

**BEFORE THE ENVIRONMENT COURT
AT CHRISTCHURCH**

**I MUA I TE KŌTI TAIAO O AOTEAROA
KI ŌTAUTAHI**

IN THE MATTER of the Resource Management Act 1991

AND of appeals under clause 14 of the First Schedule of the Act

BETWEEN DOMINION SALT

(ENV-2020-CHC-21)

and all other appellants concerning the proposed Marlborough Environment Plan

(as set out in Annexure 2 attached)

Appellants

AND MARLBOROUGH DISTRICT COUNCIL

Respondent

MINUTE (21 August 2020)

Introduction

[1] These proceedings concern a number of appeals against the Marlborough District Council's proposed Marlborough Environment Plan ('pMEP').

[2] The court issued a Minute on 16 June 2020 with the following directions:

- (a) the Council is to lodge and serve a case management memorandum which must (at least) report on the matters raised in [2](a)-(g) [of the Minute] by **Friday 31 July 2020**;
- (b) any party who wishes to raise any issues or respond to the Council's memorandum should lodge and serve a memorandum by **Friday 14 August 2020**; and
- (c) a pre-hearing conference will be set down in Blenheim on **Friday 28 August 2020**.

[3] The court has now read and considered the case management memorandum for Marlborough District Council ('MDC') and its associated proposed table of topics and sub-



topics, both dated 31 July 2020 ('MDC memorandum') and the several other memoranda and responses.¹ In light of the memoranda, and for the reasons I give, I consider it appropriate to vacate the scheduled pre-hearing conference ('PHC') and make various further directions herein. Once the court receives responses to those directions, the matter of a PHC can be revisited.

General matters

Versions of the proposed MEP

[4] The pMEP is more precisely a composite policy and planning instrument to serve MDC's unitary authority regional council and district council functions, particularly those in ss 30 and 31, RMA. It comprises the following (aspects of which are not appealed and are operative):

- (a) regional policy statement ('RPS');
- (b) regional coastal plan ('RCP');
- (c) other regional plans ('RP'); and
- (d) district plan ('DP').

[5] Parties should note that there are various versions of this pMEP that are relevant in our consideration of appeals. Using MDC's proposed acronyms:

¹ Memorandum for Friends of Nelson Haven & Tasman Bay Inc. ('FNHTB') dated 6 August 2020; memorandum for Brentwood Vineyards Ltd & Others dated 6 August 2020; memorandum for Dominion Salt dated 6 August 2020; memorandum for Wine Marlborough Ltd (s274 party) dated 10 August 2020; memorandum for the Omaka Valley Group dated 11 August; joint memorandum from the Minister of Conservation and Royal Forest and Bird Protection Society of NZ dated 12 August; memorandum for the Environmental Defence Society dated 13 August 2020; memorandum for Nelson-Marlborough Fish and Game Council dated 14 August 2020; memorandum for the New Zealand King Salmon Company Limited dated 14 August 2020; memorandum for Waka Kotahi NZ Transport Agency dated 14 August 2020; memorandum for Te Ātiawa o Te Waka-a-Māui Trust dated 14 August 2020; memorandum for Port Marlborough NZ Ltd dated 14 August 2020; memorandum for the Fishing Industry Parties dated 14 August 2020; memorandum for Te Rūnanga o Kaikōura and Te Rūnanga o Ngāi Tahu dated 14 August 2020; memorandum for Yachting New Zealand Inc. dated 14 August 2020; memorandum for Trustpower Ltd dated 14 August 2020; memorandum for the Marine Farming Association and Aquaculture New Zealand dated 14 August 2020; email from Mr Caddie for the Kenepuru and Central Sounds Residents Association Inc dated 14 August 2020; memorandum for the Royal Forest and Bird Protection Society of NZ Inc. dated 14 August 2020; memorandum for Kāinga Ora—Homes and Communities ('Kāinga Ora') dated 14 August 2020; memorandum for KiwiRail Holdings Limited ('KiwiRail') dated 14 August 2020; memorandum for Heritage NZ Pouhere Taonga dated 14 August 2020; memorandum for the East Bay Conservation Society dated 14 August 2020; memorandum for OneFortyOne dated 14 August 2020; memorandum for Transpower NZ Ltd dated 17 August 2020.



