

# **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: Natural Character – Technical Mapping,  
Values and Overlays**

**Report prepared by**

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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
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 Feature & 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 natural character studies for the Nelson, Canterbury 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 closely involved 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 2015<sup>1</sup>. As a result of this work and my involvement with the above, I am very familiar with current thinking and best practice methods of natural character and landscape, as well as being very 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).

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<sup>1</sup> 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 2: Values contributing to high, very high and outstanding natural character
- Volume 4, Overlays regarding natural character

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 – Natural Character. Mr Dale's report specifically responds to submitters requests concerning Objectives, Policies and Rules concerning natural character, both in the coastal environment as well as within riparian margins.

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

# 3. Background to Natural Character Studies

## 3.1 Coastal Natural Character Study

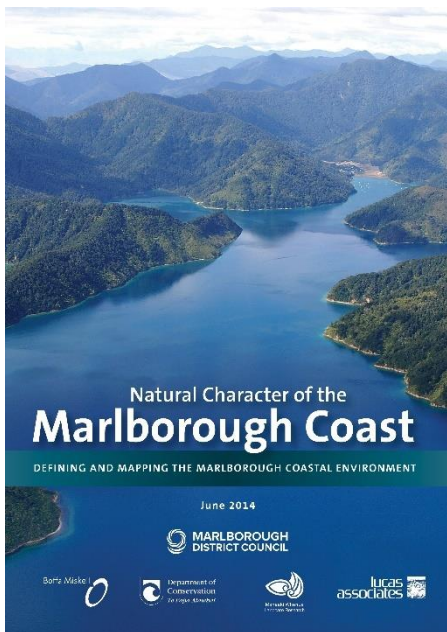


Image 1 Natural Character of the Marlborough Coast, BML et al, 2014

MDC commissioned Boffa Miskell Limited (BML) to undertake a Coastal Natural Character Study in light of the release of the NZCPS 2010. BML were tasked to fully update the material that was contained within Volume 1, Appendix 2 of the MSRMP and to apply areas of high, very high and outstanding levels of natural character to the Marlborough coastal environment.

The Coastal Study was undertaken as an independent technical assessment by BML, with input provided from Lucas Associates, DOC, Landcare Research and MDC. The initial methodology was developed and applied in the *Draft Coastal Natural Character Report*, dated September 2011, by BML.

A workshop, organised by DOC, was held soon after, in late September 2011, to 'test' the methodology via peer-reviewing and to assist DOC in producing guidance notes on policies 1, 13 and 14 of the NZCPS 2010. (This was the second of two DOC-run workshops held in 2011 to look at providing greater guidance over these three

NZCPS policies.)

The September 2011 workshop, hosted at MDC by Pere Hawes, was attended by DOC personnel, including planner Sarah McRae, marine ecologist Andrew Baxter; by landscape practitioners including Di Lucas (Lucas Associates), James Bentley and Boyden Evans (Boffa Miskell); and, Victoria Froude (Pacific Eco-Logic). Participants discussed the methodology, including terminology, natural character attributes and alternative methodologies to implement NZCPS Policy 13. Natural character provisions and associated descriptive material already in the MSRMP and WARMP were also examined, including the 'systems framework' set out in Chapter 2 of the MSRMP, where the natural character of the whole (i.e. the Marlborough Sounds) is preserved by caring for the individual parts that comprise it.

It was agreed that a combination of the existing 'systems framework' and the evaluation methodology developed by BML would be an effective way to implement NZCPS Policy 13. In combination, these approaches would enable the component parts that make up Marlborough's coasts 'whole' to be described, and those areas considered to be 'outstanding natural character' identified<sup>2</sup>.

The study team has subsequently held numerous meetings and discussions to further develop the methodology and discussed the direction contained in Policy 1 (Coastal Environment) and Policy 13 (Natural Character) of the NZCPS.

The methodology outlined in the Coastal Study has been developed through an iterative process involving a range of professional environmental and planning practitioners.

It has also been developed and applied in tandem with other regional and district coastal environment studies, which have been peer reviewed by other landscape architects, resulting in further amendments to the methodology to reflect agreed outcomes.

Integral to this study was to update, complete and interpret, in relation to Policy 13 the biophysical data describing the individual land and marine natural character management areas already in the MSRMP and equivalent information about the South Marlborough coast. This work was carried out by DOC, Landcare

<sup>2</sup> DOC, 2012: Natural Character and the NZCPS 2010: Marlborough Workshop – Summary of discussion and outcomes



Research and Lucas Associates – substantially the same team that originally produced this systems framework in 1997 in relation to the Marlborough Sounds. Here terrestrial and marine areas were based on broad geo-biographic regions and thoroughly updated. Additional work was required to ensure that all aspects of Policy 13 are covered, including experiential attributes, which was added by BML and Lucas Associates.

The study team that undertook this work retains a high level of familiarity with the Marlborough coastal environment. While no specific or new sites visits were undertaken as part of this present study, recent other work including the Ecologically Significant Marine Sites in Marlborough study (2011) and the Marlborough Landscape Study (2009) greatly informed the process.

The mapping of the coastal environment was predominantly undertaken at a local scale of 1:50,000. The mapping was assisted through the Land System (or land typing) exercise provided by Landcare Research as well as the terrestrial, freshwater and marine biotic data from DOC. This is a nested hierarchy approach, which can be applied from broad to detailed scales. It is acknowledged that information contained within this study ranges in detail and mapping scale.

The methodology for this is explicitly detailed in Section B of the Coastal Study. Further queries relating to the method applied are contained in the following section of this report.

## 3.2 Selected Rivers and their Margins

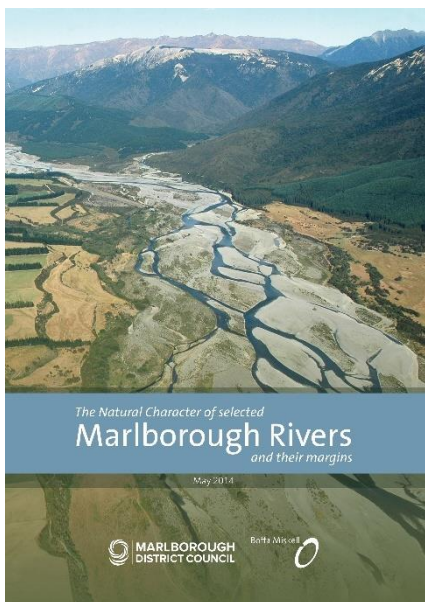


Image 2: *The Natural Character of selected Marlborough Rivers and their margins*; BML, 2014

MDC engaged BML to assess selected rivers and their margins in the Marlborough Region under Section 6(a) of the RMA 1991 as part of their review of the natural character aspects of the RPS, the MSRMP and the WARMP. Section 6 under the RMA concerns 'Matters of National Importance' and Section 6(a) states: *'the preservation of the natural character of the coastal environment (including the coastal marine area), wetlands, and lakes and rivers and their margins, and the protection of them from inappropriate subdivision, use, and development'*.

Separate to this study, BML led a team of experts from the DOC, Landcare Research and Lucas Associates to define and map the Coastal Environment and to undertake a natural character study of that coastal environment. This separate, yet complementary report is entitled *'Natural Character of the Marlborough Coast: Defining and Mapping the Marlborough Coastal Environment, (2014), Boffa Miskell et al'*. Furthermore, MDC have undertaken a further study in relation to wetlands and lakes within the region. Therefore, the natural character relating to the coastal environment, wetlands and lakes within the Marlborough Region do not form part of this study.

There is no statutory requirement for territorial authorities to determine the natural character of a region's or district's rivers (such as the 2010 New Zealand Coastal Policy Statement for the coastal environment). However, MDC was involved in a study in 2009 co-funded by the Foundation for Research Science and Technology (FRST), headed by Ken Hughey of Lincoln University. The FRST study is a nationwide research programme analysing different aspects of river values. The river assessment and FRST study were integrated into the Marlborough Landscape Study 2009, prepared by BML. As part of this review process the rivers study is now a stand-alone document. The results of this study have not been updated since 2009.

This study was undertaken by an expert panel of people familiar with Marlborough's Rivers. They comprised Neil Deans (Fish and Game Nelson Marlborough Region), Val Wadsworth (MDC's Surface Water Hydrologist), Brin Williman (MDC's Engineer Hydrologist), Pere Hawes (Environmental Policy Team Leader at MDC) and Allan Rackham and James Bentley (Landscape Architects from BML). This study was peer reviewed by Peter Hamill (MDC Freshwater Ecologist) and Dr Michael Stevens (Landscape Architect).

The purpose of the study was to provide a case study of how to apply the method for significance assessment of rivers using natural character values particularly in the Marlborough District.

## 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 appears 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,<sup>3</sup> the findings of which have been set out in separate reports.

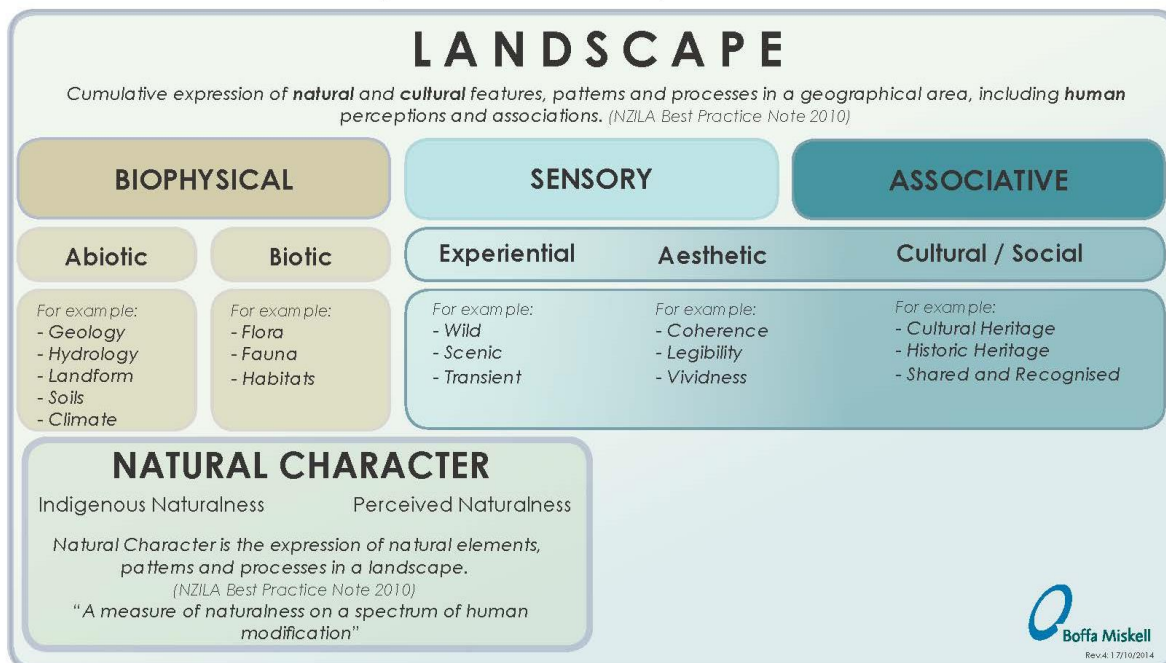
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<sup>3</sup> They are distinct topics, each with their own attributes and considerations – something which is reflected in the New Zealand Coastal Policy Statement 2010 ('NZCPS') which states that natural character is not the same as natural features and landscape, or amenity values.

Essentially Natural Character is a sub-set or component of landscape. Landscape can be understood as encompassing three broad attributes, namely biophysical, sensory and associative<sup>4</sup>. 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 assessments<sup>5</sup>.

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

<sup>4</sup> 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].

<sup>5</sup> 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 MHWM.

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 processes<sup>6</sup> 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".<sup>7</sup>*

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 bodies<sup>8</sup>. 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 definition<sup>9</sup>. I therefore do not understand or agree with Dr Steven's statement that '*no clear, unambiguous operational definition is offered*<sup>10</sup>'.

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

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<sup>6</sup> 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.

<sup>7</sup> NZCPS 2010 Guidance Note Policy 13: Preservation of natural character, Department of Conservation, page 11

<sup>8</sup> Department of Conservation (October 2012) Natural Character and the NZCPS 2010 National Workshop – Summary of Discussion and Outcomes, page 19.

<sup>9</sup> Boffa Miskell et al (June 2014) Natural Character of the Marlborough Coast, page 13.

<sup>10</sup> 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 evident<sup>11</sup>.

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)<sup>12</sup>.

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:

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<sup>11</sup> Steven (20 August 2016) Review of Landscape & Natural Character Chapters etc; paragraph 28

<sup>12</sup> 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'<sup>13</sup>.*

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."<sup>14</sup>*

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

<sup>13</sup> Natural Character of the Marlborough Coast, 2014, page 262

<sup>14</sup> 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.

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 Landscapes<sup>15</sup>.

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'*<sup>16</sup>.

The Friends submission<sup>17</sup> 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 seascapes<sup>18</sup>. 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.

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<sup>15</sup> Marlborough Landscape Study, page 21.

<sup>16</sup> 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 landscape 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.

<sup>17</sup> Friends Submission page 45.

<sup>18</sup> 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 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*"<sup>19</sup> 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 a part 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:

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<sup>19</sup> 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 Crail 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 mapping<sup>20</sup>. It is

<sup>20</sup> 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 decision<sup>21</sup> (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)*

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*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.*

<sup>21</sup> Decision [2015] NZHC 767 Man o'War Station Ltd v Auckland Council

- *Assess whether any landscape, as a natural landscape, is also outstanding*

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*<sup>22</sup>'.

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 evaluated<sup>23</sup>.

Dr Steven considers that as aesthetic values have not been mapped, 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 (refer to Policy 7.1.5 where it is expected that the document will change over time as the landscape does) 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.

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<sup>22</sup> Steven (20 August 2016) Review of Landscape & Natural Character Chapters etc; paragraph 97

<sup>23</sup> Including Decision C180/99 Wakatipu Environment Society v Queenstown Lakes District Council

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

### **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 environment<sup>24</sup>. 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 importance<sup>25</sup>.

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 within Section 5 of this report.

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<sup>24</sup> Decision [2015] NZHC 767 Man o'War Station Ltd v Auckland Council, paragraph 93

<sup>25</sup> 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 natural character 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.

A number of Individual submitters who used a common format, requesting the same relief, have been grouped as a single entry per relevant point in this report 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.

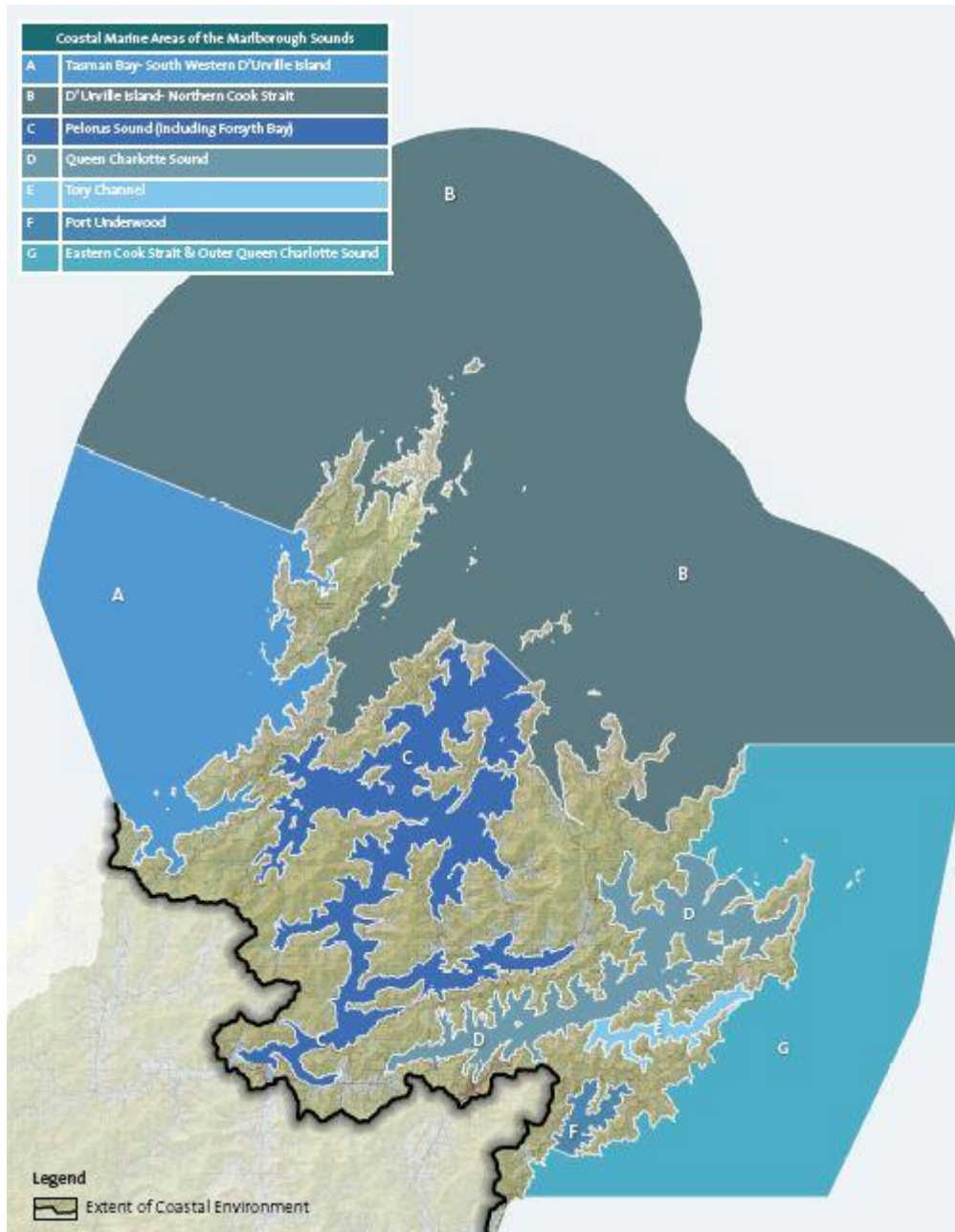
### 5.2 Structure and organisation of this report

Due to the amount of submissions received concerning natural character matters, specifically Volume 3 Appendix 2: Values contributing to high, very high and outstanding natural character', and Volume 4 maps (or overlays concerning both coastal natural character and riparian natural character management areas), it was decided to organise this report into broad geographic areas. Whilst there were a few submissions that focussed on broad aspects, the clear majority of submissions concerned specific parts of the coastal environment of the Marlborough Region. Based on this, this report is organised by Coastal Marine Areas A-H, as referenced and delineated within the Coastal Study (*and within Images 1 and 2 below*). Within each Coastal Marine Area, 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. This is most noticeable in Coastal Marine Area C: Pelorus Sound, where 16 sub-areas have been identified. Submissions have therefore been 'grouped' as much as possible both geographically and where possible, by matter raised. Refer to Images 3 and 4 below.

Whilst the majority of submissions concern individual aquaculture areas in the marine environment, many submissions also refer to the adjacent terrestrial environment. Where possible, those submissions have been grouped within the relevant Coastal Marine Area (especially when the matter raised is similar to other matters in this area), however occasionally, it was necessary to place the submission within its' own Coastal Terrestrial Area, due to the nature of the matters raised.

For reference purposes, the '*Natural Character of the Marlborough Coast: Defining and Mapping the Marlborough Coastal Environment*', Boffa Miskell et al June 2014, will be termed the 'Coastal Study' within this report. Furthermore, for the few submissions regarding '*The Natural Character of selected Marlborough Rivers and their margins*' Boffa Miskell et al May 2014, this will be referenced within this report as the 'Rivers Study'.

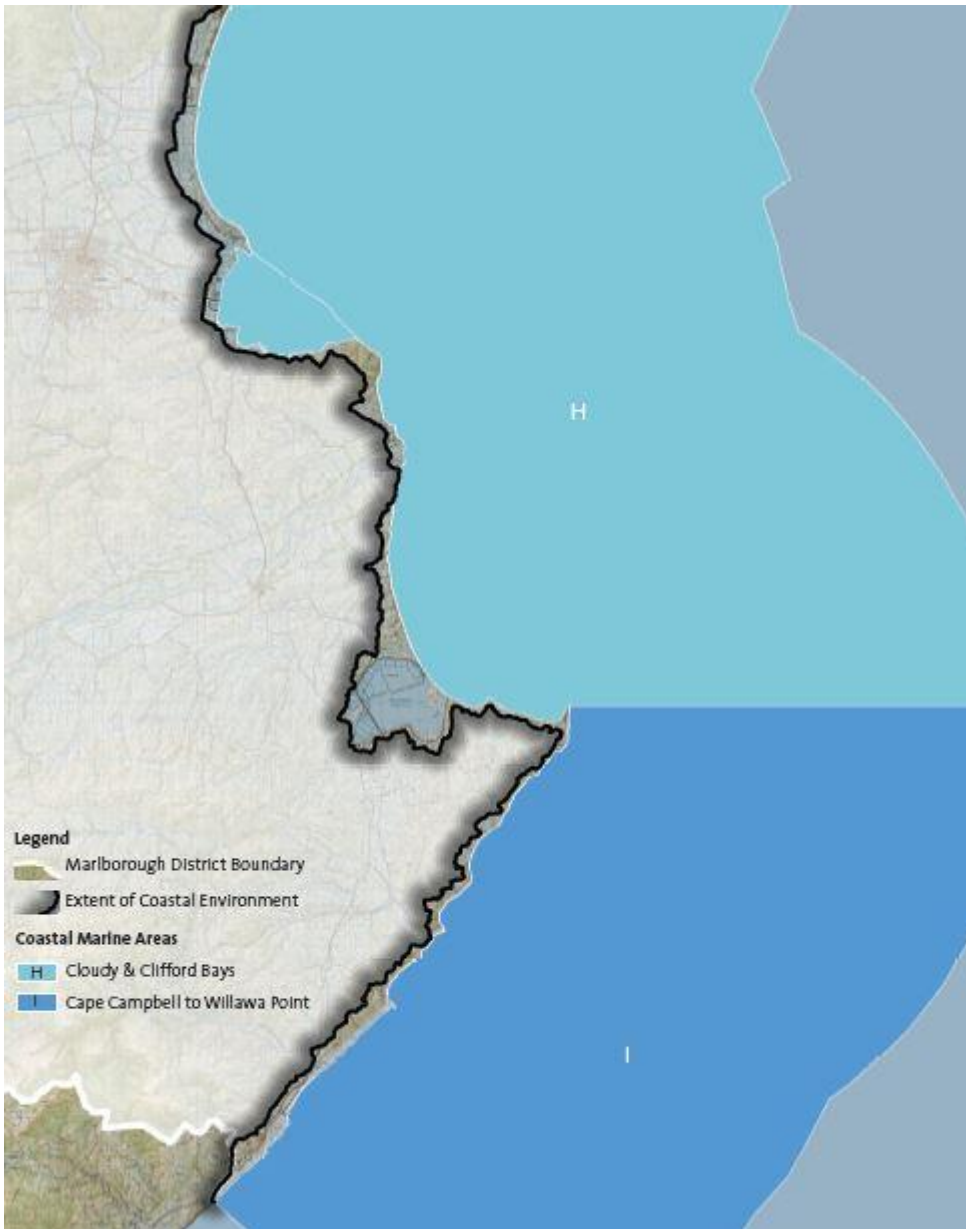
**Image 3: Coastal Marine Areas in the Marlborough Sounds (A-G)**



### 5.3 Key matters raised by submitters

Of those matters raised by submitters concerning natural character, the majority relate to individual or groups of mussel farms (or other forms of aquaculture), relevant to a particular 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 paragraph 5.5. Very few submitters comment on natural character on a terrestrial basis, and where these are the case, a review has been undertaken.

**Image 4: Coastal Marine Areas in South Marlborough (H-I)**



## 5.4 New information

Since the completion of the Natural Character report in 2014, 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 information came to light during a meeting that I had with Andrew Baxter at DOC when reviewing the CMAs.

This new data has been included in this report as **Figures 1, 2 and 3**. Ideally, because of this new and updated data, a review of the extent of the original natural character mapping (notably within the marine environment) would be made. However, as part of this process, no changes have been recommended to any areas of mapped natural character where there is no supporting submission that underpins the reasons for remapping purposes as that would be out of scope at this point in time. 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.



## 5.5 Submissions: General Matters

*Submitter 218/4 Salvador Delgado Oro Laprida, Submitter 401/48, 401/245, 401/251, 401/252, 401/253, 401/254, 401/255 and 401/256 Aquaculture New Zealand, Submitter 424/193 Michael and Kristen Gerard, Submitter 425/768 and 425/782 Federated Farmers of New Zealand, Submitter 426/47, 426/241, 426/246, 426/247, 426/289, 426/290, 426/291 and 426/292 Marine Farming Association Incorporated, Submitter 490/1 and 490/2 Murray Lewis Waghorn, Submitter 513/1, 513/2, 513/3, 513/4, 513/5 and 513/6 Helen Johnson, Submitter 544/2 Apex Marine Farm Limited, Submitter 648/23, 648/25 DC Hemphill, Submitter 716/202 and 716/211 Friends of Nelson Haven and Tasman Bay Incorporated, Submitter 750/2 Goulding Trustees Limited, Submitter 764/2 HARO Partnership, Submitter 839/1, 839/2, 839/3, 839/4, 839/5 and 839/6 John Wilson, Submitter 842/2 Just Mussels Limited and Tawhitinui Greenshell Limited, Submitter 868/3, 868/6 Kenepuru and Central Sounds Residents Association Incorporated, Submitter 874/3 KPF Investments Limited and United Fisheries Limited, Submitter 890/2 Lloyd Sampson David, Submitter 903/1, 903/2, 903/3, 903/4, 903/5 and 903/6 Lewis Wilson, Submitter 962/41 Marlborough Forest Industry Association Incorporated, Submitter 990/176, 990/177 Nelson Forests Limited, Submitter 997/2, 997/5 The New Zealand King Salmon Company Limited, Submitter 1002/266 New Zealand Transport Agency, Submitter 1140/74, 1140/75, 1140/76, 1140/77, 1140/78, 1140/79, 1140/80, 1140/81, 1140/82 and 1140/83 Sanford Limited, Submitter 1150/2 Shellfish Marine Farms Limited, Submitter 1160/2 St George Limited, Submitter 1186/220 Te Atiawa o Te Waka-a-Maui, Submitter 1152/1, 1152/2, 1152/3, 1152/4, 1152/5, 1152/6 and 1152/7 Slade, King and King and Port Gore Marine Farm Partnership*

### **General: Appendix 2 of the MEP and lists of values**

**Submitters 218, 401, 426, 764, 842, 874, 890, 997, 1150, 1160** query the approach used in Appendix 2, where the descriptions are focussed on 'values'. Clear wording in the MEP should state that where aquaculture is present, those farms do not affect natural character values. **Submitters 401 and 426** request that the 2014 Natural Character Study and wording within the MEP (i.e. at Policy 6.1.1) be consistent.

**Submitter 401** requests that natural character should only be assessed at the detailed level (level 5). The commentary should be amended to reflect this. The submitter also states that no cultural assessment has been undertaken (pp 24 – 25, 2014 Study), and that mapped areas illustrate abiotic and biotic values only, not experiential values (pp 63, 69, 75, 81, 85, 95, and Appendix 6, 2014 Study). The Submitter mentions that many of the "marine values" identified are, in fact, terrestrial values (e.g. pp 73 – 74, 2014 Study) and that there is an undue focus on the effects of aquaculture on natural character. (Aquaculture is mapped on pp 63, 75, 81, 85 and 95 of the 2014 Study). The Submitter mentions that other anthropological effects, such as sedimentation, dredging, fishing (recreational and commercial), vessel wake, and exotic species are not mapped and that the definition of "outstanding" in the 2014 Study is incorrect. The submitter also mentions that the frequent use of the terms "unmodified" or "largely unmodified" is unwarranted. It shows that the assessment was made based on an incorrect factual premise. Therefore, the output is also incorrect. All parts of the Marlborough Sounds are modified; it is simply a question of degree. Modification does not necessarily adversely affect natural character, based on the definition of natural character. Not all modification will interfere with abiotic and biotic processes.

