay (absence of ONL).

Submitter 716 requests to expand ONFL in northern seascapes of Waitata Reach entrance including Port Ligar; include the coastal waters within Ligar Bay; amend the boundaries of the D'Urville Island outstanding natural features and landscape overlays to include the entire Bay that is located further than 300 metres from shore; connect seascape between Forsyth Island and Alligator Head.

Submitter 959 requests a reassessment is undertaken in ONL 5 to recognise existing levels of activity and modification or record that aquaculture will not affect the relevant values.

Submitter 1140 requests to remove the inclusion of the water space around Pipitawai, Harding Point, Paparua and Blow Hole Point in addition to the ONL at the southern end of Kaitira (East Entry Point), Sugar Loaf, by pulling back to Paarekeke Point, south west corner at Tawarua Point and around Orchard Bay in Forysth Bay. Remove the ONL at Waihinau Bay, Homestead Bay and Waterfall Bay around Cape Horn and down to Te Akaroa (West Entry Point). Remove the ONL around Kaitira (East Entry Point) where it is 400m from marine farm 8109. This submitter also requests to amend the ONL around coastal boundary at Clayface Point so that it includes the inner bays and does not extend seaward in relation to marine farm 8014. Amend the boundary of the ONL in Waikawa Bay by pulling the northern boundary up to Two Island Point.

Submitter 688 requests a review under Policy 6.1.4 (Natural Character) of why Waitata Reach has not been defined as an outstanding landscape, given that coastal or freshwater landforms and landscapes (including seascape) are within the definition of natural character (as per Policy 6.1.1). *Note: I assume that this is in reference to natural character matters rather than landscape.* Further, this Submitter comments that the long view south down the Sound from the Pelorus Sound seaward entrance towards Maud Island and likewise the view north, out to sea past the Chetwode Islands, is an unparalleled seascape in New Zealand, and should be carefully protected in perpetuity, for our children and grandchildren, and long after that. These superb views cannot be further compromised by unsightly commercial developments in the public space. *This submission is a repeat from the Natural Character report as it appears that the content is relates to both landscape and natural character.*

Submitter 1150 supports the absence of the ONL overlay in the north-eastern part of Waitata Bay and **Submitter 1160** supports the absence of ONL in Camp Bay and Waitata Bay.

Discussion

All of these submitters request that the ONL be reassessed, especially in light of existing modifications in the area.

As outlined previously, modifications within this outstanding area are listed at the end of the evaluation section of the text, after the list of values.

As discussed, a landscape or feature need not be 'pristine' to be considered an ONL or ONF. Further, land use practices and land cover are only one part of considering the merits of a particular landscape or feature and whether it crosses the outstanding threshold. Some modifications can continue to be considered acceptable within an ONL or ONF as they themselves are not necessarily adversely affecting a particular landscape value (such as pastoral farming for instance in noted locations). Other structures, such as an individual or small groups of marine farms within an area holding very high remote and natural values are less acceptable but may be 'tolerated' as exclusion would not make sense in the broader picture.

Also, more concentrated areas of modifications, such as larger groups of marine farms, coupled with trawling and dredging, may impact upon a landscape or feature that does not warrant that part from reaching the outstanding threshold, when mapped at that scale. It is because of this type and extent of modification that the seascape of Waihinau Bay, Port Ligar and most of Forsyth Bay/ Orchard Bay have not been mapped and therefore not identified as being outstanding.

As such, I do not consider amending any of the landscape overlay in this area.

Recommendation

As discussed earlier, I recommend that the mapping of the ONL of the seascape between D'Urville Island and Clay Point area be included (as illustrated on **Refer to Landscape Mapping Change 1: Northern Admiralty Bay.**) I reject all other recommended changes. I also recommend a change to the extent of the seascape mapping in Guards Bay (within the eastern part of this Landscape Area, however, full commentary regarding this is contained within **Landscape Area 12.**

5.9 Landscape Area 6: Maud Island, Mt Shewell, Fitzroy Bay and Eastern Tawhitinui Reach

Submitter 401/263, 401/264 Aquaculture New Zealand, Submitter 426/254, 426/255 Marine Farming Association Incorporated, Submitter 534/3, 534/4 Anne-Marie Prendeville, Submitter 563/12, 563/13 Brent Matthew Dalley, Submitter 574/15 Bryan Skeggs, Submitter 587/5, 587/6, 587/7, 587/8 Caroline Farley, Submitter 616/1, 616/2 Clearwater Mussels Limited and Talleys Group Limited, Submitter 626/4, 626/5, 626/6 Christopher Peter Womersley, Submitter 707/3, 707/4 Frank Prendeville, Submitter 716/206, 716/207, 716/208, 716/209, 716/210 Friends of Nelson Haven and Tasman Bay Incorporated, Submitter 733/10, 733/11, 733/12 Graeme L Beal, Submitter 750/6, 750/7, 750/8 Goulding Trustees Limited, Submitter 808/5 Kroon, Hanneke and Jansen, Joop, Submitter 809/13 Jim Jessep, Submitter 820/5, 820/6, 820/7, 820/8 Jeffrey Meachen, Submitter 842/9, 842/8, 842/10, 842/11 Just Mussels Limited and Tawhitinui Greenshell Limited, Submitter 874/14, 874/15 KPF Investments Limited and United Fisheries Limited, Submitter 854/9, 854/10 Kathleen Mary Mead, Submitter 866/10, 866/11, 866/12, 866/13, 866/15 Karen Donaldson, Submitter 867/10, 867/11, 867/12, 867/15 Karl Donaldson, Submitter 923/12, 923/13 Margaret Dalley, Submitter 958/38, 958/39, 958/57, 958/58 Marine Farm Management Limited, Submitter 997/10, 997/11 The New Zealand King Salmon Company Limited, Submitter 1034/4, 1034/5, 1034/6 P W Archer, Submitter 1060/12, 1060/13, 1060/18, 1060/19, 1060/20 Richard F Paine, Submitter 1056/5, 1056/6, 1056/9 Rob Curtis, Submitter 1098/6, 1098/7, 1098/10 Sandra Ann King, Submitter 1140/90, 1140/104 Sanford Limited, Submitter 1150/8 Shellfish Marine Farms Limited, Submitter 1160/9, 1160/10 St George Limited, Submitter 1165/1 Ngai Tahu Seafood Resources Limited, Submitter 1188/10, 1188/12 Te Runanga o Ngati Rarua, Submitter 1199/3 Treble Tree Holdings Limited, Submitter 1204/4 United Fisheries Holdings Limited, Submitter 1214/4, 1214/6 Vincent Rene Smith, Submitter 1234/4, 1234/5 Waimana Marine Limited.

Note: Due to the numerous submissions in this Landscape Area and for ease of geographical reference, I have subdivided this Landscape Area into seven different sub-areas, comprising:

1. Inner Admiralty Bay;
2. Waitata Bay and Richmond Bay;
3. Fitzroy Bay Area;
4. Mt. Shewell, Apuau Channel, Treble Tree, Yellow Cliffs and Maud Island Area;
5. Horseshoe Bay, Tawhitinui Bay, Kauauroa Bay Area;
6. Western Beatrix Bay and
7. Southern Tawhitinui Reach, Tawero Point and south of Tawero Point.

5.9.1 Inner Admiralty Bay

Submitters 587, 820, 1214 request that the ONL overlay is removed from the vicinity of marine farms 8026, 8038, 8040 in Admiralty Bay; or record that aquaculture will not affect the relevant values.

Submitter 1188 requests that the ONL overlay is removed from the vicinity of Admiralty Bay; or record that aquaculture will not affect the relevant values.

Submitter 1204 supports the mapping as proposed in Inner Admiralty Bay.

Submitter 1098 requests that the ONL overlay is removed from marine farm 8043 in Admiralty Bay; or record that aquaculture will not affect the relevant values

Discussion

All submissions concerning Inner Admiralty Bay (or where the presence of marine farms are present) request that any mapped ONL and ONF extent won't affect existing aquaculture. The only farms where the ONL and ONF are even marginally close are those associated with the 'edges' of the line of farms that encircle the broad embayment. As discussed earlier in Landscape Area 2, it is proposed to extend the ONL overlay across the outer waters of Admiralty Bay, although this will not affect the inner waters of the bay. Sufficient modification within the inner bay, including the presence of aquaculture has prevented much of this from being outstanding. Therefore, I recommend no change to this area.

Recommendation

That no change occurs to the landscape mapping or values identification in this area.

5.9.2 Waitata Bay and Richmond Bay

Submitter 997 supports the ONL overlay of Waitata Bay and Kopaua (Richmond Bay). **Submitter 1150** supports the absence of the ONL in the north-eastern part of Waitata Bay.

Submitter 750 supports the ONL mapping as proposed in Camp Bay, Steamboat Bay, Turner Bay in Waitata Bay; requests to remove the ONL overlay from Hamilton Cove; or record that aquaculture will not affect the relevant values

Submitter 1056 requests that the ONL overlay is removed from the vicinity of marine farms 8098 and 8099 in Waitata Bay; or record that aquaculture will not affect the relevant values.

Submitter 1199 requests that the ONL overlay is removed from the vicinity of marine farms 8104, 8105, and 8106 in Waitata Bay; and modify both plans to reflect the unique, innovation and research values identified for this zone.

Submitter 1060 requests that the ONL overlay is removed from the vicinity of Waitata Reach; or record that aquaculture will not affect the relevant values.

Submitter 1098 requests that the ONL overlay is removed from the vicinity of marine farm 8204 in Richmond Bay; or record that aquaculture will not affect the relevant values

Submitter 1140 requests to remove the ONL overlay on the northern side of Hamilton Cove so that it follows the bush line out to Yellow Cliffs in a straight line.

Discussion

All submitters concerning Waitata and Richmond Bay request that any mapped ONL and ONF won't affect existing aquaculture. The nearest farms to an ONL/ ONF are those at Hamilton Bay. The extent of the ONL/ONF mapping in the marine area has been restricted by the presence of the aquaculture. The mapped land area retains high degrees of naturalness, landscape legibility and is broadly unmodified and is deserving of its inclusion as outstanding. Based on this, I propose no change.

Recommendation

That no change occurs to the landscape mapping or values identification in this area.

5.9.3 Fitzroy Bay Area

Submitters 401, 426 request removal of the ONL overlay from the vicinity of Fitzroy Bay, or record that aquaculture will not affect the relevant values.

Submitter 1034 requests that the ONL overlay is removed from the vicinity of marine farm 8184 in Hallam Cove and marine farm 8304 in Cregoe Point; or record that aquaculture will not affect the relevant values.

Submitter 958 requests that the ONL overlay is removed from the vicinity of marine farm 8181 in Picnic Bay and 8193, 8194 in Fitzroy Bay; or record that aquaculture will not affect the relevant values.

Submitter 842 requests to reduce the extent of the ONL mapping in Hallam Cove, Fitzroy Bay, Tawero Point, or expressly recognise that marine farms do not adversely impact the values that lead to that classification, by amending the values at Vol 3, Appendix 1, as per separate submission. Supports Camel Point mapping.

Submitter 1098 requests that the ONL overlay is removed from the vicinity of marine farm 8573 in Canoe Bay and 8188 in Hallum Cove; or record that aquaculture will not affect the relevant values

Submitter 1140 requests to delete the seaward extent of the ONL in Savill Bay, Game Bay and pull back to MHWS.

Discussion

All submitters concerning the Fitzroy Bay area request that any mapped ONL and ONF won't affect existing aquaculture. As can be seen by the mapping, all aquaculture has been excluded from the mapping, due to the adverse effects that the farms have on the values. Due to the small scale of the various bays that comprise this area, only the waters of Savill Bay and part of Game Bay are included within the broader land based ONL/ONF mapping. The mapped land area retains high degrees of naturalness, landscape legibility and is devoid of significant modification. Aquaculture can appear large in these smaller embayments therefore having a greater adverse effect. Based on this, I propose no change.

Recommendation

That no change occurs to the landscape mapping or values identification in this area.

5.9.4 Mt. Shewell, Apuau Channel, Treble Tree, Yellow Cliffs and Maud Island Area

Submitter 626 requests that the ONL overlay is removed from the vicinity of marine farm 8181, 8179 in Picnic Bay; or record that aquaculture will not affect the relevant values.

Submitter 716 requests the ONL include the coastal marine area within 300 metres of Maud Island; include the whole of Apuau Channel between Buckland Bay and Treble Tree Point; to connect Mount Shewell Reserve and Treble Tree Peninsula with Maud Island.

Submitter 750 requests to remove the ONL overlay from Reef Point/ Yellow Cliffs; or record that aquaculture will not affect the relevant values.

Submitter 1204 requests to remove the northern extent of ONL overlay from the ridgeline above Waiona Bay.

Discussion

Most of these Submissions request to reduce the extent of the ONL overlay in relation to their marine farm or from their properties. Submitter 716 request to extend the ONL overlay to include more seascape.

As expressly outlined, all modifications in the Sounds have been considered and have had a bearing on the values of the ONL/ONF and on the extent of how the areas were mapped.

I have re-examined Submitter 716's concerns regarding including Apuau Channel as an ONL/ONF and increasing the coastal water overlay around Maud Island. From a landscape perspective, there is a close relationship between the ONF/ONL landform of Maud Island and the ONL/ONF mainland (Waiona Bay area), and the narrow, un-modified waterway of Apuau Channel assists in defining these areas. Each area retains high or very levels of natural character (with Maud Island being considered to hold outstanding natural character). Modification is minimal in this area. One of the matters preventing Apuau Channel being considered as an ONL/ONF originally was the level of trawling and dredging occurring in this area (refer to **Figures 1 and 2**). On reflection of this (especially in light of the updated MPI data), I agree with the Submitter that the high levels of naturalness experienced on the water's surface, coupled with the extremely high legibility and aesthetic values of the adjacent landforms and ridgelines, mean that Apuau Channel should be included as an intrinsic part of this ONL/ONF overlay. I therefore reject Submitter 1204's request to remove the ONL overlay from the ridge of Waiona Bay.

I also agree that an extension to the seascape around Maud Island is appropriate, despite the dredging and trawling that is in operation around this area. The seascape around Maud Island is inextricably linked to the island's values, and recognition of these values of this indented landform would be appropriately acknowledged if the mapping were to extend out to 300m, as suggested by Submitter 716.

Recommendation

To re-map the seascape of Apuau Channel as an ONL/ONF, and to increase the mapped extent of sea around Maud Island to 300m to better reflect the seascape qualities associated with this island. Refer to **Figure B: Landscape Mapping Change 2: Maud Island and Apuau Channel**. The following additions are also required with respect to the values table that underpins the mapped extent:

6: Maud Island, Mt. Shewell, Fitzroy Bay and Eastern Tawhitinui Reach

Scale of Mapping and Assessment	The Marlborough Sounds is an ONL at a national scale. Within this wider landscape, Maud Island, Mt Shewell, Fitzroy Bay and Eastern Tawhitinui Reach have been assessed as ONFs at the district scale, when mapped and assessed at that scale.
Mapping Approach	This area was mapped using the Contained Landscape Feature Approach as well as the Landuse Mapping Approach. Refer to page 21.
Landscape Characteristics and Values Summary	
Biophysical	<ul style="list-style-type: none"> • Mt. Shewell is nationally significant for <i>Powelliphanta hochstetteri obscura</i> (New Zealand giant snail) and diverse plant species. • Maud Island is internationally significant, as a predator-free island sanctuary, harbouring nationally threatened species of invertebrates, birdlife and the entire population of the Maud Island frog. • Fitzroy Bay - nationally significant beech forest/lowland/coastal broad leaf and internationally significant waters. • Largely intact podocarp-broadleaf forest in Kauauroa Bay (eastern Tawhitinui Reach). • Maud Island largely cloaked in regenerating shrubland and forest. • Remnant indigenous forest on the elevated slopes of Mt Drew. • Maud Island is a visually striking, unique landform and holds outstanding natural character. • <u>The open, and unmodified Apuau Channel that physically separates the mainland from Maud Island retains very high levels of naturalness</u> • Fitzroy Bay, Mt. Shewell and parts of Kauauroa Bay hold very high levels of natural character due to the indigenous bush cover. The remaining areas hold high levels of natural character.
Perceptual (Sensory)	<ul style="list-style-type: none"> • Impressive peak of Mt Shewell at the head of Admiralty Bay. • Interesting distinct pyramidal form of Maud Island. • Low levels of modification, <u>especially regarding seascapes.</u> • Road to Admiralty Bay/French Pass passes through the bush above Fitzroy Bay – contributing to the scenic journey. • Frequent, intimate bays with sheltered waters, notably Fitzroy Bay/ Savill Bay/ Garne Bay/ Waiona Bay and Kauauroa Bay. • Area typified by slender peninsulas (notably Tawero and Whakamawahi Points) and broad bays. • Visually impressive Yellow Cliffs at the southern head of Waitata Bay. • <u>Very high levels of perceived naturalness of the seascape of Apuau Channel.</u>
Associative	<ul style="list-style-type: none"> • Historic gun emplacement on Maud Island. • Peninsulas of Tawero Point and Whakamawahi Point act as gateway features to central Pelorus Sound.
Rating:	Outstanding Natural Features

5.9.5 Horseshoe Bay, Tawhitinui Bay, Kauauroa Bay Area

Submitters 534, 563, 707, 854, 923 request that the ONL overlay is removed from the vicinity of marine farm 8209, 8215 in Horseshoe Bay; or record that aquaculture will not affect the relevant values.

Submitters 574, 587, 820, 866, 867 request that the ONL overlay is removed from the vicinity of marine farm 8217, 8223, 8224 in Kauauroa Bay, Tawhitinui Bay; or record that aquaculture will not affect the relevant values.

Submitter 716 requests connection of seascape of Maud Island with Tawero Point and SW Pohnuenui; include Tawhitinui and Kauauroa Bays; and to include the coastal marine area between Tawero Peninsula and Kauauroa Bays.

Submitter 750 supports the ONL mapping as proposed in Horseshoe Bay.

Submitter 842 requests to reduce the extent of the ONL mapping in Tapapa Point/ Tawhitinui Bay or expressly recognise that marine farms do not adversely impact the values that lead to that classification, by amending the values at Vol 3, Appendix 1, as per separate submission.