- (a) **NV-MEP** refers to the notified version of the pMEP; and
- (b) **DV-MEP** refers to the version of the pMEP as changed by decisions made by MDC's hearing panel. It is the DV-MEP that is subject of appeals.

[6] Furthermore, parties should bear in mind that, as appeal points are determined or otherwise resolved through the court's appeal processes, this will typically mean that relevant DV-MEP provisions will be either confirmed, changed or replaced. Helpfully, MDC will have on its website a working document that shows the provisions of the DV-MEP as they are updated by changes in appeal processes (and associated MDC resolutions). MDC explains that this annotated working document, referred to as **AV-MEP**, includes both the significant portions of the DV-MEP that are not under appeal (and, hence are now operative) and provisions as updated or included as a consequence of the determination or other resolution of appeals.

The Environment Court Practice Note

[7] Environment Court procedures are set out in the court's Practice Note at www.environmentcourt.govt.nz/about/practice-note/. The court expects those procedures to be followed as directions, subject to specific directions as may be made such as by Minute (or in a judicial pre-hearing or telephone conference).

MDC communication and support arrangements

[8] Properly, in its role as respondent, MDC is providing leadership and assistance to parties in regard to access to certain documentation, both for mediation and hearings processes.

[9] In particular, MDC describes its intended provision of a 'Hearings Portal' to assist in providing electronic access to key documents (including with a 'Document Resource Locator' or 'DRL'). Further, MDC explains that its documents will be hyperlinked and available via its website (with MDC notifying parties when a document has been uploaded). Parties should note the hyperlinks for the documents in the table at [15] of MDC's memorandum.

[10] It would assist parties if all court minutes, records of pre-hearing conferences, decisions and consent orders were available to parties via the MDC website. Directions



are made for MDC to report back on whether it can provide that hosting service and, if so, what link parties should follow through its website.

Typical topic-based sequence towards hearing and determining points on appeal

[11] There are some 51 appeals and some 384 s274 notices from 61 separate parties. It would be clearly inefficient and impracticable to endeavour to deal with each appeal as a separate discrete proceeding. Inherently, inasmuch as the appeals concern plan provisions, all are in some way related. As signalled and is typically the case for plan appeals, the most efficient approach is to determine appeal points according to topic and sub-topic groupings. The relevant topics and sub-topics will be confirmed by Minute in due course, and are further discussed later in this Minute.

[12] Parties should expect the following general sequence of steps towards points on appeal as pertain to identified topics and sub-topics:

- (a) confirmation, by Minute, of the topics and sub-topics as a first step;
- (b) procedural and jurisdictional determinations, if in due process terms they should be addressed at the outset;
- (c) topic-focussed pre-hearing conference(s), where the court considers this warranted, according to arrangements that address COVID-19 restrictions (see below);
- (d) topic-focussed court-facilitated mediation or other alternative dispute resolution, according to directions (including, potentially, prior issues conferencing);
- (e) consideration of joint memoranda seeking consent order determinations (with determinations sometimes held over pending determinations of related topics);
- (f) topic hearing preparation and service and filing of evidence and expert conferencing, generally in this order:
 - (i) sequential service and filing of evidence-in-chief (usually MDC first);
 - (ii) expert conferencing and filing of joint witness statements;
 - (iii) sequential service and filing of rebuttal evidence;
- (g) topic hearing(s);
- (h) topic decision(s).



Preliminary procedural issues

Jurisdictional matters

[13] MDC's memorandum raises a jurisdictional issue in regard to the appeal by Friends of Nelson Haven Tasman Bay ('FONHTB').² This concerns the requested relief, including the statement:

... In granting the relief sought, it may also be appropriate for the Environment Court to consider issuing directions under section 293(1) of the Act.