**Submitter 990** requests that existing commercial forests from the coastal terrestrial zones accurately reflect the detail of the rankings in Appendix 2.

**Submitter 1002** fully supports the values contributing to natural character as contained in Appendix 2.

**Submitter 424** fully supports the mapping on Natural Character Overlay Map 4 of the MEP.

**Submitter 425** seeks that further emphasis in Appendix 2 should be made where existing structures are in the coastal marine area. Further, that the maps contained within Appendix 1 are clarified to show each sub area and provide the same level of detail as in the BML report. Further, that all land is ground-truthed and landowners with Coastal Natural Character mapped over private land consulted with. That landowners with Coastal Natural Character identified on their property are provided with copies of the Natural Character of the Marlborough Coast – June 2014 report. 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 value.

**Submitters 716, 868** request that Appendix 2, Values contributing to high very high and outstanding coastal natural character must be re-written to clearly identify the specific natural elements, patterns and processes that must be preserved and protected within each coastal marine and coastal terrestrial area of the coastal environment. Only relevant and assessable indicators for natural character ratings should be referred to. **Submitter 868** also requests that all of the coastal environment be mapped (i.e., not just high and very high), and that areas not mapped as high, are given an inference of less than high.

**Submitter 648** states that in relation to Policy 6.2.5 of the MEP, areas that have been modified should be correctly mapped according to the criteria in the MEP. This Submitter considers that there are errors in this identification and that the natural character assessment has not been accurately assessed.

**Submitter 1140** does not support that naturalness equates to the absence of modification.

**Submitters 490, 513, 903** seek that the level of natural character values (i.e. high, very high and outstanding ratings) in the vicinity of mussel farms be removed or request a relief the same as **Submitters 401, 426**, while **Submitters 544, 750, 839, 997** simply request the statement that mussel farms do not compromise the overall naturalness of the coastal environment or do not adversely impact the values that lead to that classification.

**Submitter 962** specifically requests that the extent of the coastal environment in the MEP truly respects the natural character of the identified area, as some areas were established as permitted activities (in previous plans) and now this has been redrawn to include forests. **Submitter 990** requests that the extent of the coastal environment be reconsidered round Havelock, due to existing land use activities in the area.

## Discussion

These submissions focus on the list of values within Appendix 2 and the relationship of these values with existing aquaculture. These submissions also mention that specific values need to be considered, ideally through ground-truthing. Finally, one submitter does not accept that naturalness equates to the absence of modifications.

As outlined within the methodology section of this report, natural character and landscape are different, require different assessments and consider different attributes. Cultural matters are not considered under natural character, only as they pertain to experiential aspects.

The assessment of natural character reflects an understanding of how natural an area is in a given time period. Where possible, indicators of the past are referenced which have informed how natural a specific area is. The Coastal Study reflects the state of the Marlborough Coastal Environment as it was during its assessment of between 2012 and 2014. It acknowledges that natural character can change with time. This study is therefore a first step in identifying the natural character of Marlborough's coastal environment and that values, characteristics and ratings identified can be added to and be changed according to time.

Natural character is essentially a task of identifying and mapping levels of naturalness along a continuum from very low levels of naturalness (i.e. great levels of modification) to very high levels of naturalness, (i.e. very low levels of modification). Natural Character is therefore directly correlated to the level of human-based modification; therefore, I maintain that the degree of naturalness of an area is directly related to how much that area has been modified. This includes all types of direct and indirect human based modification, from sedimentation from areas of commercial forestry, vessel wakes, aquaculture and structures to name a few. Although all of the Marlborough Sounds coastal environment is modified to some degree by humans (taking an extreme look and including matters such as climate change, species diversity etc.), this Study attempts to recognise those areas are that hold the least amount of modifications.

As outlined within Section B of the Coastal Study, natural character has been analysed at a series of different scales, ranging from broad regional elements, patterns and processes (levels 1 to 3), through to more detailed referencing (levels 4 and 5). The values and characteristics captured reflect the scale at which the study was undertaken. Whilst only abiotic and biotic aspects have been mapped for the marine component, experientially, these have been picked up within the text (such as diving areas, fish sightings etc) and referenced more comprehensively within the terrestrial descriptions.

The values and characteristics listed within Appendix 2 of the MEP are direct copies from the Coastal Study at the Level 4 and 5 scale. They reflect the values and characteristics that are pertinent to that identified mapped area. In some areas, the data recorded is broader than in other areas. For example, marine data recorded is at the broader level (more Level 4) and the terrestrial more at the Level 5 scale. The word 'values' have been discussed earlier in this report under 'Methodology'.

The capturing of data for the Coastal Marine Area is outlined within Appendix 6 of the Coastal Study and sets out the limitations behind such a method. Based on the data required to support mapped areas, it is impossible to map areas solely at the Level 5 scale.

Where required, an additional commentary box is included which provides notes applicable to each mapped area. Much of this additional commentary focusses on modifications, such as jetties, houses and aquaculture explaining why certain areas are excluded or included within the overlay. Due to the higher level (level 4) consideration for the marine environment, in some areas, isolated and small groups of modification within a broader area containing high or very high natural character have been included in the overlay, as these small modifications do not ultimately detract from the broader mapping. Where more consistent modification is present, such as numerous areas of aquaculture, or large areas of commercial forestry, the overlay stops short of these. Therefore, modifications within the Marlborough Coastal Environment have been taken account of, especially aquaculture and forestry, and their associated effects have dictated whether an area is contained within an overlay or not. As with any form of modification, if areas of modification were not present then the overlay would likely extend further, however the mapping is the result of the modifications present at the time the Coastal Study was undertaken. In some areas, terrestrial based modifications can affect marine based ratings and vice-versa. Some refinement of the values may need to be determined through this hearings process due to updated information that has come to light, including more recent information on dredging and trawling.

Only high, very high and outstanding natural character has been mapped. This is not to say that unmapped areas do not contain levels of natural character. Within the Marlborough coastal environment, everywhere would retain some levels of natural character and would be rated somewhere on the seven-point scale of very low to very high<sup>26</sup>. Those areas unmapped are either considered to hold a natural character condition below high (i.e. very low, low, moderate to low, moderate and moderate to high) or, as outlined within Appendix 6 of the Coastal Study, the value and condition is broadly unknown, which relate to those areas beyond two kilometres offshore in most instances. The greatest amount of information is found on terrestrial areas, then the intertidal area and then within 2km of the shoreline. Beyond this area, sketchy information exists. All of these values have been copied directly across to the MEP, therefore consistency should be apparent.

Two submitters (962 and 990) request that the extent of the coastal environment to be reflective of the modifications that are contained within it. My response is simply that the extent of the coastal environment has been mapped based on the methodology employed within Section B of the Coastal Study and that the coastal environment can hold a spectrum of naturalness from very low to very high. I maintain therefore that the extent of the coastal environment has been appropriately mapped.

Whilst ground-truthing would be an acceptable way of refining the values, condition and mapping of an area, natural character exists with or without people. Everywhere retains a level of naturalness that is directly or indirectly affected by human modifications. It would not be practicable to map every nuance of the Marlborough Coastal Environment, due principally to the rate of change that occurs and the expense of undertaking this mammoth exercise. Rather, the Coastal Study is a platform for decision makers and the broader community to refer to and to refine further based on individual areas under consideration.

## **Recommendation**

Based on this, I recommend no change to Appendix 2 other than the maps in the MEP are clarified further (refer to the next section General: Mapping) for further explanation.

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<sup>26</sup> Policy 13 of the NZCPS requests under 1(c): 'assessing the natural character of the coastal environment of the region or district, by mapping or otherwise identifying at least areas of high natural character'.

## **General: Mapping**

The following submitters raise specific matters concerning general mapping, especially the seaward extent of the overlay and how (more generally) the mapping has been translated into the MEP.

**Submitters 401 and 426** query the seaward extent of the natural character overlay stating that there is no justification for this to extend this far into Cook Strait. **Submitter 426** specifically requests the seaward extent of the coastal natural character mapping be reduced to snorkelling or recreational diving depth, and the maps amended to reflect this (or relief securing same outcome). This approach is supported by the commentary in Natural Character of the Marlborough Coast (Boffa Miskell, 2014) at Appendix 6, page 316.

**Submitter 716** states that the maps in the MEP are drawn in a manner that makes them confusing and that the natural character areas are extended as per the submission (which is detailed in the relevant geographic area).

**Submitter 1140** requests that changes to the extent of the natural character areas be undertaken in accordance with the submission (where individual areas have been included within relevant geographic areas below) and that the seaward boundary is reviewed and further explained. Specifically requests deletion of the coastal Natural Character overlays from the planning maps, or amend as proposed in Part 3 of the submission (the table setting out changes to boundaries) which are relatively minor and will ensure that existing marine farms are not unnecessary encumbered.

**Submitter 1152** states that part of the mapping in the hard copies of the natural character maps were omitted, including Melville Cove, Beatrix Bay and most of Maud Island. Request that the Natural Character Maps be updated to include the missing section and affected parties be given adequate time to make a submission.

## **Discussion**

The seaward extent of the Coastal Marine Areas for the Level 4 and 5 scale mapping is determined by a number of aspects, which are broadly outlined within Appendix 6 of the Coastal Study. While the coastal marine area extends out to the edge of the territorial sea (the 12mile limit), information on seabed ecology is generally greatest close to shore and decreases appreciably with distance offshore. The strong connection between the land and the sea is also a pivotal feature in terms of defining the natural character of the coast. The Coastal Study therefore focused on the marine environment closer to shore, specifically:

- All enclosed waters of the Marlborough Sounds
- The outer Marlborough Sounds bounded by the main headlands and offshore islands and stacks;
- Out to 2 km offshore from the outer coast (including from offshore islands and stacks around the outer Sounds).

The extent of the seaward mapping is relatively complex, however a detailed method underpinned by a host of data has resulted in conclusions as to an appropriate extent. Within the Coastal Report, the seaward boundary of the natural character mapping is blurred, indicating that the extent fades away. Unfortunately, this hasn't been indicated in the MEP maps, where a hard line is used. The blurred line indicates where information is less readily available (and less specific). Recognition of the marine component being an integral part of coastal environment (where underwater features and activities are known) is critical to better understanding the natural character of the coastal environment.

Deletion of the natural character mapping is not something that is warranted, since there is a specific policy within the New Zealand Coastal Policy Statement directing local authorities to '*assessing the natural character of the coastal environment of the region or district, by mapping or otherwise identifying at least high natural character*' (NZCPS, Policy 13(1)(c)). MDC have opted for mapping, which offers certainty for resource users. Submitter **1140** contains a series of tables with suggested edits and these edits will be considered under relevant geographical sections.

The maps drawn in the hard copies of the MEP (Coastal Natural Character Map 1-5) illustrate areas mapped high (blue tone), very high (pink tone) and outstanding natural character (pink cross hatch). The land is coloured a light grey and the sea white. In some areas, it is difficult to read the distinction between land and sea due to the scale of the maps and the colours used. Also, the maps also do not join together. There is a

gap in mapping between Maps 1 and 3, Maps 2 and 4 and Maps 4 and 5. This 'gap' in the maps is the basis of Submitter 1152's concerns.

## **Recommendation**

I recommend that the Coastal Natural Character Maps 1-5 maps within Volume 4 of the MEP be amended to better articulate the mapped areas (through more refined maps and colouration) and to address the mapping gaps currently present.

The maps should therefore be reproduced at a larger scale, have sufficient colouration differences between areas of High, Very High and Outstanding Natural Character and overlap sufficiently.

## **General: Spelling**

**Submitter 1186** requests that Coastal Terrestrial Area 4: Arapawa be spelt correctly 'Arapaoa'.

## **Discussion**

At the time the Coastal Study was undertaken, all reference names (such as Arapawa) were identified with reference to the Topographic Maps. I also acknowledge that through the Treaty settlement (Te Tau Ihu) process that many other place names within Marlborough were replaced and/ or corrected. I therefore recommend that all replacement place names (including Arapaoa) are updated in Appendix to reflect those changed by the Treaty settlement.

## **Recommendation**

I recommend the request to rename Arapawa to 'Arapaoa' be accepted (and all other place names that have changed under the Treaty settlement for Appendix 2).

Example: Appendix 2: [change all references] ~~Arapawa~~ to 'Arapaoa'.

# **5.6 Coastal Marine Area A: Tasman Bay – South Western D'Urville Island**

## **4.5.1 Coastal Marine Area A: General Broad Matters**

### ***Submitter 716/203 and 716/204 Friends of Nelson Haven and Tasman Bay Incorporated***

**Submitter 716** requests that the outstanding natural character area of Outer Sounds and Eastern Tasman Bay be expanded. In this CMA, it is to include that all of Eastern Tasman Bay be integrated in Outstanding Natural Character between North D'Urville and entrance of Croisilles. A further request is that the boundary of the outstanding natural character area is to include a distance of not less than 500 metres from MHW as being within the outstanding natural character area.

## **Discussion**

This submitter requests that the outstanding natural character area of Outer Sounds and Eastern Tasman Bay be expanded, however provides no rationale for why this is the case.

The marine mapping in this part of the Outer Sounds generally includes the majority of the water within 2km of the land. All of this is mapped as very high, extending from Cape Soucis (Raetihi) north to Greville Harbour on D'Urville Island. Outstanding Natural Character in this area is confined to three parts, Croisilles Harbour area (excluding Okiwi Bay and Squally Cove), French Pass (excluding the southern part of Current Basin, Waikawa Bay and Okuri Bay) and Greville Harbour.

Whilst there are references to modifications in this area, the very high level of natural character mapping includes a largely unmodified near-shore area, where high flow habitats are inextricably linked by strong

currents. Whilst the marine area has been mapped out to 2km as very high, when reappraised for outstanding qualities, only three areas reach the threshold. This is due to numerous reasons:

- Land based practices along much of the coastline between Askews Hill and Greville Harbour are grazed, which means that there is the potential for sedimentation issues occur.
- A large consented offshore mussel farm off south-western D'Urville Island
- Large parts are trawled, dredged or fished – refer to Figures 1-3 of this report

Whilst trawling, fishing and dredging are important factors to consider when determining values and mapping extents of natural character, other factors including sedimentation/ runoff from the land (when farmed), aquaculture and other structures affect how areas are determined. Due to this, I maintain that the mapping in the Coastal Study for the areas of Outstanding Natural Character are accurate and do not warrant expanding and do not meet the high threshold for outstandingness that *'exhibits a combination of natural elements, patterns and processes that are exceptional in their extent and relative intactness, integrity and lack of built structures..'* (Coastal Study, page 262).

## Recommendation

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

### **4.5.2 Coastal Marine Area A: Squally Cove/ Okiwi Bay Area**

**Submitter 401/259 Aquaculture New Zealand, Submitter 426/250 Marine Farming Association Incorporated, Submitter 546/11 and 546/13 Aroma Aquaculture Limited, Submitter 574/16 Bryan Skeggs, Submitter 916/1, 916/2, 916/3 and 916/5 Margaret Hippolite, Submitter 958/2, 958/14 and 958/27 Marine Farm Management Limited, Submitter 964/13 and 964/14 Marlborough Oysters Limited, Submitter 1068/1, 1068/2, 1068/3 and 1068/5 Robert Hippolite, Submitter 1140/102, 1140/108 and 1140/110 Sanford Limited**

**Submitters 401, 426** request removal of the natural character overlay on the land on the southern side of Whakitunga Bay area or record that aquaculture will not affect the relevant values. The MFA notes that Natural Character Map 3 does not correspond with the Natural Character Index. Squally Cove is not included within the map

**Submitter 574** requests a review of this area and provides appropriate justification for the extent and definition. It specifically seeks acknowledgement within the schedules to these natural character and landscape areas that the existing marine farms (8289, Round Hill) are not causing adverse effects.

**Submitters 546, 958, 964** request removal of the natural character overlay in the vicinity of farms 8269, 8297, 8287, 8275, 8285, 8622 or record that aquaculture will not affect the relevant values. **Submitters 916, 1068** request removal of the natural character overlay more generally in the vicinity of Squally Cove and Okiwi Bay area or record that aquaculture will not affect the relevant values.

**Submitter 1140** requests that the natural character overlay be amended. Specifically, to delete the HNC around Oyster bay (both sides) and Matarau Point, and that a straight line in the HNC is drawn so that it does not include the two tongues down to the foreshore by farms 8271, 8272, 8273, to amend the VHNC so that it stretches from Lone Rock to Kakaho Point (west of Squally Cove) and to delete the VHNC at Round Hill along the southern side of Whakitunga Bay. This submitter also requests that the very high mapping of the water of Okiwi Bay is removed due to existing modifications.

## Discussion

These submitters request that either the natural character mapping is removed or that a review be undertaken to justify its extent. Specifically, most submitters want to ensure that the current farming activities that they undertake in the area, won't be affected by the overlay.

Within the Coastal Study, the mouth of Croisilles Harbour marine area is mapped very high extending from Lone Rock in a line north-eastwards towards Red Clay Point. This includes the small embayments of Whangarae Bay and Okiwi Bay. The remainder of the waterbody is unmapped, due principally to the

presence of aquaculture (Squally Cove, Oyster Bay, Wairangi Bay and Whakitenga Bay) which results in the natural character being considered less than high. On the land, south of Croisilles Harbour, there are large areas of indigenous vegetation, which change more to areas of forestry and areas of regeneration further eastwards. Broad-scale modified areas have been excluded from the mapping.

Within Squally Cove, Oyster Bay, Wairangi Bay and Whakitenga Bay, the land use is more fragmented, however areas of regenerating bush are still apparent. Land on the southern side of Whakitenga Bay appears to be slowly regenerating and maintains a reasonably consistent cover. Whilst wilding pines are evident, there are no structures present, and hence a high rating for this land is justifiable. The same can be said for Round Hill, which is located further south of Whakitenga Bay.

Areas of pine and pasture have been excluded, especially around Oyster Bay. Mapped at the Level 4 scale for the marine area, there is very little modification apparent, apart from concentrations of aquaculture in Squally Cove and a slipway and small jetties in Okiwi Bay. I consider that these structures in Okiwi Bay are subservient to the broader very high levels of marine natural character, bought in part by the indigenous bush cover on the north-western slopes of the bay. Based on this, I maintain the current mapping in the Coastal Study.

I also maintain that the current level of modification present has prevented those unmapped parts from being mapped high, very high or even outstanding natural character.

## **Recommendation**

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

### **4.5.3 Coastal Marine Area A: Symonds Hill**

***Submitter 488/1 Margaret and Robert Hippolite, Submitter 502/9 Karaka Projects Limited,***

**Submitters 488 and 502** request that the terrestrial natural character mapping around Symonds Hill be removed, stating that the land is highly modified. Specifically, that property areas 12C/223, CFR 505902, NL 12C/224, NL 138/669, NL37/121, NL 12C/224, NL 138/669 and NL37/121 be excluded from the Symonds Hill Coastal Natural Character area, and that the Coastal Natural Character Map 3 be amended accordingly.

## **Discussion**

These submissions seek removal of the terrestrial natural character mapping of Symonds Hill. I have relooked at Symonds Hill and do not agree with the submitters that the land is highly modified. The hill is regenerating indigenous bush, with occasional wilding pines. There are areas of plantation forestry evident, which certainly affects natural character and I note that some of this forestry area has been included in the high natural character overlay.

Whilst there is aquaculture to the immediate north, the majority of the coastal interface with this hill is free from modification. Furthermore, there are no tracks, houses or other structures on this hill, which amplify perceived naturalness. For this reason, I maintain that bulk of Symonds Hill has been appropriately mapped as holding high levels of natural character, however I do recommend some amendments regarding the extent of the high natural character overlay where it relates to plantation forestry.

I have asked Marlborough District Council to assist in identifying specifically the above properties, and understand that they (or possibly only one) relate to 2579 Croisilles- French Pass Road. Unfortunately, the other identification areas were unable to be located. Based on the identified property, this is located within an area dominated by pine forestry and grass, and I agree that this property (2579 Croisilles- French Pass Road) should be reclassified based on the level of modification apparent.

## **Recommendation**

I recommend a change to the mapping of the high natural character overlay as it relates to property 2579 Croisilles- French Pass Road, and its immediate surroundings due to modifications in the area that do not

constitute to high levels of natural character. Refer to **Figure A: Natural Character Mapping Change 1: Okiwi Bay.**

#### **4.5.4 Coastal Marine Area A: Okuri and Waikawa Bays**

***Submitter 617/2 and 617/6 Clearwater Mussels Limited, Submitter 1140/108 and 1140/110 Sanford Limited, Submitter 1160/3 St George Limited***

**Submitter 617** requests the removal of the high natural character overlay in Okuri Bay. Furthermore, **Submitter 1160** requests the removal of the very high natural character overlay in Waikawa Bay, Current Basin or record that aquaculture will not affect the relevant values

**Submitter 1140** requests that the natural character overlay be amended. Specifically, to delete the VHNC so that it does not extend into Waikawa Bay (i.e. ends at Two Island Point and crosses over in a straight line to the northern tip of Malven Hill Point). Also, to delete the HNC as they extend over the bays of Fitzroy.

### **Discussion**

These submitters request that the natural character mapping is removed from parts of this area. Specifically, most submitters want to ensure that the current activities they undertake in the area, won't be affected by the overlay.

In terms of the identification and mapping of natural character in these areas, only a very small area of native bush has been captured in the southern section of Okuri Bay, with the majority being either grazed pastoral land or commercial forestry, therefore rating less than high (and hence not mapped). Within the marine environment, the entire nearshore coastal waters are mapped as very high, extending from Croisilles Harbour in the south to Greville Harbour on D'Urville Island in the north.

The marine environment is mapped at the Level 4 scale, where there is very little modification apparent, apart from three marine farms (one in Okuri Bay and two in Waikawa Bay). There are no foreshore structures present, other than a slipway and a jetty in Camp Bay to the north of Waikawa Bay. However, if the area is considered at a more local (Level 5 scale) the modification associated with the terrestrial environment does start to present a few issues, especially in Okuri and Waikawa Bays. Whilst Okuri Bay is larger and contains one farm this has less modification when compared with Waikawa Bay, which is a smaller bay and contains more farms. Both have modified land. At the Level 5 scale mapping, I consider that Okuri Bay would be high and Waikawa would be appear 'less than high'. Since none of the water has been mapped at this scale, this would represent an anomaly (mapping-wise), however, I acknowledge that at a more detailed view, the ratings would change.

Beyond these two embayments, the broader stretch of coastal waters extends and connects areas of outstanding natural character (at both Croisilles Harbour to Current Basin). Whilst the land use activities have an influence on the natural character of the water, at this broader Level 4 mapping, the elements, patterns and processes are largely unmodified and warrant the very high status mapping.

### **Recommendation**

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

## **5.7 Coastal Marine Area B: D'Urville Island – North Cook Strait**

#### **4.6.1 Coastal Marine Area B: Port Gore Area**

***Submitter 177/2 and 177/3 Kristen Gerald, Submitter 468/3, 468/4 and 468/5 Port Gore Group, Submitter 493/3, 493/4 and 493/5 Karen Marchant, Submitter 546/9 and 546/13 Aroma Aquaculture Limited, Submitter 645/2, 645/3, 645/4 and 645/5 Darnyl Gordon Slade, Submitter 668/1 and 668/2 David Qunitin Hogg, Submitter 698/118 and 698/119 Environmental Defence Society Incorporated, Submitter 716/203 and 716/204 Friends of Nelson Haven and Tasman Bay Incorporated, Submitter***



**926/27 and 926/28 Wainui Green 2015 Limited, Submitter 1010/1 and 1010/2 PB Partnership, Submitter 1152/2, 1152/3, 1152/4, 1152/5, 1152/6 and 1152/7 Slade, King and King and Port Gore Marine Farm Partnership.**

**Submitter 177** fully supports all coastal natural character and ONLs and ONFs for the Port Gore area of the Marlborough Sounds.

**Submitters 468 and 493** request that parts of the southern side of Port Gore to the sea, the ridge and eastern side of it between Puzzle Peak and Cape Lambert (and back to Hunia), the eastern side of the Alligator headland, all the waters of Waitui Bay and Port Gore except Melville Cove, all of East Bay and northern Arapawa Island as Outstanding Natural Character. Melville Cove should be "very high".

**Submitters 546, 668, 926, 1010** request the removal of the natural character overlay from the vicinity of marine farm 8167 in Pig Bay, or record that aquaculture will not affect the relevant values. **Submitter 645** requests the removal of the natural character overlay from the vicinity of marine farm 8169, 8591 and 8174 in Melville Cove, or record that aquaculture will not affect the relevant values.

**Submitter 698** notes the consents for the marine farms at site 8166 and 8165 have lapsed and MDC has declined consent on application on the basis that the environmental effects of the farms are unacceptable. Because of this change in context the natural character mapping should be revisited. The removal of the marine farms may result in a change in the natural character rating of Pig Bay and this needs to be assessed.

**Submitter 716** requests that the outstanding natural character area of Outer Sounds and Eastern Tasman Bay Coastal Marine Area (CMA) be expanded. In this CMA, it is to include all of Port Gore. A further request is that the boundary of the outstanding natural character area is to include a distance of not less than 500 metres from MHSW as being within the outstanding natural character area.

**Submitter 1152** requests remapping of the natural character overlay in the vicinity of Melville Cove, or record that aquaculture will not affect the relevant values, or to move the arbitrary Coastal Natural Character boundary to the current CMZ2, CMZ1 interface, across the mouth of Melville Cove. (Hunia to East of Tunnel Bay, Map 2) and onto the land, or to curve, swing or indent the High Natural Character boundary so it circumvents farm 8591, as has been done at site 8173 for the Outstanding Natural Character Landscape Overlay (see map 3). This submitter also submits that part of the natural character maps in the MEP were omitted in the hard copy.

## **Discussion**

Many of these submissions either fully support the natural character mapping in and around Port Gore or request that a review be undertaken to extend it. A few submitters request that the natural character mapping is removed from parts of this area. Specifically, most submitters want to ensure that the current activities they undertake in the area, won't be affected by the overlay.

Within the Coastal Study, most of the terrestrial environment is either identified and mapped as high or very high natural character, with only parts of the more modified pastoral grazing areas being considered as 'less than high' and therefore not mapped. Those parts that retain less than a high terrestrial rating include the southern part of Cape Lambert (at Pig Bay), the Hunia Peninsula and parts of the lower slopes of Melville Cove. Within the marine environment, outer Port Gore is identified and mapped as very high natural character with the remainder of Port Gore (excluding Melville Cove) being mapped as High. Melville Cove is unmapped due to the concentration of aquaculture in this bay.

In terms of outstanding natural character, this includes the majority of the Cape Jackson Peninsula, the upper heavily vegetated areas of Mt. Furneaux to Puzzle Peak and the northern most part of Cape Lambert. Much of the outer waters are considered to be outstanding.

Limits to the extension of the outstanding natural character area in the marine environment have been determined by the amount of trawling and dredging that has and continues to occur in these waters. This was an important source of information at the time the natural character areas in the marine environment were mapped. Since this area was mapped, MPI have updated their information regarding dredging, trawling and commercial fishing in the area, and these are contained within Figures 1-3. Within Port Gore (i.e.

between Cape Lambert and Cape Jackson) there is no discernible changes observed concerning these marine-based activities since the area was mapped in 2014.

I have specifically reviewed the area around Pig Bay. Two farms (8166 and 8165) are subject to appeal and will be heard in the Environment Court in December 2017. A decision is therefore likely sometime in 2018. If the appeal is declined, and the farms removed, then a change should be made to the area in recognition of their absence. I have recommended on **Figure B: Natural Character Mapping Change 2: Pig Bay** the extent of change to the natural character mapping that would occur should these two farms be declined through the appeal process.