Submitter 847 requests that the ONL overlay is removed from the vicinity of Horseshoe Bay, Kauauroa Bay; or record that aquaculture will not affect the relevant values. Supports ONL mapping (absence of) at Beatrix Bay; and at Rams Head, Tawhitinui Reach, Middle Pelorus Sound.

Submitter 1140 requests to delete the ONL around Horseshoe Bay and to delete the ONL at Tapapa Point, Kauauroa Bay, Tawhitinui Bay and Tawero Point.

Discussion

All but one submitter request either deletion of the ONL/ONF overlay or recognition that aquaculture does not affect the values that underpin the overlay. The remaining submitter requests that the extent of the seascape mapping be increased. The mapped area is solely terrestrial focused and is a result of the very high levels of naturalness noted on these peninsulas. A scenic reserve in Kauauroa Bay also increases the areas naturalness. Aquaculture within Kauauroa Bay, Tawhitinui Bay and around Tapapa Point has restricted the waters of the embayment's of being mapped, along with significant dredging occurring. Based on this, I am comfortable with the existing mapped extent.

Recommendation

That no change occurs to the landscape mapping or values identification in this area.

5.9.6 Western Beatrix Bay

Submitters 616, 1060 request that the ONL overlay is removed from the vicinity of Beatrix Bay; or record that aquaculture will not affect the relevant values.

Submitters 809, 866, 867, 1165 request that the ONL overlay is removed from the vicinity of marine farm 8230, 8235, 8240 in Beatrix Bay; or record that aquaculture will not affect the relevant values.

Submitter 847 supports the ONL mapping (or absence of) at Beatrix Bay;

Discussion

All submitters concerning western Beatrix Bay request that any mapped ONL and ONF won't affect existing aquaculture. The Whakamawahi peninsula is the only mapped area, and is noted for its relatively intact vegetation cover and high degree of naturalness. This peninsula forms an important entrance into Beatrix Bay. The aquaculture that is aligned along its foreshore has foreshortened the outstanding overlay from extending further into the waters of the bay. Based on this, I propose no change.

Recommendation

That no change occurs to the landscape mapping or values identification in this area.

5.9.7 Southern Tawhitinui Reach, Tawero Point and south of Tawero Point

Submitter 716 requests to include the coastal marine area between Tawero Peninsula and Kauauroa Bays as ONL.

Submitter 808 requests the ONFL classification of Tawero Point should include the ecologically significant marine site skirting it.

Submitters 733, 1234 request that the ONL overlay is removed from the vicinity of marine farms 8306, 8307, 8321 in Brightlands Bay, Wilson Bay; or record that aquaculture will not affect the relevant values.

Submitter 1160 requests to remove or reduce the western extent of the ONL overlay from Tawero Point; or expressly recognise that marine farms do not adversely impact the values that lead to that classification, by amending the values at Vol 3, Appendix 1, as per separate submission.

Submitter 842 requests to reduce the extent of the ONL mapping in Tawero Point, Bay or expressly recognise that marine farms do not adversely impact the values that lead to that classification, by amending the values at Vol 3, Appendix 1, as per separate submission. Supports Camel Point mapping.

Submitter 874 supports ONL mapping (absence of) at Rams Head, Tawhitinui Reach, Middle Pelorus Sound.

Submitter 1140 requests to move the ONL boundary at Cregoe so that it follows the creek line to the west as well as to delete the ONL from Cregoe Rock that extends in a north-west line and includes marine farm 8203 and is 400m from marine farm 8301. Delete the ONL at Tawero Point.

Discussion

The majority of these submissions concern reducing the extent of the ONL mapping to avoid existing marine farms or parts of private land. The only areas of ONL are associated with Cregoe headland in the west and the whole of the slender Tawero peninsula in the east. All existing modification has been considered, including aquaculture and land use practices. The presence of these modifications has prevented the ONL mapping from extending beyond these mapped areas. The mapping at Tawero Point encompasses the slender peninsula as an impressive landform feature of central Pelorus Sound and its extent into the marine environment terminates at the foreshore. I do not consider that the incorporation of the ecologically significant site (3.11 – subtidal values) into the ONFL at Tawero Point is warranted, as this would be inconsistent with the mapping in other areas (such as at Tapapa Point).

I have considered whether the seascape between Tawero Point and Kauauroa Bay be mapped. Due to the presence of aquaculture and the high amount of dredging and trawling that occurs in this area, I consider that despite a lack of surface modification being apparent, the seascape falls short of being considered outstanding. I consider that the identified land areas are mapped for their own values, rather than blurring them together with a less than outstanding seascape. Even if aquaculture was excluded from this mapping, it would appear disjointed with little technical justification.

Based on the above, I support the mapping as it currently is.

Recommendation

That no change occurs to the landscape mapping or values identification in this area.

5.10 Landscape Area 7: Islands of Croisilles Harbour and Northern Coastline

Submitter 426/255 Marine Farming Association Incorporated, Submitter 546/24, 546/27 Aroma Aquaculture Limited, Submitter 617/1 Clearwater Mussels Limited, Submitter 916/7, 916/9 Margaret Hippolite, Submitter 958/29, 958/41, 958/58 Marine Farm Management Limited, Submitter 964/15 Marlborough Oysters Limited, Submitter 1140/104 Sanford Limited, Submitter 1160/7, 1160/8 St George Limited, Submitter 1068/7, 1068/9 Robert Hippolite.

Submitters 426, 964 support the ONL mapping of Squally Cove and **Submitter 617** supports that Okuri Bay is not an ONL.

Submitters 546, 958 request that the ONL overlay is removed from the vicinity of marine farms 8269, 8287, 8297 in Squally Bay; or record that aquaculture will not affect the relevant values.

Submitters 916, 1068 request to remove the ONL overlay from the vicinity of Squally Cove; or record that aquaculture will not affect the relevant values.

Submitter 1140 requests to amend the ONL so that it stretches from Lone Rock to Kakoho Point (west of Squally Cove).

Submitter 1160 supports the absence of ONL in Waikawa Bay.

Discussion

Whilst there is some support for the ONL mapping in this area, there is also some opposition, noticeably from Submitters who have an interest in marine farms. The mapped ONL in this area is around the entrance of Croisilles Harbour, and the exposed coastal area on the northern shores of Askews Hill, up to Okuri Bay. Modifications from a range of sources (not only aquaculture) have prevented the ONL mapping from extending further into Squally Bay, and onto much of the adjacent land.

In terms of seascape, the ONL mapping within Croisilles Harbour extends from Lone Rock in the south to Red Clay Point on the northern peninsula. Submitter 1140 requests that this extent be shifted to Kakoho Point (further west of Red Clay Point). This current mapped extent captures this important stretch of coastline, where numerous geopreservation sites and nationally significant ecological areas are located. The interaction between the land and the sea in this part of Croisilles Harbour is very important. Furthermore, the extent of the mapping comprehensively includes all the rocks and islands of outer Croisilles Harbour. Based on this, I do not agree with the shifting of the seascape extent to Kakoho Point.

Recommendation

That no change occurs to the landscape mapping or values identification in this area.

5.11 Landscape Area 8: Whangarae Inlet and Okiwi Bay

Submitter 498/2 Hura Pakake Family Trust, 916/6, 916/9 Margaret Hippolite, Submitter 1068/6, 1068/9 Robert Hippolite.

Submitter 498 requests that the ONL overlay is removed from Whangarae Inlet and Okiwi Bay (Property Number 537753) and Landscape Map 4 (Marlborough Sounds Coastal Landscape - Outer Sounds) be amended accordingly.

Submitters 916, 1068 request to remove ONL overlay from the vicinity of Okiwi Bay; or record that aquaculture will not affect the relevant values.

Discussion

These submitters request removal of the ONL from their land or where areas of aquaculture are located. The area of ONL includes the majority of this area, and acknowledges the importance of the outstanding qualities of this part of the Marlborough Sounds. With the majority of the area holding very high levels of naturalness, along with aesthetically impressive landforms and features, this area, in combination with the seascape values of Croisilles Harbour surpasses the outstanding threshold. The areas of modification are reasonably confined to the waters of Okiwi Bay and parts of the surrounding land, where aquaculture, moorings, jetties, slipways, ramps, forestry, settlement and areas of land regenerating from former disturbance are apparent and have not been included in the mapping. However, I note that for farm 8592 there is an overlay with the ONL mapping and the farm and that this should be addressed.

Property 537753 is undeveloped and covered in native regenerating vegetation. It is a small area of land, with Wharf Road forming the north-western boundary. Due to the small section and likelihood that this section would get developed, I agree with Submitter 498, that the ONL area should be removed from this property and aligned along the road. To better align

Recommendation

That two small areas of adjustment to the ONL/ONF mapping occur as outlined on **Refer to Figure I: Landscape Mapping Change 9: Okiwi Bay**. These two areas include the removal of the ONL mapping on property 537753 on the southern side of Wharf Road and the removal of the ONL mapping where it overlays with marine farm 8592.

5.12 Landscape Area 9: Tennyson Inlet and Northern Nydia Bay

Submitter 18/1 Jonathan Corskie, Submitter 482/3, 482/4 Worlds End Enterprises Limited, Submitter 546/14, 546/15, 546/16, 546/27 Aroma Aquaculture Limited, Submitter 726/14, 726/16 Canantor Mussels Limited and N. I Buchanan-Brown, Submitter 764/5, 764/6 HARO Partnership, Submitter 809/13 Jim Jessep, Submitter 815/4, 815/3 Jonathan Large, Submitter 842/10, 842/11 Just Mussels Limited and Tawhitinui Greenshell Limited, Submitter 847/4, 847/3, 847/14, 847/15 KJB Marine Farms Limited, Submitter 874/14 KPF Investments and United Fisheries Limited, Submitter 1098/7, 1098/10 Sandra Ann King, Submitter 1125/7, 1125/8 Scott Madsen, Submitter 1140/104 Sanford Limited, Submitter 1150/9, 1150/10 Shellfish Marine Farms Limited, Submitter 1214/5, 1214/6 Vincent Rene Smith, Submitter 1234/5, 1234/6 Waimana Marine Limited, Submitter 1240/3, 1240/4 Worlds End Enterprise Limited.

Note: This Landscape Area has been sub-divided into two sub-areas, namely:

1. Tennyson Inlet Area; and
2. Nydia Bay Area

5.12.1 Tennyson Inlet Area

Submitter 482 requests that the ONL overlay is removed from western side of Tennyson Inlet and supports the ONL mapping as proposed in respect of the Coastal Living Zone in Penzance Bay/Tuna Bay.

Submitter 764 supports the ONL mapping at Camel Point and requests that the ONL overlay is removed from the northern extreme of Tennyson Inlet or record that aquaculture will not affect the relevant values.

Submitters 842, 1150 request that the ONL overlay is removed from the northern extreme of Tennyson Inlet; or record that aquaculture will not affect the relevant values.

Submitter 847 requests that the ONL overlay is removed from the vicinity of marine farm 8201 in Camel Point; or record that aquaculture will not affect the relevant values.

Submitters 1125, 1234, 1240 request that the ONL overlay is removed from the vicinity of marine farm 8203, 8302, 8303 in Camel Point, Cregoe Point; or record that aquaculture will not affect the relevant values.

Discussion

All submissions request amendments to the extent of the ONL in this area. Tennyson Inlet holds some of the most nationally important biophysical values in the Marlborough Sounds, from intact intertidal and subtidal areas to some of the largest tracts of lowland coastal forests. Despite this, there are modifications within Tennyson Inlet. These are, however, restricted to specific parts, including the populated areas of Duncan Bay and Penzance Bay, and the broader area around Elaine Bay and northern waters of Camel Point.

As a consequence, all relevant areas where modification has had an effect on the outstanding values have been taken into consideration.

I do acknowledge that as with the extent of the natural character overlay in Tennyson Inlet that the ONL overlay extent has overlapped slightly with marine farm 8203. Based on this I support amending this small area.

Recommendation

Amend the entrance to Tennyson Inlet to illustrate a slight adjustment to the extent of the ONL boundary to avoid the current overlap with mussel farm 8203. Refer to **Figure B: Landscape Mapping Change 2: Maud Island and Apuau Channel** for recommended change.

5.12.2 Nydia Bay Area

Submitter 18 requests to remove the ONL from property numbers 252642, 252643, 532309, 532313, 533497, 533502, 152434, 152442, 152450, 152426, 152418, 529455 and 529457 zoned Coastal Living and Coastal Environment on the western shore of Nydia Bay from the ONL overlay map.

Submitters 546, 815, 1098, 1214 request that the ONL overlay is removed from the vicinity of marine farms 8355, 8354, 8358, 8363 in Nydia Bay; or record that aquaculture will not affect the relevant values.

Submitters 726, 847 request a review of the ONL overlay mapping in Fairy Bay (Scott Bay) and specifically seek acknowledgement within the schedules to this ONL area that their existing marine farm is not causing adverse effects.

Submitter 809 requests that the ONL overlay is removed from the vicinity of marine farm 8327 in Fairy Bay; or record that aquaculture will not affect the relevant values. **Submitter 874** generally opposes the mapping in Fairy Bay.

Submitter 1140 requests to delete the seaward extent of the ONL above (north) of Hikapu Reach and above Maori Reach, Amend the ONL that extends into Nydia Bay and Fairy Bay so that the seaward boundary abuts the MHWS.

Discussion

All of these submissions relate to the removal of the ONL from either around their property or from areas of aquaculture. For the majority of aquaculture mentioned, the ONL overlay does not affect them. The only area where aquaculture is directly affected is Fairy Bay. This group of three farms is isolated from the remaining area of farms and when considered in the broader context, represents limited modification within a broadly unmodified and highly natural part of Pelorus Sound. By cutting these Fairy Bay farms out of the ONL, it would affect the overall cohesion of the broader overlay.

The extent of the ONL in this area is one of the most important in the inner Sounds. It connects with Tennyson Inlet and holds exceptional biophysical, sensory and associative landscape values. The coastline is moderately dissected with numerous large, deeply indented inlets between large and prominent vegetated headlands. The area's upland forest communities and estuaries are still largely intact. Original forests are

featured on lower altitude hillslopes and toe slopes, and coastal forests are largely intact in especially from Nydia Bay to Fairy Bay. The area features a vegetated backdrop. The mapped ONL area in Nydia Bay reflects intertidal/ subtidal areas, its broadleaf/beech forest and altitudinal sequences of primary forest from ridgetop to sea floor, which are considered a nationally significant. I therefore reject Submitter 1140's request to limit the ONL to the MHWS.

Concerning Submitter 18's concerns, I have re-examined the extent of the overlay in relation to these property areas. I note that many of these sections have yet to be built on, and are currently holding areas of advanced regenerating bush (such as Site 532309). Others are either partly developed or outside of the overlay. All of these Sites are zoned either Coastal Living or Coastal Environment in the MEP. Building on these lots is therefore anticipated, especially on the lower elevated parts of the properties where access is easier. As a consequence, and as much of these properties form the edge of the ONL mapping, I recommend that the mapping be amended to exclude all but two properties in their entirety (as these are reasonably small and are located close to the lower slopes). For the remaining two (532313 and 533502), I recommend that due to their extent, which occupies a much larger and more elevated area, that only the upper parts be considered an ONL, as recommended on **Figure C: Landscape Mapping Change 3: Nydia Bay.**

Recommendation

To amend the ONL mapping to avoid the following properties in their entirety: 252642, 252643, 532309, 533497, 152434, 152442, 152450, 152426, 152418, 529455 and 529457.

To amend the ONL so that the lower parts of properties 532313 and 533502 be excluded from the ONL mapping, however to keep the more elevated parts of the properties as ONL.

Refer to **Figure C: Landscape Mapping Change 3: Nydia Bay.** No other amendments are considered necessary.

5.13 Landscape Area 10: Havelock (Pelorus) Estuary, Mt Cawte and Northern Hills

Submitter 339/31 Sharon Parkes, Submitter 433/222 Port Marlborough New Zealand Limited, Submitter 735/3, 735/4 Gillian Margaret Rothwell, Submitter 847/14, 847/15 KJB Marine Farms Limited, Submitter 874 KPF Investments Limited and United Fisheries Limited, Submitter 1140/104 Sanford Limited.

Submitter 339 requests the ONL be reviewed as to the true significance on properties 850, 888 and 1263 Queen Charlotte Drive, Linkwater.

Submitter 433 requests that the ONL overlay is removed from Havelock to exclude the reclamation area and to be in line with the CMA edge of the reclamation.

Submitter 735 requests that the ONL overlay is removed from the vicinity of marine farm 8371 in Maori Bay; or record that aquaculture will not affect the relevant values.

Submitters 847, 874 request that the ONL overlay is removed from the vicinity of Kaiuma Bay; or record that aquaculture will not affect the relevant values.

Submitter 1140 requests to delete ONL at or on the Putanui Point.

Discussion

All submissions in this area request that the ONL be removed from private land or from areas of aquaculture. Regarding Submitter 339, only a small part of property 850/888 Queen Charlotte Drive is affected by the ONL overlay, the remaining property is not directly affected. The mapped part includes elevated land which

supports advanced regenerating vegetation. This vegetation forms part of the broader mapped areas to the south associated with the heavily vegetated Mt. Richmond Forest Park. Based on this, I confirm that the mapping of this is appropriate.

Regarding Submission 433, the overlay is meant to exclude the reclamation area and marina of Havelock. It is possible that some very minor fine-tuning of this mapping will need to occur.

The remaining submissions concerning Maori Bay, Kaiuma Bay and Putanui Point have been reviewed and I cannot see any reason for them to be excluded from the mapping. Indeed, there is no mapping at all in Maori Bay. Where mapping is apparent, it is because the area holds significant areas of naturalness and where modifications are apparent, these areas have been excluded from the mapping.

As a consequence of this, and other than some potential fine tuning of the mapping round the reclamation area of Havelock, no change is proposed.