[14] In response, Environmental Defence Society Inc (a s274 party to FONHTB's appeal) supports FONHTB's position (opposing the jurisdictional challenge).

[15] Other jurisdictional issues are raised by:

- (a) The New Zealand King Salmon Co Limited³ in regard to the McGuinness Institute appeal;⁴ and
- (b) Fisheries Inshore New Zealand, the Paua Industry Council and the NZ Rock Lobster Industry Council as s274 parties to certain appeals (the 'Fishing Industry Parties') in regard to:

the substance of sub-topic 5.4 and the extent to which the inclusion of king shag feeding areas and important bird areas as ecologically significant marine sites (with corresponding controls on certain fishing activities) is within the scope of any submission on the proposed Plan.

[16] As a priority, MDC and relevant parties should further discuss the appropriate procedural approach to the determination of matters of jurisdiction. Parties should note that it is not always most efficient to determine jurisdiction at a preliminary stage in that resolution of jurisdiction can, sometimes, require that the cases on relative merits be heard. On the other hand, it is important to ensure that issues of jurisdiction do not hold up progress in case management including in finalising the topic-based sequence for ADR/mediation and hearings.

² ENV-2020-CHC-33.

³ ENV-2020-CHC-51.

⁴ ENV-2020-CHC-48.



Further particulars sought in regard to some s274 notices

[17] MDC records that, while it is continuing to analyse matters, it has so far found notices of appeal sufficiently clear. On the other hand, it has found several s274 notices do not provide adequate detail as to the particular appeal points the party is interested in. It signals a preference that s274 parties use MDC's list of appeal points as a reference point for informing MDC (and I add, other parties and the court) of the provisions of interest. MDC seeks leave to seek further particulars.

[18] That leave is readily granted. I emphasise the importance of providing clarity in these matters. One illustration of why it is important concerns the resolution of matters in mediation. When a consent order is filed but the court records s274 parties who have not signed it, that causes unsatisfactory churn and delay. Experience reveals that this is often attributable to parties who file broad s274 notices, to cover their potential bases, only to not have any real interest in the relevant provisions in issue in the appeal. Hence, MDC's suggestions seem eminently sensible, on a basis that directions would require particularisation at an early stage prior to mediations being scheduled.

Directions on preliminary issues regarding jurisdiction or particulars

[19] Timetabling directions are made for applications to be made, whether by MDC or other parties, in regard to any jurisdictional challenges and/or requests for particulars.

Proposed topics (and sub-topics)

[20] MDC's memorandum provides a helpful explanation of how MDC has analysed appeal points in order to derive its table of some twenty-two provisional topics and sub-topics. For convenience, these are listed in **Annexure 1** but parties should refer to MDC's memorandum and associated table for a more complete description.

[21] Some parties have raised relatively discrete concerns about potential errors and omissions in this list.⁵ It would seem that these can be sensibly resolved through further

⁵ Although not necessarily an exhaustive list, I refer to The NZ King Salmon, Waka Kotahi NZTA, Te Ātiawa o Te Waka-a-Māui Trust, Port Marlborough, Fishing Industry Parties, Marine Farming Association and Aquaculture New Zealand, Te Rūnanga o Kaikōura & Te Rūnanga o Ngāi Tahu, Yachting NZ, TrustPower, Kenepuru & Central Sounds Res. Assoc., Royal Forest & Bird, Kāinga Ora, KiwiRail, Heritage NZ Pouhere Taonga, East Bay Conservation Soc, OneFortyOne, Transpower.



discussion prior to MDC reporting back. Directions are made accordingly (including enabling parties who remain dissatisfied to inform the court).

[22] Directions to determine the list of topics and sub-topics will be made in due course.

Proposed topic sequencing for mediations and appeal point determinations

[23] The more significant case management issue concerns how identified topics and sub-topics are then sequenced through court-facilitated mediation, hearings and determinations.