I maintain that no high, very high or outstanding mapping should occur to the waters of Melville Cove due to the existing aquaculture. This development is contained to the Melville Cove embayment and coupled with the modifications associated with the land, receives a less than high rating. The single marine farm remaining in southern Pig Bay (Papatua) is isolated from the remaining areas of aquaculture and can be tolerated within this area of high marine natural character, however this should be reviewed once it comes up for consenting in January 2019.

In terms of the terrestrial environment, I maintain that due to the pastoral modifications to part of the southern section of Cape Lambert, the Hunia peninsula and the land surrounding Waitui Bay and Alligator Head they cannot be considered to hold outstanding natural character. I recommend that in landscape terms, they remain as outstanding, but not for natural character reasons.

## **Recommendation**

I recommend proposed changes to the extent of the outstanding and high marine mapping in Pig Bay (although acknowledge that this area is subject to an Environment Court Appeal). Should these two farms be declined through the appeal process, then I recommend the following mapping changes on **Figure B: Natural Character Mapping Change 2: Pig Bay**. I acknowledge that this change is dependent on other external sources from this process.

I do not consider that any further mapping changes to this area are required.

### **4.6.2 Coastal Marine Area B: Admiralty Bay Area**

***Submitter 587/2, 587/3 and 587/4 Caroline Farley, Submitter 820/2, 820/3 and 820/4 Jeffrey Meachen, Submitter 874/4 and 874/5 KPF Investments Limited and United Fisheries Limited, Submitter 1098/1 and 1098/5 Sandra Ann King, Submitter 1160/4 and 1160/3 St George Limited, 1188/7 and 1188/9 Te Runanga o Ngati Rarua, Submitter 1204/3 United Fisheries Holdings Limited, Submitter 1214/1 and 1214/3 Vincent Rene Smith.***

**Submitters 874, 1160, 1204** support retention of the absence of mapping in respect of Inner Admiralty Bay.

**Submitters 587, 820, 1098, 1188, 1214, 1160** request the removal of the natural character mapping around farms 8026, 8038, 8043, 290, 8040 or record that aquaculture will not affect the relevant values.

## **Discussion**

There is no justification to remove any mapping from around these marine farms as there is no mapping currently present. The whole area is sufficiently modified not to warrant mapping at the high, very high or outstanding thresholds.

## **Recommendation**

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

### **4.6.3 Coastal Marine Area B: Remaining D'Urville Island – North Cook Strait Area**

**Submitter 401/254 and 401/253 Aquaculture New Zealand, Submitter 486/2 and 486/3 Waitui Holdings Limited, Submitter 688/44 Judy and John Hellstrom, Submitter 716/203 and 716/204 Friends of Nelson Haven and Tasman Bay Incorporated, Submitter 959/2 and 959/3 Marlborough Aquaculture Limited, Submitter 1140/108, 1140/110 Sanford Limited.**

**Submitter 401** states that there is insufficient justification for the seaward extent of the outstanding/very high/high natural character ratings extending so far offshore into Cook Strait. The submitter requests a redraft of the Coastal Natural Character maps to show a reduction in the seaward extent of the outstanding/very high/high natural character areas.

**Submitter 486** requests a mapping change: The western inner part of Waitui Bay should have its classification downgraded to reflect the existing levels of activity that are occurring within that part of the bay and in particular the farming of the land such that some adjoining farming of the water is appropriate that is confined to that area. Therefore, change the classifications of both landscape (including seascape) and character away from outstanding values and away from high values to enable some limited aquaculture to occur on the western side of the inner part of the Bay. *(The submission includes a previous submission on a request for a plan change for two areas measuring 15 hectare each along the western side of Waitui Bay allowing for the farming of mussels and sea cucumber - changing these specific areas from Coastal Marine Zone 1 to Zone 2).*

**Submitter 716** requests that the outstanding natural character area of Outer Sounds and Eastern Tasman Bay be expanded. In this CMA, it is to include that all of Trio Island, Chetwode Islands and Titi Island be integrated in the Outstanding Natural Character of North D'Urville and Port Gore. A further request is that the boundary of the outstanding natural character area is to include a distance of not less than 500 metres from MHWL as being within the outstanding natural character area.

**Submitter 959** requests a review of the Coastal Terrestrial Area 2 (Cook Strait). Recognise existing levels of activity and modification and allow those not to be threatened by an overly broad brush and an overstated assessment of the relevant values. Reassess and modify the classifications of outstanding and high for the identified areas. Particularly north of Te Akaroa in the area where there is existing forestry and aquaculture and Pelorus Heads (in the same area) and Bulwer (particularly the area on the southern side of the entrance to Bulwer between 2 Salmon farms).

**Submitter 688** requests that D'Urville Island - Northern Cook Strait (page App 2-27) is described in its entirety as an outstanding landscape (seascape) and includes the long views from east-west from the ONLs of D'Urville Island, the Rangitoto Islands to the Chetwodes and the Capes (page App 2-29).

**Submitter 1140** requests the removal of the very high natural character as it extends seawards from Kaitira (East Entry Point).

### **Discussion**

These submitters request changes to the mapping of the marine and terrestrial natural character areas in the outer sounds, including northern parts of D'Urville Island. Much of this area retains high, very high and outstanding levels of natural character.

Regarding the seaward extent of the natural character overlay, this is also discussed under the General Submission section at the start of this report.

The marine environment of Waitui Bay is mapped as high. Most the land is farmed, apart from the eastern part of the bay which is under DOC management, and is too steep to farm. This part of the bay, along with part of the coastal waters, is mapped as very high as well as retaining outstanding levels of natural character. There are no structures in Waitui Bay, on the water or on the land. The only modification is resultant from the farming on the land, however when referencing **Figures 1-3**, some trawling and fishing have occurred within the central bay. Based on this, I maintain that the mapping is correct in Waitui Bay.

**Submitter 716** requests expanding the existing mapping of outstanding natural character from Port Gore to D'Urville Island. Currently the majority of the water is classified as high natural character, with areas of

outstanding natural character located at both ends. As mentioned earlier under the Port Gore submissions, restrictions to the extension of the outstanding natural character area in the marine environment have been determined by the amount of trawling and dredging that has and continues to occur in these waters. Through a request to review the extent mapped in the Cook Strait area from a number of submitters, the latest updated information gathered from the MPI website indicates that trawling occurs off Cape Lambert and that a change will need to be made to the extent of the outstanding and high natural character overlays north of Cape Lambert to reflect this. Therefore, and regarding those MPI maps, heavy disturbance is experienced in these areas, which has resulted in these waters being only high, and not outstanding in a natural character sense.

The content of Coastal Terrestrial Area 2 (Cook Strait) is at the Level 3 scale of assessment, which is reasonably broad and recognises (at a broader scale) the elements, patterns and processes that occur. At the Level 4 and 5 scale, further details are outlined. Modifications have been identified and areas retaining commercial forestry (such as Te Akaroa) have not been included in the mapping on the land. Within the marine environment, the mapping occurred at the Level 4 scale, where smaller modifications (such as isolated areas of aquaculture (at Blow Hole Point for example) do not sufficiently degrade the marine environment when assessed at that scale. Based on this, I maintain the mapping as currently proposed.

I have read **Submitter 688's** concerns and consider that this relates more to landscape than natural character and hence will address this in the landscape Section 42A report rather than this one.

## **Recommendation**

I recommend that changes be made to the outstanding and very high marine mapping considering information relating to dredging and trawling. I propose those changes as contained on **Figure C: Natural Character Mapping Change 3: Cook Strait.**

Regarding the remaining requests, I confirm that no further change should occur to the natural character mapping or values identification in this area.

### **Coastal Marine Area B: Guards Bay Area**

***Submitter 601/1 and 601/7 Christopher Redwood, Submitter 1022/1 and 1022/7 Patricia Redwood, Submitter 1166/1 PH Redwood and Company Limited.***

**Submitters 601, 1022** request that the natural character overlay in the vicinity of farm 8164 in Guards Bay be removed, or record that aquaculture will not affect the relevant values.

**Submitter 1166** supports the absence of natural character mapping in Guards Bay.

## **Discussion**

There is no justification to remove any mapping from around this marine farm as there is no mapping currently present. The whole area is sufficiently modified not to warrant mapping at the high, very high or outstanding thresholds.

## **Recommendation**

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

### **Coastal Marine Area B: Anakoha Bay Area**

***Submitter 401/258 Aquaculture New Zealand, Submitter 426/249 Marine Farming Association Incorporated, Submitter 824/1 and 824/2 Archer, Beryl Evelyn and Heberd, John Roderick, Submitter 842/5 Just Mussels Limited and Tawhitinui Greenshell Limited, Submitter 874/6 KPF Investments Limited and United Fisheries Limited, Submitter 958/15 and 958/27 Marine Farm Management Limited, Submitter 1098/3 and 1098/5 Sandra Ann King, Submitter 1219/1 and 1219/2 William Albert Trevor and Kathleen Mary Rainbow.***

**Submitters 401, 426, 842, 874** also support the mapping of the seascape in Anakoha Bay has not having high, very high or outstanding natural character. Some submitters oppose the mapping of the land on the western headland of Anakoha Bay as having high natural character and seek its removal. If the mapping remains, all submitters request that marine farms do not adversely impact the values that lead to that classification

**Submitters 824, 958, 1098, 1219** request that the natural character overlay in the vicinity of farm 8149, 8144, 8148, 8155 in Anakoha Bay be removed, or record that aquaculture will not affect the relevant values.

## **Discussion**

All of these Submitters request removal of the natural character overlay from close to their farms or their land.

Due to the modifications with this embayment, including much of the bay being cleared for pastoral land use and virtually all of its coastline being used for aquaculture, limited areas of high natural character and above exist. The two headlands of this embayment are virtually free from aquaculture and retain a semblance of indigenous revegetation. I therefore consider that the small areas of high on these two headland warrants mapping and identification.

## **Recommendation**

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

### **Coastal Marine Area B: Catherine Cove and Port Hardy Area**

**Submitter 574/14 Bryan Skeggs, Submitter 1036/1 and 1036/2 Philip Wilson, Submitter 1118/2 and 1118/5 Shane Gerald Thomas McCarthy, Submitter 1126/2 Shane Gerard Thomas McCarthy, Submitter 1164/2 Tui Rosalie Elkington and Shane Gerald Thomas McCarthy, Submitter 1184/8 Talleys Group Limited.**

**Submitters 1036, 1118, 1126, 1164 1184** request that the natural character mapping around farm 8003, 8004, 8006, 8007 and 8631 in Catherine Cove, be removed or record that aquaculture will not affect the relevant values.

**Submitter 574** requests that the natural character overlay in the vicinity of farm 8013 in Port Hardy be reviewed, or record that aquaculture will not affect the relevant values.

## **Discussion**

All of these Submitters request removal of the natural character overlay from close to their farms.

Catherine Cove retains high and very high levels of naturalness on the land, due principally due to the lack of apparent modifications. There are occasional small areas of concentrated modification, such as around Kiangawari in the north of the bay and around Cherry Tree Bay, where buildings, tracks, power lines, grazed areas and some wilding pines are evident. There are also a small number of jetties and pontoons within these two bays. Within the marine environment, aquaculture occupies much of the eastern part of the bay, reducing levels of naturalness. These coupled with numerous mooring areas and significant amounts of trawling along this coast (refer to Figure 1) has reduced the level of natural character within the water to rate less than high. As a consequence, this part of the marine environment has not been mapped. Outstanding levels of natural character occur on the forested upper slopes of Attempt Hill.

With regards to Port Hardy, the majority of the inlet, including all of its coastal waters hold outstanding natural character, despite to presence of a single marine farm (at Waiua Bay). The southerly terrestrial environment has indigenous forest extending from the ridges that define the bay to the foreshore. Where more localised modification is present, these have been appropriately recognised in the mapping as holding either very high or high levels of natural character. Whilst the existing farm in Port Hardy will continue to adversely affect the high naturalness of the area, it represents an outlier and by itself does not warrant to be excluded from the marine component of the area, when mapped at the Level 4 scale.

Based on this, I have reviewed the current mapping and confirm that it should remain as mapped.

## **Recommendation**

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

## **5.8 Coastal Marine Area C: Pelorus Sound Area**

Due to the geographic breadth of Coastal Marine Area C (CMA C) and the amount of submissions received in this area, there has been a need to sub-divide this Area into many smaller areas. During the compilation of this evidence, the growth of the 'sub-areas' grew as the amount of submissions relevant to specific parts became apparent. Therefore, there may be situations where a single submitter has more than one request in more than one area, therefore there may be a doubling-up of specific point pertaining to that submitter in any one sub-area. Throughout the course of cross-checking this report, I have tried to observe as many of these situations as possible and delete the submission point not relating to that specific geographic area.

In total, there are 16 individual sub-areas for CMA C. These are (in no particular order):

1. Kenepuru Sound
2. Port Ligar
3. Richmond and Ketu Bay Areas
4. Waihinau and Waitata Bays and northern Waitata Reach Area
5. Treble Tree and Maud Island Area
6. Tapapa Point, Tawhitinui Bay and Kauauroa Bay Areas
7. Horseshoe Bay Area
8. Southern Tawhitinui Reach (Cregoe Point to Rams Head)
9. Northern Tawhitinui Reach (Picnic Bay Area)
10. Northern Tennyson Inlet (including Camel Point, Canoe Bay, Fitzroy Bay, Savill Bay, Garne Bay, Hallam Cove Area)
11. Nydia Bay to Fairy Bay to Tawero Point
12. Yncyca Bay, South East Bay and Nikau Bay
13. Old Homewood Bay and Marys Bay
14. Forsyth Bay
15. Crail Bay/ Clova Bay
16. Beatrix Bay

The following map illustrates these broad extents for ease of reference:

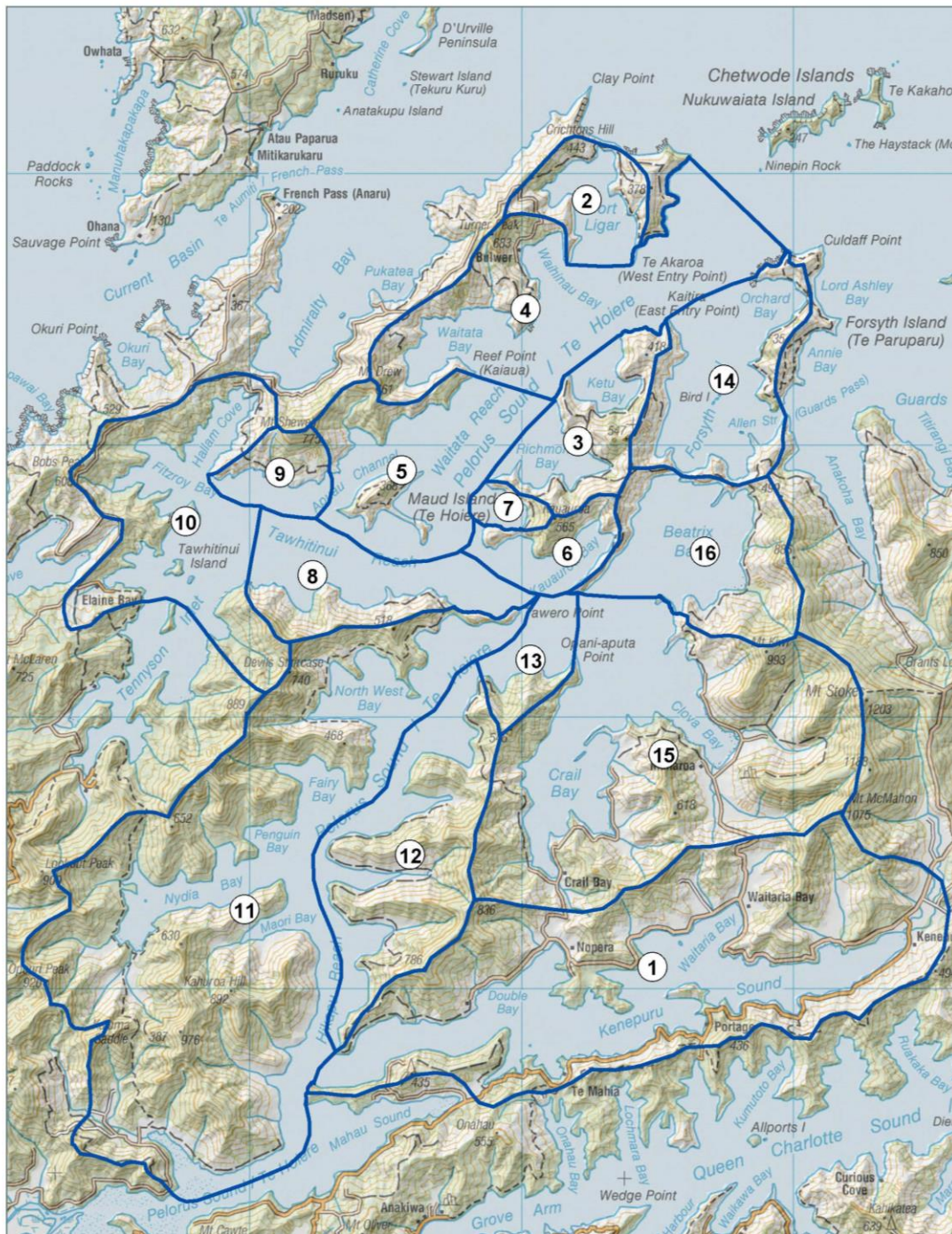


Image 5: Sub-areas of Pelorus Sound for the purposes of submission responses

### **Coastal Marine Area C: Kenepuru Sound**

**Submitter 323/2 Lyn Molly Godsiff, Submitters 738/2 and 738/18 Glenda Vera Robb, Submitter 866/1, 866/2 and 866/7 Karen Donaldson, Submitter 867/1, 867/2, 867/7 Karl Donaldson, Submitter 874/5, 874/8 and 874/9 KPF Investments Limited and United Fisheries Limited, Submitter 935/15 and 935/64 Melva Joy Robb, Submitter 1019/1, 1019/2 and 1019/3 Philip Henderson, Submitter 1037/1 and 1037/2 PADD Investments Limited, Submitter 1060/5, 1060/6 and 1060/11 Richard F Paine, Submitter 1094/1, 1094/2, 1094/3 and 1094/4 Richards Family Trust, Submitter 1140/108, 1140/110 Sanford Limited, Submitter 1171/2 and 1171/3 Tim Madden, Submitter 1188/8 and 1188/9 Te Runanga o Ngati Rarua.**

**Submitter 323** requests that the natural character overlay be removed from their property in Goulter Bay, Kenepuru Sound as the area has commercial forestry and is partly grazed.

**Submitters 866, 867, 1019, 1037, 1094, 1171, 1188** request that the natural character overlay be removed around marine farms 8471, 8472, 8485, 8473, 8488, 8491, 8457 and farm licences 297 and 460, or record that aquaculture will not affect the relevant values. **Submitter 1060** requests generally to remove the natural character overlay from Kenepuru Sound or record that aquaculture/ existing modifications will not affect the relevant values.

**Submitter 874** supports the absence of a natural character overlay in Waitaria Bay and Fish Bay.

**Submitters 738, 935** state that consultation appears not to have occurred (for both landscape and natural character), especially in relation to private property in Goulter Bay, Mills Bay and Weka Point areas.

**Submitter 1140** requests deletion of the VHNC Gold Reef bay by drawing the line at the Kenepuru Road, deletion of the HNC at Schnapper Point. **Submitter 1188** requests that the natural character overlay be removed from farms 297 and 460 or record that the farms do not affect the values.

## Discussion

These Submitters request removal of the natural character overlay from close to their property or marine farms.

Kenepuru Sound is one of the more modified areas of the Sounds, however, despite this, it does retain high and very high levels of natural character at certain locations. Principally areas of very high natural character are found along the forested upper ridges of the hills that define the Sound, where modification is noticeably limited. An exception is an area of very high levels of natural character at Weka Point and Gold Reef Bay, where advanced regenerating indigenous bush extends to the foreshore. Towards the head of the Sound are the forested ridges that extend from the Mount Stokes massif, and these have been mapped as retaining outstanding levels of natural character. Along the southern shores, areas of high natural character are found above Kenepuru Road, noticeably north of Portage. Here advanced regeneration of previously cleared land with limited structures is evident.

Within the marine environment, aquaculture is present along northern stretches of the central part of the Sound, noticeably from Mills Bay eastwards towards Waitaria Bay and from the west of Fish Bay to McMahan Point, as well as along both stretches of the coast at the entrance to Kenepuru Sound. Commercial fishing also occurs in this Sound (refer to Figure 3).

All modifications have impacted the extent of the identification and mapping of the natural character. The majority of the submissions relate to marine farms that are not close to any natural character mapping. Specifically, the high natural character south of Schnapper Point indicates an area of advanced regenerating bush. There are some wilding pines, however there is no aquaculture present along the shore. Perceived levels of naturalness are high. Based on this, I confirm that this mapped area is appropriate.

In Goulter Bay, only the areas of significant bush coverage have been mapped, despite some of this being located within private property. No commercial forestry has been included. I maintain that the mapping in this area reflects the naturalness of the area.

**Submitters 738 and 935** contest that consultation has not occurred for both landscape and natural character. Landscape consultation occurred during 2014 and 2015 and was targeted specifically where outstanding natural landscapes were included on private property. No consultation occurred in relation to natural character as it applied to individual properties and/ or marine farms.

## Recommendation

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

### **Coastal Marine Area C: Port Ligar**

**Submitter 617/6 Clearwater Mussels Limited, Submitter 750/3, 750/4 and 750/5 Goulding Trustees Limited, Submitter 866/6 and 866/7 Karen Donaldson, Submitter 876/1, 867/6, 867/7 Karl Donaldson, Submitter 874/4, 874/5, 874/8 and 874/9 KPF Investments Limited and United Fisheries Limited, Submitter 1147/1, 1147/2 and 1147/3 Shand Enterprises Limited, Submitter 1148/1, 1148/2 and 1148/3**



***Shand Trust Partnership, Submitter 1150/3, 1150/4 Shellfish Marine Farms Limited, Submitter 1196/1, 1196/2 and 1196/3 Tiracaan Limited.***

**Submitters 1147, 1148, 1196** request a review of the high natural character overlay mapping in Port Ligar, recognising the highly-modified land and ongoing human activity or record that aquaculture will not affect the relevant values. To amend the relevant planning map to remove the High Natural Character designations over the Port Ligar area as objected to.

**Submitter 617** requests the removal of the natural character mapping around Port Ligar or record that aquaculture will not affect the relevant values.

**Submitters 866, 867** request the removal of the natural character mapping around farm 8071 or record that aquaculture will not affect the relevant values.

**Submitters 874, 750, 1150** supports the absence of mapping in Port Ligar.

## **Discussion**

These Submitters request removal of the natural character overlay from close to their property or marine farms.

There is no natural character mapping within Port Ligar as existing modifications have prevented the terrestrial and marine environments from reaching high, very high or outstanding.

The nearest mapping of high natural character is associated with the marine environment, which extends from Te Akaroa south towards Kaitira and includes all of the Outer Sounds, including areas immediately north of Port Ligar, including Blow Hole Point.

## **Recommendation**

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

## **Coastal Marine Area C: Richmond and Ketu Bay Areas**

***Submitter 514/13 AJ King Family Trust and SA King Family Trust, Submitter 574/14 Bryan Skeggs, Submitter 1098/1 and 1098/5 Sandra Ann King, Submitter 1140/108, 1140/110 Sanford Limited.***

**Submitters 514, 1098** request a review the Natural Character Overlay over marine farm 8204 and amend the schedules in Appendix 2 to acknowledge that marine farm 8204 is not causing adverse effects on Natural Character.

**Submitter 574** requests a review of this area and provide appropriate justification for the extent and definition. The submitter specifically seeks acknowledgement within the schedules to these natural character and landscape areas that existing marine farms (8205, Richmond Bay) are not causing adverse effect.

**Submitter 1140** requests that the natural character overlay be amended. Specifically, to delete the HNC and VHNC that includes Ketu Bay and Richmond Bay etc.

## **Discussion**

All of these Submitters requests removal of the natural character overlay from close to their property or marine farms.

The terrestrial environment of both Richmond Bay and Ketu Bay is recovering from once being wholly grazed. Much of the land is covered with regenerating indigenous vegetation and is generally uniform in cover throughout, with the greatest area of modification apparent around the house and farm structures of Pohuenui, at the head of Richmond Bay. Here, patches of grazed land are still apparent, as is an area of pine forest. The two bays also support little structures or other modifications, indeed there is only one jetty

and a small collection of buildings at the head of Richmond Bay (Pohuenui) and no structures at all in Ketu Bay. Numerous farm tracks are also evident.

Within the marine environment, there are a small number of mussel farms, and one salmon farm. As illustrated on **Figures 1 and 2** trawling is noticeably apparent. Based on this, none of the water rates as high or above.

Upon review of the high natural character overlay on the terrestrial environment, the mosaic of land use activity and associated modification at the head of Richmond Bay means the mapped area of high natural character should be reconsidered. I recommend that this area should be reclassified as less than high, therefore meaning that no mapped natural character overlay is appropriate for this area. Marine farming in these bays have not directly affected the terrestrial mapping.

## **Recommendation**

To amend the terrestrial natural character mapping at the head of Richmond Bay. Refer to **Figure D: Natural Character Mapping Change 4: Richmond Bay**.

### **Coastal Marine Area C: Waihinau and Waitata Bays and northern Waitata Reach Area**

**Submitter 401/257 Aquaculture New Zealand, Submitter 426/248 Marine Farming Association Incorporated, Submitter 546/8 and 546/13 Aroma Aquaculture Limited, Submitter 688/38 Judy and John Hellstrom, Submitter 750/3, 750/4 and 750/5 Goulding Trustees Limited, Submitter 958/12, 958/13 and 958/27 Marine Farm Management Limited, Submitter 959/2 Marlborough Aquaculture Limited, Submitter 997/4, 997/5 & 997/7 The New Zealand King Salmon Company Limited, Submitter 1056/1, 1056/2 and 1056/4 Rob Curtis, Submitter 1060/9, 1060/10, 1060/11 Richard F Paine, Submitter 1140/108, 1140/110 Sanford Limited, Submitter 1150/3, 1150/4 and 1150/5 Shellfish Marine Farms Limited, Submitter 1160/3, 1160/4 St George Limited.**

**Submitters 401, 426** support the absence of mapping of Waihinau Bay.

**Submitters 750, 1160** support the avoidance of mapping in Camp Bay, Steamboat Bay and Turner Bay in Waitata Bay.

**Submitters 546, 958** request the removal of the natural character mapping around farm 8082, 8081, 8083 (Waihinau Bay) or record that aquaculture will not affect the relevant values. **Submitter 1056** requests the removal of the natural character overlay in Waitata Reach.

**Submitter 1056** requests that the natural character overlay is removed from farms 8098 and 8099 in Waitata Bay, or record that aquaculture will not affect the relevant values. **Submitter 1060** requests the removal of the natural character overlay from the vicinity of Waitata Reach or record that aquaculture will not affect the relevant values

**Submitters 750, 1140** request the removal of the natural character mapping of Reef Point/ Hamilton Cove/ Yellow Cliffs, at Burnt Point including White Rock, and at the West Entry Point of Waitata Reach or record that aquaculture will not affect the relevant values.

**Submitter 959** requests a review of the Coastal Marine Area C (Pelorus Sound to Forsyth Bay) and Coastal Terrestrial Area 3: Bulwer (Land to west of Waitata Reach). Recognise existing levels of activity and modification and allow those not to be threatened by an overly broad brush and an overstated assessment of the relevant values. Reassess and modify the classifications of outstanding and high for the identified areas.