Recommendation

Some very minor mapping changes around the reclamation area and marina of Havelock. Refer to **Figure D: Landscape Mapping Change 4: Havelock.**

5.14 Landscape Area 11: Forested ridges around Crail Bay

Submitter 323/1 Lyn Molly Godsiff, Submitter 424/191 Michael and Kristen Gerard, Submitter 426/255 Marine Farming Association Incorporated, Submitter 514/19 A J King Family Trust and S A King Family Trust, Submitter 544/9 Apex Marine Farm Limited, Submitter 546/19, 546/20, 546/27 Aroma Aquaculture Limited, Submitter 617/7 Clearwater Mussels Limited, Submitter 637/3, 637/4 Crail Bay Trust, Submitter 640/14 Douglas and Colleen Robbins, Submitter 689/6, 689/7, 689/8, 689/9, 689/10, 689/11 Elizabeth Patricia Clarke, Submitter 719/3, 719/4, 719/5 Gary and Ellen Orchard, Submitter 723/3, 723/4 & 724/3, 724/4 Graeme Henry Clarke, Submitter 726/16 Canantor Mussels Limited and N. I Buchanan-Brown, Submitter 738/17 Glenda Vera Robb, Submitter 788/3, 788/4 Jessica Bunting, Submitter 808/5 Kroon, Hanneke and Jansen, Joop, Submitter 843/3, 843/4 Karen Anne Harris, Submitter 847/14, 847/15 KJB Marine Farms Limited, Submitter 866/8, 866/9, 866/15 Karen Donaldson, Submitter 867/8, 867/9, 867/15 Karl Donaldson, Submitter 874 KPF Investments Limited and United Fisheries Limited, Submitter 890/9 Lloyd Sampson David, Submitter 911/3, 911/4 M and S Johns, Submitter 928/3, 928/4 Michael Headley Harris, Submitter 935/14 Melva Joy Robb, Submitter 952/3, 952/4 Matthew White, Submitter 958/46, 958/58 Marine Farm Management Limited, Submitter 959/1 Marlborough Aquaculture Limited, Submitter 977/3, 977/4 Nanette Bunting, Submitter 997/11 The New Zealand King Salmon Company Limited, Submitter 1019/4, 1019/5, 1019/6 Philip Henderson, Submitter 1037/3, 1037/4 PADD Investments Limited, Submitter 1060/14, 1060/15, 1060/20 Richard F Paine, Submitter 1094/5, 1094/6, 1094/7, 1094/8, 1094/9 Richards Family Trust, Submitter 1098/7, 1098/10 Sandra Ann King, Submitter 1125/5, 1125/8 Scott Madsen, Submitter 1140/104 Sanford Limited, Submitter 1154/3, 1154/4 Sounds Fun Mussel Company, Submitter 1171/4, 1171/5, 1171/6 Tim Madden, Submitter 1184/4 Talleys Group Limited, Submitter 1188/11, 1188/12 Te Runanga o Ngati Rarua, Submitter 1203/3, 1203/4 Turner Aquaculture New Zealand Limited, Submitter 1216/3, 1216/4 Victoria White.

Note: Due to the number of submission points, this Landscape Area has been sub-divided into the following smaller sub-geographic areas:

1. Pelorus Sound Area (Old Homewood Bay, Marys Bay, South East Bay, Yncyca Bay, Four Fathom Bay, Nikau Bay, Hikapu Reach);
2. Crail Bay Area (Crail Bay, Grant Bay, Hopai Bay); and
3. Western Kenepuru Sound (Goulter Bay, Waitaria Bay, Schnapper Point).

5.14.1 Pelorus Sound Area (Old Homewood Bay, Marys Bay, South East Bay, Yncyca Bay, Four Fathom Bay, Nikau Bay, Hikapu Reach)

Submitters 544, 890, 847, 874 support the mapping as proposed in Nikau Bay, Marys Bay and South East Bay (absence of ONL).

Submitter 617 requests that the ONL overlay is removed from the head of Yncyna Bay (forestry and residential development).

Submitter 726 requests a review of the ONL overlay mapping in Yncyca Bay and specifically seeks acknowledgement within the schedules to this ONL area that their existing marine farm is not causing adverse effects.

Submitters 843, 911, 928, 1098, 1125, 1154 request that the ONL overlay is removed from the vicinity of marine farms 8333, 8338, 8346, 8351, 8387 in Old Homewood Bay, Nikau Bay, South East Bay, Yncyna Bay; or record that aquaculture will not affect the relevant values

Submitter 1140 requests to amend the ONL at Yncyca Bay so that it is at least 500m from marine farm 8343 and abuts MHWS, and to delete corner of ONL by marine farm 8343 - Yncyca Bay.

Discussion

There is a mix of submissions that support and oppose the mapping of the ONL in this part of Pelorus Sound. The support for mapping is in relation to the absence of any mapping in the first place.

As with other areas, the ONL mapping is focussed on the most unmodified parts, and in this location, it is concentrated to the ridges and upper spurs of an unnamed ridge that separates Pelorus Sound from Crail Bay. There is a small part of ONL that extends into the lower slopes and waters of inner Yncyca Bay. Yncyca Bay is a deep and tranquil bay, with a high degree of naturalness evident, especially on its northern and southerly slopes that define the head of the bay.

There are modifications apparent at the head of Yncyca Bay, which include small areas of pine forestry, buildings, moorings, jetties and aquaculture positioned along the southern shore. These modifications have cumulatively affected the naturalness of the head of the bay, however I still consider that this part of the bay is still natural enough to be considered outstanding. What promotes the landscape values further here are that this small bay retains very high degrees of naturalness along its upper ridges, and that structures are reasonably limited and well assimilated into the bay. Where significant modifications (such as aquaculture) have affected these values these have not been included. So, whilst I acknowledge that there are modifications in this area, I maintain that this small, relatively intimate bay retains landscape values that are high enough to place this bay over the outstanding threshold. Based on this, I do not propose an amendment to the mapping of the ONL in this area.

Recommendation

That no change occurs to the landscape mapping or values identification in this area.

5.14.2 Crail Bay Area (Crail Bay, Grant Bay, Hopai Bay)

Submitters 426, 874, 997 support the ONL mapping of Crail Bay

Submitter 424 requests that the ONL overlay is removed from the area of plantation forestry (blackwoods and eucalyptus species) in Hopai Bay.

Submitters 514, 637, 689, 719, 723, 724 788, 952, 958, 977, 1098, 1171, 1203, 1216 request that the ONL overlay is removed from the vicinity of marine farms 8457, 8515, 8518, 8519, 8520, 8529, 8530, 8532, 8540, 8543, 8544 in Crail Bay, Grants Bay and Wet Inlet; or record that aquaculture will not affect the relevant values.

Submitter 546 requests that the ONL overlay is removed from the vicinity of marine farm 8551 in Crail Bay; or record that aquaculture will not affect the relevant values.

Submitter 808 requests that Bobbery Bay (between Wet Inlet & Elie Bay) should be added to the ONFL overlay in the MEP including the seascape of this bay; and that a further small unnamed bay between Hopai

Bay and Elie Bay also be classified as ONFL, including the seascape. Further, this submitter requests that Grant Bay should keep its classification as an ONFL and be added to the ONFL overlay in the MEP plan as such.

Submitter 847 requests that the ONL overlay is removed from the vicinity of Grant Bay; or record that aquaculture will not affect the relevant values. Supports the ONL mapping in South East Bay (absence of); or record that aquaculture will not affect the relevant values.

Submitter 959 requests a reassessment is undertaken in ONL 5 (to recognise existing levels of activity and modification or record that aquaculture will not affect the relevant values).

Submitter 1140 requests that the ONL overlay is deleted the ONL at Hopai Bay.

Discussion

There is a mix of submissions that support and oppose the mapping of the ONL in Crail Bay. Much of the support for mapping is in relation to the absence of any mapping in the first place, however one submitter seeks an extension of the ONL mapping at a bay between Wet Inlet and Elie Bay.

The majority request that the ONL mapping does not affect existing aquaculture areas. The only area where the ONL includes the seascape is at Hopai Bay and Ouokaha Island. This slender peninsula and small island are free of structures (apart from a small number of marine farms to the north of the peninsula) and are actively regenerating with indigenous species. They form important land features, with the Hopai peninsula being an extension of the ridge that separates Crail Bay from Clova Bay to the east. Despite some wilding pines present (which I understand have recently been eradicated), these areas hold high levels of naturalness. As a result, I confirm their mapping is accurate.

I have considered the requests for additions to the ONL overlay from Submitter 808. I acknowledge the special qualities of the small bay located between Wet Inlet in the west and Elie Bay in the east. This bay retains advanced regenerating bush along its foreshore and lower slope margins, as well as an ecologically significant marine site within the centre of the bay. There are however significant land use modifications to the north of the bay involving aquaculture and forestry is evident above the Elie Bay Road on the upper slopes of the bay. Any mapping would be very small and somewhat isolated from the remainder of the ONL mapping. I recommend that this part of Crail Bay remain part of the Marlborough Sounds High Amenity Landscape Area, and not be an ONFL.

Concerning the small bay between Hopai Bay and Elie Bay (Bobbery Bay), this again represents a very small area that holds significant landscape value, however is isolated due to extensive modifications occurring to the land above the bay.

Furthermore, commercial forestry, aquaculture and structures on the land associated with Grant Bay further to the north have prevented this bay from being included in the overlay.

Recommendation

That no change occurs to the landscape mapping or values identification in this area.

5.14.3 Western Kenepuru Sound (Goulter Bay, Waitaria Bay, Schnapper Point)

Submitter 323 requests the ONL overlay is removed from property in Goulter Bay.

Submitters 866, 867, 1019, 1037, 1094, 1184 request that the ONL overlay is removed from the vicinity of marine farms 8466, 8471, 8472, 8473, 8485, 8488, 8491 in Kenepuru Sound; or record that aquaculture will not affect the relevant values.

Submitters 1060, 1188 request that the ONL overlay is removed from the vicinity of Kenepuru Sound (especially in relation to farms 297 and 460).

Submitter 1140 requests that the ONL overlay is removed from the vicinity of Gold Reef by drawing the line at the Kenepuru Road.

Submitters 738 and 935 contest that consultation has not occurred for both landscape and natural character.

Submitters 640, 738, 935 request that the ONL overlay is reviewed as the submitter is concerned by the overlay on private property.

Discussion

All of these submitters request that part or all of the ONL overlay in Western Kenepuru is removed for various reasons.

There are very few areas of ONL within this part of the Marlborough Sounds, and where there are areas identified, they stand out from the surrounding area. These areas include the vegetated peninsula at the southern entrance to Kenepuru Sound, the vegetated splayed peninsula incorporating Golf Reef Bay and Weka Point, and the small island referred to as Kaiaho Island.

As with other areas in the Sounds, significant areas of modifications (including plantation forestry, aquaculture and structures/ buildings) have been avoided as these areas do not rate as sufficiently natural to be considered as outstanding. Some of the mapped areas do include some kind of modification, however these are relatively small scale, difficult to observe and critically have not reduced the level of naturalness so much that the area is not outstanding. Some mapped areas also include parts of private property, and these parts have been identified purely on their landscape value merits.

The splayed peninsula incorporating Gold Reef Bay and Weka Point holds very high levels of natural character due to the lack of modifications and unity of regenerating vegetation. This peninsula is also loosely connected with the vegetated ridge that extends from Bobs Knob to the north. There is limited aquaculture present (only in Mills Bay). The remaining outstanding areas are also, in my opinion, ONFL in their own right.

Regarding Goulter Bay, only the indigenous vegetated upper slopes of the ridge that defines the northern stretch of Kenepuru Sound is mapped as an ONF. Part of this may include private property. From a landscape mapping perspective, it is not always appropriate to exclude private property where it intersects with a continuous area of significant landscape value. In this instance the most elevated parts of the private property have been identified.

Landscape consultation occurred during 2014 and 2015 and was targeted specifically where outstanding natural landscapes were included on private property.

Recommendation

That no change occurs to the landscape mapping or values identification in this area.

5.15 Landscape Area 12: Cape Jackson, Cape Lambert and Alligator Head

Submitter 177/1 Kristen Gerard, Submitter 424/192 Michael and Kristen Gerard, Submitter 486/1, 486/4, 486/5 Waitui Holdings Limited, Submitter 546/22, 546/27 Aroma Aquaculture Limited, Submitter 601/8, 601/15 Christopher Redwood, Submitter 668/3, 668/4 David Quintin Hogg, Submitter 716/206, 716/207, 716/208, 716/209 Friends of Nelson Haven and Tasman Bay Incorporated, Submitter 926/29, 926/30 Wainui Green 2015 Limited, Submitter 1010/3, 1010/4 PB Partnership, Submitter 1022/8, 1022/15 Patricia Redwood, Submitter 1166/2 P H Redwood and Company Limited, Submitter 1186/218 Te Atiawa o Te Waka-a-Maui.

Submitters 177, 424 request to retain all coastal natural character and ONFL overlays for the Port Gore area of the Marlborough Sounds.

Submitter 486 requests changes to the ONL (including seascape) to enable some limited aquaculture to occur on the western side of the inner part Waitui Bay.

Submitters 546, 668, 926, 1010 request that the ONL overlay is removed from the vicinity of marine farm 8167 and Pig Bay; or record that aquaculture will not affect the relevant values.

Submitter 716 requests the ONL to connect seascape between Forsyth Island and Alligator Head (to include Guards Bay).

Submitter 1186 requests the associative values list is amended and record the cultural significance of the area (Cape Jackson, Cape Lambert and Alligator Head).

Submitters 601, 1022, 1166 request that the ONL overlay is removed from the vicinity of marine farm 8164 in Guards Bay; or record that aquaculture will not affect the relevant values.

Discussion

The submissions for this landscape area comprise a mix of requests from extending the ONL overlay to reducing it. This part of Port Gore forms an important part of the Outer Sounds, and the peninsulas and seascape are integral. The landscape values here are amongst some of the most valued in the region. The drowned crested peninsulas are some of the most legible formative processes seen in the Sounds, and coupled with the dramatic transient and aesthetic values, is deserving of its ONL overlay.

Whilst some modification has been captured by the ONL overlay, there are exceptions where the ONL has excluded areas for more intense based modification. This is apparent in Melville Cove (which I acknowledge is outside of the landscape area), where aquaculture dominates this small bay. Here the landscape values aren't as high as the landform that surrounds it and its size is considered too big for the whole of the Cove to be considered 'a small pocket' of modification. For other areas, such as Pig Bay, small isolated structures can be tolerated within the broader mapping, as removing them would interrupt the broader cohesion of the overlay. I recommend that each marine farm in this area is carefully considered against the ONL overlay, when they come up for consenting.

Specifically, I have examined submission 716, which queries why Guards Bay specifically has not been mapped. The seascape of this area is virtually surrounded by ONL land and the bay itself forms an integral part of the waters of the Outer Sounds. There is modification apparent, most noticeably the marine farm in Guards Bay, and much of the bay is heavily dredged and trawled. It was these modifications that suggested the seascape be excluded from the ONL mapping. However, on review, I consider that the seascape plays an integral role in defining these Outer Sounds landforms, irrespective of the modification. The surface of the water is virtually unmodified, with only one marine farm in Guards Bay interrupting the naturalness of the surface. Based on this, I agree with Submitter 716 that the entire seascape be included as an ONL, up to the entrance of Anakoha Bay. This mapping would connect Forsyth Island, Allen Strait and the prominent headlands of the Outer Sounds to the east.

Regarding cultural matters, I agree with the sentiment of Submitter 1186. As part of the research of the Landscape Study, cultural matters were considered, and where appropriate, included within the values and tables. The Marlborough Landscape Study 2009 was presented to the Council's Iwi Working Group (IWG) and considered in several hui. The opportunity to incorporate the cultural and spiritual values of Marlborough tangata whenua iwi as they relate to landscape was provided via the hui. That opportunity was not taken up. However, at the same time, the Council and the IWG were also considering a concept of identifying and protecting places (as opposed to sites) of cultural and spiritual significance. It could have been that the opportunity identified above was not realised due to a potential parallel process to provide protection to places of significance to iwi.

Recommendation

Based on this review, I consider that the seascape of Guards Bay be included as part of the broader ONL mapping. Refer to **Figure E: Landscape Mapping Change 5: Guards Bay**. I also consider that further discussions with MDC be held concerning how cultural values are included within the Study.

5.16 Landscape Area 13: Mt Stokes and surrounds

Submitter 177/1 Kristen Gerard, Submitter 388/3 Adrian Mark Henry Harvey, Submitter 401/264, 401/265 Aquaculture New Zealand, Submitter 424/192 Michael and Kristen Gerard, Submitter 426/255, 426/256 Marine Farming Association Incorporated, Submitter 514/16 A J King Family Trust and S A King Family Trust, Submitter 515/27, 515/28 Mt Zion Charitable Trust, Submitter 546/17, 546/18, 546/25, 546/26, 546/27 Aroma Aquaculture Limited, Submitter 572/1 Beleve Limited and R J Davidson Family Trust, Submitter 578/16 Pinder Family Trust, Submitter 616/1, 616/2 Clearwater Mussels Limited and Talleys Group Limited, Submitter 645/6, 645/7, 645/8, 645/9, 645/10, 645/11 Darnyl Gordon Slade, Submitter 716/206, 716/207, 716/208, 716/209 Friends of Nelson Haven and Tasman Bay Incorporated, Submitter 752/16 Guardians of the Sounds, Submitter 824/3, 824/4 Archer, Beryl Evelyn and Heberd, John Roderick, Submitter 842/12 Just Mussels Limited and Tawhitinui Greenshell Limited, Submitter 874/12, 874/13 874/16 KPF Investments Limited and United Fisheries Limited, Submitter 958/42, 958/47, 958/48, 958/49, 958/50, 958/51, 958/52, 958/53, 958/54, 958/55 958/56, 958/58 Marine Farm Management Limited, Submitter 969/1 Ngai Tahu Seafood Resources Limited, Submitter 1060/12, 1060/13, 1060/20 Richard F Paine, Submitter 1098/7, 1098/9, 1098/10 Sandra Ann King, Submitter 1140/104, 1140/106, 1140/107 Sanford Limited, Submitter 1145/3, 1145/4, 1145/5 Sea Health Foods Limited, Submitter 1146/16 Sea Shepherd New Zealand, Submitter 1152/8 Slade, King and King Limited and Port Gore Marine Farm Partnership, Submitter 1199/1 Treble Tree Holdings Limited, Submitter 1219/3, 1219/4 William Albert Trevor and Kathleen Mary Rainbow.