[24] MDC recommends against a “uniform sequencing methodology” such as “a top-down approach to addressing provisions”. Rather, in view of the scope of the MEP and appeals, it suggests that “a more nuanced approach is desirable”. It adds that appeals that concern urban development should be prioritised “so that component of the MEP can be put to one side as operative as soon as possible”. Further to that, it identifies the following as its priorities for 2020:

- (a) Port Marlborough appeal;
- (b) urban appeals;
- (c) minor zoning appeals;
- (d) flood hazard overlay appeals;
- (e) coastal occupancy charge appeals;
- (f) the Okiwi Residents Association appeal;
- (g) utilities appeals;
- (h) transportation appeals; and
- (i) most heritage appeals.

[25] In addition, MDC raise some issues for consideration of sequencing of certain topics.

[26] It points out that national instruments presently being developed or amended, concerning the coastal environment, freshwater and biodiversity have potential implications for the substance of MEP provisions on three such topics:



- (a) water allocation and use;
- (b) water quality; and
- (c) indigenous biodiversity “in so far as the national policy statement relates to the Council’s Significant Natural Areas Programme and indigenous vegetation clearance rules”.

[27] For these proposed topics (and related sub-topics), MDC proposes a “temporary hiatus until such time as the Council, and any relevant party, has had the opportunity to consider the content of those two specific national policy statements (and the implications for relief sought in appeals)”. It expresses concern that, without this approach, substantial effort may go into resolving appeals on provisions that may be subject to change as a result of the requirements of the national policy statements. It further explains:

On gazettal, the Council will be required to consider the extent to which the MEP provisions give effect to the national direction. Any requirement to amend the MEP content will necessitate a plan variation. That plan variation has the potential to apply to provisions subject to appeal.

[28] On the other hand, while MDC wants more time to consider its position, it is presently suggesting what appears to be a somewhat inconsistent approach to when appeal points that may be impacted by variations it is pursuing on aquaculture are considered (i.e. MDC variations 1A, 1B, 1C).

[29] It explains that it is pursuing those variations in view of the large number of deemed coastal permits due for re consenting in 2024 and the New Zealand Coastal Policy Statement. It points out that there are a significant number of appeal points, by mostly marine farming interests, on the DV-MEP’s Outstanding Natural Character (‘ONC’), Outstanding Natural Features and Landscapes (‘ONFL’), and Ecologically Significant Marine Sites (‘ESM Sites’) provisions. However, given the very small cohort of existing marine farms within ONC or ONFL overlays or ESM Sites, MDC’s present position is that there is no need for any hiatus in dealing with the relevant appeal points. However, it seeks more time to reflect on this position.



[30] A range of views is expressed on those suggestions, some supportive and others not so.⁶ Some parties raise issues as to the proposed sequencing of the marine farming related sub-topics of Coastal Environments. Two parties raise issues concerning the sequencing proposals for Heritage.⁷

[31] All of these matters would benefit from MDC conferring with those parties with relevant interests and filing a further memorandum with its updated position. In particular, that is the case for when in sequence matters should be dealt with, whether in mediation or heard:

- (a) topics or sub-topics potentially affected by proposed changes to or draft national policy instruments (i.e as to the coast, freshwater, biodiversity);
- (b) topics of interest to marine farming interests in light of the noted variations; and
- (c) determination of jurisdictional issues that have been raised, particularly as to whether these should be determined in advance of or in conjunction with related topics.

[32] Finally, regarding designations in the DP part of the DV-MEP, the court notes MDC's indication that there remains one potential appeal in regard to the Ministry of Education's designation for Whitney Street School (C32).

Directions to resolve topic sequencing for mediations and appeal point determinations

[33] Directions are made accordingly, including to enable parties to comment on what MDC may propose by way of any adjustments to its position. Directions will be issued in due course on the topic sequencing that will be applied.

[34] Subject to that, I record these preliminary views:

⁶ Although not necessarily an exhaustive list, I refer to Brentwood Vineyards, Wine Marlborough, Minister of Conservation and Forest & Bird, Environmental Defence Society ('EDS'), Nelson-Marlborough Fish & Game, Te Ātiawa o Te Waka-a-Māui Trust, Te Rūnanga o Kaikōura & Te Rūnanga o Ngāi Tahu, TrustPower, Marine Farming Association and Aquaculture New Zealand.