**Submitter 997** requests to retain the mapping in Waihinau Bay and that the natural character overlays be removed from the eastern headlands of Waitata Reach (i.e. entrance to Forsyth and Richmond Bays) and the headland at the north-eastern entrance to Waitata Bay, or record that aquaculture will not affect the relevant values. **Submitter 1150** requests the removal of the high natural character at the north-eastern entrance to Waitata Bay.

**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). The submitter assumes that this is in reference to the 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 all our children and grandchildren, and long after that. These superb views cannot be further compromised by unsightly commercial developments in the public space.

## Discussion

Most of these Submitters request removal of the natural character overlay from close to their property or marine farms.

This part of Pelorus Sound contains large areas of modification to both the terrestrial and marine environments. Much of this modification is associated with land use activities, such as grazing through pastoral farming, commercial forestry, structures (predominantly buildings), powerlines and tracks. Within the marine environment, numerous bays, including Waitata Bay and Waihinau Bay contain aquaculture (mussels and salmon farming), moorings, jetties and slipways.

Because of these modifications, there are limited areas where there are high or very high areas of natural character. The principal areas of high natural character relate to the parts of the terrestrial environment where regeneration of previously cleared land is sufficiently advanced. These areas are around White Horse Rock, along the southern and eastern shores of Hamilton Cove, and all of the Kaitira Headland, which have been mapped as such. Areas of very high natural character are limited to the Yellow Cliffs which extend southwards past Treble Tree. The Treble Tree area is specifically discussed in the following section.

With regards to the submissions, I can confirm that there is no mapping close to marine farms 8098 and 8099 in Waitata Bay, principally due to the modifications. As mentioned within areas elsewhere, all modifications at the time of identification and mapping were considered, and this specifically included aquaculture, as well as other activities such as dredging and trawling. As can be seen in **Image 6** below and reference to the updated MPI maps for dredging and trawling (refer to **Figures 1 and 2**), reasonably significant amounts of dredging occur within Waitata Bay and central Waitata Reach, but less so in Waihinau Bay and at the mouth of Pelorus Sound. This, along with other marine modifications has resulted in limited mapping of the marine environment.

Image 6 indicates a series of coloured points within southern Waitata Reach, which indicates the number of areas dredged at any given time from data received from the 2011 season. This same Image is represented more crudely in **Figure 1**. This image simply illustrates the abundance of dredging in this area.

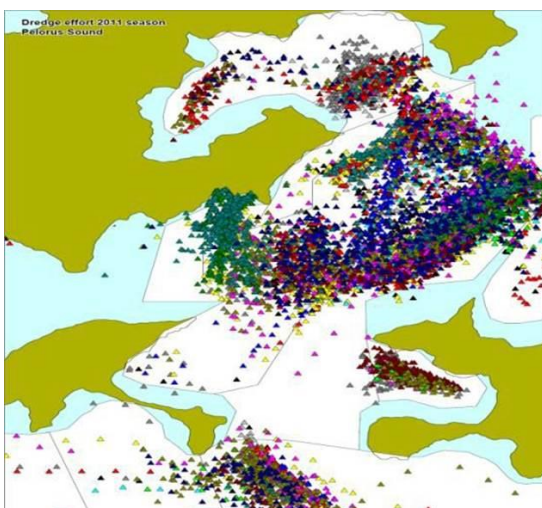


Image 6. Source: Evidence of Sharyn Smith on behalf of Te Rūnanga o Ngāti Kuia Charitable Trust, Dredged Effort Data Te Hoiere 2011, Witness Statement for New Zealand King Salmon Submission No. 0455, 2011.

The wind shorn bush at Reef Point/ Yellow Cliff and regenerating bush above Hamilton Cove are, in my view, appropriately mapped as high natural character. Indeed, it is my view that on re-examination that this high on the land should continue northwards towards Turner Bay. So, whilst **Submitter 750 and 1140** request removal of areas of mapping, **Submitter 959** requests a review of the whole area, and I recommend that on review, this small area of land be mapped as high natural character.

At White Horse Rock/ Burnt Point the terrestrial headland environment is relatively advanced regenerating bush and supports no structures or other modifications, other than occasional wilding pines. The salmon farm located immediately offshore has prevented the foreshore from also being considered high.

The marine component north of West Entry Point (Te Akaroa) is mapped, however the small peninsula is not, due to its pine tree domination. The mapped high natural character area at this point reflects the generally high level of naturalness of the marine environment, despite the presence of the occasional marine farm.

Based on the reconsideration of this area, I am confident that the existing mapping accurately represents the natural character identified at the scales discussed, apart from a small amendment within the terrestrial component of Hamilton Bay that is currently unmapped. I recommend to extend an area of high natural character to include the northern part of the bay, up to the ridge that divides Hamilton Cove from Turner Bay. I am also happy to include further information within the schedules identifying the existing modifications to support this extension. Furthermore, and in response to **Submission 688**, I consider that much of this concerns landscape matters, and as such will be debated in that report, rather than this natural character one.

## Recommendation

To amend the natural character mapping within Hamilton Cove. Refer to **Figure E: Natural Character Mapping Change 5: Hamilton Cove**.

I also recommend that an amendment to the Coastal Terrestrial Area 3: Bulwer table be undertaken, to expressly recognise the mapped area and is more specific than what is currently listed as 'Land to the west of Waitata Reach', as follows:

### Coastal Terrestrial Area 3: Bulwer (Level 4/5 Table)

Sub Area	Rating	Key Values	Additional Comments
<u>Land to west of Waitata Reach, White Horse Rock, Hamilton Cove, Yellow Cliffs</u>	Very High and High	<p>Whilst some land has been cleared for pasture, there are limited structures on the land, especially around northern Port Ligar and land west of Waitata Reach, <u>including White Horse Rock, Yellow Cliffs and Hamilton Cove</u>.</p> <p><u>Advancing regenerating headlands and embayments extending from ridge to foreshore.</u></p> <p><u>Of the remaining indigenous forests within the Area, much appears on more elevated slopes (Mt. Shewell, Mt. Drew, Bobs Peak, Okuri Peak), but with substantial tracts at lower coastal altitudes, especially east and south aspects (Apuau Channel, Fitzroy Bay).</u></p> <p>Very High perceived naturalness values</p>	<p><u>Many bays contain houses, jetties and wharves</u></p> <p><u>Modifications within Waihinau Bay and Waitata Bay limit extent of mapping to those identified. Modifications within these mapped areas are restricted to several jetties, a small number of private residences, powerlines and tracks. Where aquaculture is present, this has limited the extent of mapping to the terrestrial area only.</u></p>

A separate table (because of this change) is confirmed for the remaining areas originally covered by this table. See Treble Tree and Maud Island Area as well as Northern Tennyson Inlet (including Camel Point, Canoe Bay, Fitzroy Bay, Savill Bay, Garne Bay, Hallam Cove Area).

### **Coastal Marine Area C: Treble Tree and Maud Island Area**

**Submitter 179/2 Tui Nature Reserve, Submitter 479/269 Department of Conservation, Submitter 716/203 and 716/204 Friends of Nelson Haven and Tasman Bay Incorporated, Submitter 1199/4 Treble Tree Holdings Limited, Submitter 1204/3 United Fisheries Holdings Limited.**

**Submitter 479** requests a mapping change: within Coastal Marine Area C: Pelorus Sound, the mapped boundary of the Maud Island to Yellow Cliffs sub area with high natural character should extend and wrap around Reef Point into Waitata Bay to a point directly north of the number 244 on the topographical maps. The high natural character marine area should wrap around this prominent headland to include the area offshore of the Yellow Cliffs as the title of the sub area suggests.

**Submitter 1199** requests that the very high and high natural character as it relates to the land and water around farms 8104, 8105 and 8106 (Treble Tree) is removed and that the presence of the farms is expressly recognised. Recognition of the unique, innovation and research values identified for this zone should also be noted.

**Submitter 179** requests a review of the mapping of high, very high and outstanding natural character in the Outer Pelorus, specifically around Maud Island. Specifically, a request that outstanding areas be reinstated.

**Submitter 716** requests that the outstanding natural character area of Outer Sounds and Eastern Tasman Bay be expanded. In this CMA, it is to include that all of Maud Island and Mount Shewell be integrated in Outstanding Natural Character. A further request is that the boundary of the outstanding natural character area is to include a distance of not less than 500 metres from MHWS as being within the outstanding natural character area.

**Submitter 1204** requests the removal of the natural character overlay from the ridgeline above Waiona Bay.

### **Discussion**

These Submitters request a review of the areas of identified and mapped natural character in this part of the Marlborough Sounds. Some request an extension of the overlay, while others request the removal of parts of the overlay, especially as it relates to their property or marine farms.

Parts of this area retain some very notable areas of naturalness. Maud Island, is noted for its outstanding levels of natural character and these values and characteristics are outlined on page 276 of the Coastal study. The tract of land extending from Reef Point in the north to Bucklands Bay in the south is also a significantly advanced area of regenerating indigenous bush. This terrestrial area lacks any form of structures other than small areas of wilding pines, the Tui Nature Lodge structures on the ridge and a small amount of tracking. No foreshore structures are apparent, apart from a consented mussel farm at Treble Tree<sup>27</sup> (currently mostly undeveloped) and two mooring buoys (one at Woodlands Bay and one at Bucklands Bay). The consent for a marine farm at Treble Tree, does not significantly affect the mapping at the scale at which the marine environment has been mapped.

Significant areas of dredging and trawling occur in this area, and this is reflected in the **Image 7** below and within **Figures 1 and 2**. Image 7 indicates a series of coloured points within southern Waitata Reach, which indicates the number of areas dredged at any given time from data received from the 2011 season. This same Image is represented more crudely in **Figure 1**. This image simply illustrates the abundance of dredging in this area.

There is very limited modification apparent within Apuau Channel. As a result, I agree with Submitter 716 that an extension of the Outstanding Natural Character to cover Apuau Channel is appropriate.

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<sup>27</sup> Refer to Marlborough District Council for current understanding of the marine farms at this location. Decision dated 20 February 2017 confirmed approval of 8104 and rejection of 8105 and 8106.

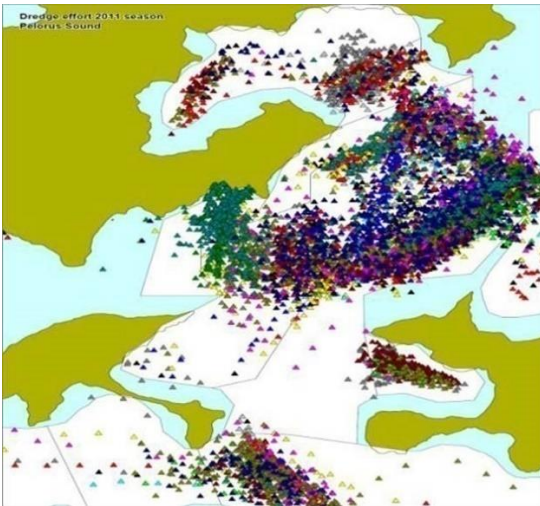


Image 7. Source: Evidence of Sharyn Smith on behalf of Te Rūnanga o Ngāti Kuia Charitable Trust, Dredged Effort Data Te Hoiere 2011, Witness Statement for New Zealand King Salmon Submission No. 0455, 2011.

I have considered whether all or parts of the adjacent mainland be considered as outstanding. There is mature indigenous forestry extending from the upper slopes of the ridge between Mt. Sheweel and Mt. Drew that certainly contribute the naturalness in Waiona Bay. Part of this extends down to the coast. Based on this, I consider that there is scope to extend part of the ONC from the head of Waiona Bay to the ridgeline.

## Recommendation

To amend the natural character mapping of Apuau Channel and part of the terrestrial environment. Refer to **Figure F: Natural Character Mapping Change 6: Treble Tree and Maud Island Area.**

I also recommend that amendments to the Coastal Marine Area C: Pelorus Sound, Coastal Terrestrial Area 3: Bulwer and Outstanding Natural Character 7: Maud Island tables be undertaken, to expressly recognise the newly mapped area which is more specific than what is currently listed as 'Land to the west of Waitata Reach'

### Coastal Marine Area C: Pelorus Sound (Level 4/5 Table)

Sub Area	Rating	Key Values	Additional Comments
Maud Island to Yellow Cliffs, including Apuau Channel	High	<p><b><u>Near-shore areas and much of Apuau Channel, including Waiona Bay, retain high natural values.</u></b></p> <p>Sheltered indented coastline with multiple aspects.</p> <p><u>Apuau Channel, with its deep channel habitats and moderate currents, separates Maud Island from the mainland.</u></p> <p>Tom Shand Scientific Reserve (Maud Island) and Deep Bay Scenic Reserve on the opposite mainland. <u>separated by Apuau Channel.</u></p>	<p>Commercial scallop dredging in Tawhitinui Reach and Waitata Reach, <u>but mostly absent between Maud Island and the mainland.</u></p> <p>Three marine farms approved for the culture of sponges and seaweeds with limited effect on seabed values</p>

Coastal Terrestrial Area 3: Bulwer (Level 4/5 Table)

Sub Area	Rating	Key Values	Additional Comments
<u>Land to west of Waitata Reach Treble Tree to Bucklands Bay</u>	Very High and High	<p><del>Whilst some land has been cleared for pasture, there are limited structures on the land, especially around northern Port Ligar and land west of Waitata Reach.</del></p> <p><u>Advancing regenerating headlands and embayments extending from ridge to foreshore with noticeable lack of modification.</u></p> <p><del>Of the remaining</del> Much of the indigenous forests <del>within the Area, much</del> appears on more elevated slopes, <del>such as on</del> (Mt. Shewell, Mt. Drew, <del>Bobs Peak, Okuri Peak</del>), however a <del>but</del> with substantial tracts <del>appears</del> at lower coastal altitudes at, <del>especially east and south aspects</del> (Apuau Channel., <del>Fitzroy Bay</del>).</p> <p>Very High perceived naturalness values</p>	<p><del>Many bays contain houses, jetties and wharves</del></p> <p><u>Modifications within this area include: Occasional area of wilding pines present, Tui Nature Lodge structures and small amount of tracking. No foreshore structures apart two from mussel farms at Treble Tree and two mooring buoys (one at Woodlands Bay and one at Bucklands Bay)</u></p>

A separate table (because of this) is confirmed for the remaining areas originally covered by this table. See Waihinau and Waitata Bays and northern Waitata Reach Area as well as Northern Tennyson Inlet (including Camel Point, Canoe Bay, Fitzroy Bay, Savill Bay, Garne Bay, Hallam Cove Area).

Outstanding Natural Character 7: Maud Island

Maud Island Outstanding Natural Character Attributes	
<i>Coastal Terrestrial Area and Rating (Level 3)</i>	Bulwer (High)
<i>Coastal Marine Area and Rating (Level 3)</i>	Pelorus Sound (including Forsyth Island) (Moderate- High)
Values	
Abiotic	<p>The Island landform of steep to moderately steep coastal hills with inlets and bays retains a high maritime influence.</p> <p>The Island forms a distinct pyramidal form with a slender landform connecting Maud Island to Harter Point.</p> <p><u>Sheltered indented coastline with multiple aspects because of Maud Island.</u></p> <p><u>Apuau Channel, with its deep channel habitats and moderate currents, separates Maud Island from the mainland.</u></p>
Biotic	<p>Internationally significant, predator free Island sanctuary</p> <p>Harbours nationally threatened species of invertebrates, birdlife and the entire population of the Maud Island Frog.</p> <p>Home Bay contains 15 hectares of remnant bush including kohekohe, tawa, nikau, pukatea and mahoe.</p> <p>Most of the Island is cloaked in regenerating shrubland and forest.</p> <p>Several species of plants uncommon in Marlborough Sounds occur on Maud Island including the large-leaved milk tree, Sonchus kirkii and renga renga lily.</p>

	Sheltered coastline with multiple aspects. Near-shore marine areas <u>and much of Apuau Channel</u> retain high natural values
Experiential	Distinct island landform, pyramidal skyline and slender neck of Harter Point is very evident.  Vegetation predominates views of the island which straddles the inner and outer Marlborough Sounds.  <u>Apuau Channel provides a sense of enclosure, but with expanding vistas northwards to Waitata Reach and southwards to Tawhitinui Reach.</u>

### **Coastal Marine Area C: Tapapa Point, Tawhitinui Bay and Kauauroa Bay Areas**

**Submitter 574/14 and 574/16 Bryan Skeggs, Submitter 587/1 and 587/4 Caroline Farley, Submitter 820/1 and 820/4 Jeffrey Meachen, Submitter 842/3, 842/4, 842/6 and 842/7 Just Mussels Limited and Tawhitinui Greenshell Limited, Submitter 866/5 and 866/7 Karen Donaldson, Submitter 867/5, 867/7 and 867/13 Karl Donaldson, Submitter 874/5, 874/7, 874/8 and 874/9 KPF Investments Limited and United Fisheries Limited, Submitter 1140/108, 1140/110 Sanford Limited.**

**Submitters 587, 820** request the removal of the natural character mapping around farm 8217 (Tawhitinui Bay) or record that aquaculture will not affect the relevant values.

**Submitter 574** requests a review of this area and provide appropriate justification for the extent and definition. The submitter specifically seeks acknowledgement within the schedules to these natural character and landscape areas that existing marine farms (8224, Kauauroa Bay) are not causing adverse effect.

**Submitters 866, 867** request the removal of the natural character mapping around farm 8223 (Kauauroa Bay) or record that aquaculture will not affect the relevant values.

**Submitters 874, 1140** request the removal of the overlay, specifically for the high and very high natural character overlay in Kauauroa Bay and high natural character at Tawhitinui Bay; or record that aquaculture will not affect the relevant values.

**Submitter 842** opposes the mapping of the high natural character at Tapapa Point and in Tawhitinui Bay or record that aquaculture will not affect the relevant values. This submitter also notes that these two bays are not included within Coastal Natural Character Map 3.

### **Discussion**

These Submitters request removal of the natural character overlay from close to their farms or their land or area of current zoning.

High and very high levels of terrestrial natural character occur continuously along this highly-indented tract of eastern Tawhitinui Reach. Much of this land is relatively advanced regenerating vegetation, with a small campsite located at Kauauroa Bay within dense native bush. Within the marine environment, aquaculture is located within Tawhitinui Bay and within Kauauroa Bay. As a consequence of the aquaculture, and the reasonably high frequency of dredging for scallops as identified on **Figure 1**, the marine environment rates as less than high for natural character in this area, and therefore has not been mapped.

There are no structures at all in either bay (other than aquaculture), with only a small track extending into Kauauroa Bay from the north from Beatrix Bay. I maintain that the mapping is therefore correct in the proposed plans.

Therefore, there is no requirement to alter any of the mapping.

### **Recommendation**

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



## **Coastal Marine Area C: Horseshoe Bay Area**

***Submitter 534/1 and 534/2 Anne-Marie Prendeville, Submitter 563/4 and 563/5 Brent Matthew Dalley, Submitter 707/1 and 707/2 Frank Prendeville, Submitter 750/3, 750/4 and 750/5 Goulding Trustees Limited, Submitter 854/4 and 854/5 Kathleen Mary Mead, Submitter 874/4, 874/5, 874/7, 874/8 and 874/9 KPF Investments Limited and United Fisheries Limited, Submitter 923/4 and 923/5 Margaret Dalley, Submitter 1140/108, 1140/110 Sanford Limited.***

**Submitters 534, 563, 707, 854, 923** request that the natural character overlay is removed from the vicinity of marine farms 8215, 8209, 8215 in Horseshoe Bay; or record that aquaculture will not affect the relevant values. **Submitters 750, 874, 1140** request more generally that the high natural character is removed.

### **Discussion**

All of these Submitters request removal of the natural character overlay from close to their farms or their land or area of current zoning.

The high levels of terrestrial natural character within Horseshoe Bay is reflective of the continuous vegetated cover and lack of development apparent in the bay. In terms of modifications, there is one jetty, one boatshed and one house. Reasonably advanced regeneration of indigenous vegetation surrounds the bay and any structures are subservient to this. Based on this, I maintain that the terrestrial component to Horseshoe Bay is mapped correctly.

Within the marine environment, the embayment is surrounded by aquaculture. The presence of aquaculture has assisted to delimit any marine natural character mapping.

Therefore, there is no requirement to alter any of the mapping.

### **Recommendation**

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

## **Coastal Marine Area C: Southern Tawhitinui Reach (Cregoe Point to Rams Head)**

***Submitter 733/3, 733/4 and 733/5 Graeme L Beal, Submitter 874/5, 874/7, 874/8 and 874/9 KPF Investments Limited and United Fisheries Limited, Submitter 1034/2 and 1034/3 P W Archer, Submitter 1125/3 and 1125/4 Scott Madsen, Submitter 1140/108, 1140/110 Sanford Limited, Submitter 1240/1 and 1240/2 Worlds End Enterprise Limited.***

**Submitters 733, 1034, 1125, 1240** request that the natural character overlay is removed from the vicinity of marine farms 8303, 8302, 8307 and 8306 in Brightlands Bay and 8304 at Cregoe Point; or record that aquaculture will not affect the relevant values.

**Submitter 1140** requests to remove the ONC from Cregoe Rock in a north-west line to Camel Point.

**Submitter 874** requests the following: retain the natural character mapping as proposed for Rams Head, Tawhitinui Reach.

### **Discussion**

All of these Submitters request removal of the natural character overlay from close to their farms.

This part of Tawhitinui Reach has been cleared in the past of its original vegetation and is, for the most of it, grazed. There is a substantial area of pine forestry close to Cregoe Point, with areas of gradual revegetation occurring within the gullies and in some of the more difficult terrain. There is aquaculture along the entirety of the foreshore area. Due to these modifications, all of this area has not been mapped as high natural character above. Only the western part of Cregoe Point and extreme upper parts of the hillside above Brightlands Bay retain areas of very high levels of natural character, due in principal to the untouched

indigenous forestry along the ridge and fronting Tennyson Inlet. I consider that these mapped and unmapped areas accurately reflect the naturalness of this part of the Marlborough Sounds.

As a consequence, there is no requirement to alter any of the mapping.

## **Recommendation**

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

### **Coastal Marine Area C: Northern Tawhitinui Reach (Picnic Bay Area)**

*Submitter 337/2 CP and LE Womersley, Submitter 428/1 Allen, Judith and Andrew Cox, Submitter 626/1, 626/2 and 626/3 Christopher Peter Womersley, Submitter 958/27 Marine Farm Management Limited, Submitter 1140/108, 1140/110 Sanford Limited, Submitter 1184/5 and 1184/6 Talleys Group Limited.*

**Submitter 337** requests that the natural character overlay in relation their property (Lot 1 DP 18488, Lot 1 DP 311518 and Lot 1 DP 18196) be reviewed, recognising the existing modifications with removal of the overlay. **Submitter 428** requests the same on their adjacent property to **Submitter 337**.

**Submitters 626, 958** request that the natural character overlay is removed from the vicinity of marine farm 8181 and 8179 in Picnic Bay (Tawhitinui Reach); or record that aquaculture will not affect the relevant values. **Submitter 1184** requests that marine farming does not affect natural character values, notably at farm 8177.

**Submitter 1140** requests that the natural character overlay be amended. Specifically, to delete the VHNC west of Woodlands.

## **Discussion**

All of these Submitters request removal of the natural character overlay from close to their farms or their land.

This part of northern Tawhitinui Reach retains a mosaic of differing land uses as well as having aquaculture along much of its shore. Therefore, limited natural character mapping of high and above is apparent. The mapped area of high natural character is associated towards the east of Picnic Bay, which includes part of Submitter property Lot 1 DP 311518. This tract of land is similar in character to the land further west, retaining a mosaic of land uses, and lower than high levels of natural character. Based on this, I consider that this area has been incorrectly mapped, and that the land be considered as holding less than high levels of natural character (and therefore unmapped). The remaining properties to the west are not included within any overlay.

There is a fringe of relatively high naturalness along the foreshore of this area, however this is interrupted by jetties, a few houses and tracks. Also, I have reviewed the upper parts of Mt. Shewell, and consider that this be very high, due to the mature indigenous vegetation present.

Based on this, I recommend that an amendment be made to this part of the natural character overlay. I recommend that the easterly tract of land (to Picnic Bay and the Submitter properties mentioned above) highlighted as high, be unmapped to better capture the mosaic of land uses on this land. Through this review, I also recommend that the upper part of Mt. Shewell be mapped reclassified as very high, from high natural character to reflect the mature indigenous vegetation present.

## **Recommendation**

I therefore recommend that the area of high natural character east of Picnic Bay be unmapped based on its level of modification and that the upper part of Mt. Shewell be considered very high. This is reflected on **Figure G: Natural Character Mapping Change 7: Northern Tawhitinui Reach.**

## **Coastal Marine Area C: Northern Tennyson Inlet (including Camel Point, Canoe Bay, Fitzroy Bay, Savill Bay, Garne Bay, Hallam Cove Area)**

**Submitter 401/257 Aquaculture New Zealand, Submitter 426/248 Marine Farming Association Incorporated, Submitter 433/212 Port Marlborough New Zealand Limited, Submitter 482/2 Worlds End Enterprises Limited, Submitter 514/13, 514/15 AJ King Family Trust and SA King Family Trust, Submitter 764/3 and 764/4 HARO Partnership, Submitter 842/3, 842/4 and 842/7 Just Mussels Limited and Tawhitinui Greenshell Limited, Submitter 847/1 and 847/2 KJB Marine Farms Limited, Submitter 958/11, 958/26 and 958/27 Marine Farm Management Limited, Submitter 1034/1 and 1034/3 P W Archer, Submitter 1098/1 and 1098/5 Sandra Ann King, Submitter 1140/108, 1140/110 Sanford Limited, Submitter 1150/3, 1150/4, 1150/5 and 1150/6 Shellfish Marine Farms Limited, Submitter 1234/2 and 1234/3 Waimana Marine Limited, Submitter 1184/5 and 1184/6 Talleys Group Limited.**

**Submitters 401, 426** oppose the mapping of the waters of Fitzroy Bay as high natural character and the surrounding land as very high natural character. The submitter states that if the mapping is correct, to record that aquaculture will not affect the relevant values.

**Submitter 842** requests that the natural character overlay is removed from the Fitzroy Bay land and seascape, the north-western side of Hallam Cove and Camel Point Headland and its vicinity or record that aquaculture will not affect the relevant values.

**Submitters 514, 958, 1034, 1098** request that the natural character mapping be removed from farm 8194, 8573, 8184, 8188, 8193 in Canoe Bay, Hallam Cove, Fitzroy Bay, Garne Bay or record that aquaculture will not affect the relevant values

**Submitter 433** requests that the very high natural character is removed from the Port Landing Zone at Elaine Bay, due to the existing modifications present.

**Submitter 482** requests amendment of the extent of the natural character overlay on the western side of Tennyson Inlet.

**Submitter 764** requests that the natural character overlay is removed from the Camel Point headland and its vicinity and the northern entrance of Tennyson Inlet or record that aquaculture will not affect the relevant values.

**Submitter 1150** requests that the natural character mapping be removed from the northern extreme of Tennyson Inlet, or record that aquaculture will not affect the relevant values. This submitter notes that part of the central Sounds isn't included within the Maps.

**Submitter 1140** requests that the natural character overlay be amended. Specifically, to delete the VHNC around Canoe Bay and Camel Point and west of Elaine Bay.

**Submitters 847, 1184, 1234** request that the natural character mapping be removed from farms 8201, 8202, 8203 (near Camel Point) and 8177, or record that aquaculture will not affect the relevant values.

### **Discussion**

All of these Submitters request removal of the natural character overlay from close to their farms or their land or area of current zoning.