Note: Due to the number of submission points in this Landscape Area, the area has been sub-divided into the following geographic areas:

1. Inner Port Gore and Melville Cove
2. Anakoha Bay
3. Eastern Beatrix Bay Area, Te Puraka Point and Clova Bay;
4. Titirangi Bay/ Guards Bay;
5. Eastern Kenepuru Sound
6. Endeavour Inlet

5.16.1 Inner Port Gore and Melville Cove

Submitters 177, 424 request to retain all coastal natural character and ONFL overlays for the Port Gore area of the Marlborough Sounds.

Submitter 645 requests that the ONL overlay is removed from the vicinity of marine farms 8169, 8591, 8174 in Melville Cove; or record that aquaculture will not affect the relevant values.

Submitters 578, 752, 1146 query why Melville Cove is not considered part of the ONL overlay.

Submitter 1152 requests that the ONL overlay is removed from the vicinity (realign with CMZ2, CMZ1 interface, across mouth of Melville Cove – see map) of marine farm 8591 in Melville Cove; or record that aquaculture will not affect the relevant values.

Discussion

As discussed within Landscape Area 12, the mapping and landscape values are considered appropriate in this area, and that no change is recommended. The cumulative modification brought about by aquaculture in

Melville Cove has prevented this area from reaching the 'is the water natural enough' to be considered outstanding.

Recommendation

That no change occurs to the landscape mapping or values identification in this area.

5.16.2 Anakoha Bay

Submitters 401, 426, 842 support the absence of mapping in Anakoha Bay

Submitters 824, 958, 1098, 1219 request that the ONL overlay is removed from the vicinity of marine farm 8144, 8148, 8149, 8155 in Anakoha Bay; or record that aquaculture will not affect the relevant values.

Submitter 874 requests to reduce the extent of the ONL overlay at the north-eastern headland of Anakoha Bay

Discussion

As discussed within Landscape Area 12, the mapping and landscape values are considered appropriate in this area, and that no change is recommended. The existing marine farms, along with the land based modifications have prevented this inlet from being considered as outstanding. The entire seascape of Guards Bay is considered to hold outstanding natural landscape values and has been recommended as an addition within the overlay.

Recommendation

That no change occurs to the landscape mapping or values identification in this area.

5.16.3 Eastern Beatrix Bay Area, Te Puraka Point and Clova Bay

Submitter 388 requests the ONL is removed from their property in Clova Bay, Totaranui Road.

Submitters 401, 426 supports the mapping of inner Beatrix Bay and Clova Bay and request the mapping of the headland between Beatrix Bay and Waimaru Bay as areas of ONL be removed or record that aquaculture will not affect the relevant values.

Submitters 514, 546, 572, 645, 958, 969, 1098, 1145, 1199 request that the ONL overlay is removed from the vicinity of marine farms 8242, 8248, 8263, 8264, 8250, 8260, 8265, 8553, 8559, 8560, 8623 in Beatrix Bay, Te Puraka Point, Otatara Bay, Clova Bay; or record that aquaculture will not affect the relevant values.

Submitter 515 requests to remove the ONL overlay from the Map.

Submitters 616, 1060 request that the ONL overlay is removed from the vicinity of Beatrix Bay; or record that aquaculture will not affect the relevant values.

Submitter 874 supports the absence of an ONL overlay in Beatrix Bay.

Submitter 1140 requests to amend the ONL within Beatrix Bay; to remove the ONL at Sugar Loaf; to delete the ONL at Waimaru Bay and Tuhitarata Bay by drawing the boundary just below Mt Kiwi. This submitter also requests to amend the ONL so that it abuts MHWS and to recognise existing farms 8169, 8598, 8171, 8591, 8174, 8173 and 8599. This submitter also requests deletion of the ONL at Te Puraka Point.

Discussion

There is a mix of submissions that support and oppose the mapping of the ONL in this part of Beatrix Bay and Clova Bay. The support for mapping is in relation to the absence of any mapping in the first place.

The only area of ONL that is of direct relevance is that of Te Puraka Point and the small peninsula immediately south, and west of Waimaru Bay. This mapped area holds many landscape values, notably naturalness values, that extend almost uninterrupted from the forested upper ridges of Mt. Kiwi and Mt. Stokes to the water. There is an ecologically significant marine site at the end of the Waimaru peninsula. The interesting, slender landforms and high aesthetic values coupled with the lack of land based modifications has resulted in this feature that divides these two bays as being outstanding. Aquaculture located around these features has prevented much of the seascape from being mapped.

Land based modifications have prevented much of this ONL being extending further. Pasture, buildings and forestry have created a slender 'neck' between Mt. Kiwi and the coast. All ONL mapping is focussed on the advanced regeneration nature of the vegetation. In response to **Submitter 388**, only the steepest and most forested parts of the property (in terms of indigenous vegetation) are mapped (which were considered at 1:10,000 scale). The majority of the property remains unmapped, principally due to the modifications apparent.

As a result of this, I am confident of the mapping and landscape values that underpin this ONL and recommend that the overlay remain in its current form.

Recommendation

That no change occurs to the landscape mapping or values identification in this area.

5.16.4 Titirangi Bay/ Guards Bay Area

Submitter 1140 requests to amend the ONL at Tawaroa Point so that it abuts the MHWS and end at the head of Titirangi Bay in Anakoha Bay

Submitter 716 requests the ONL to connect seascape between Forsyth Island and Alligator Head, to include Guards Bay.

Discussion

As discussed previously within Landscape Area 12, I recommend that the entire seascape of Guards Bay be included as an ONL.

Recommendation

Refer to recommendations outlined within Landscape Area 12 and **Figure E: Landscape Mapping Change 5: Guards Bay.**

5.16.5 Eastern Kenepuru Sound

Submitter 874 supports the absence of an ONL overlay in Waitaria Bay and Fish Bay.

Discussion

This submitter supports the current mapping and values associated with this part of eastern Kenepuru Sound.

Recommendation

That no change occurs to the landscape mapping or values identification in this area.

5.16.6 Endeavour Inlet

Submitters 578, 752, 1146 request that the whole of Endeavour Inlet be an ONL.

Discussion

I have reconsidered the extent of mapping in Endeavour Inlet, and agree that further improvement could be made with respect to the extent of the overlay, especially around the mouth of the Inlet. Much of the headlands to this area are considered to be ONF/ONL with the seascape being integral to the separation of these features. The headlands are regenerating indigenous vegetation, with limited structures or modifications. Based on this, I agree that part of Endeavour Inlet be further considered as a ONF, which would connect the headlands of this Inlet and extend the ONF/ONL mapping of Queen Charlotte Sound further in the Inlet.

Recommendation

To amend the seascape and in a small area the terrestrial mapping of the ONF overlay at the mouth of Endeavour Inlet. Refer to **Figure F: Landscape Mapping Change 6: Endeavour Inlet.**

5.17 Landscape Area 14: Arapawa Island and East and West Heads

Submitter 100/2, 100/28, 100/29, 100/30 East Bay Conservation Society, Submitter 218/9, 218/10 Salvador Delgado Oro Laprida, Submitter 261/7, 261/8 Lynette and Kevin Oldham, Submitter 468/6 Port Gore Group, Submitter 493/6 Karen Marchant, Submitter 518/3, 518/4 Abigail Burns, Submitter 544/10, 544/11 Apex Marine Farm Limited, Submitter 578/15, 578/16 Pinder Family Trust, Submitter 605/3, 605/4 Colin Ronald Norton, Submitter 615/2 Clearwater Mussels Limited and Knight-Somerville Partnership, Submitter 702/3, 702/4 Frank Burns, Submitter 716/210 Friends of Nelson Haven and Tasman Bay Incorporated, Submitter 752/15 Guardians of the Sounds, Submitter 848/3, 848/4 Kirsten Burns, Submitter 890/10, 890/11 Lloyd Sampson David, Submitter 916/8, 916/9 Margaret Hippolite, Submitter 958/30, 958/31, 958/32, 958/33, 958/34, 958/58 Marine Farm Management Limited, Submitter 997/12 The New Zealand King Salmon Company Limited, Submitter 1003/3, 1003/4 Olivia Burns, Submitter 1140/107 Sanford Limited, Submitter 1060/16, 1060/17, 1060/20 Richard F Paine, Submitter 1068/8, 1068/9 Robert Hippolite, Submitter 1143/10, 1143/11, 1143/17, 1143/18 Schwass Family Trusts Partnership, Submitter 1146/15, 1146/16 Sea Shepherd New Zealand, Submitter 1186/219 Te Atiawa o Te Waka-a-Maui, Submitter 1197/3, 1197/4 Tory Channel Aquaculture Limited, Submitter 1202/4 Tu Jaes Trust.

Note: Due to the number of submission points in this Landscape Area, the area has been sub-divided into the following geographic areas:

1. East Bay Area;
2. Tory Channel Area;
3. Northern shore of Arapawa Island (in Queen Charlotte Sound).

5.17.1 East Bay Area

Submitters 100, 468, 493, 578, 752, 1146 request that the whole of East Bay including the land and the sea should be zoned ONFL.

Submitters 518, 605, 615, 702, 848, 958, 1003, 1068, 1143, 1197 request that the ONL overlay is removed from the vicinity of marine farms 8397, 8398, 8399, 8400, 8401, 8402, 8403, 8404, 8405 and 8510, 8425, 8435, 8441, 8453, 8580 in East Bay; or record that aquaculture will not affect the relevant values.

Submitter 716 requests to include the coastal marine area within 300 metres of the northern side of East Bay.

Submitters 916, 1060, 1068 request to remove outstanding natural feature and landscape overlay from the vicinity of East Bay; or record that aquaculture will not affect the relevant values.

Submitter 1040 requests to remove the ONL Arapawa Island on the eastern side of Onauku Bay.

Submitter 1202 requests to retain the ONL in Otanerau Bay, East Bay.

Submitter 261 requests to move the seaward facing slopes of Arapawa Island into the Exposed Eastern Coastline assessment unit and re-asses Northern Arapawa landscape values; and remove proposed ONFL classifications in MEP Volume 4 from the areas on the southern and eastern slopes of East Bay covering from the water's edge to the ridgeline and from Manawa Point through to Matiere Point; amend Section 32 Report 7 and supporting documents accordingly, and; remove the comment "*The waters around East Bay have nationally significant ecological values, particularly for Hector's dolphin.*" from the Boffa Miskell report Marlborough Landscape Study 2015. Landscape Characterisation and Evaluation, and retain the exclusion of the waters of East Bay from the ONFL classification.

Submitters 578, 752, 1146 request that the Endangered Hector dolphin habitat at East Bay is designated as ONFL's or as ecologically significant marine sites.

Discussion

Within this embayment, there are a mix of submissions requesting both an extension and retraction of the mapped ONL extent. As with many other bays in the Sounds, East Bay has areas of aquaculture, that have been determined through the zoning split of CMZ1 and CMZ2 through the embayment.

All aquaculture in this embayment is located within the southern and eastern parts of this bay, extending from Otanerau Bay in the south to just south of Onepipi Bay in the north-east. The seascape mapping in this area has avoided the areas of aquaculture, however, there is the potential to reconsider part of the mapping in the northern part of the embayment, notably from the mouth of East Bay to its head, where aquaculture is absent. Furthermore, I note that from a biophysical perspective, there are several ecologically significant sites present along this coastline, notably 4.25 (wide variety of rare species), 4.24 (abundance of scallops/ giant lampshell) and 4.20 (gannet colony). Due to the lack of modification along this coastline, and due to the high levels of marine based naturalness present, I propose to extend the ONL mapping in the northern part of the marine environment of East Bay.

Virtually all of the coastal waters of Outer Queen Charlotte Sound are labelled as a Hector Dolphin area (area 4.17 in the Ecologically Significant Marine Site – Marine Mammal (Dolphin) Map 18 of the MEP²⁸). Whilst the mapping indicates that Hector Dolphins aren't specifically restricted to East Bay, the mapping does indicate that there are resident dolphins presents in the area. As such, I am happy to leave this reference in the table, and the mapping indicated above, will increase and support the extension requested by Submitters 578, 752 and 1146.

I agree to some extent with Submitter 261 that the eastern part of Arapawa Island is similar in character and value to the exposed outer components of the subsequent Landscape Area (15: Exposed Eastern Coastline). However, for the purposes of the organisation of the report, it makes sense to include Arapawa Island as one unit, however I can confirm that the recognised characteristics and values of the exposed part of Arapawa Island are contained adequately in Landscape Area 14.

Recommendation

To amend the extent of the seascape mapping to northern parts of East Bay. To terminate the mapping along the eastern and southern marine farms. **Refer to Figure G: Landscape Mapping Changes 7: East Bay.**

²⁸ The area also indicates that the majority of Queen Charlotte Sound and East Bay, along with large parts of the Outer Sounds/ Cook Strait are an ecologically significant marine site for whales (7.15 on Map 17). Specifically, this area indicates that migratory humpback whales use this area as they move north for calving and breeding. Also, southern right whales, sperm whales and blue whales utilise this area. Ecologically Significant Marine Sites in Marlborough, Davidson et al, 2011, MDC.

5.17.2 Tory Channel Area

Submitter 218 requests the western extent of the ONL on the south-eastern headland at the entrance to Tory Channel be reviewed/removed. Supports the ONL mapping of Otanerau Bay; Te Pangu Bay and Ngamahau Bay.

Submitter 997 supports the extent of the ONL mapping in Ruakaka Bay; Otanerau Bay; Te Pangu Bay; Clay Point (salmon farm); and Ngamahau Bay and requests to remove the western extent of the ONL on the south-eastern headland at the entrance to Tory Channel.

Submitters 544, 890 support the south side of Tory Channel from Dieffenbach Point to past Te Rua Bay and Port Underwood mapping and request that the ONL overlay is removed from the headland extending into Ngaruru Bay; or record that aquaculture will not affect the relevant values.

Submitter 1186 requests Arapawa Island and Tory Channel including west Head – ‘associative values’ are amended to record that the location is of ongoing cultural significance, occupation and cultural traditions.

Submitter 1060 requests to remove outstanding natural feature and landscape overlay from the vicinity of Tory Channel; or record that aquaculture will not affect the relevant values.

Submitters 578, 752, 1146 request that the whole of Tory channel is designated as an ONFL's in its entirety.

Discussion

Within Tory Channel, there are a mix of submissions requesting both an extension and retraction of the mapped ONL extent. Aquaculture within Tory Channel is reasonably confined to certain areas, notably around the central part of the channel in Oyster Bay. Three salmon farms are present in the main channel and a few areas of mussel farms are present further westwards, in Ngaruru Bay and Hitaua Bay. All aquaculture is within the CMZ2 zoning

The majority of the land in this area is modified, predominantly by commercial forestry and agriculture, which has resulted in the majority of the area not being considered as an ONL. Only parts, such as the southern flanks of the headland at Kaitapeha near the Queen Charlotte Sound western end of the channel, and the extreme eastern part where the Channel meets the Cook Strait are considered to be ONFL. In these areas, a combination of biophysical, associative and sensory landscape values underpins the mapping extent.

As a consequence of existing modification in Tory Channel, I do not consider that further parts should be included as outstanding.

In response to the request to include further associative values into the accompanying table, I agree with the submitter that this would greatly assist further in articulating cultural values. I also refer to my response outlined in the discussion within section 5.15 of this report. I do raise a matter concerning the word ‘occupation’ and how this may be interpreted, especially in relation to the potential relationship with the Marine and Coastal Area (Takutai Moana) Act 2011. That Act provides a process to establish Customary Marine Title. The requirement to establish such title requires that the area is exclusively used and occupied from 1840 to the present day without substantial interruption (see Section 58). In Marlborough, as in many parts of the country, there are competing applications. These are yet to be considered by the Crown or High Court.

As the request does not identify a specific iwi, then I am happy to use this, however I am conscious of the potential for unintended connection to Marine and Coastal Area (Takutai Moana) Act 2011 as a potential issue.

Recommendation

To update the list of values by inclusion of a further associative value in the table. No other changes recommended.

14: Arapawa Island and East and West Heads

Scale of Mapping and Assessment	The Marlborough Sounds is an ONL at a national scale. Within this wider landscape, Arapawa Island and East and West Heads have been assessed as ONFs at the district scale, when mapped and assessed at that scale. They are ONF's within the eastern part of the Outer Sounds ONL.
Mapping Approach	This area was mapped using the Contained Landscape Feature, Seascape and Landuse Mapping Approaches. Refer to page 21.
Landscape Characteristics and Values Summary	
Biophysical	<ul style="list-style-type: none"> • Geopreservation site: Tory Channel East Head. • Arapawa Island Reserves – nationally significant original cliff vegetation and rare species. Possum free. • The eastern flanks of Arapawa Island support some of the best remaining examples of Cook Strait mixed broadleaf forests and are nationally significant. • Highly natural coastal cliffs and large southerly swells are typical of this high-energy coastline, which is minimally modified. • Steep coastal cliffs and rocky reefs dominated by high-energy wave action provide a unique coastal habitat. • Easternmost parts of Arapawa Island hold outstanding natural character due to the unmodified cliffs. Remaining northern parts of Arapawa Island and Kaitapeha hold high levels of natural character.
Perceptual (Sensory)	<ul style="list-style-type: none"> • Gateway to South Island and Marlborough Sounds from Cook Strait ferry route. • Dramatic, narrow entrance to the Tory Channel between East Head and West Head. • Dramatic coastal processes are highly legible along the length of the Arapawa Island's steep coastal cliffs and rocky reefs. • Semi-exposed to very exposed coast. • Strong tidal currents on the outer edge of the Sounds. • Experiential and naturalness values high along Kaitapeha Peninsula and northern Arapawa Island including East Bay and parts of Tory Channel.
Associative	<ul style="list-style-type: none"> • Early whaling stations, including the first shore whaling station at Te Awaiti and Fisherman's Bay. • Pa sites and other archaeological evidence of early Māori settlement line the coast of Tory Channel. • <u>Ongoing cultural occupation, traditions and significance occur in this area</u>
Rating:	Outstanding Natural Features

5.17.3 Northern shore of Arapawa Island (in Queen Charlotte Sound)

Submitters 578, 752 request that the Endangered Hector dolphin habitat including "Hectorville" Te Ipapakerereu Bay and Waikakamea Bay are designated as ONFL's or as ecologically significant marine sites and the whole of Queen Charlotte Sound designated as an ONFL's in its entirety.