⁷ Although not necessarily an exhaustive list, I refer to EDS (marine farming), Te Rūnanga o Kaikōura and Te Rūnanga o Ngāi Tahu and Heritage NZ Pouhere Taonga (both heritage).



- (a) a top-down approach is generally desirable in dealing with plan appeal points by topic. That is particularly where it is important that findings be made on strategic level or other influential objectives and policies before determinations are made on related plan zones, rules or other provisions. An added dimension to this is that plan provisions serve to give effect to related RPS provisions. That suggests efficiency in determining at least key RPS provisions early. It can also be more efficient to determine provisions that impose resource use constraints (e.g. to protect values, address natural hazards) before dealing with provisions that enable resource use (e.g. as to the urban environment, rural environment, coastal activities, zonings);
- (b) however, mindful that responses to MDC's proposed sequencing are relatively confined, the court remains open to approaching matters in a more fluid and flexible way as MDC proposes. MDC will need to satisfy the court that this approach would not give rise either to premature determinations on provisions or unwarranted costs and inefficiencies in proceedings to the detriment of other parties. In these terms, it is noted that part of MDC's present thinking is that certain appeal points within some broader topics would be heard with priority. That reinforces the importance of MDC giving proper assurance on the matters noted.

[35] Furthermore, on a preliminary consideration of the various topics, it would appear possible to achieve some greater efficiencies by grouping some of these. For instance, that may better enable hearings to address topics together. For example, we invite consideration of the following groupings (not in any necessary sequence, and assuming the potential for sub-groupings):

- (a) 'protection' principles/values – natural character/landscape, public access/open space, cultural and heritage. biodiversity;
- (b) natural hazards, air quality, energy and climate change, nuisance effects;
- (c) water and soil resources – covering in one or two groupings water allocation and use, water quality, water and discharge to land and soil and land disturbance;
- (d) urban environments;
- (e) coastal environment;
- (f) rural environment and forestry;
- (g) zoning;



- (h) utilities and transportation; and
- (i) miscellaneous.

[36] Directions are made for MDC to confer with all interested parties and put forward its considered position on these matters. MDC's response will be required to:

- (a) list propose topics and topic groupings and related DV-MEP provisions in the order MDC considers that they should be sequenced for mediation and hearing purposes – in a form suitable to be recorded by minute if the court agrees;
- (b) confirm what particular appeals/appeal points MDC seeks be heard with greater priority, out of typical sequence, and explain why this will not give rise to the concerns I have noted; and
- (c) report on what arrangements are being made, and include any requested case management directions concerning mediations/hearings for any matters MDC considers should be given relative priority.

[37] The directions allow for parties to respond to this before directions issue by further Minute.

[38] If need be, a judicial teleconference will be convened.

ADR/mediation and arrangements for consent orders and other joint resolutions

General

[39] MDC properly recognises that the focus for any ADR/mediation or inter-party negotiation is the provisions of the MEP in issue. It proposes to meet with parties, in the first instance, either to resolve or narrow points of difference and explore whether a common approach can be taken to unresolved issues. It proposes to file a 'request for mediation' if the court's resources are called on for those purposes. MDC indicates that, with co-operation from other parties, it will provide the Environment Commissioner who facilitates mediation with a 'Document Resource Locator' and table showing the parties' different positions on the text in issue. MDC explains that it will resource mediation so as to be able to amend and resolve text, where possible, as part of the mediation process.



[40] A few parties have addressed these proposals in their memoranda. Some express general support or a desire to undertake mediation. Others make suggestions.⁸

[41] As a general observation, MDC's proposals are welcomed as strongly aligning with how the court generally approaches plan appeal processes. In particular, it is encouraging to see that MDC will be proactive in undertaking prior negotiation and in providing related resourcing in mediation. Those initiatives properly reflect MDC's role as respondent and planning authority.