This northern part of Tennyson Inlet and eastern Tawhitinui Reach hold generally high levels of natural character. There are generally limited large areas of modification and where there are, these areas have been excluded from any mapping. Whilst this northern part of Tennyson Inlet does not hold the same values and characteristics as the remaining parts of Tennyson Inlet, there are areas that are justifiably notable, for their very high levels of natural character. These areas are typically where modification is scarce, and include parts of northern Elaine Bay and much of the vegetated slopes above Fitzroy Bay and Hallam Cove. Within the marine environment, there are numerous marine farms, which to varying degrees has had an effect on how the marine environment was mapped in this area. A small area mapped high extends from Long Reef Point northwards through the central channel of Hallam Cove to a point just south of Cissy Bay. This area includes much of Fitzroy Bay and all of Savill Bay and Garne Bay and part of Hallam Cove. The only water-

based modifications are two areas of marine farms in southern Fitzroy Bay and Garne Bay. These water-based modifications are the only evidence of development in the area, apart from a single jetty and two mooring buoys in Savill Bay. On land, there are a few built structures in Garne Bay and in Savill Bay, and an area of pine trees in Garne Bay and a small grazed area in Savill Bay, but these appear subservient to the broader mapping. At a detailed re-examination, I would be happy to remove the very high level of natural character around the area of grazed land in Savill Bay.

The highly-rated terrestrial environment in Canoe Bay is an extension of that found further northwards and southwards, and lacks sufficient modification to be declassified. I am therefore happy that this remains as high, along with Camel Point and land north of Elaine Bay, despite the odd wilding pine being present. Aquaculture within Canoe Bay and around much of Camel Point and north of Elaine Bay prevents this area from being high or very high in the marine environment.

South of Camel Point is an area of outstanding natural character, which includes the bulk of Tennyson Inlet and extends over the ridge to Nydia Bay. It appears that the alignment of this northernmost mapping extends through marine farm 8203. This appears to be an error and a minor mapping change is required to be made to exclude this farm from the outstanding and very high natural character mapped area of Tennyson Inlet.

Regarding the Port Landing Zoning at Elaine Bay, I agree with Submitter 433 that the very high natural character mapping here should be realigned to follow the outer edge of this zone, principally due to the localised existing modifications of this part of the bay.

## Recommendation

Based on the above, I recommend that three small mapping changes occur. One around the more modified area of Savill Bay, (where the area of pasture is to be removed from the very high mapping) one south of Camel Point and one to the area around Elaine Bay. These are reflected on **Figure H: Natural Character Mapping Change 8: Savill Bay, Northern Tennyson Inlet and Elaine Bay.**

I also recommend that an amendment to the Coastal Terrestrial Area 3: Bulwer table be undertaken, to expressly recognise the mapped area and is more specific than what is currently listed as 'Land to the west of Waitata Reach', as follows:

### Coastal Terrestrial Area 3: Bulwer (Level 4/5 Table)

Sub Area	Rating	Key Values	Additional Comments
<del>Land to west of Waitata Reach</del> <u>Fitzroy Bay Area</u>	Very High and High	<p>Whilst some land has been cleared for pasture, there are limited structures <del>on</del> within the mapped area. <del>land, especially around northern Port Ligar and land west of Waitata Reach.</del></p> <p><u>Advancing regenerating headlands and embayments extending from ridge to foreshore, noticeably from Bobs Peak and Okuri Peak with substantial tracts at lower coastal altitudes in between the numerous embayments of Fitzroy Bay.</u></p> <p><u>Of the remaining indigenous forests within the Area, much appears on more elevated slopes (Mt. Shewell, Mt. Drew, Bobs Peak, Okuri Peak), but with substantial tracts at lower coastal altitudes, especially east and south aspects (Apuau Channel, Fitzroy Bay).</u></p> <p>Very High perceived naturalness values</p>	<p><del>Many bays contain houses, jetties and wharves</del></p> <p><u>Modifications within these mapped areas are restricted to one jetty in Savill Bay, several private residences in Canoe Bay, Garne Bay, small tracks extending from the French Pass Rd into Canoe Bay, Savill Bay and Garne Bay.</u></p> <p><u>Agriculture and forestry have restricted mapping to parts of Hallam Cove and Savill Bay.</u></p> <p><u>Aquaculture has limited the extent of mapping in Hallam Cove, Canoe Bay and around Camel Point to Elaine Bay.</u></p>

A separate table (because of this) is confirmed for the remaining areas originally covered by this table. Also, refer to Treble Tree and Maud Island Area discussion above as well as Waihinau and Waitata Bays and northern Waitata Reach Area.

### **Coastal Marine Area C: Nydia Bay to Fairy Bay to Tawero Point**

**Submitter 546/1, 546/2, 546/3 and 546/13 Aroma Aquaculture Limited, Submitter 640/15 Douglas and Colleen Robbins, Submitter 726/13, 726/15 Canantor Mussels Limited and NI Buchanan-Brown, Submitter 735/1 and 735/2 [735/3] Gillian Margaret Rothwell, Submitter 738/18 Glenda Vera Robb, Submitter 809/14 Jim Jessep, Submitter 815/1 and 815/2 Jonathan Large, Submitter 842/3, 842/4, 842/6 and 842/7 Just Mussels Limited and Tawhitinui Greenshell Limited, Submitter 874/5, 874/7, 874/8 and 874/9 KPF Investments Limited and United Fisheries Limited, Submitter 935/15 Melva Joy Robb, Submitter 1098/1, 1098/2 and 1098/5 Sandra Ann King, Submitter 1140/108, 1140/110 Sanford Limited, Submitter 1160/3, 1160/4, 1160/5 and 1160/6 St George Limited, Submitter 1214/2 and 1214/3 Vincent Rene Smith, Submitter 1234/1 and 1234/3 Waimana Marine Limited.**

**Submitter 1234** requests removal of the natural character overlay from the vicinity of marine farms 8321 in Wilson Bay, or record that aquaculture will not affect the relevant values.

**Submitter 809** requests removal of the natural character overlay from the vicinity of marine farms 8327 in Fairy Bay, or record that aquaculture will not affect the relevant values and **Submitter 874** opposes the mapping of the natural character overlay in Fairy Bay and Kaiuma Bay or record that aquaculture will not affect the relevant values

**Submitter 726** requests that descriptions in Fairy Bay & Scott Bay include existing residential development and that marine farms are present. This submitter also requests that acknowledgment in the schedules that existing marine farms do not cause adverse effects to the overlay. *(Note: I am unaware of exactly where Scott Bay is as there is no reference to a 'Scott Bay' on the topographic maps, or in the submission, but assume that it is close to Fairy Bay).*

**Submitters 546, 735, 815, 1098, 1214** request removal of the natural character overlay from the vicinity of marine farms 8355, 8358, 8354, 8363 in Nydia Bay, and 8371 in Maori Bay, or record that aquaculture will not affect the relevant values.

**Submitters 842, 1160** request the removal of the very high natural character overlay from the seascape south of Tawero Point and in Wilson Bay, or record that aquaculture will not affect the relevant values.

**Submitter 935** requests that the natural character mapping be removed from Nydia Bay to Tawero Point.

**Submitters 640 and 738** request that Nydia Bay - Tawero Point is deleted from Coastal Marine Area C: Pelorus Sounds of Appendix 2.

**Submitter 1140** requests to delete the HNC overlay at Putanui Point, to amend the northern extent of the HNC by ending at Pipi Beach in a straight line with the VHNC, to amend the VHNC so that it does not include seascapes in Nydia Bay (Chance Bay and Penguin Bay) and to delete the VHNC at Tawero Point south towards Capsize Point.

*Note: **Submission point 735/3** relates more to landscape considerations than natural character and consequently has been considered as part of the landscape report rather than this natural character report (despite it being contained within the natural character schedules).*

### **Discussion**

All of these Submitters request removal of the natural character overlay from close to their farms or their land.

This stretch of coastal land and waters in the Inner Sounds contains some of the most intact and significant stands of original forest in the Marlborough Sounds. This area also has some of the longest unmodified parts

of the coastal environment within the Inner Sounds. Therefore, the majority of this area, along with tracts of Tennyson Inlet, have been identified as outstanding natural character. This exceptional tract of inland indigenous forest, displaying a sequence of vegetation types from mountain top to shore is rare nationally. The more modified parts of inner Nydia Bay and North West Bay have been excluded from this outstanding overlay, however still hold very high levels of natural character in the marine environment and areas of high natural character within the terrestrial part of North West Bay.

Within this broad Level 4 mapping of the marine environment, there are small areas of modification that have not directly affected the broad mapping of this stretch of coastal water to a degree that they should be excluded. This includes the isolated marine farms in Fairy Bay and Wilson Bay and the jetties and other coastal foreshore development. Whilst these developments are tolerated, they do have an ongoing-effect on the naturalness of the area, and those in Fairy Bay specifically (due to the outstanding natural character overlay) should be assessed for their appropriateness when consenting occurs for these farms. Based on this, I am comfortable with the natural character mapping in this area.

The mapping of high natural character in Kaiuma Bay reflects part of the largest estuarine area in the Marlborough Sounds and the extensive saltmarsh beds, diverse avifauna and lack of modifications apparent to the waterbody. The farm in Kaiuma Bay has been identified in the 'Additional comments' within Appendix 2 and does not detract from the broader Level 4 mapping of the marine environment.

Existing modifications have therefore been taken into account in terms of the mapping, however, I agree that greater clarity could be contained within the tables in Appendix 2, notably for the Level 4/5 table for Coastal Marine Area C: Pelorus Sound (sub-area Nydia Bay-Tawero Point), the Level 4/5 table for Coastal Terrestrial Area 6: Nydia and the Level 4/5 table for Coastal Terrestrial Area 3: Bulwer.

## Recommendation

To amend the relevant tables to expressly recognise existing modifications, as follows:

### Coastal Marine Area C: Pelorus Sound (Level 4/5 Table)

Sub Area	Rating	Key Values	Additional Comments
Nydia Bay – Tawero Point	Very High	<p><b>Largely unmodified section of coast extending over many kilometres from the head of Nydia Bay along the western side of Pelorus Sound to Tawero Point.</b></p> <p>Several small bays.</p> <p>Mostly sheltered but exposed to a wide range of tidal flow conditions including high flow communities.</p> <p>Large sections of this coast are backed by scenic reserves.</p>	<p>Two small areas of mussel farms (Fairy Bay and west of Tawero Point).</p> <p><u>A number of moorings, jetties, boatsheds and private residences located within Fairy Bay and North West Bay.</u></p>

### Coastal Terrestrial Area 6: Nydia (Level 4/5 Table)

Sub Area	Rating	Key Values	Additional Comments
Tennyson Inlet & Nydia Bay area	Very High	<p>Original forests on lower altitude hillslopes and toeslopes, and coastal forests are largely intact in Tennyson Inlet, and Nydia Bay to Fairy Bay.</p> <p>Small areas of alluvial forests and beach communities are still intact in Tennyson Inlet and Nydia Bay and contribute significantly to the biodiversity of the area.</p> <p>Tennyson Inlet and Nydia Bay supports some of the largest tracts of lowland and coastal</p>	<p>Some modification around Tuna Bay, Penzance Bay and North West Bay restricts those areas to High Natural Character.</p> <p><u>Modification to Fairy Bay is limited and restricted to several jetties and a</u></p>

		<p>forests in Marlborough. These are largely intact altitudinal sequences of primary forest, extending from ridgetops to seafloor and are therefore nationally important.</p> <p>There are nationally threatened plants on the Tennyson Inlet islands.</p> <p>Tennyson Inlet and parts of Nydia Bay retain extremely high experiential values, due mainly to its unmodified indigenous vegetation cover that extends from the shore line to the ridges and peaks that contain the inlet.</p>	<p><u>small number of houses.</u></p> <p><u>Modifications to North West Bay include:</u>  <u>numerous jetties,</u>  <u>boatsheds, private residences, powerlines and tracks.</u></p>
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Coastal Terrestrial Area 3: Bulwer (Level 4/5 Table)

Sub Area	Rating	Key Values	Additional Comments
North West Bay	Very High and High	Indigenous forested peninsula at Stafford Point	<p><u>Modification to the immediate north</u></p> <p><u>Modification to Miro Bay and Wilson Bay include:</u>  <u>numerous jetties,</u>  <u>boatsheds, private residences, powerlines and tracks.</u></p>

**Coastal Marine Area C: Yncyca Bay, South East Bay and Nikau Bay**

**Submitter 514/13, 514/15 AJ King Family Trust and SA King Family Trust, Submitter 544/4 and 544/5 Apex Marine Farm Limited, Submitter 617/6 and 617/8 Clearwater Mussels Limited, Submitter 726/13, 726/15 Canantor Mussels Limited and NI Buchanan-Brown, Submitter 874/5, 874/7, 874/8 and 874/9 KPF Investments Limited and United Fisheries Limited, Submitter 890/3, 890/4 and 890/5 Lloyd Sampson David, Submitter 911/1 and 911/2 M and S Johns, Submitter 1098/1 and 1098/5 Sandra Ann King, Submitter 1125/1 and 1125/4 Scott Madsen, Submitter 1154/1 and 1154/2 Sounds Fun Mussel Company.**

**Submitter 726** opposes the mapping in Yncyca Bay due to modifications and **Submitter 874** opposes the mapping of the natural character overlay in South East Bay. Both request acknowledgment in the schedules that existing marine farms do not cause adverse effects to the overlay.

**Submitter 617** supports the absence of mapping of the waters of South East Bay and Yncyca Bay. Opposes the mapping of the land adjacent to South East Bay due to forestry and residential development.

**Submitters 514, 1098, 1125** request removal of the natural character overlay from the vicinity of marine farms 8333 and 8338 in South East Bay, with sufficient modification evident to remove the overlay and **Submitter 1154** requests removal of the natural character overlay from the vicinity of marine farms 8346 in Yncyca Bay. All submitters request that if the overlay remains record that aquaculture will not affect the relevant values

**Submitters 544, 890,** request that the absence of natural character mapping in Nikau Bay is retained, and **Submitter 911** requests the removal of the natural character overlay from the vicinity of marine farm 8387.

**Discussion**

These Submitters request removal of the natural character overlay from close to their farms or their land.

These bays are located within a part of the Inner Sounds which retains reasonably high levels of natural character, principally due to the lack of modifications readily apparent. To the north, in North West Bay and Fairy Bay exists one of the very few stretches of significant inner reaches where modification is limited to isolated areas and where land and sea appear unencumbered by structures. At Nikau Bay, Yncyca Bay and South East Bay, more modification is apparent, in the form of commercial forestry, powerlines, tracks, boatsheds, slipways, jetties, houses, aquaculture and moorings. Whilst most of these modifications are located close to the intertidal area, the upper steeper slopes of the ridges that confine the embayments retains much higher levels of naturalness.

The mapped areas of high and very high natural character, in my view, represent appropriately those areas. Existing modification has limited the extent of the mapped natural character areas, with much of these two bays retaining natural character limits below high. Based on this, I consider that no change to the mapping should occur.

## **Recommendation**

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

### **Coastal Marine Area C: Old Homewood Bay and Marys Bay**

***Submitter 544/4 and 544/5 Apex Marine Farm Limited, Submitter 842/3, 842/4 and 842/7 Just Mussels Limited and Tawhitinui Greenshell Limited, Submitter 843/1 and 843/2 Karen Anne Harris, Submitter 890/3, 890/4 and 890/5 Lloyd Sampson David, Submitter 928/1 and 928/2 Michael Headley Harris.***

**Submitters 544, 890**, request that the mapping in Marys Bay is amended to remove the high natural character on the land at the south side of the bay, or record that aquaculture will not affect the relevant values.

**Submitters 842, 843, 928** request removal natural character overlay from the vicinity of marine farm 8351 in Old Homewood Bay, or record that aquaculture will not affect the relevant values.

## **Discussion**

All of these Submitters request removal of the natural character overlay from close to their farms or their land.

Due to modifications apparent in these two bays, there is only one small area of regenerative bush in Marys Bay identified as holding high levels of natural character. No other mapping is apparent, as these two bays would rate as less than high in natural character terms.

## **Recommendation**

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

### **Coastal Marine Area C: Forsyth Bay**

***Submitter 261/2 Lynette and Kevin Oldham, Submitter 514/13 and 514/21 AJ King Family Trust and SA King Family Trust, Submitter 544/3 Apex Marine Farm Limited, Submitter 563/1, 563/2, 563/3, 563/5 Brent Matthew Dalley, Submitter 601/2, 601/3, 601/4, 601/5, 601/6 and 601/7 Christopher Redwood, Submitter 617/4 Clearwater Mussels Limited, Submitter 726/13, 726/17 and 726/18 Canantor Mussels Limited and NI Buchanan-Brown, Submitter 733/1, 733/2 and 733/5 Graeme L Beal, Submitter 750/3, 750/4 and 750/5 Goulding Trustees Limited, Submitter 809/16 Jim Jessep, Submitter 854/1, 854/2, 854/3 and 854/5 Kathleen Mary Mead, Submitter 874/5, 874/6, 874/8 and 874/9 KPF Investments Limited and United Fisheries Limited, Submitter 890/3 and 890/5 Lloyd Sampson David, Submitter 923/1, 923/2, 923/3, 923/4 and 923/5 Margaret Dalley, Submitter 1018/1 PH Redwood and Company Limited, Submitter 1022/2, 1022/3, 1022/4, 1022/5, 1022/6 and 1022/7 Patricia Redwood, Submitter 1056/3 and 1056/4 Rob Curtis, Submitter 1098/1, 1098/3 and 1098/5 Sandra Ann King, Submitter 1140/108, 1140/110 and 1140/111 Sanford Limited, Submitter 1156/1, 1156/2 and 1156/3 Southern Crown Limited, Submitter 1157/14 Southern Crown Limited.***



**Submitter 261** requests the removal of the natural character mapping to all land facing into Forsyth Bay where the land lies both south and west of Wynens Rock and all waters of Forsyth Bay located both south and west of Wynens Rock, where the rock known locally as Wynens Rock is shown as an un-named mark on nautical chart NZ6152, located at or near 40°58.55' S, 174°1.03' E. (The location where the existing MSRMP CMZ1/CMZ2 boundary line intersects the shore of Forsyth Bay to the south of Kaitira could be used as a proxy). This is due to inconsistencies of the identified values in this area.

**Submitters 514, 563, 601, 733, 809, 854, 923, 1018, 1022, 1056, 1098, 1156, 1157** request removal natural character overlay from the vicinity of marine farms 8574, 8125, 8129, 8500, 8590, 8574, 8130, 8135, 8136, 8590, 8128, 8108 in Forsyth Bay, or record that aquaculture will not affect the relevant values.

**Submitters 544, 750, 890**, supports the current mapping in Forsyth Bay. **Submitters 617, 1018** supports the current mapping of the waters of Forsyth Bay but opposes the mapping of Forsyth Island.

**Submitter 874** requests removal of the natural character mapping of Orchard Bay or record that aquaculture will not affect the relevant values

**Submitter 726** requests that the natural character overlay in Whakatahuri Bay be reviewed due to the modifications in the bay and record that aquaculture will not affect the relevant values.

**Submitter 1140** requests that the natural character overlay be amended. Specifically, to delete HNC from Duffers Reef to just below Kaitira (East Entry Point) and to delete VHNC below Forsyth Bay and west of Anakoha Bay. Also, to delete the HNC around Orchard Bay and around Sugar Loaf Island.

## Discussion

All of these Submitters request removal of the natural character overlay from close to their farms or their land.

Forsyth Bay is one of the more recognised bays where aquaculture is present in Pelorus Sound and the natural character mapping (at the Level 4 mapping scale) in this area is reflective of this. Further, the condition of the terrestrial environment has also been considered. Much of Forsyth Bay, which includes Orchard Bay and Pigeon Bay off Forsyth Island is in a state of regeneration. Much of the farmed land has been retired and is actively covered with indigenous regrowth. Forsyth Island is a good example of this, along with parts of the Kaitira Headland and land around Allen Strait. Therefore, these areas have been mapped as retaining high levels of terrestrial natural character.

I have reviewed the current mapping and confirm that based on the modifications within the bay, that the mapping is correct. Existing modifications (such as aquaculture) have influenced the extent of the mapping (noticeably in the marine environment) and that the mapping is responsive to this current situation.

I do have one recommended amendment which stems from **Submitter 1140** around Duffers Reef. I have reviewed this area in light of the updated information received from MPI, and this is based on information, specifically relating to dredging (**Figure 1**), I recommend a small amendment to the area of high marine based natural character. I recommend to remove a small part of the high marine mapping as it extends from the Kaitira Headland to the west of the bay towards Duffers Reef, to reflect areas currently dredged for scallops. **Refer to Figure I: Natural Character Mapping Change 8: Forsyth Bay.**

## Recommendation

Based on this I recommend that the majority of the mapping within Forsyth Bay remain, apart from the area identified on Figure B: Forsyth Bay that has been dredged. **Refer to Figure I: Natural Character Mapping Change 9: Forsyth Bay.**

## **Coastal Marine Area C: Crail Bay/ Clova Bay**

***Submitter 152/20 Clova Bay Residents Association Inc, Submitter 388/2 Adrian Mark Henry Harvey, Submitter 401/257, 401/259 and 401/260 Aquaculture New Zealand, Submitter 426/248, 426/250 and 426/251 Marine Farming Association Incorporated, Submitter 546/4, 546/5, 546/6, 546/7 and 546/13 Aroma Aquaculture Limited, Submitter 637/1, 637/2 and 637/5 Crail Bay Trust, Submitter 648/17,***

*648/18, 648/19, 648/20 and 648/21 DC Hemphill, Submitter 689/1, 689/2, 689/3, 689/4 and 689/5 Elizabeth Patricia Clarke, Submitter 719/1, 719/2 Gary and Ellen Orchard, Submitter 723/1 and 723/2 Graeme Henry Clarke, Submitter 724/1, 724/2 Graeme Henry Clarke, Submitter 788/1 and 788/2 Jessica Bunting, Submitter 874/5, 874/7, 874/8 and 874/9 KPF Investments Limited and United Fisheries Limited, Submitter 952/1 and 952/2 Matthew White, Submitter 958/19, 958/20, 958/21, 958/22, 958/23 and 958/27 Marine Farm Management Limited, Submitter 969/2 Ngai Tahu Seafood Resources Limited, Submitter 977/1 and 977/2 Nanette Bunting, Submitter 997/5, 997/6 & 997/7 The New Zealand King Salmon Company Limited, Submitter 1098/1, 1098/2 and 1098/5 Sandra Ann King, Submitter 1140/108, 1140/110 Sanford Limited, Submitter 1145/1 and 1145/2 Sea Health Foods Limited, Submitter 1171/1 and 1171/3 Tim Madden, Submitter 1199/2 Treble Tree Holdings Limited, Submitter 1203/1 and 1203/2 Turner Aquaculture New Zealand Limited, Submitter 1216/1, 1216/2 and 1216/3 Victoria White.*

**Submitters 546, 637, 689, 719, 723, 724, 788, 952, 958, 977, 969, 1098, 1145, 1171, 1199, 1203, 1216** request removal natural character overlay from the vicinity of marine farms 8263, 8264, 8265, 8518, 8519, 8520, 8515, 8529, 8530, 8532, 8540, 8543, 8544, 8560, 8551, 8553, 8559 in Crail Bay, Wet Inlet, Hopai Bay, Grant Bay, Clova Bay, Otatara Bay, Waimaru Bay and around Te Puraka Point, or record that aquaculture will not affect the relevant values.

**Submitter 648** requests that the natural character overlay on the land in the vicinity of this submitter's property is ground-truthed. This submitter notes that the land facing Crail Bay (the property), is mapped as "high" and is heavily modified and not reflective of the commentary concerning the terrestrial commentary contained within adjacent Coastal Terrestrial Area 6: Nydia.

**Submitter 388** requests that the natural character overlay be removed from the land (110 Totaranui Road) due to the commercial forestry and sustainable Forest Management Plan registered on freehold titles.

**Submitters 401, 426** support the natural character mapping at the head of Crail Bay, however they oppose the mapping of the headlands between Beatrix Bay and Waimaru Bay as having high natural character or record that aquaculture will not affect the relevant values.

**Submitter 997** requests that the natural character overlay be removed from the western side of Crail Bay or record that aquaculture will not affect the relevant values.

**Submitter 1140** requests deletion of the areas of HNC at Hopai Bay, at Crail Bay and at Waimaru Bay.

**Submitter 874** requests retention of the absence of the natural character mapping as proposed for the eastern side of Crail Bay, but requests the removal of the high natural character overlay between Hopai Bay and Grant Bay or record that aquaculture will not affect the relevant values.

**Submitter 152** requests that Clova Bay be identified in the MEP as an area at threat or risk from significant adverse cumulative effects on natural character. This will give some long overdue recognition to the over farming issue in Clova Bay and set the platform for some resolution.

## **Discussion**

Most of these Submitters request removal of the natural character overlay from close to their farms or their land.

Both Crail Bay and Clova Bay are recognised areas of Pelorus Sound where aquaculture is present. As a consequence of this, the marine environment of both of these bays is not rated at the Level 4 scale as holding high, very high or outstanding for natural character (however some parts may retain higher levels of natural character at the more refined scale of mapping at Level 5). There are however some areas of the terrestrial environment that do meet these high thresholds of naturalness. These areas are where regeneration of indigenous species contribute to high levels of naturalness, and are found on the western side of Crail Bay and around the slender peninsulas of Hopai Bay and Te Puraka Point. These areas support very little other modification, such as structures on the land. The surrounding land close to the water is either actively grazed or used for commercial forestry. The upper forested ridges that define both of these embayments are mapped as holding very high levels of natural character, with the easterly hills of Clova Bay being part of the broader Mt. Stokes area and holding outstanding levels of natural character.

Aquaculture, along with other modifications, has dictated the extent of natural character mapping, including the effect they have cumulatively. Those mapped areas closest to marine farms (in Crail Bay, Hopai Bay and Te Puraka Point), are in my opinion, appropriately mapped as high as they all retain levels of naturalness that are sufficiently unmodified.

Regarding the Submission regarding significant adverse cumulative effects, whilst this is something that has been considered at a reasonably high-level involving identification of all modification apparent in a given area, any consideration pertaining to a policy perspective is considered by Mr. Dale in his report.

Regarding **Submitter 648**, it is unclear exactly where this submitter resides, however, I have reviewed the terrestrial component as it borders Crail Bay (so assume the property is located on the western side of the bay). Of that mapping, areas are mapped high, very high, with some areas not mapped at all. Those unmapped areas are typically those nearest the water which contain the most modification. Without knowing exactly where this submitter's property is, and following a review of the mapping in this area (at the scale that it was mapped at), I am happy with no changes being recommended.

As such, I do not consider that any re-mapping should occur to these areas.

## **Recommendation**

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

### **Coastal Marine Area C: Beatrix Bay**

***Submitter 401/257, 401/258 and 401/260 Aquaculture New Zealand, Submitter 426/248, 426/249 and 426/251 Marine Farming Association Incorporated, Submitter 514/13 and 514/17, AJ King Family Trust and SA King Family Trust, Submitter 546/12 and 546/13 Aroma Aquaculture Limited, Submitter 572/2 Beleve Limited and RJ Davidson Family Trust, Submitter 616/3, 616/4 Clearwater Mussels Limited and Talleys Group Limited, Submitter 645/5 Darnyl Gordon Slade, Submitter 645/1 Darnyl Gordon Slade, Submitter 809/15 Jim Jessep, Submitter 866/3, 866/4 and 866/7 Karen Donaldson, Submitter 867/3, 867/4, 867/7 Karl Donaldson, Submitter 874/4, 874/5, 874/6, 874/8 and 874/9 KPF Investments Limited and United Fisheries Limited, Submitter 958/24, 958/25 and 958/27 Marine Farm Management Limited, Submitter 1060/1, 1060/2, 1060/3, 1060/4 and 1060/11 Richard F Paine, Submitter 1098/1, 1098/2, 1098/4 and 1098/5 Sandra Ann King, Submitter 1140/108, 1140/110 and 1140/111 Sanford Limited, Submitter 1165/2 Ngai Tahu Seafood Resources Limited.***

**Submitters 401, 426, 572, 616, 874, 1060, 1140, 1165** support the absence of mapping of the seascape in Beatrix Bay as not having high, very high or outstanding natural character and oppose the mapping of the land in Beatrix Bay (and Tuhitarata Bay) or state that marine farms do not adversely impact the values that lead to that classification.