Discussion

I have reviewed this area (especially Te Ipapakerereu Bay and Waikakamea Bay) and confirm that it is already listed as an ecologically significant site for dolphins (Hector dolphin). In terms of ONL, much of the terrestrial backdrop comprises commercial forestry with small areas of regenerating bush present, noticeably on the northern lands of Te Ipapakerereu Bay. It is due to this forestry in this part of Queen Charlotte Sound that the ONFL extent is terminated just north of Te Ipapakerereu Bay. Based on this, I recommend no change.

Recommendation

That no change occurs to the landscape mapping or values identification in this area.

5.18 Landscape Area 15: Exposed Eastern Coastline

Submitter 401/265 Aquaculture New Zealand, Submitter 426/256 Marine Farming Association Incorporated, Submitter 546/23 Aroma Aquaculture Limited, Submitter 579/3, 579/4 Craig and Sherald MacDonnell, Submitter 748/3, 748/4 GAL Partnership, Submitter 855/3, 855/4 Kyra Madsen, Submitter 940/3, 940/4 Michelle Madsen, Submitter 958/28, 958/35, 958/36, 958/37, 958/43, 958/44, 958/45, 958/58 Marine Farm Management Limited, Submitter 995/49 New Zealand Forest Products Holdings Limited, Submitter 1111/4, 1111/5, 1111/6 Stephen Cross, Submitter 1140/107 Sanford Limited, Submitter 1143/12, 1143/13, 1143/14, 1143/15, 1143/16 Schwass Family Trusts Partnership, Submitter 1125/6, 1125/8 Scott Madsen, Submitter 1200/3, 1200/4 Triple LG Limited, Submitter 1257/3, 1257/4 Allan Tester, Submitter 1264/3, 1264/4 Ron Bothwell

Submitters 401, 426 request the mapping in Whangatoetoe Bay (Port Underwood) as ONL be removed or record that aquaculture will not affect the relevant values.

Submitters 546, 579, 748, 855, 940, 958, 1111, 1125, 1143, 1200, 1257, 1264 request that the ONL overlay is removed from the vicinity of marine farms 8415, 8419, 8420, 8425, 8431, 8434, 8435, 8436, 8439, 8441, 8443, 8447, 8448, 8449, 8452, 8453, 8455, 8628 in Port Underwood; or record that aquaculture will not affect the relevant values.

Submitter 995 requests ONFL overlay excludes land used for commercial forestry from the Landscapes map.

Submitter 1140 requests to remove the ONL around Horahora Kakahu Island by ending the overlay at Pipe Bay and pulling the seaward boundary back to MHWS.

Discussion

All of these submitters request that the ONL overlay be removed from their land or from area of aquaculture. The mapped extent of this ONL includes the easterly facing steep and precipitous rocky shores and waters of this highly indented peninsula. With much of the land use being in commercial forestry, this identified ONL is noted for more than land use activities. It holds significant seascape values, dramatic aesthetic values and one of the most important cultural sites in Marlborough, the island of Horahora Kakahu.

I have re-examined the extent of the overlay and despite the modifications apparent from commercial forestry along the southern two thirds of the area, I consider that as a whole, this peninsula is natural enough to be considered outstanding. Its landform alone is highly legible of its formative processes and its aspect to the open and exposed eastern coastline dramatizes the experiential, transient and aesthetic values.

Aquaculture within Port Underwood has prevented much of the seascape from being identified and has had a direct effect on the mapping extent.

Recommendation

That no change occurs to the landscape mapping or values identification in this area.

5.19 Landscape Area 16: Islands of North-Eastern Queen Charlotte Sound, including White Rock and the Brothers

Submitter 100/30 East Bay Conservation Society

This submitter supports the following text: *'Large areas of the waters in Queen Charlotte Sound are of international and national scientific ecological significance. Blumine Island and Arapawa Island Reserves are considered nationally significant for ecological values'*. The submitter notes that many of these values are in or immediately around East Bay.

Recommendation

That no change occurs to the landscape mapping or values identification in this area

5.20 Landscape Area 17: Northern lands of Inner Queen Charlotte Sounds

Submitter 218/9 Salvador Delgado Oro Laprida, Submitter 433/215, 433/216 Port Marlborough New Zealand Limited, Submitter 578/15, 578/16 Pinder Family Trust, Submitter 716/206, 716/207, 716/208, 716/209, 716/210 Friends of Nelson Haven and Tasman Bay Incorporated, Submitter 752/15, 752/16 Guardians of the Sounds, Submitter 1146/16 Sea Shepherd New Zealand.

Submitter 218 supports the ONL mapping of Ruakaka Bay.

Submitter 433 requests to amend the boundaries of the ONL at Kaipupu Point to exclude the Port zoned land as per a map in their submission.

Submitters 578, 752, 1146 request the whole of Queen Charlotte Sound is designated as an ONFL in its entirety.

Submitter 716 requests to include the coastal marine area within 300 metres of the northern side of Queen Charlotte Sound and the whole of Onahau, Lochmara, Torea, Kumutoto, Blackwood and Bay of Many Coves and to expand the ONFL overlay of northern Queen Charlotte to include the seascapes.

Discussion

These Submitters request a mix of either supporting the mapping, requesting an extension, or requesting a refinement in relation to the Port zoned land.

The landscape values of Queen Charlotte Sound are notably very high, with areas of high and very high naturalness evident along much of the area. Significant areas of native vegetation are present, and in some areas, ridge to sea floor unmodified vegetation sequences are found. There are however, significant amounts of modification present within this area, predominantly in the form of houses, jetties, wharves, boatsheds and ramps along much of the coastal foreshore. Virtually all elevated land is bush-clad with no structures or tracks evident. One salmon farm is present in Ruakaka Bay.

The mapping has therefore been cognisant of these modifications. Where vegetated peninsulas appear almost unmodified, these are included within the overlay. This has included the majority of the upper slopes (above the Coastal Living Zone), headlands, bays and in some areas the marine environment (such as at Kaipakirikiriri Bay and Kumutoto Bay).

Dr Steven through his report for Submitter 716 requests additional seascape mapping to a number of bays. Many of these bays in which Dr Steven mentions holds much modification along the coastal foreshore. An image from the Council's Smart Maps on Foreshore structures is included below for a few bays:



Image 3: Source: MDC Smart Maps 'Foreshore structures'.

Further to this is a Smart Map indicating the number of mooring buoys present in these bays, and these are illustrated on Image 4.



Image 4: Source: MDC Smart Maps 'Moorings'.

Based on the above, I have reviewed the extent of the seascape mapping. Only small areas around Kaipakirikiri Bay and Allports Island retain any meaningful seascape extent, where existing levels of naturalness are sufficiently high to be considered outstanding. When reviewing this, it became clear how challenging this area was to map originally. So, whilst I accept the tenor of Dr Steven's comments, I consider that due to the concentration of modifications along much of the foreshore, that the majority of the Queen Charlotte Sound seascape is sufficiently modified to be considered as outstanding. However, I have not dismissed this request entirely, rather I have re-examined the seascape extent and in some small areas considered its extent worthy. Areas where the seascape could extend include Kaipakirikiri Bay and Allports Island. There is also potential to connect this area up with adjacent headlands. Where possible, I have extended the seaward extent to 750m (a recommendation put forward by Submitter 716). Whilst this additional mapping is in some part an acknowledgement of this submission; its mapping extent is also reflective of the existing modifications present that have prevented all of the water from being identified.

With respect to Submitter 433, I have reviewed the extent of mapped ONL at Kaipupu Point, and note that the Port Zone extends over part of this forested headland. The landscape values of this forested headland relate to the entirety of this vegetated area, irrespective of its zoning overlay. I note that wilding pine eradication has occurred on the northerly part of this area (outside the Port Zone) and that there are a few tracks evident in the Port Zone. The northerly aspect of this headland is the most publicly visible, whilst the small Port Zoned area is not, where its aspect is orientated towards the Port/ Shakespeare Bay. Based on this, I am happy to recommend removal of the ONL overlay on the Port Zoned land part of this headland.

Recommendation

To amend some seascape mapping to parts of Queen Charlotte Sound and to remove part of the vegetated headland of Kaipupu Point from being an ONL.

Refer to recommendations illustrated on **Figure H: Landscape Mapping Changes 8: Queen Charlotte Sound.**

5.21 Landscape Area 21: Te Parinui o Whiti/White Bluff

Submitter 366/3 Basil Roger Stanton.

Submitter 366 requests that the White Bluffs are included in coastal access priorities.

Discussion

As I understand this submission, it relates to Policy 9.1.1 – Public Access, especially in relation to the White Bluffs. I am unsure how this Submission relates to landscape overlays or values, so invite the submitter to provide some further details on this if appropriate.

Recommendation

That no change occurs to the landscape mapping or values identification in this area

5.22 Landscape Area 22: The Limestone Coastline

Submitter 355/19 Dominion Salt Limited, Submitter 544/12, 544/13 Apex Marine Farm Limited, Submitter 890/12, 890/13 Lloyd Sampson David.

Submitter 355 requests Landscape Map 9 is amended to remove the ONL from areas in or adjacent to the Saltworks Zone.

Submitters 544, 890 request that the ONL overlay is removed from Log Point to Mussel Point; or record that aquaculture will not affect the relevant values.

Discussion

All of these Submitters request that the ONL is removed from specific areas.

In relation to the Lake Grassmere Saltworks Zone, the ONL overlay in this area is primarily associated with the impressive limestone coast, with the nearest mapping associated with Marfells Beach, some 1.5km to the east. Based on this, and due to the distance of the ONL and the Saltworks Zone, no change is required.

In relation to the extent of the ONL from Mussel Point westwards (to a location referred to by Submitters 544 and 890 as Log Point), and partly along Marfells Beach, this captures the chalk steep cliffs that are gradually being recolonised by vegetation. There is limited modification and this ONL inclusion assists in defining Mussel Point as an important feature along this coastline. Based on the biophysical, associative and sensory aspects, I conclude that the extent of the ONL beyond Mussel Point is justified and should remain.

Recommendation

That no change occurs to the landscape mapping or values identification in this area

5.23 Additional ONFs/ ONLs requested that are not part of any mapped extent

Submitter 317/1 David Arthur Barker.

Submitter 355 requests that Lake Elterwater should be included as an outstanding natural feature and landscape in South Marlborough, for the following reasons -

- size and shape, 60ha and elongated
- the only lake of this type in the northern South Island
- it is a dynamic and diverse wetland
- home to large flocks of birds and a wide variety of them
- situated amongst hill country with a back drop of large coastal hills to the east and the inland high country to the west
- situated beside SH1 for easy public access and the railway line
- historically a resting place for people travelling on the road
- a food gathering place for Maori

Until recently it has been hidden behind willows near SH1.

Discussion

I note that within the Wairau Awatere Resource Management Plan (WARMP) that Lake Elterwater was recognised as an ONFL in the plan. At the time the Marlborough Landscape Study was undertaken, Lake Elterwater was re-appraised and a decision was made that the lake no longer was considered to be outstanding, even though it was considered to be natural-enough to be an ONL or ONF. The lake was unfenced and covered in exotic vegetation. I do, however understand that the lake has been appropriately fenced and the willows have since been removed, which has certainly lifted its apparent naturalness. Indeed, I understand that the lake has been identified as a Significant Wetland in the MEP, especially as it forms an important habitat for waterfowl. The lake does, in dry years, dry up.

I maintain that the lake does not currently meet the high threshold of being considered an ONL or ONF for its biophysical, sensory or associative values. Nonetheless, the lake is important as a significant local feature of southern Marlborough.

The lake has been identified in the Significant Wetland technical analysis and this, I consider, is appropriate based on its ecological merits.

Recommendation

That no change occurs to the landscape mapping or values identification in this area

5.24 High Amenity Landscape Area A: Marlborough Sounds

Submitter 425/110 Federated Farmers of New Zealand, Submitter 433/22, 433/24, 433/26, 433/217, 433/218, 433/219, 433/220, 433/221 Port Marlborough New Zealand Limited.

Submitter 425 requests to delete all references to landscapes with high amenity in the Marlborough Sounds Coastal Landscape and/or requests to add an additional value in the Marlborough Sounds VAL, "Farming and rural activities positively contribute to the values and attributes of the Marlborough Sounds Coastal Landscape."

Submitter 433 requests to amend the landscape overlay "Marlborough Sounds Coastal Landscape" to exclude those developed areas with urban zoning (such as the areas within this landscape that are zoned Port, Port Landing, Marina, Business 1, Urban Residential 2). *Note: This is specifically dealt with in the report prepared by Mr. Dale.*

Discussion

For those areas that are not considered to rate as outstanding under Section 6(b) of the RMA and Policy 15 of the NZCPS in the Marlborough Sounds, these are considered to hold significant amenity. Such areas are typically more modified and hold a greater mosaic of land uses, but, nonetheless, hold high amenity due to their location within the Marlborough Sounds context and the close intimacy with the land and sea interface.

The request by Submitter 425 to include text around farming and rural activities contributing positively to the attributes to the HALF is fine in principal, however for these high amenity values to be maintained, restrictions around certain types of farming, land use change and rural based operations will need to be put in place. For instance, new activities that are out of scale with the surrounding pattern of land use can adversely affect the visual cohesion, legibility and overall amenity of a particular area. I do not consider that broad-brush comments such as that proposed by Submitter 425 will result in a continuity of good land (and marine-based) decisions that uphold the special amenity the Sounds offer.

Concerning Submitter 433's request, I refer to the planning report prepared by Mr. Dale.

I do, however note that a long 'finger' of the 'Port Zone' extends into the coastal marine area from Havelock. I recommend that the ONL/ONF extent is clipped to the main zoning and does not include this long, elongated extension into the CMA.

Recommendation

That no change occurs to the landscape mapping or values identification in this area. **Refer to Figure D: Havelock** for confirmation of the extent of the ONF/ONL layer close to Havelock marina.

5.25 High Amenity Landscape Area B: The Southern Hills, including Wither Hills and Dashwood Pass area

Submitter 201/2 Vallyn & Diana Wadsworth, Submitter 425/106, 425/107, 425/108 Federated Farmers of New Zealand, Submitter 715/426, 715/427 Royal Forest and Bird, Submitter 907/32 Levide Capital Limited.

Submitter 715 requests to add the Wairau Dry Hills as an ONL.

Submitter 201 requests to better define the actual criteria for inclusion within the Wairau Dry Hills Landscape, e.g. visibility from public places etc., and amend the map overlay accordingly, and/or remove all areas west of the Taylor River from the Wairau Dry Hills, and/or; remove our property from the Wairau Dry Hills Landscape overlay, and/or; Change the provisions of the MEP to allow conservation and amenity planting within the WDHL (see separate submission).

Submitter 425 requests to delete all references to landscapes with high amenity in the Wairau Dry Hills landscape and/or requests to add an additional value, "Farming and rural activities positively contribute to the values and attributes of the Wairau Dry Hills", and that the overlay of Significant Ridgelines and all associated policies and provisions are deleted from the Plan.

Submitter 907 requests to amend the Wairau Dry Hills Landscape overlay to exclude those areas of the Submitter's property that are not visible to a wide viewing audience where such areas are currently included.

Discussion

Whilst one submitter requests that the Wairau Dry Hills should all be considered outstanding in a landscape sense, the remaining three submitters request amendments to the mapped area. No technical assessment has been undertaken to support these requests.

The Wither Hills, along with the Redwood Pass, Dashwood Pass and Southern Hills are collectively referred to as the Wairau Dry Hills. The Wairau Dry Hills have been identified as a High Amenity Landscape and Feature (HALF) predominantly for their sensory values, related to the visual coherence of the hills in terms of their homogenous undulating form and colour, and the way in which they provide a visual contrast to the rows of vines that stretch across the plains. They have become evocative of south Marlborough. This is due in part to their presence as the visual backdrop to the population centre of Blenheim and because so many people pass through these hills on State Highway 1.

The method for identification of the extent of the Wairau Dry Hills is essentially based in recognition of the visually strategic or 'scenic' basis through which the existing landscape overlays have been identified, and understanding the degree to which areas of the landscape are visible from key locations, such on areas from public vantage points is a major consideration. This includes SH1, the railway, Taylor Pass Road and from many roads within and surrounding Blenheim, including New Renwick Road, Brancott Road, Brookby Road, Hawkesbury Road and Waihopai Valley Road. This 'visibility' is then coupled with the high amenity values.

Under this consideration, it was decided that these hills, whilst retaining landscape value, did not reach the threshold of being outstanding. They are sufficiently modified in naturalness, but not so modified that their value is diminished. Based on this, I confirm that the hills remain appropriate as being a HALF.

Based on this, land visible on SH1, the railway and specifically Taylor Pass Road have been identified. The alignment of this has tended to follow, where practicable, the toe of the slope, or where the elevated land meets the plains. Where cultural interventions are apparent, a topographical contour line was determined or, in some cases land use. Whilst I generally agree with Submitter 425 that farming and rural activities positively contributes to the values and attributes of the Wairau Dry Hills, this is determinant on the type of activity, noting that forestry, woodlot forestry, buildings and structures would detract from the aesthetic coherence of the hills, whilst other farming practices, such as grazing, have contributed towards the values. These areas are different from the more intensively farmed areas of the Wairau Plains. Based on this, my recommendations are the same as discussed for this same submitter in the Marlborough Sounds.

Significant ridgelines have been included only on the Wither Hills HALF. This reflects the high visual coherence of the hills and their unmodified ridges. This identification of specific, selected ridges on these hills represent an important value of the hills which partially led to identification of the HALF. Retention of these identified notable ridges is considered important.

For submitter 907, I understand that the property is located off SH1, east of the Cloudy Bay winery plant, occupying two small east-west facing valleys of the eastern portion of the Wither Hills. I have reviewed this

from a desk-top perspective and do not consider that any change is required, however this may be better informed through a site visit.

Extensive consultation with affected landowners occurred in 2012 and 2013 for this part of the region, however, it appears that this submitter did not request any specific changes at the time. Based on this, I recommend that a specific site visit is carried out to determine this extent.

Recommendation

I recommend the following for the Wairau Dry Hills:

- That the area is not redefined as an outstanding landscape or feature;
- That no change occurs to the extent of the overlay in relation to Submitter 902's property without a site visit;
- That land to the west of the Taylor River positively contributes to the aesthetic values of the Wairau Dry Hills HALF and therefore should not be removed;

That the following amendment be made to the table that underpins the mapping for the Wairau Dry Hills:

B: The Southern Hills, including Wither Hills and Dashwood Pass Area

Mapping Description	Mapped using 100, 120 and 140m contour lines (and where appropriate land use) to include the ridges and spurs of the hills that extend into the plains and their immediate backdrop. Refer to page 21
Landscape Characteristics and Values Summary	
<ul style="list-style-type: none"> • Soft, undulating hills act as an important backdrop to Blenheim and contrast with the varied <u>and more intensely developed</u> land use practices across the Wairau Plains. • Southern Hills provide topographical relief to the flat plains. • The Hills provide a high level of visual coherence due to their prominent and mostly unencumbered nature from buildings and noticeably 'unmodified' ridges and spurs. • Dry hills around Dashwood Pass and Redwood Pass are particularly scenic. • Golden, homogenous undulating form is an iconic feature of Marlborough. • The openness of the hills provides recreational and transient values, offering panoramic views of the Wairau Valley. • Wither Hills Farm Park is a popular recreation area and Redwood Pass is popular for mountain biking. • <u>Farming and rural activities that do not involve woodlots, commercial forestry, or large scale structures positively contribute to the values and attributes of the Wairau Dry Hills</u> 	

5.26 High Amenity Landscape Area C: Wairau River and its margins including Spring Creek

Submitter 715/426, 715/427 Royal Forest and Bird, Submitter 1193/59 The Marlborough Environment Centre Incorporated.

Submitter 715 requests to add the Wairau River as an ONL. **Submitter 1193** agrees from the source to the Waihopai confluence that the Wairau River should be an ONL.

Discussion

These submitters request that the Wairau River be included as an ONL either in its entirety or partly from the source to the Waihopai confluence.

Within the Landscape Study, the Wairau River at its headwaters forms part of an ONL extending to a location close to Bull Paddock Flat, close to the northern end of the St. Arnaud Range. The remaining part of the river is included as a High Amenity Landscape or Feature, apart from its natural mouth, close to the Wairau Lagoons, which is considered outstanding.

The Wairau River is Marlborough's largest and longest river, extending from the Rainbow River Valley towards Cloudy Bay. Its course has been strongly influenced by the underlying tectonic movements associated with the Marlborough fault system and, more specifically, by the Alpine Fault as the river follows the fault for the majority of its length. At its source, the river valley is narrow, with extensive terracing and moraines forming prominent valley floor features particularly near Eves Stream on the Red Hills Ridge. Further eastwards, downstream, the valley broadens into flat alluvial plains on which Blenheim, Renwick, Spring Creek and other smaller settlements are located.

As the river flows eastwards, beyond Tophouse, modifications become more apparent amongst its predominantly braided character. Modifications include modified flow due to Argyle power house close to Tophouse, extensive colonization of exotic 'weeds' (including willow and gorse) in the river gravels, intensive land use activities (vineyards), stop-banks, bridges and outflow pipes.

In terms of values, the river itself is highly legible, with the multiple gravel river braids identified as a geopreservation feature of regional importance, however in terms of indigenous vegetation, only remnant areas survive beyond Tophouse within or close to the main channel, with most indigenous vegetation associated with the upper catchment and side tributaries.

Aesthetically, the river itself is attractive, especially when seen against the steep bush clad mountains in the upper catchment. Further downstream, the river can be difficult to appreciate, due to the main viewing areas being at some distance from the river. The most impressive areas are at its headwaters and at its mouth.

The Wairau river does however hold strong shared and recognised values, for both Maori and Europeans., especially as the Wairau River valley was used by Māori to access overland routes through the mountains including across the saddles of the Branch, Leatham and Waihopai River catchments to the upper Awatere and Acheron/Saxton catchments of the Clarence River.

Based on the above, I conclude that the Wairau River as a landscape feature reaches very close to the threshold of being considered outstanding, where it retains a great many values, however due to its associated modifications, especially below the Tophouse area (and above the Wairau Lagoons) it is considered to fall just short of outstanding status for the majority of its length.

Recommendation

That no change occurs to the landscape mapping or values identification in this area.

Appendix 1: Recommended decisions on decisions requested

A separate Excel spreadsheet identified each submitter and submission point in relation to this topic.

Submission Number	Submission Point	Submitter	Volume	Chapter	Provision	Recommendation
100	28	East Bay Conservation Society	Volume 3	Appendix 1 Landscape Schedule of Values		Accept in part
100	29	East Bay Conservation Society	Volume 3	Appendix 1 Landscape Schedule of Values		Accept
100	30	East Bay Conservation Society	Volume 3	Appendix 1 Landscape Schedule of Values		Accept
218	3	Salvador Delgado Oro Laprida	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
261	7	Lynette and Kevin Oldham	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
366	3	Basil Roger Stanton	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
401	244	Aquaculture New Zealand	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
425	108	Federated Farmers of New Zealand	Volume 3	Appendix 1 Landscape Schedule of Values		Accept in part
425	110	Federated Farmers of New Zealand	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
425	767	Federated Farmers of New Zealand	Volume 3	Appendix 1 Landscape Schedule of Values		Accept in part
426	68	Marine Farming Association Incorporated	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
426	70	Marine Farming Association Incorporated	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
426	73	Marine Farming Association Incorporated	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
426	76	Marine Farming Association Incorporated	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
426	240	Marine Farming Association Incorporated	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
479	268	Department of Conservation	Volume 3	Appendix 1 Landscape		Accept

				Schedule of Values		
486	1	Waitui Holdings Limited	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
490	4	Murray Lewis Waghorn	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
513	18	Helen Johnston	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
518	4	Abigail Burns	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
534	4	Anne-Marie Prendeville	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
544	1	Apex Marine Farm Limited	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
544	11	Apex Marine Farm Limited	Volume 3	Appendix 1 Landscape Schedule of Values		Accept in part
544	13	Apex Marine Farm Limited	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
546	27	Aroma Aquaculture Limited	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
563	13	Brent Matthew Dalley	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
579	4	Craig and Sherald MacDonnell	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
587	8	Caroline Farley	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
601	15	Christopher Redwood	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
605	4	Colin Ronald Norton	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
626	6	Christopher Peter Womersley	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
640	14	Douglas and Colleen Robbins	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
645	11	Darnyl Gordon Slade	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
648	47	D C Hemphill	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
668	4	David Quintin Hogg	Volume 3	Appendix 1 Landscape		Reject

				Schedule of Values		
689	11	Elizabeth Patricia Clarke	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
702	4	Frank Burns	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
707	4	Frank Prendeville	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
715	426	Royal Forest and Bird Protection Society NZ (Forest and Bird)	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
719	5	Gary and Ellen Orchard	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
723	4	Graeme Henry Clarke	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
724	4	Graeme Henry Clarke	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
733	12	Graeme L Beal	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
735	4	Gillian Margaret Rothwell	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
738	17	Glenda Vera Robb	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
748	4	GAL Partnership	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
750	1	Goulding Trustees Limited	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
750	7	Goulding Trustees Limited	Volume 3	Appendix 1 Landscape Schedule of Values		Accept in part
764	1	HARO Partnership	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
764	6	HARO Partnership	Volume 3	Appendix 1 Landscape Schedule of Values		Accept in part
768	70	Heritage New Zealand Pouhere Taonga	Volume 3	Appendix 1 Landscape Schedule of Values		Accept
788	4	Jessica Bunting	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
815	4	Jonathan Large	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
820	8	Jeffrey Meachen	Volume 3	Appendix 1 Landscape		Reject

				Schedule of Values		
824	4	Archer, Beryl Evelyn and Heberd, John Roderick	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
839	18	John Wilson	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
842	1	Just Mussels Limited and Tawhitinui Greenshell Limited	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
842	9	Just Mussels Limited and Tawhitinui Greenshell Limited	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
842	11	Just Mussels Limited and Tawhitinui Greenshell Limited	Volume 3	Appendix 1 Landscape Schedule of Values		Accept in part
843	4	Karen Anne Harris	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
845	19	Kenneth R and Sara M Roush	Volume 3	Appendix 1 Landscape Schedule of Values		Accept
847	4	KJB Marine Farms Limited	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
848	4	Kirsten Burns	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
854	10	Kathleen Mary Mead	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
855	4	Kyra Madsen	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
866	15	Karen Donaldson	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
867	15	Karl Donaldson	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
874	2	KPF Investments Limited and United Fisheries Limited	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
874	11	KPF Investments Limited and United Fisheries Limited	Volume 3	Appendix 1 Landscape Schedule of Values		Accept in part
874	13	KPF Investments Limited and United Fisheries Limited	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
874	15	KPF Investments Limited and United Fisheries Limited	Volume 3	Appendix 1 Landscape Schedule of Values		Accept in part
890	1	Lloyd Sampson David	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
890	11	Lloyd Sampson David	Volume 3	Appendix 1 Landscape		Accept in part

				Schedule of Values		
890	13	Lloyd Sampson David	Volume 3	Appendix 1 Landscape chedule of Values		Reject
903	18	Lewis Wilson	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
911	4	M and S Johns	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
916	9	Margaret Hippolite	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
923	13	Margaret Dalley	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
926	30	Wainui Green 2015 Limited	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
928	4	Michael Headley Harris	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
935	14	Melva Joy Robb	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
940	4	Michelle Madsen	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
952	4	Matthew White	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
958	58	Marine Farm Management Limited	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
959	1	Marlborough Aquaculture Limited	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
977	4	Nanette Bunting	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
997	1	The New Zealand King Salmon Company Limited	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
1003	4	Olivia Burns	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
1010	4	PB Partnership	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
1019	6	Philip Henderson	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
1022	15	Patricia Redwood	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
1034	6	P W Archer	Volume 3	Appendix 1 Landscape		Reject

				Schedule of Values		
1036	4	Philip Wilson	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
1037	4	PADD Investments Limited	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
1042	18	Port Underwood Association	Volume 3	Appendix 1 Landscape Schedule of Values		Accept
1056	9	Rob Curtis	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
1060	20	Richard F Paine	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
1068	9	Robert Hippolite	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
1094	9	Richards Family Trust	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
1098	10	Sandra Ann King	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
1111	6	Stephen Cross	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
1125	8	Scott Madsen	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
1143	18	Schwass Family Trusts Partnership	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
1145	5	Sea Health Foods Limited	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
1147	6	Shand Enterprises Limited	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
1148	6	Shand Trust Partnership	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
1150	1	Shellfish Marine Farms Limited	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
1150	8	Shellfish Marine Farms Limited	Volume 3	Appendix 1 Landscape Schedule of Values		Accept in part
1150	10	Shellfish Marine Farms Limited	Volume 3	Appendix 1 Landscape Schedule of Values		Accept in part
1154	4	Sounds Fun Mussel Company	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
1156	6	Southern Crown Limited	Volume 3	Appendix 1 Landscape		Reject

				Schedule of Values		
1160	1	St George Limited	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
1160	8	St George Limited	Volume 3	Appendix 1 Landscape Schedule of Values		Accept in part
1160	10	St George Limited	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
1171	6	Tim Madden	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
1186	218	Te Atiawa o Te Waka-a-Maui	Volume 3	Appendix 1 Landscape Schedule of Values		Accept in part
1186	219	Te Atiawa o Te Waka-a-Maui	Volume 3	Appendix 1 Landscape Schedule of Values		Accept in part
1188	12	Te Runanga o Ngati Rarua	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
1196	6	Tiracaan Limited	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
1197	4	Tory Channel Aquaculture Limited	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
1200	4	Triple LG Limited	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
1203	3	Turner Aquaculture New Zealand Limited	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
1214	6	Vincent Rene Smith	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
1216	4	Victoria White	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
1219	4	William Albert Trevor and Kathleen Mary Rainbow	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
1234	6	Waimana Marine Limited	Volume 3	Appendix 1 Landscape Schedule of Values		Accept in part
1240	4	Worlds End Enterprise Limited	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
1257	4	Allan Tester	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
1264	4	Ron Bothwell	Volume 3	Appendix 1 Landscape Schedule of Values		Reject
401	261	Aquaculture New Zealand	Volume 4	Overlay Maps	Landscapes 1	Reject

401	262	Aquaculture New Zealand	Volume 4	Overlay Maps	Landscapes 1	Reject
401	263	Aquaculture New Zealand	Volume 4	Overlay Maps	Landscapes 1	Reject
426	252	Marine Farming Association Incorporated	Volume 4	Overlay Maps	Landscapes 1	Reject
426	253	Marine Farming Association Incorporated	Volume 4	Overlay Maps	Landscapes 1	Reject
426	254	Marine Farming Association Incorporated	Volume 4	Overlay Maps	Landscapes 1	Reject
433	217	Port Marlborough New Zealand Limited	Volume 4	Overlay Maps	Landscapes 1	Accept in part
513	7	Helen Johnston	Volume 4	Overlay Maps	Landscapes 1	Reject
544	8	Apex Marine Farm Limited	Volume 4	Overlay Maps	Landscapes 1	Accept
546	21	Aroma Aquaculture Limited	Volume 4	Overlay Maps	Landscapes 1	Reject
574	13	Bryan Skeggs	Volume 4	Overlay Maps	Landscapes 1	Reject
587	6	Caroline Farley	Volume 4	Overlay Maps	Landscapes 1	Reject
587	7	Caroline Farley	Volume 4	Overlay Maps	Landscapes 1	Reject
617	1	Clearwater Mussels Limited	Volume 4	Overlay Maps	Landscapes 1	Accept
617	5	Clearwater Mussels Limited	Volume 4	Overlay Maps	Landscapes 1	Reject
716	206	Friends of Nelson Haven and Tasman Bay Incorporated	Volume 4	Overlay Maps	Landscapes 1	Accept in part
726	19	Canantor Mussels Limited and N. I Buchanan-Brown	Volume 4	Overlay Maps	Landscapes 1	Reject
750	6	Goulding Trustees Limited	Volume 4	Overlay Maps	Landscapes 1	Accept in part
820	6	Jeffrey Meachen	Volume 4	Overlay Maps	Landscapes 1	Reject
820	7	Jeffrey Meachen	Volume 4	Overlay Maps	Landscapes 1	Reject
839	7	John Wilson	Volume 4	Overlay Maps	Landscapes 1	Reject
842	8	Just Mussels Limited and Tawhitinui Greenshell Limited	Volume 4	Overlay Maps	Landscapes 1	Reject
866	14	Karen Donaldson	Volume 4	Overlay Maps	Landscapes 1	Reject
867	14	Karl Donaldson	Volume 4	Overlay Maps	Landscapes 1	Reject
874	10	KPF Investments Limited and United Fisheries Limited	Volume 4	Overlay Maps	Landscapes 1	Accept in part
890	8	Lloyd Sampson David	Volume 4	Overlay Maps	Landscapes 1	Accept
903	7	Lewis Wilson	Volume 4	Overlay Maps	Landscapes 1	Reject
958	39	Marine Farm Management Limited	Volume 4	Overlay Maps	Landscapes 1	Reject
958	40	Marine Farm Management Limited	Volume 4	Overlay Maps	Landscapes 1	Reject
959	4	Marlborough Aquaculture Limited	Volume 4	Overlay Maps	Landscapes 1	Reject

997	10	The New Zealand King Salmon Company Limited	Volume 4	Overlay Maps	Landscapes 1	Accept in part
1036	3	Philip Wilson	Volume 4	Overlay Maps	Landscapes 1	Reject
1056	5	Rob Curtis	Volume 4	Overlay Maps	Landscapes 1	Reject
1056	6	Rob Curtis	Volume 4	Overlay Maps	Landscapes 1	Reject
1060	18	Richard F Paine	Volume 4	Overlay Maps	Landscapes 1	Reject
1098	6	Sandra Ann King	Volume 4	Overlay Maps	Landscapes 1	Reject
1118	1	Shane Gerard Thomas McCarthy	Volume 4	Overlay Maps	Landscapes 1	Reject
1118	4	Shane Gerard Thomas McCarthy	Volume 4	Overlay Maps	Landscapes 1	Reject
1126	1	Shane Gerard Thomas McCarthy	Volume 4	Overlay Maps	Landscapes 1	Reject
1140	90	Sanford Limited	Volume 4	Overlay Maps	Landscapes 1	Reject
1140	105	Sanford Limited	Volume 4	Overlay Maps	Landscapes 1	Reject
1147	4	Shand Enterprises Limited	Volume 4	Overlay Maps	Landscapes 1	Reject
1148	4	Shand Trust Partnership	Volume 4	Overlay Maps	Landscapes 1	Reject
1150	7	Shellfish Marine Farms Limited	Volume 4	Overlay Maps	Landscapes 1	Accept in part
1156	4	Southern Crown Limited	Volume 4	Overlay Maps	Landscapes 1	Reject
1160	7	St George Limited	Volume 4	Overlay Maps	Landscapes 1	Accept in part
1164	1	Tui Rosalie Elkington and Shane Gerard Thomas McCarthy	Volume 4	Overlay Maps	Landscapes 1	Reject
1184	7	Talleys Group Limited	Volume 4	Overlay Maps	Landscapes 1	Reject
1188	10	Te Runanga o Ngati Rarua	Volume 4	Overlay Maps	Landscapes 1	Reject
1196	4	Tiracaan Limited	Volume 4	Overlay Maps	Landscapes 1	Reject
1199	3	Treble Tree Holdings Limited	Volume 4	Overlay Maps	Landscapes 1	Reject
1204	4	United Fisheries Holdings Limited	Volume 4	Overlay Maps	Landscapes 1	Accept in part
1214	4	Vincent Rene Smith	Volume 4	Overlay Maps	Landscapes 1	Reject
433	218	Port Marlborough New Zealand Limited	Volume 4	Overlay Maps	Landscapes 2	Accept in part
486	4	Waitui Holdings Limited	Volume 4	Overlay Maps	Landscapes 2	Reject
513	8	Helen Johnston	Volume 4	Overlay Maps	Landscapes 2	Reject
515	28	Mt Zion Charitable Trust	Volume 4	Overlay Maps	Landscapes 2	Reject
601	8	Christopher Redwood	Volume 4	Overlay Maps	Landscapes 2	Reject
601	13	Christopher Redwood	Volume 4	Overlay Maps	Landscapes 2	Reject
601	14	Christopher Redwood	Volume 4	Overlay Maps	Landscapes 2	Reject