**Submitters 514, 546, 616, 645, 809, 866, 867, 958, 1098, 1165**, request removal of the natural character overlay from the vicinity of marine farms 8230, 8235, 8240, 8242, 8248, 8250, 8260 in Beatrix Bay, or record that aquaculture will not affect the relevant values.

**Submitter 514** refers to wilding pines above Tuhitarata Bay and notes that this is mapped as high natural character. This Submitter requests that this area is reviewed.

## **Discussion**

These Submitters request removal of the natural character overlay from close to their farms or their land.

Beatrix Bay is recognised as an area of Pelorus Sound where aquaculture is present. As a consequence of this, the marine environment is not rated high, very high or outstanding for natural character at the Level 4 scale (however some parts may retain higher levels of natural character at the more refined scale of mapping at Level 5). There are however some areas of the terrestrial environment that do meet these high thresholds of naturalness. These areas are where regeneration of indigenous species contribute to high levels of naturalness, and are found almost continuously surrounding Beatrix Bay. This broad mapped area supports very little other modification, such as structures on the land and where they are present, they are relatively isolated or discrete. Small parts of the eastern part of the terrestrial environment (at lower

elevations close to the foreshore) are managed as pastoral grazing areas, and these areas have been excluded from the mapping. Whilst wilding pines are not indigenously natural, where they appear in sporadic groups, coupled with limited other land based modifications and part of a broader area of regrowth, the area has been included as holding high levels of natural character, such is the case above Tuhitarata Bay.

The upper forested ridge that defines the eastern part of the bay is mapped as holding very high levels of natural character. This most elevated part of the bay forms part of the broader Mt. Stokes area, which also holds outstanding levels of natural character.

Aquaculture, along with other modifications have dictated the extent of natural character mapping. Those mapped areas closest to marine farms, are in my opinion, appropriately mapped as high as they all retain levels of naturalness that are sufficiently unmodified.

As such, I do not consider that any re-mapping should occur to these areas.

## **Recommendation**

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

## **5.9 Submissions: Coastal Marine Area D: Queen Charlotte Sound**

### **Coastal Marine Area D: East Bay Area**

*Submitter 100/15, 100/31 and 100/33 East Bay Conservation Society (EBCS), Submitter 218/7 Salvador Delgado Oro Laprida, Submitter 261/5, and 261/6 Lynette & Kevin Oldham, Submitter 468/5 Port Gore Group, Submitter 493/4 and 493/5 Karen Marchant, Submitter 518/1 and 518/2 Abigail Burns, Submitter 605/1 and 605/2 Colin Ronald Norton, Submitter 615/1 Clearwater Mussels Limited and Knight-Somerville Partnership, Submitter 702/1 and 702/2 Frank Burns, Submitter 848/1 and 848/2 Kirsten Burns, Submitter 916/4 and 916/5 Margaret Hippolite, Submitter 958/3, 958/4, 958/5, 958/6, 958/7 and 958/27 Marine Farm Management Limited, Submitter 997/8 The New Zealand King Salmon Company Limited, Submitter 1003/1 and 1003/2 Olivia Burns, Submitter 1047/1, 1047/2, 1047/3 and 1047/4 RA and RS Hall Aquaculture, Submitter 1060/7 and 1060/11 Richard F Paine, Submitter 1068/4 and 1068/5 Robert Hippolite, Submitter 1140/109 Sanford Limited, Submitter 1143/1, 1143/2, 1143/8 and 1143/9 Schwass Family Trusts Partnership.*

These submitters seek a change to the mapping of the areas of natural character in East Bay. **Submitter 100** seeks that the entire bay (both terrestrial and marine) be remapped as very high levels of natural character, despite modifications being apparent. Also, restoration opportunities could be explored.

**Submitter 261** seeks that the areas already mapped as very high natural character be removed due to degraded vegetation and high levels of modification (specifically the areas on the southern and eastern slopes to the ridgeline and from Manawa Point through to Matiere Point).

**Submitter 218** requests that the very high natural character mapping of the seascape in East Bay and the land in Otanerau Bay be removed.

**Submitters 518, 605, 615, 848, 702, 958, 1003, 1047, 1140, 1143** request the removal of the natural character overlay from the vicinity of marine farms 8397, 8398, 8399, 8400, 8401, 8402, 8403, 8404, 8509, 8510, 8580 in East Bay, or record that aquaculture will not affect the relevant values. **Submitter 1140** requests the removal of the very high natural character overlay so that it does not lie within 400m of existing farms.

**Submitters 916, 997, 1060, 1068** request the removal of the natural character overlay from the vicinity of East Bay or record that aquaculture will not affect the relevant values.

**Submitters 468, 493** request that land on northern Arapawa Island be mapped as Outstanding Natural Character.

## Discussion

Some of these Submitters request removal of the natural character overlay from close to their farms or their land, while others request an extension of the existing overlay to cover all un-mapped areas.

Whilst much of the terrestrial component of East Bay (and southern bays) was historically cleared for pastoral farming purposes, much of this land has been retired and is actively regenerating with indigenous vegetation. As a consequence, much of the land cover is relatively uniform. Areas of more substantial indigenous bush cover extend from some of the higher ridges and peaks in the bay towards the foreshore, including from ridge associated with Narawhia to the east of Otanerau Bay.

There are very few structures within East Bay, with a few buildings located at the head of the bay (at Ruapara Bay) and a few scattered throughout some of the smaller embayments. Parts of Otanerau Bay contain the most modification, with houses, jetties, tracks and power lines evident, as well a large area of commercial forest on the Parea Point headland to the west of the bay.

Within the marine environment, aquaculture in the form of mussel farms (predominantly) and one salmon farm occupy much of the eastern shore of East Bay and parts of Otanerau Bay. The northern part of East Bay is free from aquaculture. Very limited dredging also occurs (refer to **Figure 1**).

All of the terrestrial environment is considered to be high or very high natural character, with the exceptions of the more modified areas of the head of East Bay, parts of Otanerau Bay and the commercial forestry associated with the Parea Point headland. I consider that this mapping accurately reflects the naturalness of the terrestrial environment.

Within the marine environment, no mapping has occurred where aquaculture is present, as this reflects the ongoing adverse effects aquaculture has on the natural character of the marine environment. I do note, however, that a small adjustment is recommended to be made relating to the mapping along the northernmost part of the bay. There is currently an overlap of the natural character overlay with existing marine farms in Onauku Bay. Otherwise, I am satisfied with the remaining mapping in this bay.

## Recommendation

Based on the above, I recommend that one small mapping change occurs to the marine environment around the northernmost farms in Onauku Bay (8404, 8510, 8403 and 8402). An offset of 200m is considered appropriate at its northern extent, then gently realigned along the western (seaward) extent to feather in with existing mapping. This is reflected on **Figure J: Natural Character Mapping Change 10: East Bay**.

### **Coastal Marine Area D: Remaining Queen Charlotte Sound Area**

***Submitter 218/7 Salvador Delgado Oro Laprida, Submitter 716/203 Friends of Nelson Haven and Tasman Bay Incorporated, Submitter 433/19, 433/211 Port of Marlborough New Zealand Limited Submitter 997/8 and 997/9 The New Zealand King Salmon Company Limited.***

**Submitter 218, 997** request that the high natural character mapping of Ruakaka Bay be removed.

**Submitters 433** requests the removal of the very high natural character overlay within the Marina Zone at Waikawa Bay, due to the modifications apparent and in light of the Plan Change 21.

**Submitter 716** requests that the outstanding natural character area of the entrance of Queen Charlotte Sound be expanded. A further request is that the boundary of the outstanding natural character area is to include a distance of not less than 500 metres from MHWS as being within the outstanding natural character area.

## Discussion

Two of these Submitters request removal of the natural character overlay from Ruakaka Bay and at the Marina Zone in Waikawa Bay and one submitter requests an expansion to the outstanding overlay at the entrance to Queen Charlotte Sound.

Commencing with the entrance of Queen Charlotte Sound, the outstanding natural character overlay includes areas of exceptional naturalness, both on the land and in the sea. This is seen in combination of the various islands and the Long Island Marine Reserve. However, the small area of high marine mapping around Motuara Island is dictated by the amount dredging that occurs there. As illustrated on **Figure 1**, relatively intense amounts of dredging have occurred, which directly affects levels of naturalness. Whilst the context is exceptional, this small area does not reach the outstanding threshold. A similar scenario, however at a reduced level of dredging intensity is found west of Long Island. Based on this, and after careful consideration, I consider that the existing mapping at the level 4 scale, accurately reflects the naturalness of this area and does not warrant expansion.

The natural character mapping in Ruakaka Bay reflects the generally high level of naturalness evident on the terrestrial environment of this bay, noting the reasonably advanced level of indigenous regeneration of the slopes defining this embayment. Whilst modification is centred around the coastal interface (in the form of jetties and structures), much of this has been excluded from the mapping. Within the marine environment, an existing salmon farm is present in one of the northern bays, and extensive dredging is apparent throughout (refer to **Figure 1**). The southerly area of very high marine mapping reflects the foreshore area and lack of modification on the land. Because of this, I consider that the natural character mapping accurately reflects the naturalness apparent.

Regarding Waikawa Bay, I have reconsidered the extent of the very high marine natural character mapping, and concur with **Submitter 433** that the extent of the mapping extends too far into Waikawa Bay. This would be a result of acknowledging that further development of the marina is enabled through Plan Change 21, which is currently operative in the MSRMP and has been reflected within the MEP.

## Recommendation

Based on the above, I recommend that one small mapping change occurs to the marine environment around Waikawa Bay to reflect the provisions of Plan Change 21 and the amount of foreshore activity in this area. This is reflected on **Figure K: Natural Character Mapping Change 11: Waikawa Bay**.

## 5.10 Submissions: Coastal Marine Area E: Tory Channel

**Submitter 218/6 and 218/7 Salvador Delgado Oro Laprida, Submitter 544/6 and 544/7 Apex Marine Farm Limited, Submitter 890/6 Lloyd Sampson David, Submitter 997/8 and 997/9 The New Zealand King Salmon Company Limited, Submitter 1060/8 and 1060/11 Richard F Paine, Submitter 1197/1, 11972 and 1197/3 Tory Channel Aquaculture Limited.**

**Submitters 218, 544, 890** seeks a change to the mapping of the natural character in Tory Channel, to capture both the terrestrial and marine component of the coastal environment together, rather than assessing the marine component separately. They oppose the blanket mapping approach to the entire marine area. These submitters also seek that where salmon farms are present, that these do not compromise the overall naturalness of the coastal environment. **Submitters 544, 890** also seek that the mapping in Ngaruru Bay be reduced or record that aquaculture do not adversely affect the values.

**Submitter 997** requests that more accurate mapping of Tory Channel occurs, or record that salmon farms do not adversely affect the values.

**Submitter 1060** requests the removal of the natural character overlay from the vicinity of Tory Channel or record that aquaculture will not affect the relevant values.

**Submitter 1197** requests the removal of the natural character overlay from the vicinity of farm 8405 or record that aquaculture will not affect the relevant values

## Discussion

All of these Submitters request changes to the natural character mapping.

I have discussed within the General Section of this report the approach that the Coastal Study has taken with regards to separating the terrestrial environment from the marine environment.

The marine environment has been identified and mapped as retaining high levels of natural character, despite the modifications from aquaculture and adjacent land use activities. As outlined with the table on page 85 of the Coastal Study (for Coastal Marine Area E: Tory Channel), Tory Channel retains relatively unique natural characteristics that are not found elsewhere within the Marlborough Sounds. Numerous amounts of significant marine ecology sites are present, which are distinguished by the high current. This is reflected in a review report entitled 'Expert panel review of selected significant marine sites surveyed in 2016-2017' by Davidson Environmental (R. Davidson et al), October 2017.

Regarding modifications, all mussel farms and two existing salmon farms have been excluded from the mapping, with the recently consented third farm (Ngamahau) now requiring to be excluded. This will result in a small mapping change. The isolated farm in Hitaua Bay (farm 8405) does not affect the underlying mapping, due to it being an isolated farm. Whilst this farm does have an adverse effect on the natural character, it is not considered that at the broader level the Channel was mapped at (level 4), that this farm should be specifically removed from this rating. Furthermore, I also recommend a small mapping change next to Clay Point Salmon Farm, where the high overlay retains a small overlay with the extent of the farm.

The final area of review is Onapua Bay. Due to the extent of modification to the terrestrial component of this bay through commercial forestry, this has a close relationship with the naturalness of the marine environment. Commercial forestry can affect the naturalness of adjacent marine areas through various ways, including sedimentation run off and biodiversity linkages. As a result of this, it is recommended to reclassify much of Onapua Bay from high to no rating (i.e. it retains a less than high rating when considered at this Level 4 scale). However, it is recommended to retain part of the high natural character area as it relates to the adjacent scenic reserve in the north-east of the bay.

## Recommendation

Based on the above, I recommend that three small mapping changes occurs to the marine environment around Tory Channel. The first is to recognise the adverse effects of the recently consented Ngamahau Salmon Farm and the second realigns the high natural character to the Clay Point Salmon Farm. The third recommended change reflects the impact that commercial forestry has had on the water quality of Onapua Bay. This is reflected on **Figure L: Natural Character Mapping Change 12: Tory Channel**. Also, to amend the following table accordingly:

Coastal Marine Area E: Tory Channel (Level 4/5 Table)

Sub Area	Rating	Key Values	Additional Comments
Tory Channel (excluding centrally located farming areas)	High	<p><b>Narrow deep channel dominated by strong tidal flows, sheltered wave climate and proximity to Cook Strait.</b></p> <ul style="list-style-type: none"> <li>- Shallow side bays.</li> <li>- Numerous ecologically significant marine sites distinguished by high current communities.</li> <li>- Unique natural character area as a whole.</li> </ul> <p>Adjoins Coastal Marine Area G</p>	<p>The main marine farming areas in Tory Channel <u>and much of Onapua Bay backed by plantation forestry</u> are excluded.</p> <p>Ferry wash continues to have an affect but is limited to exposed intertidal shores.</p> <p>Undaria is widespread in shallow waters but is not considered to affect wider trophic/community structure and function significantly.</p> <p>Strong currents minimise sedimentation impacts along the main channel</p>

## 5.11 Coastal Marine Area F: Port Underwood

### Coastal Marine Area F: General

**Submitter 479/269 Department of Conservation, Submitter 845/20, 845/21 and 845/23 Kenneth R and Sara M Roush, Submitter 890/6 Lloyd Sampson David, Submitter 995/48 New Zealand Forest Products Holdings Limited, Submitter 1042/19, 1042/20 & 1042/23 Port Underwood Association,**

**Submitters 890, 995** support the absence of most of the mapping in Port Underwood.

**Submitters 479, 845, 1042** request a mapping change: the boundary between Coastal Marine Areas G and F at the entrance to Port Underwood should be in a straight line between Robertson Point and Ocean Point (the southern headland of Ocean Bay). This Submitter states that currently the maps indicate this boundary to be from Robertson Point to an unnamed point to the south of Ocean point. The Submitter continues by stating that this boundary is a demarcation of the biogeographic difference between the open waters of Cook Strait and the enclosed waters of Port Underwood. This correction will change the natural character rating to very high in the marine area between the unnamed point on the coast and Ocean Point.

**Submitters 845, 1042** request that Coastal Marine Area F receive closer inspection and be mapped at levels 4/5. Particular attention may be paid to the inside area around Robertson Point, the area around Horahora Kakahu, the Knobbies, and the western coast of Port Underwood from Oyster Bay southward or the following amendment be made to the explanation: *'The Coastal Marine Area F is rated moderate-high although it has not been surveyed at levels 4/5 and high or very high sections may exist'*. Specifically, the submitter requests that the following be included:

*The coastal area south of Ocean Bay has a very high natural character rating in line with the remainder of the coast that runs further south to White's Bay and with the key values of:*

- *Large unmodified coastal marine environment in association with the coastal area reaching to White's Bay.*
- *Semi exposed to very exposed and subject in some places to strong tidal currents.*
- *Diverse and productive reef communities with high macroalgae diversity.*
- *Large whale migration route and calving area.*
- *The small section of coast south of Ocean Bay is included in the Eastern Cook Strait district*

### **Discussion**

Most of these submissions request greater refinement to the identification and mapping to the marine environment. One submitter supports the overall absence of mapping in the bay.

Currently, the division between the marine environments of Coastal Marine Area F and the broader Coastal Marine Area G extends from Robinson Point at the south-eastern extent of Port Underwood across the water to a point just north of Rangitane Bay. This delineation has been identified a mapping error by the Department of Conservation who were involved in the original delineation of the Coastal Areas. The correct delineation should be between Robertson Point and Ocean Point (the southern headland of Ocean Bay), as identified by Submitters 479, 845 and 1042. I therefore accept this amendment to these two biogeographic areas (referencing the difference between the open waters of Cook Strait and the enclosed waters of Port Underwood), be made. This correction will therefore change the natural character rating to very high in the marine area between the unnamed point north of Rangitane Bay on the coast and Ocean Point, which satisfies the concerns of Submitters 845 and 1042 and will fall within Coastal Marine Area G.

I have also considered Port Underwood at a more refined scale, as requested by Submitters 845 and 1042 and conclude that a small section of coast extending from Ocean Bay through to Willawa Point in the north be recommended as an area of high marine natural character. This is reflective of the lack of structures along this coastline and due to the regenerating nature of the much of the terrestrial environment in this part of the bay. The extent of this area is suggested to go out into the water by 200m. The balance of the bay's marine environment receives high amounts of trawling and coupled with the frequency of aquaculture and other related modifications, has resulted in the remainder of the water being considered to be less than high.



## Recommendation

Based on the above, I recommend that two mapping changes are made in this Coastal Marine Area. Firstly, that the demarcation between this Coastal Marine Area and Coastal Marine Area G is amended to accurately record the correct biogeographic region, as outlined above. Furthermore, that a new area of high marine based natural character extends along the coast foreshore extending out to 200m from Ocean Bay to Willawa Point in the north. This is reflected on **Figure M: Natural Character Mapping Change 13: Port Underwood.**

Furthermore, that the following table is created to capture this additional mapped area:

### Coastal Marine Area F: Port Underwood (Level 4/5 Table)

Sub Area	Rating	Key Values	Additional Comments
<u>Ocean Bay to Willawa Point</u>	<u>High</u>	<p><b><u>Largely undeveloped semi-exposed rocky coast.</u></b></p> <p><u>Influenced by southerly swells and periods of relatively high sedimentation, especially when the Wairau River floods.</u></p> <p><u>Reef communities, including a range of macroalgae, fringe the shoreline.</u></p> <p><u>This area is one of the least modified areas of Port Underwood. Aquaculture is absent.</u></p> <p><u>The adjacent terrestrial environment retains a mosaic of land use activities, ranging from forestry and pasture to areas of regenerating scrub and bush. Much of the coastal fringe seawards of the Port Underwood Road is regenerating scrub.</u></p> <p><u>This section of coast is continuous with a similar but more exposed rocky coast from Ocean Bay to Rarangi.</u></p> <p><u>Adjoins Coastal Marine Area G.</u></p>	<p><u>Trawling offshore through parts of Port Underwood.</u></p> <p><u>Despite episodic high levels of sedimentation, moderate-strong wave action will mitigate adverse effects close to shore through resuspension and dispersal of sediments.</u></p>

### Coastal Marine Area F: Marine Farm related

***Submitter 401/260 Aquaculture New Zealand, Submitter 426/251 Marine Farming Association Incorporated, Submitter 544/6 Apex Marine Farm Limited, Submitter 546/10 and 546/13 Aroma Aquaculture Limited, Submitter 579/1 and 579/2 Craig and Sherald MacDonnell, Submitter 748/1 and 748/2 GAL Partnership, Submitter 855/1 and 855/2 Kyra Madsen, Submitter 890/7 Lloyd Sampson David, Submitter 940/1 and 940/2 Michelle Madsen, Submitter 958/1, 958/8, 958/9, 958/10, 969, 958/17, 958/18 and 958/27 Marine Farm Management Limited, Submitter 1111/1, 1111/2 and 1111/3 Stephen Cross, Submitter 1125/2 and 1125/4 Scott Madsen, Submitter 1143/3, 1143/4, 1143/5, 1143/6, 1143/7 and 1143/9 Schwass Family Trusts Partnership, Submitter 1200/1 and 1200/2 Triple LG Limited, Submitter 1257/1 and 1257/2 Allan Tester, Submitter 1264/1 and 1264/2 Ron Bothwell.***

**Submitters 401, 426, 544, 890** support the absence of natural character overlay at Whangatoetoe Bay and Oyster Bay Port Underwood.

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

## Discussion

All of these Submitters either support the absence of natural character mapping in the embayment or request to remove the overlay in relation to their farms.

No mapping of natural character (either marine or terrestrial) as high or above is identified as being close to any of these farms, due to the existing marine and terrestrial based modifications in the bay.

## Recommendation

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

## 5.12 Coastal Marine Area G: Eastern Cook Strait & Outer Queen Charlotte Sound

**Submitter 479/269 Department of Conservation, Submitter 845/20 and 845/23 Kenneth R and Sara M Roush, Submitter 1042/19, 1042/20 & 1042/23 Port Underwood Association.**

**Submitters 479, 845, 1042** request a mapping change: the boundary between Coastal Marine Areas G and F at the entrance to Port Underwood should be in a straight line between Robertson Point and Ocean Point (the southern headland of Ocean Bay). Currently the maps indicate this boundary to be from Robertson Point to an unnamed point to the south of Ocean point. This boundary is a demarcation of the biogeographic difference between the open waters of Cook Strait and the enclosed waters of Port Underwood. This correction will change the natural character rating to very high in the marine area between the unnamed point on the coast and Ocean Point.

**Submitters 845, 1042** request that Coastal Marine Area F receive closer inspection and mapped at levels 4/5. Particular attention may be paid to the inside area around Robertson Point, the area around Horahora Kakahu, the Knobbies, and the western coast of Port Underwood from Oyster Bay southward or the following amendment be made to the explanation: *'The Coastal Marine Area F is rated moderate-high although it has not been surveyed at levels 4/5 and high or very high sections may exist'*. Specifically, the submitter requests that the following be included:

*The coastal area south of Ocean Bay has a very high natural character rating in line with the remainder of the coast that runs further south to White's Bay and with the key values of:*

- *Large unmodified coastal marine environment in association with the coastal area reaching to White's Bay.*
- *Semi exposed to very exposed and subject in some places to strong tidal currents.*
- *Diverse and productive reef communities with high macroalgae diversity.*
- *Large whale migration route and calving area.*
- *The small section of coast south of Ocean Bay is included in the Eastern Cook Strait district*

## Discussion

As the above submissions relate to Coastal Marine Area F, the discussion behind my conclusions is set out in that section. The small change in the biogeographic boundary between CMA F and CMA G results in CMA G having a slightly larger area. This small addition of the coastal waters can now be included within Coastal Marine Area G (north of Rangitane Bay to Ocean Bay).

I do record that the updated MPI data would mean that potential changes may occur to the very high level of natural character mapped south of Robertson Point, however, due to no specific submission on a review of this area, no further change can be made.

## Recommendation

Other than the boundary change between these two CMAs, I recommend that no further change occurs to the natural character mapping or values identification in this area.

### 5.13 Coastal Marine Area H: Cloudy & Clifford Bays

**Submitter 291/1 Chris Kirk, Submitter 355/20 Dominion Salt Limited, Submitter 629/1 and 629/2 Clifford Bay Marine Farms Limited, Submitter 934/2 MJH and RL Davidson Family Trust.**

**Submitter 291** supports the high remote values mentioned for Cloudy and Clifford Bay and opposes commercial trawling and dredging within 500m of the foreshore.

**Submitter 934** requests the removal of the reference to 'high remote values' from property 243 Renners Road.

**Submitter 629** requests the removal of the natural character overlay from the vicinity of marine farm 8001 in Clifford Bay; or record that aquaculture will not affect the relevant values.

**Submitter 355** requests that the natural character mapping within Coastal Natural Character Map 5 be removed within or adjacent to the Salt Works zoning.

## Discussion

Regarding property 243 Renners Road, I note that no natural character overlay is proposed on this area. The 'high remote values' that the Submitter references, is applied to the 2km width of very high Level 4 mapping that extends along this entire coastline, from Whites Bay in the north to Cape Campbell in the south. It is an indicative value of the whole of the area, rather than of one individual part. I do acknowledge that experientially, there is some modification apparent, noticeably the amount of trawling in Cloudy Bay. Whilst there is variability, I am happy that reference to high remote areas be considered as simply remote values.

The salt works at Lake Grassmere do not affect the very high coastal Level 4 mapping. Whilst there is some modification associated with the salt works on the gravel ridge that separates the lake from the marine environment, these modifications in themselves do not affect the identified values in this area which are in the coastal marine area. As a result, I am confident with the mapping in this area should be retained.

Within the table on page 192 of the Coastal Study, reference is made to marine farm 8001 in Clifford Bay. As stated, when the marine farm is implemented, this will alter the naturalness along this coastline. I therefore maintain that the text within the table is relevant: *A large marine farm approved south of the Awatere River mouth, which will alter seabed values at the site once operational, is excluded.*

Separate to the submissions above, is new and updated information concerning trawling. Despite this, there is no submission referencing a review of this area, therefore, on this basis, I recommend no change concerning this.

## Recommendation

To remove 'high' from the remote values in the following schedule:

Coastal Marine Area H: Cloudy & Clifford Bays (Level 4/5 Table)

Sub Area	Rating	Key Values	Additional Comments
Cloudy and Clifford Bays and (including Wairau Lagoons and Lake Grassmere).	Very High	<p><b>Largely unmodified and mostly exposed east coast South Island coastal environment extending over tens of kilometres from Rarangi to Cape Campbell.</b></p> <p>Extensive sand/gravel shores.</p> <p>Cape Campbell reef systems and patchy offshore <i>Macrocystis</i> beds.</p> <p>Adjoins Coastal Marine Areas G and I.</p> <p><del>High</del> Remote values</p>	<p>Certain offshore areas are commercially trawled; those grounds closer to shore are expected to be reasonably resilient to the effects of trawling.</p> <p>Effects of the Blenheim sewage discharge on the outer coast are considered minor.</p> <p>A large marine farm approved south of the Awatere River mouth, which will alter seabed values at the site once it becomes operational, is excluded.</p>

## 5.14 Coastal Terrestrial Area 10: Kaituna

**Submitter 339/30 Sharon Parkes.**

**Submitter 339** requests that the Coastal Natural Character Overlay be reviewed as to the true significance on properties (850, 888 and 1263 Queen Charlotte Drive, Linkwater).

### Discussion

This Submitter requests a review of the identified and mapped extent of natural character on the properties identified on Queen Charlotte Drive.

I have reviewed these three properties. Property 850 and 888 Queen Charlotte Drive extends from the foreshore of Mahakipawa Arm up to abut the Mt. Richmond State Forest Park boundary. The most elevated parts of this property are covered with mature indigenous vegetation. Property 1263 Queen Charlotte Drive is located on the pastoral flats of Linkwater.

All natural character mapping in this area has recognised existing land use activities. Only the most elevated parts of Properties 850 and 888 Queen Charlotte Drive are mapped as very high natural character to capture the mature bush. I therefore consider that this mapping is appropriate.

### Recommendation

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

## 5.15 Coastal Terrestrial Area 11: Wairau

**Submitter 1089/32 Rarangi District Residents Association.**

**Submitter 1089** requests that the mapping on the Rarangi beach ridges and swamp complex be upgraded as part of formally recognising and protecting these endangered areas.

## Discussion

I note within the proposed Zoning Maps, areas of Significant Wetland have been determined, and specifically, these are partly associated with the Rarangi beach ridges. I note that the identified significant wetlands in this area are long, elongated strips that form part of a broader beach ridge and swamp complex.