617	3	Clearwater Mussels Limited	Volume 4	Overlay Maps	Landscapes 2	Accept in part
716	207	Friends of Nelson Haven and Tasman Bay Incorporated	Volume 4	Overlay Maps	Landscapes 2	Accept in part
726	20	Canantor Mussels Limited and N. I Buchanan-Brown	Volume 4	Overlay Maps	Landscapes 2	Reject
839	8	John Wilson	Volume 4	Overlay Maps	Landscapes 2	Reject
854	7	Kathleen Mary Mead	Volume 4	Overlay Maps	Landscapes 2	Reject
874	12	KPF Investments Limited and United Fisheries Limited	Volume 4	Overlay Maps	Landscapes 2	Accept/Accept in part/
903	8	Lewis Wilson	Volume 4	Overlay Maps	Landscapes 2	Reject
1018	2	P H Redwood and Company Limited	Volume 4	Overlay Maps	Landscapes 2	Reject
1022	8	Patricia Redwood	Volume 4	Overlay Maps	Landscapes 2	Reject
1022	13	Patricia Redwood	Volume 4	Overlay Maps	Landscapes 2	Reject
1022	14	Patricia Redwood	Volume 4	Overlay Maps	Landscapes 2	Reject
1060	19	Richard F Paine	Volume 4	Overlay Maps	Landscapes 2	Reject
1098	8	Sandra Ann King	Volume 4	Overlay Maps	Landscapes 2	Reject
1140	91	Sanford Limited	Volume 4	Overlay Maps	Landscapes 2	Reject
1140	106	Sanford Limited	Volume 4	Overlay Maps	Landscapes 2	Reject
1147	5	Shand Enterprises Limited	Volume 4	Overlay Maps	Landscapes 2	Reject
1148	5	Shand Trust Partnership	Volume 4	Overlay Maps	Landscapes 2	Reject
1156	5	Southern Crown Limited	Volume 4	Overlay Maps	Landscapes 2	Reject
1166	2	P H Redwood and Company Limited	Volume 4	Overlay Maps	Landscapes 2	Reject
1196	5	Tiracaan Limited	Volume 4	Overlay Maps	Landscapes 2	Reject
433	219	Port Marlborough New Zealand Limited	Volume 4	Overlay Maps	Landscapes 3	Accept in part
513	9	Helen Johnston	Volume 4	Overlay Maps	Landscapes 3	Reject
616	1	Clearwater Mussels Limited and Talleys Group Limited	Volume 4	Overlay Maps	Landscapes 3	Reject
617	7	Clearwater Mussels Limited	Volume 4	Overlay Maps	Landscapes 3	Reject
716	208	Friends of Nelson Haven and Tasman Bay Incorporated	Volume 4	Overlay Maps	Landscapes 3	Accept in part
839	9	John Wilson	Volume 4	Overlay Maps	Landscapes 3	Reject
903	9	Lewis Wilson	Volume 4	Overlay Maps	Landscapes 3	Reject
1140	92	Sanford Limited	Volume 4	Overlay Maps	Landscapes 3	Reject

1152	8	Slade, King and King Limited and Port Gore Marine Farm Partnership	Volume 4	Overlay Maps	Landscapes 3	Reject
18	1	Jonathan Corskie	Volume 4	Overlay Maps	Landscapes 4	Accept in part
323	1	Lyn Molly Godsiff	Volume 4	Overlay Maps	Landscapes 4	Reject
339	31	Sharon Parkes	Volume 4	Overlay Maps	Landscapes 4	Reject
401	264	Aquaculture New Zealand	Volume 4	Overlay Maps	Landscapes 4	Reject
424	191	Michael and Kristen Gerard	Volume 4	Overlay Maps	Landscapes 4	Reject
426	255	Marine Farming Association Incorporated	Volume 4	Overlay Maps	Landscapes 4	Accept in part
433	215	Port Marlborough New Zealand Limited	Volume 4	Overlay Maps	Landscapes 4	Accept
433	220	Port Marlborough New Zealand Limited	Volume 4	Overlay Maps	Landscapes 4	Accept in part
433	222	Port Marlborough New Zealand Limited	Volume 4	Overlay Maps	Landscapes 4	Accept in part
482	3	Worlds End Enterprises Limited	Volume 4	Overlay Maps	Landscapes 4	Reject
482	4	Worlds End Enterprises Limited	Volume 4	Overlay Maps	Landscapes 4	Accept
498	2	Hura Pakake Family Trust	Volume 4	Overlay Maps	Landscapes 4	Accept in part
513	10	Helen Johnston	Volume 4	Overlay Maps	Landscapes 4	Reject
514	19	A J King Family Trust and S A King Family Trust	Volume 4	Overlay Maps	Landscapes 4	Reject
515	27	Mt Zion Charitable Trust	Volume 4	Overlay Maps	Landscapes 4	Reject
534	3	Anne-Marie Prendeville	Volume 4	Overlay Maps	Landscapes 4	Reject
544	9	Apex Marine Farm Limited	Volume 4	Overlay Maps	Landscapes 4	Accept
546	14	Aroma Aquaculture Limited	Volume 4	Overlay Maps	Landscapes 4	Reject
546	15	Aroma Aquaculture Limited	Volume 4	Overlay Maps	Landscapes 4	Reject
546	16	Aroma Aquaculture Limited	Volume 4	Overlay Maps	Landscapes 4	Reject
546	17	Aroma Aquaculture Limited	Volume 4	Overlay Maps	Landscapes 4	Reject
546	19	Aroma Aquaculture Limited	Volume 4	Overlay Maps	Landscapes 4	Reject
546	24	Aroma Aquaculture Limited	Volume 4	Overlay Maps	Landscapes 4	Reject
546	25	Aroma Aquaculture Limited	Volume 4	Overlay Maps	Landscapes 4	Reject
563	6	Brent Matthew Dalley	Volume 4	Overlay Maps	Landscapes 4	Reject
563	8	Brent Matthew Dalley	Volume 4	Overlay Maps	Landscapes 4	Reject
563	10	Brent Matthew Dalley	Volume 4	Overlay Maps	Landscapes 4	Reject
563	12	Brent Matthew Dalley	Volume 4	Overlay Maps	Landscapes 4	Reject
572	1	Beleve Limited and R J Davidson Family Trust	Volume 4	Overlay Maps	Landscapes 4	Reject

574	15	Bryan Skeggs	Volume 4	Overlay Maps	Landscapes 4	Reject
587	5	Caroline Farley	Volume 4	Overlay Maps	Landscapes 4	Reject
601	9	Christopher Redwood	Volume 4	Overlay Maps	Landscapes 4	Reject
601	11	Christopher Redwood	Volume 4	Overlay Maps	Landscapes 4	Reject
615	2	Clearwater Mussels Limited and Knight-Somerville Partnership	Volume 4	Overlay Maps	Landscapes 4	Reject
616	2	Clearwater Mussels Limited and Talleys Group Limited	Volume 4	Overlay Maps	Landscapes 4	Reject
626	4	Christopher Peter Womersley	Volume 4	Overlay Maps	Landscapes 4	Reject
626	5	Christopher Peter Womersley	Volume 4	Overlay Maps	Landscapes 4	Reject
637	3	Crail Bay Trust	Volume 4	Overlay Maps	Landscapes 4	Reject
645	6	Darnyl Gordon Slade	Volume 4	Overlay Maps	Landscapes 4	Reject
689	6	Elizabeth Patricia Clarke	Volume 4	Overlay Maps	Landscapes 4	Reject
689	7	Elizabeth Patricia Clarke	Volume 4	Overlay Maps	Landscapes 4	Reject
689	8	Elizabeth Patricia Clarke	Volume 4	Overlay Maps	Landscapes 4	Reject
689	9	Elizabeth Patricia Clarke	Volume 4	Overlay Maps	Landscapes 4	Reject
707	3	Frank Prendeville	Volume 4	Overlay Maps	Landscapes 4	Reject
716	209	Friends of Nelson Haven and Tasman Bay Incorporated	Volume 4	Overlay Maps	Landscapes 4	Accept in part
719	3	Gary and Ellen Orchard	Volume 4	Overlay Maps	Landscapes 4	Reject
723	3	Graeme Henry Clarke	Volume 4	Overlay Maps	Landscapes 4	Reject
724	3	Graeme Henry Clarke	Volume 4	Overlay Maps	Landscapes 4	Reject
726	16	Canantor Mussels Limited and N. I Buchanan-Brown	Volume 4	Overlay Maps	Landscapes 4	Reject
733	6	Graeme L Beal	Volume 4	Overlay Maps	Landscapes 4	Reject
733	8	Graeme L Beal	Volume 4	Overlay Maps	Landscapes 4	Reject
733	10	Graeme L Beal	Volume 4	Overlay Maps	Landscapes 4	Reject
733	11	Graeme L Beal	Volume 4	Overlay Maps	Landscapes 4	Reject
750	8	Goulding Trustees Limited	Volume 4	Overlay Maps	Landscapes 4	Reject
764	5	HARO Partnership	Volume 4	Overlay Maps	Landscapes 4	Accept in part
788	3	Jessica Bunting	Volume 4	Overlay Maps	Landscapes 4	Reject
809	13	Jim Jessep	Volume 4	Overlay Maps	Landscapes 4	Reject

815	3	Jonathan Large	Volume 4	Overlay Maps	Landscapes 4	Reject
820	5	Jeffrey Meachen	Volume 4	Overlay Maps	Landscapes 4	Reject
839	10	John Wilson	Volume 4	Overlay Maps	Landscapes 4	Reject
842	10	Just Mussels Limited and Tawhitinui Greenshell Limited	Volume 4	Overlay Maps	Landscapes 4	Accept in part
843	3	Karen Anne Harris	Volume 4	Overlay Maps	Landscapes 4	Reject
847	3	KJB Marine Farms Limited	Volume 4	Overlay Maps	Landscapes 4	Reject
854	9	Kathleen Mary Mead	Volume 4	Overlay Maps	Landscapes 4	Reject
866	8	Karen Donaldson	Volume 4	Overlay Maps	Landscapes 4	Reject
866	9	Karen Donaldson	Volume 4	Overlay Maps	Landscapes 4	Reject
866	10	Karen Donaldson	Volume 4	Overlay Maps	Landscapes 4	Reject
866	12	Karen Donaldson	Volume 4	Overlay Maps	Landscapes 4	Reject
867	8	Karl Donaldson	Volume 4	Overlay Maps	Landscapes 4	Reject
867	9	Karl Donaldson	Volume 4	Overlay Maps	Landscapes 4	Reject
867	10	Karl Donaldson	Volume 4	Overlay Maps	Landscapes 4	Reject
867	12	Karl Donaldson	Volume 4	Overlay Maps	Landscapes 4	Reject
874	14	KPF Investments Limited and United Fisheries Limited	Volume 4	Overlay Maps	Landscapes 4	Accept in part
890	9	Lloyd Sampson David	Volume 4	Overlay Maps	Landscapes 4	Accept
903	10	Lewis Wilson	Volume 4	Overlay Maps	Landscapes 4	Reject
911	3	M and S Johns	Volume 4	Overlay Maps	Landscapes 4	Reject
916	6	Margaret Hippolite	Volume 4	Overlay Maps	Landscapes 4	Accept in part
916	7	Margaret Hippolite	Volume 4	Overlay Maps	Landscapes 4	Reject
923	6	Margaret Dalley	Volume 4	Overlay Maps	Landscapes 4	Reject
923	8	Margaret Dalley	Volume 4	Overlay Maps	Landscapes 4	Reject
923	10	Margaret Dalley	Volume 4	Overlay Maps	Landscapes 4	Reject
923	12	Margaret Dalley	Volume 4	Overlay Maps	Landscapes 4	Reject
928	3	Michael Headley Harris	Volume 4	Overlay Maps	Landscapes 4	Reject
952	3	Matthew White	Volume 4	Overlay Maps	Landscapes 4	Reject
958	29	Marine Farm Management Limited	Volume 4	Overlay Maps	Landscapes 4	Reject
958	38	Marine Farm Management Limited	Volume 4	Overlay Maps	Landscapes 4	Reject
958	41	Marine Farm Management Limited	Volume 4	Overlay Maps	Landscapes 4	Reject

958	46	Marine Farm Management Limited	Volume 4	Overlay Maps	Landscapes 4	Reject
958	47	Marine Farm Management Limited	Volume 4	Overlay Maps	Landscapes 4	Reject
958	49	Marine Farm Management Limited	Volume 4	Overlay Maps	Landscapes 4	Reject
958	51	Marine Farm Management Limited	Volume 4	Overlay Maps	Landscapes 4	Reject
958	53	Marine Farm Management Limited	Volume 4	Overlay Maps	Landscapes 4	Reject
958	55	Marine Farm Management Limited	Volume 4	Overlay Maps	Landscapes 4	Reject
958	57	Marine Farm Management Limited	Volume 4	Overlay Maps	Landscapes 4	Reject
964	15	Marlborough Oysters Limited	Volume 4	Overlay Maps	Landscapes 4	Accept
969	1	Ngai Tahu Seafood Resources Limited	Volume 4	Overlay Maps	Landscapes 4	Reject
977	3	Nanette Bunting	Volume 4	Overlay Maps	Landscapes 4	Reject
997	11	The New Zealand King Salmon Company Limited	Volume 4	Overlay Maps	Landscapes 4	Accept
1019	4	Philip Henderson	Volume 4	Overlay Maps	Landscapes 4	Reject
1022	9	Patricia Redwood	Volume 4	Overlay Maps	Landscapes 4	Reject
1022	11	Patricia Redwood	Volume 4	Overlay Maps	Landscapes 4	Reject
1034	4	P W Archer	Volume 4	Overlay Maps	Landscapes 4	Reject
1034	5	P W Archer	Volume 4	Overlay Maps	Landscapes 4	Reject
1037	3	PADD Investments Limited	Volume 4	Overlay Maps	Landscapes 4	Reject
1056	7	Rob Curtis	Volume 4	Overlay Maps	Landscapes 4	Reject
1060	12	Richard F Paine	Volume 4	Overlay Maps	Landscapes 4	Reject
1060	14	Richard F Paine	Volume 4	Overlay Maps	Landscapes 4	Reject
1068	6	Robert Hippolite	Volume 4	Overlay Maps	Landscapes 4	Accept in part
1068	7	Robert Hippolite	Volume 4	Overlay Maps	Landscapes 4	Reject
1094	5	Richards Family Trust	Volume 4	Overlay Maps	Landscapes 4	Reject
1094	7	Richards Family Trust	Volume 4	Overlay Maps	Landscapes 4	Reject
1098	7	Sandra Ann King	Volume 4	Overlay Maps	Landscapes 4	Reject
1125	5	Scott Madsen	Volume 4	Overlay Maps	Landscapes 4	Reject
1125	7	Scott Madsen	Volume 4	Overlay Maps	Landscapes 4	Reject
1140	93	Sanford Limited	Volume 4	Overlay Maps	Landscapes 4	Reject
1140	104	Sanford Limited	Volume 4	Overlay Maps	Landscapes 4	Reject
1145	3	Sea Health Foods Limited	Volume 4	Overlay Maps	Landscapes 4	Reject

1150	9	Shellfish Marine Farms Limited	Volume 4	Overlay Maps	Landscapes 4	Accept in part
1154	3	Sounds Fun Mussel Company	Volume 4	Overlay Maps	Landscapes 4	Reject
1160	9	St George Limited	Volume 4	Overlay Maps	Landscapes 4	Reject
1165	1	Ngai Tahu Seafood Resources Limited	Volume 4	Overlay Maps	Landscapes 4	Reject
1171	4	Tim Madden	Volume 4	Overlay Maps	Landscapes 4	Reject
1171	5	Tim Madden	Volume 4	Overlay Maps	Landscapes 4	Reject
1184	4	Talleys Group Limited	Volume 4	Overlay Maps	Landscapes 4	Reject
1188	11	Te Runanga o Ngati Rarua	Volume 4	Overlay Maps	Landscapes 4	Reject
1199	1	Treble Tree Holdings Limited	Volume 4	Overlay Maps	Landscapes 4	Reject
1203	4	Turner Aquaculture New Zealand Limited	Volume 4	Overlay Maps	Landscapes 4	Reject
1214	5	Vincent Rene Smith	Volume 4	Overlay Maps	Landscapes 4	Reject
1216	3	Victoria White	Volume 4	Overlay Maps	Landscapes 4	Reject
1234	4	Waimana Marine Limited	Volume 4	Overlay Maps	Landscapes 4	Reject
1234	5	Waimana Marine Limited	Volume 4	Overlay Maps	Landscapes 4	Accept in part
1240	3	Worlds End Enterprise Limited	Volume 4	Overlay Maps	Landscapes 4	Reject
100	2	East Bay Conservation Society	Volume 4	Overlay Maps	Landscapes 5	Accept in part
177	1	Kristen Gerard	Volume 4	Overlay Maps	Landscapes 5	Accept in part
218	9	Salvador Delgado Oro Laprida	Volume 4	Overlay Maps	Landscapes 5	Accept
218	10	Salvador Delgado Oro Laprida	Volume 4	Overlay Maps	Landscapes 5	Reject
261	8	Lynette and Kevin Oldham	Volume 4	Overlay Maps	Landscapes 5	Reject
388	3	Adrian Mark Henry Harvey	Volume 4	Overlay Maps	Landscapes 5	Reject
401	265	Aquaculture New Zealand	Volume 4	Overlay Maps	Landscapes 5	Accept in part
424	192	Michael and Kristen Gerard	Volume 4	Overlay Maps	Landscapes 5	Accept
426	256	Marine Farming Association Incorporated	Volume 4	Overlay Maps	Landscapes 5	Accept in part
433	216	Port Marlborough New Zealand Limited	Volume 4	Overlay Maps	Landscapes 5	Accept
433	221	Port Marlborough New Zealand Limited	Volume 4	Overlay Maps	Landscapes 5	Accept in part
468	6	Port Gore Group	Volume 4	Overlay Maps	Landscapes 5	Accept in part
486	5	Waitui Holdings Limited	Volume 4	Overlay Maps	Landscapes 5	Reject
493	6	Karen Marchant	Volume 4	Overlay Maps	Landscapes 5	Accept in part
513	11	Helen Johnston	Volume 4	Overlay Maps	Landscapes 5	Reject

514	16	A J King Family Trust and S A King Family Trust	Volume 4	Overlay Maps	Landscapes 5	Reject
518	3	Abigail Burns	Volume 4	Overlay Maps	Landscapes 5	Reject
544	10	Apex Marine Farm Limited	Volume 4	Overlay Maps	Landscapes 5	Accept in part
546	18	Aroma Aquaculture Limited	Volume 4	Overlay Maps	Landscapes 5	Reject
546	20	Aroma Aquaculture Limited	Volume 4	Overlay Maps	Landscapes 5	Reject
546	22	Aroma Aquaculture Limited	Volume 4	Overlay Maps	Landscapes 5	Reject
546	23	Aroma Aquaculture Limited	Volume 4	Overlay Maps	Landscapes 5	Reject
546	26	Aroma Aquaculture Limited	Volume 4	Overlay Maps	Landscapes 5	Reject
563	7	Brent Matthew Dalley	Volume 4	Overlay Maps	Landscapes 5	Reject
563	9	Brent Matthew Dalley	Volume 4	Overlay Maps	Landscapes 5	Reject
563	11	Brent Matthew Dalley	Volume 4	Overlay Maps	Landscapes 5	Reject
578	15	Pinder Family Trust	Volume 4	Overlay Maps	Landscapes 5	Accept in part
579	3	Craig and Sherald MacDonnell	Volume 4	Overlay Maps	Landscapes 5	Reject
601	10	Christopher Redwood	Volume 4	Overlay Maps	Landscapes 5	Reject
601	12	Christopher Redwood	Volume 4	Overlay Maps	Landscapes 5	Reject
605	3	Colin Ronald Norton	Volume 4	Overlay Maps	Landscapes 5	Reject
637	4	Crail Bay Trust	Volume 4	Overlay Maps	Landscapes 5	Reject
645	7	Darnyl Gordon Slade	Volume 4	Overlay Maps	Landscapes 5	Reject
645	8	Darnyl Gordon Slade	Volume 4	Overlay Maps	Landscapes 5	Reject
645	9	Darnyl Gordon Slade	Volume 4	Overlay Maps	Landscapes 5	Reject
645	10	Darnyl Gordon Slade	Volume 4	Overlay Maps	Landscapes 5	Reject
668	3	David Quintin Hogg	Volume 4	Overlay Maps	Landscapes 5	Reject
689	10	Elizabeth Patricia Clarke	Volume 4	Overlay Maps	Landscapes 5	/Reject
702	3	Frank Burns	Volume 4	Overlay Maps	Landscapes 5	Reject
716	210	Friends of Nelson Haven and Tasman Bay Incorporated	Volume 4	Overlay Maps	Landscapes 5	Accept in part
719	4	Gary and Ellen Orchard	Volume 4	Overlay Maps	Landscapes 5	Reject
726	14	Canantor Mussels Limited and N. I Buchanan-Brown	Volume 4	Overlay Maps	Landscapes 5	Reject
733	7	Graeme L Beal	Volume 4	Overlay Maps	Landscapes 5	Reject
733	9	Graeme L Beal	Volume 4	Overlay Maps	Landscapes 5	Reject
748	3	GAL Partnership	Volume 4	Overlay Maps	Landscapes 5	Reject

750	9	Goulding Trustees Limited	Volume 4	Overlay Maps	Landscapes 5	Accept
752	15	Guardians of the Sounds	Volume 4	Overlay Maps	Landscapes 5	Reject
824	3	Archer, Beryl Evelyn and Heberd, John Roderick	Volume 4	Overlay Maps	Landscapes 5	Reject
839	11	John Wilson	Volume 4	Overlay Maps	Landscapes 5	Reject
842	12	Just Mussels Limited and Tawhitinui Greenshell Limited	Volume 4	Overlay Maps	Landscapes 5	Accept
848	3	Kirsten Burns	Volume 4	Overlay Maps	Landscapes 5	Reject
854	6	Kathleen Mary Mead	Volume 4	Overlay Maps	Landscapes 5	Reject
854	8	Kathleen Mary Mead	Volume 4	Overlay Maps	Landscapes 5	Reject
855	3	Kyra Madsen	Volume 4	Overlay Maps	Landscapes 5	Reject
866	11	Karen Donaldson	Volume 4	Overlay Maps	Landscapes 5	Reject
866	13	Karen Donaldson	Volume 4	Overlay Maps	Landscapes 5	Reject
867	11	Karl Donaldson	Volume 4	Overlay Maps	Landscapes 5	Reject
874	16	KPF Investments Limited and United Fisheries Limited	Volume 4	Overlay Maps	Landscapes 5	Accept in part
890	10	Lloyd Sampson David	Volume 4	Overlay Maps	Landscapes 5	Accept in part
903	11	Lewis Wilson	Volume 4	Overlay Maps	Landscapes 5	Reject
916	8	Margaret Hippolite	Volume 4	Overlay Maps	Landscapes 5	Reject
923	7	Margaret Dalley	Volume 4	Overlay Maps	Landscapes 5	Reject
923	9	Margaret Dalley	Volume 4	Overlay Maps	Landscapes 5	Reject
923	11	Margaret Dalley	Volume 4	Overlay Maps	Landscapes 5	Reject
926	29	Wainui Green 2015 Limited	Volume 4	Overlay Maps	Landscapes 5	Reject
940	3	Michelle Madsen	Volume 4	Overlay Maps	Landscapes 5	Reject
958	28	Marine Farm Management Limited	Volume 4	Overlay Maps	Landscapes 5	Reject
958	30	Marine Farm Management Limited	Volume 4	Overlay Maps	Landscapes 5	Reject
958	31	Marine Farm Management Limited	Volume 4	Overlay Maps	Landscapes 5	Reject
958	32	Marine Farm Management Limited	Volume 4	Overlay Maps	Landscapes 5	Reject
958	33	Marine Farm Management Limited	Volume 4	Overlay Maps	Landscapes 5	Reject
958	34	Marine Farm Management Limited	Volume 4	Overlay Maps	Landscapes 5	Reject
958	35	Marine Farm Management Limited	Volume 4	Overlay Maps	Landscapes 5	Reject
958	36	Marine Farm Management Limited	Volume 4	Overlay Maps	Landscapes 5	Reject
958	37	Marine Farm Management Limited	Volume 4	Overlay Maps	Landscapes 5	Reject

958	42	Marine Farm Management Limited	Volume 4	Overlay Maps	Landscapes 5	Reject
958	43	Marine Farm Management Limited	Volume 4	Overlay Maps	Landscapes 5	Reject
958	44	Marine Farm Management Limited	Volume 4	Overlay Maps	Landscapes 5	Reject
958	45	Marine Farm Management Limited	Volume 4	Overlay Maps	Landscapes 5	Reject
958	48	Marine Farm Management Limited	Volume 4	Overlay Maps	Landscapes 5	Reject
958	50	Marine Farm Management Limited	Volume 4	Overlay Maps	Landscapes 5	Reject
958	52	Marine Farm Management Limited	Volume 4	Overlay Maps	Landscapes 5	Reject
958	54	Marine Farm Management Limited	Volume 4	Overlay Maps	Landscapes 5	Reject
958	56	Marine Farm Management Limited	Volume 4	Overlay Maps	Landscapes 5	Reject
997	12	The New Zealand King Salmon Company Limited	Volume 4	Overlay Maps	Landscapes 5	Accept in part
1003	3	Olivia Burns	Volume 4	Overlay Maps	Landscapes 5	Reject
1010	3	PB Partnership	Volume 4	Overlay Maps	Landscapes 5	Reject
1019	5	Philip Henderson	Volume 4	Overlay Maps	Landscapes 5	Reject
1022	10	Patricia Redwood	Volume 4	Overlay Maps	Landscapes 5	Reject
1022	12	Patricia Redwood	Volume 4	Overlay Maps	Landscapes 5	Reject
1056	8	Rob Curtis	Volume 4	Overlay Maps	Landscapes 5	Reject
1060	13	Richard F Paine	Volume 4	Overlay Maps	Landscapes 5	Reject
1060	15	Richard F Paine	Volume 4	Overlay Maps	Landscapes 5	Reject
1060	16	Richard F Paine	Volume 4	Overlay Maps	Landscapes 5	Reject
1060	17	Richard F Paine	Volume 4	Overlay Maps	Landscapes 5	Reject
1068	8	Robert Hippolite	Volume 4	Overlay Maps	Landscapes 5	Reject
1094	6	Richards Family Trust	Volume 4	Overlay Maps	Landscapes 5	Reject
1094	8	Richards Family Trust	Volume 4	Overlay Maps	Landscapes 5	Reject
1098	9	Sandra Ann King	Volume 4	Overlay Maps	Landscapes 5	Reject
1111	4	Stephen Cross	Volume 4	Overlay Maps	Landscapes 5	Reject
1111	5	Stephen Cross	Volume 4	Overlay Maps	Landscapes 5	Reject
1125	6	Scott Madsen	Volume 4	Overlay Maps	Landscapes 5	Reject
1140	94	Sanford Limited	Volume 4	Overlay Maps	Landscapes 5	Reject
1140	107	Sanford Limited	Volume 4	Overlay Maps	Landscapes 5	Reject
1143	10	Schwass Family Trusts Partnership	Volume 4	Overlay Maps	Landscapes 5	Reject

1143	11	Schwass Family Trusts Partnership	Volume 4	Overlay Maps	Landscapes 5	Reject
1143	12	Schwass Family Trusts Partnership	Volume 4	Overlay Maps	Landscapes 5	Reject
1143	13	Schwass Family Trusts Partnership	Volume 4	Overlay Maps	Landscapes 5	Reject
1143	14	Schwass Family Trusts Partnership	Volume 4	Overlay Maps	Landscapes 5	Reject
1143	15	Schwass Family Trusts Partnership	Volume 4	Overlay Maps	Landscapes 5	Reject
1143	16	Schwass Family Trusts Partnership	Volume 4	Overlay Maps	Landscapes 5	Reject
1143	17	Schwass Family Trusts Partnership	Volume 4	Overlay Maps	Landscapes 5	Reject
1145	4	Sea Health Foods Limited	Volume 4	Overlay Maps	Landscapes 5	Reject
1146	15	Sea Shepherd New Zealand	Volume 4	Overlay Maps	Landscapes 5	Reject
1157	13	Southern Crown Limited	Volume 4	Overlay Maps	Landscapes 5	Reject
1197	3	Tory Channel Aquaculture Limited	Volume 4	Overlay Maps	Landscapes 5	Reject
1200	3	Triple LG Limited	Volume 4	Overlay Maps	Landscapes 5	Reject
1202	4	Tu Jaes Trust	Volume 4	Overlay Maps	Landscapes 5	Accept in part
1219	3	William Albert Trevor and Kathleen Mary Rainbow	Volume 4	Overlay Maps	Landscapes 5	Reject
1257	3	Allan Tester	Volume 4	Overlay Maps	Landscapes 5	Reject
1264	3	Ron Bothwell	Volume 4	Overlay Maps	Landscapes 5	Reject
513	12	Helen Johnston	Volume 4	Overlay Maps	Landscapes 6	Reject
839	12	John Wilson	Volume 4	Overlay Maps	Landscapes 6	Reject
903	12	Lewis Wilson	Volume 4	Overlay Maps	Landscapes 6	Reject
1140	95	Sanford Limited	Volume 4	Overlay Maps	Landscapes 6	Reject
513	13	Helen Johnston	Volume 4	Overlay Maps	Landscapes 7	Reject
839	13	John Wilson	Volume 4	Overlay Maps	Landscapes 7	Reject
903	13	Lewis Wilson	Volume 4	Overlay Maps	Landscapes 7	Reject
1140	96	Sanford Limited	Volume 4	Overlay Maps	Landscapes 7	Reject
201	2	Vallyn & Diana Wadsworth	Volume 4	Overlay Maps	Landscapes 8	Reject
425	106	Federated Farmers of New Zealand	Volume 4	Overlay Maps	Landscapes 8	Reject
513	14	Helen Johnston	Volume 4	Overlay Maps	Landscapes 8	Reject
839	14	John Wilson	Volume 4	Overlay Maps	Landscapes 8	Reject
903	14	Lewis Wilson	Volume 4	Overlay Maps	Landscapes 8	Reject
1140	97	Sanford Limited	Volume 4	Overlay Maps	Landscapes 8	Reject

355	19	Dominion Salt Limited	Volume 4	Overlay Maps	Landscapes 9	Reject
425	107	Federated Farmers of New Zealand	Volume 4	Overlay Maps	Landscapes 9	Reject
513	15	Helen Johnston	Volume 4	Overlay Maps	Landscapes 9	Reject
544	12	Apex Marine Farm Limited	Volume 4	Overlay Maps	Landscapes 9	Reject
839	15	John Wilson	Volume 4	Overlay Maps	Landscapes 9	Reject
890	12	Lloyd Sampson David	Volume 4	Overlay Maps	Landscapes 9	Reject
903	15	Lewis Wilson	Volume 4	Overlay Maps	Landscapes 9	Reject
907	32	Levide Capital Limited	Volume 4	Overlay Maps	Landscapes 9	Accept in part
1140	98	Sanford Limited	Volume 4	Overlay Maps	Landscapes 9	Reject
513	16	Helen Johnston	Volume 4	Overlay Maps	Landscapes 10	Reject
839	16	John Wilson	Volume 4	Overlay Maps	Landscapes 10	Reject
903	16	Lewis Wilson	Volume 4	Overlay Maps	Landscapes 10	Reject
1140	99	Sanford Limited	Volume 4	Overlay Maps	Landscapes 10	Reject
513	17	Helen Johnston	Volume 4	Overlay Maps	Landscapes 11	Reject
839	17	John Wilson	Volume 4	Overlay Maps	Landscapes 11	Reject
903	17	Lewis Wilson	Volume 4	Overlay Maps	Landscapes 11	Reject
1140	100	Sanford Limited	Volume 4	Overlay Maps	Landscapes 11	Reject
369	14	Tony Hawke	Volume 4	Overlay Maps		Reject
425	784	Federated Farmers of New Zealand	Volume 4	Overlay Maps		Reject
425	785	Federated Farmers of New Zealand	Volume 4	Overlay Maps		Reject
425	788	Federated Farmers of New Zealand	Volume 4	Overlay Maps		Reject
490	3	Murray Lewis Waghorn	Volume 4	Overlay Maps		Reject
716	205	Friends of Nelson Haven and Tasman Bay Incorporated	Volume 4	Overlay Maps		Accept in part
808	5	Kroon, Hanneke and Jansen, Joop	Volume 4	Overlay Maps		Accept in part
1193	59	The Marlborough Environment Centre Incorporated	Volume 4	Overlay Maps		Reject
995	49	New Zealand Forest Products Holdings Limited	Volume 4	Overlay Maps		Reject

Appendix 2: How natural does a landscape/feature have to be in order to be considered for ONL status?

A natural landscape is one possessing a dominance of natural elements, patterns and processes (for instance soil, hydrology, topography and vegetation), over those created by humans. A natural landscape has a predominance of unchanged landforms, functioning water, drainage and soil processes and tree, plant and animal patterns, compared to human developments such as buildings, earthworks, vegetation modification, fencing, roads, quarries, reclamations or subdivision. Under the RMA a landscape does not have to be unmodified to be natural, just relatively unmodified. At issue is the degree of the natural component compared to the degree of human modification, and the balance of dominance of one over the other. This has to be assessed in the context of the Marlborough Region.

Court decisions make it clear a landscape need not have indigenous or native vegetation to be considered natural, even though landscapes with a significant component of unmodified native vegetation would be considered more natural and closer to a pristine state. Landscape assessments in New Zealand generally ascribe higher landscape values to unmodified areas, but this does not imply that anything less than pristine is devoid of natural values, just that they are of lesser value²⁹. Most of the above issues arose in the 'Plan Change 13 Interim Decision' concerning the Mackenzie Basin. In this Decision the Court determined that landscapes with a wide range of 'High' landscape values can qualify as an ONF/Ls despite significant modifications.³⁰ In the Interim Decision, the Court 'provisionally approved' a seven-point scale of naturalness that might be useful in landscape proceedings (but subject to a caveat about naturalness being a cultural construct).³¹ ONLs can, therefore, be identified in the moderate to high, high or very high range of naturalness, while they would not qualify if they are moderate or below in naturalness. The Court viewed this scale as having potential to standardise references to degree of naturalness in landscape proceedings, and it is therefore adopted in this study. The same paragraphs of the Mackenzie Basin Interim Decision also discuss the degree of naturalness necessary for a landscape to be an outstanding natural landscape. It states that the criteria of 'naturalness' usually include:

- relatively unmodified and legible physical landform and relief;
- the landscape being uncluttered by structures and/or obvious human influence;
- the presence of water (lake, river, sea);
- the presence of vegetation (especially native vegetation) and other ecological patterns.

The subsequent discussion makes it clear the Court regards naturalness as comprising a balance between the natural and cultural components of a landscape³². It concludes that modified landscapes, and not just pristine ones, can qualify as ONF/L.

²⁹ Wakatipu Environmental Society Inc. v Queenstown Lakes District Council [2000] NZRMA 209 at paragraphs 88 and 89.

³⁰ High Country Rosehip Orchards Ltd v Mackenzie District Council [2011] NZEnvC 387, paragraphs 105 - 106, but also the general discussions in 76 – 105.

³¹ High Country Rosehip Orchards Ltd v Mackenzie District Council [2011] NZEnvC 387, paragraphs, paragraphs 93 - 95

³² Long Bay-Okura Great Park Society Inc. v North Shore City Council, EnvC Auckland A078/08 16 July 2008. The issue is considered also in Long Bay-Okura Great Park Society Inc. v North Shore City Council, EnvC Auckland A078/08 16 July 2008 at paragraphs 133 – 135.