I acknowledge that much of the beach ridges and swamp complex has been modified and drained, however accept that fragments north of the area already identified in the Coastal Study remain reasonably intact. On this basis, I am happy to map those additional areas identified as significant wetlands within the coastal environment as areas as holding high natural character.

## Recommendation

To map the remaining Rarangi beach ridges and swamp complex that have been identified as a Significant Wetland within the coastal environment. Refer to **Figure N: Natural Character Mapping Change 14: Rarangi.**

To update the accompanying table of values:

### Coastal Terrestrial Area 11: Wairau (Level 4/5 Table)

Sub Area	Rating	Key Values	Additional Comments
Rarangi-Wairau Bar beach ridge system	High	Nationally important landform: a sequence of beach ridges and swales created by tectonic uplift events.  Remnant native vegetation: forest, treeland, dry shrubland and wetland.  <u>Recognised as a significant wetland in the Marlborough District.</u>	Areas of housing and land use modifications have eroded the legibility of some of these ridge systems.

## 5.16 Coastal Terrestrial Area 16: Campbell

### ***Submitter 358/1 Cape Campbell Farm***

**Submitter 358** requests that the natural character mapping on the property be partly removed around the future house site in the same manner that the outstanding natural landscape overlay had done.

## Discussion

I have examined this area specifically in light of this submission, acknowledging the special requirements that were made with respect to the landscape overlay. The small area in question supports a small structure and is predominantly grass. At a more refined scale, I agree that this area does not rate as highly as the remainder of the coastal environment, where substantial parts are of grassland are being recolonised by coastal species. I am therefore willing to remove the natural character overlay on this small section based on its below-high rating for naturalness.

## Recommendation

I recommend to remove the identified small area of land from Coastal Terrestrial Area 16. Refer to **Figure O: Natural Character Mapping Change 15: Cape Campbell.**

## 5.17 Natural Character of Selected Rivers and their margins

**Submitter 425/786 Federated Farmers, Submitter 496/101 Royal Forest and Bird Protection Society NZ (Forest & Bird), 1084/9 Raeburn Property Partnership, Submitter 1201/58 Trustpower Limited.**

**Submitter 425** requests that the overlay of Riparian Natural Character Management Areas and all associated policies and provisions are deleted from the Plan.

**Submitter 496** requests that the Brown River (a tributary of the Rai River) be included as a mapped part of the waterbodies.

**Submitter 1084** requests removal of the maps and references regarding the Riparian Natural Character Areas, specifically regarding the river valleys on the North Bank, due to their modified nature. The submitter also queries the method undertaken, specifically questioning the date in history that the natural character is measured and how it is measured and maintained.

**Submitter 1201** opposes the boundary between “moderate” natural character values and “very high” natural character values on the Branch River beyond the weir. This Submitter seeks to amend the natural character classifications for the Branch River to extend the area of “moderate” natural character value upstream to the confluence with the Leatham River.

### Discussion

All of these submitters request changes to the following report: '*Natural Character of Selected Rivers and their margins*', Boffa Miskell et al, 2014. The methodology is outlined within Section B of the Study. This study was undertaken by an expert panel of people familiar with Marlborough's Rivers. They comprised Neil Deans (Fish and Game Nelson Marlborough Region), Val Wadsworth (MDC's Surface Water Hydrologist), Brin Williman (MDC's Engineer Hydrologist), Pere Hawes (Environmental Policy Team Leader at MDC) and Allan Rackham and James Bentley (Landscape Architects from Boffa Miskell Ltd). This study was peer reviewed by Peter Hamill (MDC Freshwater Ecologist) and Dr Michael Stevens (Landscape Architect). The work was carried out during mid 2009 and reflects the natural character of rivers at that time. The criteria for assessing and measuring the naturalness is outlined within Section B of the Study.

The purpose of the Study was to provide a case study of how to apply the method for significance assessment of rivers using natural character values in the Marlborough District.

Only selected rivers as part of the Study were chosen, it is not the intention of Council to undertake further river assessments. Therefore, the request set out by Submitter 496 cannot be undertaken without further evaluation.

Regarding outstanding requests by the remaining submissions, I am unable to respond to Submitter 425; however, Mr. Dale has considered this submission in his report. I can reiterate that '*wetlands and lakes and rivers and their margins*' are a specific requirement under Section 6(a) of the RMA and that MDC has decided to identify and map a selection of these.

The Study illustrates a snap-shot of a selection of Marlborough's River in mid-2009, using a defined methodology. The results were carefully discussed amongst the study team. Areas of modification associated with a particular stretch of river have been recorded. Of those rivers selected on the north bank of the Wairau River (Goulter, Top Valley, Onamalutu, Waikakaho and Tuamarina) all reflect their state of naturalness at the time, and context was an important component of the consideration of the overall rating.

Regarding the Branch River, I am comfortable that at the scale and level that the Branch River was discussed at, that the mapping reflects the level of naturalness evident at the time.

The River Study involved a comprehensive river-analysis series of workshops involving a number of specialist river personnel. If any changes were to occur, I would recommend that a comprehensive update be considered of all rivers, where all information is reviewed, and updated. This may or may not change the identified level of natural character for any specific locations.

## **Recommendation**

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

## Appendix 1: Recommended decisions on decisions requested

Submission Number	Submission Point	Submitter	Volume	Chapter	Provision	Recommendation
100	31	East Bay Conservation Society	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values		Accept in part
218	4	Salvador Delgado Oro Laprida	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values		Reject
218	6	Salvador Delgado Oro Laprida	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values		Reject
261	5	Lynette and Kevin Oldham	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values		Reject
291	1	Chris Kirk	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values		Accept in part
401	245	Aquaculture New Zealand	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values		Accept in part
425	768	Federated Farmers of New Zealand	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values		Accept in part
426	241	Marine Farming Association Incorporated	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values		Reject
468	3	Port Gore Group	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values		Reject
479	269	Department of Conservation	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values		Accept in part
486	2	Waitui Holdings Limited	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values		Reject
490	2	Murray Lewis Waghorn	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values		Reject



493	3	Karen Marchant	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values		Reject
513	6	Helen Johnston	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values		Reject
518	2	Abigail Burns	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values		Accept in part
534	2	Anne-Marie Prendeville	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values		Reject
544	2	Apex Marine Farm Limited	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values		Reject
544	5	Apex Marine Farm Limited	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values		Reject
544	7	Apex Marine Farm Limited	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values		Accept in part
546	13	Aroma Aquaculture Limited	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values		Reject
563	5	Brent Matthew Dalley	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values		Reject
579	2	Craig and Sherald MacDonnell	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values		Reject
587	4	Caroline Farley	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values		Reject
601	7	Christopher Redwood	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values		Reject
605	2	Colin Ronald Norton	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values		Reject
626	3	Christopher Peter Womersley	Volume 3	Appendix 2 Coastal Natural Character		Reject

				Schedule of Values	
629	2	Clifford Bay Marine Farms Limited	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values	Accept
637	2	Crail Bay Trust	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values	Reject
637	5	Crail Bay Trust	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values	Reject
640	15	Douglas and Colleen Robbins	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values	Reject
645	5	Darnyl Gordon Slade	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values	Reject
668	2	David Quintin Hogg	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values	Reject
688	44	Judy and John Hellstrom	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values	Accept in part
689	5	Elizabeth Patricia Clarke	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values	Reject
702	2	Frank Burns	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values	Accept in part
707	2	Frank Prendeville	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values	Reject
716	211	Friends of Nelson Haven and Tasman Bay Incorporated	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values	Reject
719	2	Gary and Ellen Orchard	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values	Reject
723	2	Graeme Henry Clarke	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values	Reject
724	2	Graeme Henry Clarke	Volume 3	Appendix 2 Coastal	Reject

				Natural Character Schedule of Values		
733	5	Graeme L Beal	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values		Reject
735	2	Gillian Margaret Rothwell	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values		Reject
738	18	Glenda Vera Robb	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values		Reject
748	2	GAL Partnership	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values		Reject
750	2	Goulding Trustees Limited	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values		Reject
750	4	Goulding Trustees Limited	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values		Accept in part
764	2	HARO Partnership	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values		Reject
764	4	HARO Partnership	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values		Accept in part
788	2	Jessica Bunting	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values		Reject
815	2	Jonathan Large	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values		Reject
820	4	Jeffrey Meachen	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values		Reject
824	2	Archer, Beryl Evelyn and Hebbard, John Roderick	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values		Reject
839	6	John Wilson	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values		Reject

842	2	Just Mussels Limited and Tawhitinui Greenshell Limited	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values		Reject
842	4	Just Mussels Limited and Tawhitinui Greenshell Limited	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values		Accept in part
842	7	Just Mussels Limited and Tawhitinui Greenshell Limited	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values		Reject
843	2	Karen Anne Harris	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values		Reject
845	20	Kenneth R and Sara M Roush	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values		Accept in part
845	21	Kenneth R and Sara M Roush	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values		Accept
847	2	KJB Marine Farms Limited	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values		Reject
848	2	Kirsten Burns	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values		Accept in part
854	5	Kathleen Mary Mead	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values		Reject
855	2	Kyra Madsen	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values		Reject
866	7	Karen Donaldson	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values		Reject
867	7	Karl Donaldson	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values		Reject
868	6	Kenepuru and Central Sounds Residents Association Incorporated	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values		Reject
874	3	KPF Investments Limited and United Fisheries Limited	Volume 3	Appendix 2 Coastal Natural Character		Reject

				Schedule of Values	
874	5	KPF Investments Limited and United Fisheries Limited	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values	Accept in part
874	8	KPF Investments Limited and United Fisheries Limited	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values	Accept in part
890	2	Lloyd Sampson David	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values	Reject
890	5	Lloyd Sampson David	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values	Accept in part
890	7	Lloyd Sampson David	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values	Accept in part
903	6	Lewis Wilson	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values	Reject
911	2	M and S Johns	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values	Reject
916	5	Margaret Hippolite	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values	Reject
923	5	Margaret Dalley	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values	Reject
926	28	Wainui Green 2015 Limited	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values	Reject
928	2	Michael Headley Harris	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values	Reject
934	2	M J H and R L Davison Family Trust	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values	Accept in part
935	15	Melva Joy Robb	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values	Reject
940	2	Michelle Madsen	Volume 3	Appendix 2 Coastal	Reject

				Natural Character Schedule of Values		
952	2	Matthew White	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values		Reject
958	27	Marine Farm Management Limited	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values		Accept in part
959	2	Marlborough Aquaculture Limited	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values		Reject
977	2	Nanette Bunting	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values		Reject
997	2	The New Zealand King Salmon Company Limited	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values		Reject
997	5	The New Zealand King Salmon Company Limited	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values		Accept in part
997	7	The New Zealand King Salmon Company Limited	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values		Reject
997	9	The New Zealand King Salmon Company Limited	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values		Reject
1002	266	New Zealand Transport Agency	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values		Accept
1003	2	Olivia Burns	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values		Accept in part
1010	2	PB Partnership	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values		Reject
1019	3	Philip Henderson	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values		Reject
1022	7	Patricia Redwood	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values		Reject

1034	3	P W Archer	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values		Reject
1036	2	Philip Wilson	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values		Reject
1037	2	PADD Investments Limited	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values		Reject
1042	19	Port Underwood Association	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values		Accept in part
1042	20	Port Underwood Association	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values		Accept
1056	4	Rob Curtis	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values		Reject
1060	11	Richard F Paine	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values		Reject
1068	5	Robert Hippolite	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values		Reject
1089	32	Rarangi District Residents Association	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values		Accept
1094	4	Richards Family Trust	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values		Reject
1098	5	Sandra Ann King	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values		Accept in part
1111	3	Stephen Cross	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values		Reject
1125	4	Scott Madsen	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values		Reject
1143	9	Schwass Family Trusts Partnership	Volume 3	Appendix 2 Coastal Natural Character		Accept in part

				Schedule of Values	
1145	2	Sea Health Foods Limited	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values	Reject
1147	3	Shand Enterprises Limited	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values	Reject
1148	3	Shand Trust Partnership	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values	Reject
1150	2	Shellfish Marine Farms Limited	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values	Reject
1150	4	Shellfish Marine Farms Limited	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values	Accept in part
1150	6	Shellfish Marine Farms Limited	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values	Accept in part
1154	2	Sounds Fun Mussel Company	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values	Reject
1156	3	Southern Crown Limited	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values	Reject
1160	2	St George Limited	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values	Reject
1160	4	St George Limited	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values	Accept in part
1160	6	St George Limited	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values	Reject
1171	3	Tim Madden	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values	Reject
1186	220	Te Atiawa o Te Waka-a-Maui	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values	Accept
1188	9	Te Runanga o Ngati Rarua	Volume 3	Appendix 2 Coastal	Reject



				Natural Character Schedule of Values		
1196	3	Tiracaan Limited	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values		Reject
1197	2	Tory Channel Aquaculture Limited	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values		Reject
1200	2	Triple LG Limited	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values		Reject
1203	2	Turner Aquaculture New Zealand Limited	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values		Reject
1214	3	Vincent Rene Smith	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values		Reject
1216	2	Victoria White	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values		Reject
1219	2	William Albert Trevor and Kathleen Mary Rainbow	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values		Reject
1234	3	Waimana Marine Limited	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values		Reject
1240	2	Worlds End Enterprise Limited	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values		Reject
1257	2	Allan Tester	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values		Reject
1264	2	Ron Bothwell	Volume 3	Appendix 2 Coastal Natural Character Schedule of Values		Reject
401	248	Aquaculture New Zealand	Volume 3	Appendix 4 Determining Significant Adverse Effects		Accept in part
425	771	Federated Farmers of New Zealand	Volume 3	Appendix 4 Determining		Reject

				Significant Adverse Effects		
426	243	Marine Farming Association Incorporated	Volume 3	Appendix 4 Determining Significant Adverse Effects		Accept in part
698	110	Environmental Defence Society Incorporated	Volume 3	Appendix 4 Determining Significant Adverse Effects		Reject
716	213	Friends of Nelson Haven and Tasman Bay Incorporated	Volume 3	Appendix 4 Determining Significant Adverse Effects		Reject
1002	267	New Zealand Transport Agency	Volume 3	Appendix 4 Determining Significant Adverse Effects		Accept
1192	97	The Fertiliser Association of New Zealand	Volume 3	Appendix 4 Determining Significant Adverse Effects		Accept in part
496	101	Royal Forest and Bird Protection Society NZ {Forest & Bird)	Volume 4	Overlay Maps	Riparian Natural Character 1	Reject
179	2	Tui Nature Reserve	Volume 4	Overlay Maps	Coastal Natural Character 1	Accept in part
337	2	CP and LE Womersley	Volume 4	Overlay Maps	Coastal Natural Character 1	Accept in part
401	251	Aquaculture New Zealand	Volume 4	Overlay Maps	Coastal Natural Character 1	Accept in part
401	252	Aquaculture New Zealand	Volume 4	Overlay Maps	Coastal Natural Character 1	Reject
401	257	Aquaculture New Zealand	Volume 4	Overlay Maps	Coastal Natural Character 1	Accept in part
426	246	Marine Farming Association Incorporated	Volume 4	Overlay Maps	Coastal Natural Character 1	Accept in part
426	247	Marine Farming Association Incorporated	Volume 4	Overlay Maps	Coastal Natural Character 1	Reject
426	248	Marine Farming Association Incorporated	Volume 4	Overlay Maps	Coastal Natural Character 1	Accept in part
428	1	Allen, Judith and Andrew Cox	Volume 4	Overlay Maps	Coastal Natural	Accept in part

					Character 1	
513	1	Helen Johnston	Volume 4	Overlay Maps	Coastal Natural Character 1	Reject
514	13	A J King Family Trust and S A King Family Trust	Volume 4	Overlay Maps	Coastal Natural Character 1	Reject
534	1	Anne-Marie Prendeville	Volume 4	Overlay Maps	Coastal Natural Character 1	Reject
544	3	Apex Marine Farm Limited	Volume 4	Overlay Maps	Coastal Natural Character 1	Accept
546	8	Aroma Aquaculture Limited	Volume 4	Overlay Maps	Coastal Natural Character 1	Reject
546	11	Aroma Aquaculture Limited	Volume 4	Overlay Maps	Coastal Natural Character 1	Reject
563	4	Brent Matthew Dalley	Volume 4	Overlay Maps	Coastal Natural Character 1	Reject
574	14	Bryan Skeggs	Volume 4	Overlay Maps	Coastal Natural Character 1	Reject
587	2	Caroline Farley	Volume 4	Overlay Maps	Coastal Natural Character 1	Reject
587	3	Caroline Farley	Volume 4	Overlay Maps	Coastal Natural Character 1	Reject
601	2	Christopher Redwood	Volume 4	Overlay Maps	Coastal Natural Character 1	Reject
617	2	Clearwater Mussels Limited	Volume 4	Overlay Maps	Coastal Natural Character 1	Reject
617	6	Clearwater Mussels Limited	Volume 4	Overlay Maps	Coastal Natural Character 1	Reject
626	1	Christopher Peter Womersley	Volume 4	Overlay Maps	Coastal Natural Character 1	Reject
626	2	Christopher Peter Womersley	Volume 4	Overlay Maps	Coastal Natural Character 1	Accept in part
648	17	D C Hemphill	Volume 4	Overlay Maps	Coastal Natural Character 1	Reject
707	1	Frank Prendeville	Volume 4	Overlay Maps	Coastal Natural Character 1	Reject
716	203	Friends of Nelson Haven and Tasman Bay Incorporated	Volume 4	Overlay Maps	Coastal Natural Character 1	Accept in part
726	17	Canantor Mussels Limited and N. I Buchanan-Brown	Volume 4	Overlay Maps	Coastal Natural Character 1	Reject
750	3	Goulding Trustees Limited	Volume 4	Overlay Maps	Coastal Natural Character 1	Accept in part

764	3	HARO Partnership	Volume 4	Overlay Maps	Coastal Natural Character 1	Accept in part
809	15	Jim Jessep	Volume 4	Overlay Maps	Coastal Natural Character 1	Reject
820	2	Jeffrey Meachen	Volume 4	Overlay Maps	Coastal Natural Character 1	Reject
820	3	Jeffrey Meachen	Volume 4	Overlay Maps	Coastal Natural Character 1	Reject
839	1	John Wilson	Volume 4	Overlay Maps	Coastal Natural Character 1	Reject
842	3	Just Mussels Limited and Tawhitinui Greenshell Limited	Volume 4	Overlay Maps	Coastal Natural Character 1	Accept in part
847	1	KJB Marine Farms Limited	Volume 4	Overlay Maps	Coastal Natural Character 1	Reject
854	4	Kathleen Mary Mead	Volume 4	Overlay Maps	Coastal Natural Character 1	Reject
866	3	Karen Donaldson	Volume 4	Overlay Maps	Coastal Natural Character 1	Reject
866	6	Karen Donaldson	Volume 4	Overlay Maps	Coastal Natural Character 1	Reject
867	3	Karl Donaldson	Volume 4	Overlay Maps	Coastal Natural Character 1	Reject
867	6	Karl Donaldson	Volume 4	Overlay Maps	Coastal Natural Character 1	Reject
874	4	KPF Investments Limited and United Fisheries Limited	Volume 4	Overlay Maps	Coastal Natural Character 1	Accept in part
890	3	Lloyd Sampson David	Volume 4	Overlay Maps	Coastal Natural Character 1	Accept
903	1	Lewis Wilson	Volume 4	Overlay Maps	Coastal Natural Character 1	Reject
916	2	Margaret Hippolite	Volume 4	Overlay Maps	Coastal Natural Character 1	Reject
923	4	Margaret Dalley	Volume 4	Overlay Maps	Coastal Natural Character 1	Reject
958	11	Marine Farm Management Limited	Volume 4	Overlay Maps	Coastal Natural Character 1	Reject
958	12	Marine Farm Management Limited	Volume 4	Overlay Maps	Coastal Natural Character 1	Reject
958	13	Marine Farm Management Limited	Volume 4	Overlay Maps	Coastal Natural Character 1	Reject
958	24	Marine Farm Management Limited	Volume 4	Overlay Maps	Coastal Natural	Reject

					Character 1	
958	26	Marine Farm Management Limited	Volume 4	Overlay Maps	Coastal Natural Character 1	Reject
959	3	Marlborough Aquaculture Limited	Volume 4	Overlay Maps	Coastal Natural Character 1	Accept in part
997	4	The New Zealand King Salmon Company Limited	Volume 4	Overlay Maps	Coastal Natural Character 1	Accept in part
1022	2	Patricia Redwood	Volume 4	Overlay Maps	Coastal Natural Character 1	Reject
1034	1	P W Archer	Volume 4	Overlay Maps	Coastal Natural Character 1	Reject
1036	1	Philip Wilson	Volume 4	Overlay Maps	Coastal Natural Character 1	Reject
1056	1	Rob Curtis	Volume 4	Overlay Maps	Coastal Natural Character 1	Reject
1056	2	Rob Curtis	Volume 4	Overlay Maps	Coastal Natural Character 1	Reject
1060	1	Richard F Paine	Volume 4	Overlay Maps	Coastal Natural Character 1	Reject
1060	9	Richard F Paine	Volume 4	Overlay Maps	Coastal Natural Character 1	Reject
1068	2	Robert Hippolite	Volume 4	Overlay Maps	Coastal Natural Character 1	Reject
1098	1	Sandra Ann King	Volume 4	Overlay Maps	Coastal Natural Character 1	Reject
1118	2	Shane Gerard Thomas McCarthy	Volume 4	Overlay Maps	Coastal Natural Character 1	Reject
1118	5	Shane Gerard Thomas McCarthy	Volume 4	Overlay Maps	Coastal Natural Character 1	Reject
1126	2	Shane Gerard Thomas McCarthy	Volume 4	Overlay Maps	Coastal Natural Character 1	Reject
1140	74	Sanford Limited	Volume 4	Overlay Maps	Coastal Natural Character 1	Accept in part
1140	79	Sanford Limited	Volume 4	Overlay Maps	Coastal Natural Character 1	Reject
1140	110	Sanford Limited	Volume 4	Overlay Maps	Coastal Natural Character 1	Accept in part
1147	1	Shand Enterprises Limited	Volume 4	Overlay Maps	Coastal Natural Character 1	Reject
1148	1	Shand Trust Partnership	Volume 4	Overlay Maps	Coastal Natural Character 1	Reject

1150	3	Shellfish Marine Farms Limited	Volume 4	Overlay Maps	Coastal Natural Character 1	Accept in part
1152	1	Slade, King and King Limited and Port Gore Marine Farm Partnership	Volume 4	Overlay Maps	Coastal Natural Character 1	Accept
1156	1	Southern Crown Limited	Volume 4	Overlay Maps	Coastal Natural Character 1	Reject
1160	3	St George Limited	Volume 4	Overlay Maps	Coastal Natural Character 1	Accept in part
1164	2	Tui Rosalie Elkington and Shane Gerard Thomas McCarthy	Volume 4	Overlay Maps	Coastal Natural Character 1	Reject
1184	5	Talleys Group Limited	Volume 4	Overlay Maps	Coastal Natural Character 1	Reject
1184	8	Talleys Group Limited	Volume 4	Overlay Maps	Coastal Natural Character 1	Reject
1188	7	Te Runanga o Ngati Rarua	Volume 4	Overlay Maps	Coastal Natural Character 1	Reject
1196	1	Tiracaan Limited	Volume 4	Overlay Maps	Coastal Natural Character 1	Reject
1199	4	Treble Tree Holdings Limited	Volume 4	Overlay Maps	Coastal Natural Character 1	Reject
1204	3	United Fisheries Holdings Limited	Volume 4	Overlay Maps	Coastal Natural Character 1	Accept in part
1214	1	Vincent Rene Smith	Volume 4	Overlay Maps	Coastal Natural Character 1	Reject
1234	2	Waimana Marine Limited	Volume 4	Overlay Maps	Coastal Natural Character 1	Reject
177	3	Kristen Gerard	Volume 4	Overlay Maps	Coastal Natural Character 2	Accept
261	2	Lynette and Kevin Oldham	Volume 4	Overlay Maps	Coastal Natural Character 2	Reject
401	253	Aquaculture New Zealand	Volume 4	Overlay Maps	Coastal Natural Character 2	Reject
401	258	Aquaculture New Zealand	Volume 4	Overlay Maps	Coastal Natural Character 2	Accept in part
426	249	Marine Farming Association Incorporated	Volume 4	Overlay Maps	Coastal Natural Character 2	Accept in part
426	289	Marine Farming Association Incorporated	Volume 4	Overlay Maps	Coastal Natural Character 2	Reject
468	4	Port Gore Group	Volume 4	Overlay Maps	Coastal Natural Character 2	Reject
486	3	Waitui Holdings Limited	Volume 4	Overlay Maps	Coastal Natural	Reject

					Character 2	
493	4	Karen Marchant	Volume 4	Overlay Maps	Coastal Natural Character 2	Reject
513	2	Helen Johnston	Volume 4	Overlay Maps	Coastal Natural Character 2	Reject
514	21	A J King Family Trust and S A King Family Trust	Volume 4	Overlay Maps	Coastal Natural Character 2	Reject
546	9	Aroma Aquaculture Limited	Volume 4	Overlay Maps	Coastal Natural Character 2	Reject
546	12	Aroma Aquaculture Limited	Volume 4	Overlay Maps	Coastal Natural Character 2	Reject
563	1	Brent Matthew Dalley	Volume 4	Overlay Maps	Coastal Natural Character 2	Reject
563	2	Brent Matthew Dalley	Volume 4	Overlay Maps	Coastal Natural Character 2	Reject
563	3	Brent Matthew Dalley	Volume 4	Overlay Maps	Coastal Natural Character 2	Reject
601	1	Christopher Redwood	Volume 4	Overlay Maps	Coastal Natural Character 2	Reject
601	3	Christopher Redwood	Volume 4	Overlay Maps	Coastal Natural Character 2	Reject
601	4	Christopher Redwood	Volume 4	Overlay Maps	Coastal Natural Character 2	Reject
601	5	Christopher Redwood	Volume 4	Overlay Maps	Coastal Natural Character 2	Reject
601	6	Christopher Redwood	Volume 4	Overlay Maps	Coastal Natural Character 2	Reject
617	4	Clearwater Mussels Limited	Volume 4	Overlay Maps	Coastal Natural Character 2	Accept in part
645	1	Darnyl Gordon Slade	Volume 4	Overlay Maps	Coastal Natural Character 2	Reject
648	18	D C Hemphill	Volume 4	Overlay Maps	Coastal Natural Character 2	Reject
668	1	David Quintin Hogg	Volume 4	Overlay Maps	Coastal Natural Character 2	Reject
698	118	Environmental Defence Society Incorporated	Volume 4	Overlay Maps	Coastal Natural Character 2	Accept in part
716	204	Friends of Nelson Haven and Tasman Bay Incorporated	Volume 4	Overlay Maps	Coastal Natural Character 2	Accept in part
726	18	Canantor Mussels Limited and N. I Buchanan-Brown	Volume 4	Overlay Maps	Coastal Natural Character 2	Reject

733	1	Graeme L Beal	Volume 4	Overlay Maps	Coastal Natural Character 2	Reject
733	2	Graeme L Beal	Volume 4	Overlay Maps	Coastal Natural Character 2	Reject
750	5	Goulding Trustees Limited	Volume 4	Overlay Maps	Coastal Natural Character 2	Accept
809	16	Jim Jessep	Volume 4	Overlay Maps	Coastal Natural Character 2	Reject
824	1	Archer, Beryl Evelyn and Hebbard, John Roderick	Volume 4	Overlay Maps	Coastal Natural Character 2	Reject
839	2	John Wilson	Volume 4	Overlay Maps	Coastal Natural Character 2	Reject
842	5	Just Mussels Limited and Tawhitinui Greenshell Limited	Volume 4	Overlay Maps	Coastal Natural Character 2	Accept
854	1	Kathleen Mary Mead	Volume 4	Overlay Maps	Coastal Natural Character 2	Reject
854	2	Kathleen Mary Mead	Volume 4	Overlay Maps	Coastal Natural Character 2	Reject
854	3	Kathleen Mary Mead	Volume 4	Overlay Maps	Coastal Natural Character 2	Reject
866	4	Karen Donaldson	Volume 4	Overlay Maps	Coastal Natural Character 2	Reject
867	4	Karl Donaldson	Volume 4	Overlay Maps	Coastal Natural Character 2	Reject
874	6	KPF Investments Limited and United Fisheries Limited	Volume 4	Overlay Maps	Coastal Natural Character 2	Accept in part
903	2	Lewis Wilson	Volume 4	Overlay Maps	Coastal Natural Character 2	Reject
923	1	Margaret Dalley	Volume 4	Overlay Maps	Coastal Natural Character 2	Reject
923	2	Margaret Dalley	Volume 4	Overlay Maps	Coastal Natural Character 2	Reject
923	3	Margaret Dalley	Volume 4	Overlay Maps	Coastal Natural Character 2	Reject
958	15	Marine Farm Management Limited	Volume 4	Overlay Maps	Coastal Natural Character 2	Reject
958	25	Marine Farm Management Limited	Volume 4	Overlay Maps	Coastal Natural Character 2	Reject
1010	1	PB Partnership	Volume 4	Overlay Maps	Coastal Natural Character 2	Reject
1018	1	P H Redwood and Company Limited	Volume 4	Overlay Maps	Coastal Natural	Accept in part



					Character 2	
1022	1	Patricia Redwood	Volume 4	Overlay Maps	Coastal Natural Character 2	Reject
1022	3	Patricia Redwood	Volume 4	Overlay Maps	Coastal Natural Character 2	Reject
1022	4	Patricia Redwood	Volume 4	Overlay Maps	Coastal Natural Character 2	Reject
1022	5	Patricia Redwood	Volume 4	Overlay Maps	Coastal Natural Character 2	Reject
1022	6	Patricia Redwood	Volume 4	Overlay Maps	Coastal Natural Character 2	Reject
1056	3	Rob Curtis	Volume 4	Overlay Maps	Coastal Natural Character 2	Reject
1060	2	Richard F Paine	Volume 4	Overlay Maps	Coastal Natural Character 2	Reject
1060	10	Richard F Paine	Volume 4	Overlay Maps	Coastal Natural Character 2	Reject
1098	3	Sandra Ann King	Volume 4	Overlay Maps	Coastal Natural Character 2	Reject
1140	75	Sanford Limited	Volume 4	Overlay Maps	Coastal Natural Character 2	Reject
1140	80	Sanford Limited	Volume 4	Overlay Maps	Coastal Natural Character 2	Reject
1140	111	Sanford Limited	Volume 4	Overlay Maps	Coastal Natural Character 2	Accept in part
1147	2	Shand Enterprises Limited	Volume 4	Overlay Maps	Coastal Natural Character 2	Reject
1148	2	Shand Trust Partnership	Volume 4	Overlay Maps	Coastal Natural Character 2	Reject
1152	2	Slade, King and King Limited and Port Gore Marine Farm Partnership	Volume 4	Overlay Maps	Coastal Natural Character 2	Accept
1152	6	Slade, King and King Limited and Port Gore Marine Farm Partnership	Volume 4	Overlay Maps	Coastal Natural Character 2	Accept in part
1156	2	Southern Crown Limited	Volume 4	Overlay Maps	Coastal Natural Character 2	Reject
1157	14	Southern Crown Limited	Volume 4	Overlay Maps	Coastal Natural Character 2	Reject
1166	1	P H Redwood and Company Limited	Volume 4	Overlay Maps	Coastal Natural Character 2	Accept
1196	2	Tiracaan Limited	Volume 4	Overlay Maps	Coastal Natural Character 2	Reject

1219	1	William Albert Trevor and Kathleen Mary Rainbow	Volume 4	Overlay Maps	Coastal Natural Character 2	Reject
339	30	Sharon Parkes	Volume 4	Overlay Maps	Coastal Natural Character 3	Reject
401	254	Aquaculture New Zealand	Volume 4	Overlay Maps	Coastal Natural Character 3	Reject
401	259	Aquaculture New Zealand	Volume 4	Overlay Maps	Coastal Natural Character 3	Accept in part
426	250	Marine Farming Association Incorporated	Volume 4	Overlay Maps	Coastal Natural Character 3	Accept in part
426	290	Marine Farming Association Incorporated	Volume 4	Overlay Maps	Coastal Natural Character 3	Reject
433	212	Port Marlborough New Zealand Limited	Volume 4	Overlay Maps	Coastal Natural Character 3	Accept
482	2	Worlds End Enterprises Limited	Volume 4	Overlay Maps	Coastal Natural Character 3	Accept in part
488	1	Margaret and Robert Hippolite	Volume 4	Overlay Maps	Coastal Natural Character 3	Accept in part
502	9	Karaka Projects Limited	Volume 4	Overlay Maps	Coastal Natural Character 3	Accept in part
513	3	Helen Johnston	Volume 4	Overlay Maps	Coastal Natural Character 3	Reject
514	15	A J King Family Trust and S A King Family Trust	Volume 4	Overlay Maps	Coastal Natural Character 3	Reject
544	4	Apex Marine Farm Limited	Volume 4	Overlay Maps	Coastal Natural Character 3	Accept in part
546	1	Aroma Aquaculture Limited	Volume 4	Overlay Maps	Coastal Natural Character 3	Reject
546	2	Aroma Aquaculture Limited	Volume 4	Overlay Maps	Coastal Natural Character 3	Reject
546	3	Aroma Aquaculture Limited	Volume 4	Overlay Maps	Coastal Natural Character 3	Reject
546	4	Aroma Aquaculture Limited	Volume 4	Overlay Maps	Coastal Natural Character 3	Reject
546	6	Aroma Aquaculture Limited	Volume 4	Overlay Maps	Coastal Natural Character 3	Reject
574	16	Bryan Skeggs	Volume 4	Overlay Maps	Coastal Natural Character 3	Reject
587	1	Caroline Farley	Volume 4	Overlay Maps	Coastal Natural Character 3	Reject
616	3	Clearwater Mussels Limited and Talleys Group Limited	Volume 4	Overlay Maps	Coastal Natural	Reject

					Character 3	
617	8	Clearwater Mussels Limited	Volume 4	Overlay Maps	Coastal Natural Character 3	Accept in part
637	1	Crail Bay Trust	Volume 4	Overlay Maps	Coastal Natural Character 3	Reject
648	19	D C Hemphill	Volume 4	Overlay Maps	Coastal Natural Character 3	Reject
689	1	Elizabeth Patricia Clarke	Volume 4	Overlay Maps	Coastal Natural Character 3	Reject
689	2	Elizabeth Patricia Clarke	Volume 4	Overlay Maps	Coastal Natural Character 3	Reject
689	3	Elizabeth Patricia Clarke	Volume 4	Overlay Maps	Coastal Natural Character 3	Reject
689	4	Elizabeth Patricia Clarke	Volume 4	Overlay Maps	Coastal Natural Character 3	Reject
719	1	Gary and Ellen Orchard	Volume 4	Overlay Maps	Coastal Natural Character 3	Reject
723	1	Graeme Henry Clarke	Volume 4	Overlay Maps	Coastal Natural Character 3	Reject
724	1	Graeme Henry Clarke	Volume 4	Overlay Maps	Coastal Natural Character 3	Reject
726	15	Canantor Mussels Limited and N. I Buchanan-Brown	Volume 4	Overlay Maps	Coastal Natural Character 3	Reject
733	3	Graeme L Beal	Volume 4	Overlay Maps	Coastal Natural Character 3	Reject
733	4	Graeme L Beal	Volume 4	Overlay Maps	Coastal Natural Character 3	Reject
735	1	Gillian Margaret Rothwell	Volume 4	Overlay Maps	Coastal Natural Character 3	Reject
738	2	Glenda Vera Robb	Volume 4	Overlay Maps	Coastal Natural Character 3	Reject
788	1	Jessica Bunting	Volume 4	Overlay Maps	Coastal Natural Character 3	Reject
809	14	Jim Jessep	Volume 4	Overlay Maps	Coastal Natural Character 3	Reject
815	1	Jonathan Large	Volume 4	Overlay Maps	Coastal Natural Character 3	Reject
820	1	Jeffrey Meachen	Volume 4	Overlay Maps	Coastal Natural Character 3	Reject
839	3	John Wilson	Volume 4	Overlay Maps	Coastal Natural Character 3	Reject

842	6	Just Mussels Limited and Tawhitinui Greenshell Limited	Volume 4	Overlay Maps	Coastal Natural Character 3	Reject
843	1	Karen Anne Harris	Volume 4	Overlay Maps	Coastal Natural Character 3	Reject
866	1	Karen Donaldson	Volume 4	Overlay Maps	Coastal Natural Character 3	Reject
866	2	Karen Donaldson	Volume 4	Overlay Maps	Coastal Natural Character 3	Reject
866	5	Karen Donaldson	Volume 4	Overlay Maps	Coastal Natural Character 3	Reject
867	1	Karl Donaldson	Volume 4	Overlay Maps	Coastal Natural Character 3	Reject
867	2	Karl Donaldson	Volume 4	Overlay Maps	Coastal Natural Character 3	Reject
867	5	Karl Donaldson	Volume 4	Overlay Maps	Coastal Natural Character 3	Reject
874	7	KPF Investments Limited and United Fisheries Limited	Volume 4	Overlay Maps	Coastal Natural Character 3	Accept in part
890	4	Lloyd Sampson David	Volume 4	Overlay Maps	Coastal Natural Character 3	Accept in part
903	3	Lewis Wilson	Volume 4	Overlay Maps	Coastal Natural Character 3	Reject
911	1	M and S Johns	Volume 4	Overlay Maps	Coastal Natural Character 3	Reject
916	1	Margaret Hippolite	Volume 4	Overlay Maps	Coastal Natural Character 3	Reject
916	3	Margaret Hippolite	Volume 4	Overlay Maps	Coastal Natural Character 3	Reject
928	1	Michael Headley Harris	Volume 4	Overlay Maps	Coastal Natural Character 3	Reject
935	64	Melva Joy Robb	Volume 4	Overlay Maps	Coastal Natural Character 3	Reject
952	1	Matthew White	Volume 4	Overlay Maps	Coastal Natural Character 3	Reject
958	2	Marine Farm Management Limited	Volume 4	Overlay Maps	Coastal Natural Character 3	Reject
958	14	Marine Farm Management Limited	Volume 4	Overlay Maps	Coastal Natural Character 3	Reject
958	19	Marine Farm Management Limited	Volume 4	Overlay Maps	Coastal Natural Character 3	Reject
958	20	Marine Farm Management Limited	Volume 4	Overlay Maps	Coastal Natural	Reject

					Character 3	
958	21	Marine Farm Management Limited	Volume 4	Overlay Maps	Coastal Natural Character 3	Reject
958	22	Marine Farm Management Limited	Volume 4	Overlay Maps	Coastal Natural Character 3	Reject
958	23	Marine Farm Management Limited	Volume 4	Overlay Maps	Coastal Natural Character 3	Reject
964	13	Marlborough Oysters Limited	Volume 4	Overlay Maps	Coastal Natural Character 3	Reject
964	14	Marlborough Oysters Limited	Volume 4	Overlay Maps	Coastal Natural Character 3	Reject
977	1	Nanette Bunting	Volume 4	Overlay Maps	Coastal Natural Character 3	Reject
997	6	The New Zealand King Salmon Company Limited	Volume 4	Overlay Maps	Coastal Natural Character 3	Reject
1019	1	Philip Henderson	Volume 4	Overlay Maps	Coastal Natural Character 3	Reject
1034	2	P W Archer	Volume 4	Overlay Maps	Coastal Natural Character 3	Reject
1037	1	PADD Investments Limited	Volume 4	Overlay Maps	Coastal Natural Character 3	Reject
1060	3	Richard F Paine	Volume 4	Overlay Maps	Coastal Natural Character 3	Reject
1060	5	Richard F Paine	Volume 4	Overlay Maps	Coastal Natural Character 3	Reject
1068	1	Robert Hippolite	Volume 4	Overlay Maps	Coastal Natural Character 3	Reject
1068	3	Robert Hippolite	Volume 4	Overlay Maps	Coastal Natural Character 3	Reject
1094	1	Richards Family Trust	Volume 4	Overlay Maps	Coastal Natural Character 3	Reject
1094	2	Richards Family Trust	Volume 4	Overlay Maps	Coastal Natural Character 3	Reject
1098	2	Sandra Ann King	Volume 4	Overlay Maps	Coastal Natural Character 3	Reject
1125	1	Scott Madsen	Volume 4	Overlay Maps	Coastal Natural Character 3	Reject
1125	3	Scott Madsen	Volume 4	Overlay Maps	Coastal Natural Character 3	Reject
1140	76	Sanford Limited	Volume 4	Overlay Maps	Coastal Natural Character 3	Reject

1140	81	Sanford Limited	Volume 4	Overlay Maps	Coastal Natural Character 3	Reject
1140	102	Sanford Limited	Volume 4	Overlay Maps	Coastal Natural Character 3	Reject
1140	108	Sanford Limited	Volume 4	Overlay Maps	Coastal Natural Character 3	Accept in part
1150	5	Shellfish Marine Farms Limited	Volume 4	Overlay Maps	Coastal Natural Character 3	Reject
1152	3	Slade, King and King Limited and Port Gore Marine Farm Partnership	Volume 4	Overlay Maps	Coastal Natural Character 3	Accept
1154	1	Sounds Fun Mussel Company	Volume 4	Overlay Maps	Coastal Natural Character 3	Reject
1160	5	St George Limited	Volume 4	Overlay Maps	Coastal Natural Character 3	Reject
1171	1	Tim Madden	Volume 4	Overlay Maps	Coastal Natural Character 3	Reject
1171	2	Tim Madden	Volume 4	Overlay Maps	Coastal Natural Character 3	Reject
1184	6	Talleys Group Limited	Volume 4	Overlay Maps	Coastal Natural Character 3	Reject
1188	8	Te Runanga o Ngati Rarua	Volume 4	Overlay Maps	Coastal Natural Character 3	Reject
1203	1	Turner Aquaculture New Zealand Limited	Volume 4	Overlay Maps	Coastal Natural Character 3	Reject
1214	2	Vincent Rene Smith	Volume 4	Overlay Maps	Coastal Natural Character 3	Reject
1216	1	Victoria White	Volume 4	Overlay Maps	Coastal Natural Character 3	Reject
1234	1	Waimana Marine Limited	Volume 4	Overlay Maps	Coastal Natural Character 3	Reject
1240	1	Worlds End Enterprise Limited	Volume 4	Overlay Maps	Coastal Natural Character 3	Reject
100	33	East Bay Conservation Society	Volume 4	Overlay Maps	Coastal Natural Character 4	Reject
177	2	Kristen Gerard	Volume 4	Overlay Maps	Coastal Natural Character 4	Accept
218	7	Salvador Delgado Oro Laprida	Volume 4	Overlay Maps	Coastal Natural Character 4	Accept in part
261	6	Lynette and Kevin Oldham	Volume 4	Overlay Maps	Coastal Natural Character 4	Reject
323	2	Lyn Molly Godsiff	Volume 4	Overlay Maps	Coastal Natural	Reject

					Character 4	
388	2	Adrian Mark Henry Harvey	Volume 4	Overlay Maps	Coastal Natural Character 4	Reject
401	255	Aquaculture New Zealand	Volume 4	Overlay Maps	Coastal Natural Character 4	Reject
401	260	Aquaculture New Zealand	Volume 4	Overlay Maps	Coastal Natural Character 4	Accept in part
424	193	Michael and Kristen Gerard	Volume 4	Overlay Maps	Coastal Natural Character 4	Accept
426	251	Marine Farming Association Incorporated	Volume 4	Overlay Maps	Coastal Natural Character 4	Accept in part
426	291	Marine Farming Association Incorporated	Volume 4	Overlay Maps	Coastal Natural Character 4	Reject
433	211	Port Marlborough New Zealand Limited	Volume 4	Overlay Maps	Coastal Natural Character 4	Accept
468	5	Port Gore Group	Volume 4	Overlay Maps	Coastal Natural Character 4	Reject
493	5	Karen Marchant	Volume 4	Overlay Maps	Coastal Natural Character 4	Reject
513	4	Helen Johnston	Volume 4	Overlay Maps	Coastal Natural Character 4	Reject
514	17	A J King Family Trust and S A King Family Trust	Volume 4	Overlay Maps	Coastal Natural Character 4	Reject
518	1	Abigail Burns	Volume 4	Overlay Maps	Coastal Natural Character 4	Accept in part
544	6	Apex Marine Farm Limited	Volume 4	Overlay Maps	Coastal Natural Character 4	Accept in part
546	5	Aroma Aquaculture Limited	Volume 4	Overlay Maps	Coastal Natural Character 4	Reject
546	7	Aroma Aquaculture Limited	Volume 4	Overlay Maps	Coastal Natural Character 4	Reject
546	10	Aroma Aquaculture Limited	Volume 4	Overlay Maps	Coastal Natural Character 4	Reject
572	2	Beleve Limited and R J Davidson Family Trust	Volume 4	Overlay Maps	Coastal Natural Character 4	Reject
579	1	Craig and Sherald MacDonnell	Volume 4	Overlay Maps	Coastal Natural Character 4	Reject
605	1	Colin Ronald Norton	Volume 4	Overlay Maps	Coastal Natural Character 4	Reject
615	1	Clearwater Mussels Limited and Knight-Somerville Partnership	Volume 4	Overlay Maps	Coastal Natural Character 4	Accept in part

616	4	Clearwater Mussels Limited and Talleys Group Limited	Volume 4	Overlay Maps	Coastal Natural Character 4	Reject
645	2	Darnyl Gordon Slade	Volume 4	Overlay Maps	Coastal Natural Character 4	Reject
645	3	Darnyl Gordon Slade	Volume 4	Overlay Maps	Coastal Natural Character 4	Reject
645	4	Darnyl Gordon Slade	Volume 4	Overlay Maps	Coastal Natural Character 4	Reject
648	20	D C Hemphill	Volume 4	Overlay Maps	Coastal Natural Character 4	Reject
698	119	Environmental Defence Society Incorporated	Volume 4	Overlay Maps	Coastal Natural Character 4	Accept in part
702	1	Frank Burns	Volume 4	Overlay Maps	Coastal Natural Character 4	Accept in part
726	13	Canantor Mussels Limited and N. I Buchanan-Brown	Volume 4	Overlay Maps	Coastal Natural Character 4	Reject
735	3	Gillian Margaret Rothwell	Volume 4	Overlay Maps	Coastal Natural Character 4	Reject
748	1	GAL Partnership	Volume 4	Overlay Maps	Coastal Natural Character 4	Reject
839	4	John Wilson	Volume 4	Overlay Maps	Coastal Natural Character 4	Reject
845	23	Kenneth R and Sara M Roush	Volume 4	Overlay Maps	Coastal Natural Character 4	Accept in part
848	1	Kirsten Burns	Volume 4	Overlay Maps	Coastal Natural Character 4	Accept in part
855	1	Kyra Madsen	Volume 4	Overlay Maps	Coastal Natural Character 4	Reject
874	9	KPF Investments Limited and United Fisheries Limited	Volume 4	Overlay Maps	Coastal Natural Character 4	Accept
890	6	Lloyd Sampson David	Volume 4	Overlay Maps	Coastal Natural Character 4	Accept in part
903	4	Lewis Wilson	Volume 4	Overlay Maps	Coastal Natural Character 4	Reject
916	4	Margaret Hippolite	Volume 4	Overlay Maps	Coastal Natural Character 4	Reject
926	27	Wainui Green 2015 Limited	Volume 4	Overlay Maps	Coastal Natural Character 4	Reject
940	1	Michelle Madsen	Volume 4	Overlay Maps	Coastal Natural Character 4	Reject
958	1	Marine Farm Management Limited	Volume 4	Overlay Maps	Coastal Natural	Reject



					Character 4	
958	3	Marine Farm Management Limited	Volume 4	Overlay Maps	Coastal Natural Character 4	Reject
958	4	Marine Farm Management Limited	Volume 4	Overlay Maps	Coastal Natural Character 4	Reject
958	5	Marine Farm Management Limited	Volume 4	Overlay Maps	Coastal Natural Character 4	Accept in part
958	6	Marine Farm Management Limited	Volume 4	Overlay Maps	Coastal Natural Character 4	Reject
958	7	Marine Farm Management Limited	Volume 4	Overlay Maps	Coastal Natural Character 4	Accept in part
958	8	Marine Farm Management Limited	Volume 4	Overlay Maps	Coastal Natural Character 4	Reject
958	9	Marine Farm Management Limited	Volume 4	Overlay Maps	Coastal Natural Character 4	Reject
958	10	Marine Farm Management Limited	Volume 4	Overlay Maps	Coastal Natural Character 4	Reject
958	16	Marine Farm Management Limited	Volume 4	Overlay Maps	Coastal Natural Character 4	Reject
958	17	Marine Farm Management Limited	Volume 4	Overlay Maps	Coastal Natural Character 4	Reject
958	18	Marine Farm Management Limited	Volume 4	Overlay Maps	Coastal Natural Character 4	Reject
969	2	Ngai Tahu Seafood Resources Limited	Volume 4	Overlay Maps	Coastal Natural Character 4	Reject
995	48	New Zealand Forest Products Holdings Limited	Volume 4	Overlay Maps	Coastal Natural Character 4	Accept
997	8	The New Zealand King Salmon Company Limited	Volume 4	Overlay Maps	Coastal Natural Character 4	Accept in part
1003	1	Olivia Burns	Volume 4	Overlay Maps	Coastal Natural Character 4	Accept in part
1019	2	Philip Henderson	Volume 4	Overlay Maps	Coastal Natural Character 4	Reject
1042	23	Port Underwood Association	Volume 4	Overlay Maps	Coastal Natural Character 4	Accept in part
1047	1	R A and R S Hall Aquaculture	Volume 4	Overlay Maps	Coastal Natural Character 4	Accept in part
1047	2	R A and R S Hall Aquaculture	Volume 4	Overlay Maps	Coastal Natural Character 4	Accept in part
1047	3	R A and R S Hall Aquaculture	Volume 4	Overlay Maps	Coastal Natural Character 4	Accept in part

1047	4	R A and R S Hall Aquaculture	Volume 4	Overlay Maps	Coastal Natural Character 4	Accept in part
1060	4	Richard F Paine	Volume 4	Overlay Maps	Coastal Natural Character 4	Reject
1060	6	Richard F Paine	Volume 4	Overlay Maps	Coastal Natural Character 4	Reject
1060	7	Richard F Paine	Volume 4	Overlay Maps	Coastal Natural Character 4	Reject
1060	8	Richard F Paine	Volume 4	Overlay Maps	Coastal Natural Character 4	Reject
1068	4	Robert Hippolite	Volume 4	Overlay Maps	Coastal Natural Character 4	Reject
1094	3	Richards Family Trust	Volume 4	Overlay Maps	Coastal Natural Character 4	Reject
1098	4	Sandra Ann King	Volume 4	Overlay Maps	Coastal Natural Character 4	Reject
1111	1	Stephen Cross	Volume 4	Overlay Maps	Coastal Natural Character 4	Reject
1111	2	Stephen Cross	Volume 4	Overlay Maps	Coastal Natural Character 4	Reject
1125	2	Scott Madsen	Volume 4	Overlay Maps	Coastal Natural Character 4	Reject
1140	77	Sanford Limited	Volume 4	Overlay Maps	Coastal Natural Character 4	Reject
1140	82	Sanford Limited	Volume 4	Overlay Maps	Coastal Natural Character 4	Reject
1140	109	Sanford Limited	Volume 4	Overlay Maps	Coastal Natural Character 4	Accept in part
1143	1	Schwass Family Trusts Partnership	Volume 4	Overlay Maps	Coastal Natural Character 4	Reject
1143	2	Schwass Family Trusts Partnership	Volume 4	Overlay Maps	Coastal Natural Character 4	Reject
1143	3	Schwass Family Trusts Partnership	Volume 4	Overlay Maps	Coastal Natural Character 4	Reject
1143	4	Schwass Family Trusts Partnership	Volume 4	Overlay Maps	Coastal Natural Character 4	Reject
1143	5	Schwass Family Trusts Partnership	Volume 4	Overlay Maps	Coastal Natural Character 4	Reject
1143	6	Schwass Family Trusts Partnership	Volume 4	Overlay Maps	Coastal Natural Character 4	Reject
1143	7	Schwass Family Trusts Partnership	Volume 4	Overlay Maps	Coastal Natural	Reject

					Character 4	
1143	8	Schwass Family Trusts Partnership	Volume 4	Overlay Maps	Coastal Natural Character 4	Reject
1145	1	Sea Health Foods Limited	Volume 4	Overlay Maps	Coastal Natural Character 4	Reject
1152	4	Slade, King and King Limited and Port Gore Marine Farm Partnership	Volume 4	Overlay Maps	Coastal Natural Character 4	Accept
1152	7	Slade, King and King Limited and Port Gore Marine Farm Partnership	Volume 4	Overlay Maps	Coastal Natural Character 4	Reject
1165	2	Ngai Tahu Seafood Resources Limited	Volume 4	Overlay Maps	Coastal Natural Character 4	Reject
1197	1	Tory Channel Aquaculture Limited	Volume 4	Overlay Maps	Coastal Natural Character 4	Reject
1199	2	Treble Tree Holdings Limited	Volume 4	Overlay Maps	Coastal Natural Character 4	Reject
1200	1	Triple LG Limited	Volume 4	Overlay Maps	Coastal Natural Character 4	Reject
1257	1	Allan Tester	Volume 4	Overlay Maps	Coastal Natural Character 4	Reject
1264	1	Ron Bothwell	Volume 4	Overlay Maps	Coastal Natural Character 4	Reject
355	20	Dominion Salt Limited	Volume 4	Overlay Maps	Coastal Natural Character 5	Reject
358	1	Cape Campbell Farm	Volume 4	Overlay Maps	Coastal Natural Character 5	Accept
401	256	Aquaculture New Zealand	Volume 4	Overlay Maps	Coastal Natural Character 5	Reject
426	292	Marine Farming Association Incorporated	Volume 4	Overlay Maps	Coastal Natural Character 5	Reject
513	5	Helen Johnston	Volume 4	Overlay Maps	Coastal Natural Character 5	Reject
629	1	Clifford Bay Marine Farms Limited	Volume 4	Overlay Maps	Coastal Natural Character 5	Accept in part
648	21	D C Hemphill	Volume 4	Overlay Maps	Coastal Natural Character 5	Reject
839	5	John Wilson	Volume 4	Overlay Maps	Coastal Natural Character 5	Reject
867	13	Karl Donaldson	Volume 4	Overlay Maps	Coastal Natural Character 5	Reject
903	5	Lewis Wilson	Volume 4	Overlay Maps	Coastal Natural Character 5	Reject

1140	78	Sanford Limited	Volume 4	Overlay Maps	Coastal Natural Character 5	Reject
1140	83	Sanford Limited	Volume 4	Overlay Maps	Coastal Natural Character 5	Reject
1152	5	Slade, King and King Limited and Port Gore Marine Farm Partnership	Volume 4	Overlay Maps	Coastal Natural Character 5	Accept
425	782	Federated Farmers of New Zealand	Volume 4	Overlay Maps		Accept in part
425	786	Federated Farmers of New Zealand	Volume 4	Overlay Maps		Reject
490	1	Murray Lewis Waghorn	Volume 4	Overlay Maps		Reject
716	202	Friends of Nelson Haven and Tasman Bay Incorporated	Volume 4	Overlay Maps		Accept in part