Dominion Salt and other potential consent memoranda

[42] MDC and Dominion Salt have responded to the court's earlier directions concerning their proposed consent order. The court is satisfied with the responses provided and can confirm the consent order is currently being processed for issue.

[43] MDC reports that several s274 parties have withdrawn and it expects other joint memoranda seeking consent orders will be filed soon. As a general comment, MDC is asked to carefully check to ensure all s274 parties to any appeal where a joint memorandum is proposed are either signatories to that joint memorandum or record no opposition to it. Furthermore, the court expects all parties to exercise due responsibility, including in being proactive and cooperative with MDC in these matters.

Directions as to mediation and other ADR

[44] MDC is directed to further confer with any party who seeks any changes to its proposed approach, before reporting by further memorandum on these matters. Directions may then issue. It is noted that, once Environment Commissioner(s) are assigned as facilitator(s), further directions can be anticipated on these matters.



⁸ Although not necessarily an exhaustive list, I refer to Omaka Valley Group, TrustPower, Marine Farming Association and Aquaculture New Zealand.

Other matters***MDC's requests for leave, waiver and directions***

[45] The court notes MDC's requests for leave to be granted to the extent required for the processes outlined in its memorandum and waivers and directions. The directions later in this Minute respond to this (including in reserving leave for further direction).

Pre-hearing conference is vacated

[46] It will be apparent that it is premature to proceed with the PHC scheduled for Friday 28 August 2020.

[47] In particular, responses to a number of directions herein are a necessary prior step to detailed pre-hearing directions. Furthermore, in view of the change in COVID-19 alert levels, the court is also attempting to avoid any unnecessary travel at this time. Already several parties had requested leave to be excused.

[48] The directions allow for parties whose memoranda recorded matters sought to be addressed at the PHC (e.g Heritage NZ Pouhere Taonga) to raise those matters by memoranda. Any such parties must confer with MDC and other relevant parties before doing so and clearly record what directions are sought and what other parties' positions are on them (if known).

[49] The court is also looking at arrangements to hold conferences via AVL or for specific issues relating to individual appeals or jurisdictional issues, via telephone conferences.

Directions

[50] Accordingly, it is directed:

- (a) the PHC scheduled for Friday 28 August 2020 is vacated, with arrangements for any resumed PHC(s) (including by teleconference) to be notified in due course;



- (b) MDC must confer with relevant parties and, in accordance with this Minute, file a further case management memorandum by **Friday 4 September 2020**:
- (i) reporting on what if any electronic hosting service it can provide for court minutes, records of pre-hearing conference, decisions and consent orders;
 - (ii) seeking any waivers or directions for electronic methods for document serving;
 - (iii) listing proposed topics/topic groupings, listing related DV-MEP provisions, and proposing a sequence for the related appeal point mediations and hearings;
 - (iv) explaining, in relation to any topics/groupings/appeal points sought to be heard with priority or out of typical top-down sequence, how this will not give rise to the issues or concerns noted in this Minute;
 - (v) updating the court on its position, following further discussion with interested parties, concerning mediation/ADR and any related directions sought;
 - (vi) reporting as far as practicable on responses from parties in consultation;
 - (vii) seeking any related directions or waivers;
- (c) any party who seeks to raise any difference of position from that proposed by MDC in that reporting memorandum and/or who seeks any further or other case management directions, must consult with MDC and relevant parties and file a memorandum in reply by **Friday 11 September 2020**. This must give reasons, report on responses from MDC and other relevant parties and set out any alternative directions sought;
- (d) any party seeking either of the following must confer with MDC and relevant parties and file and serve a memorandum seeking related directions by **Friday 18 September 2020**:
- (i) further particulars concerning any relief in any appeal or position of any s274 party concerning such relief (including identifying related DV-MEP provisions);
 - (ii) strike out, in whole or part, of any appeal or s274 notice, including specifying whether or not this is appropriately addressed at a preliminary stage and why;



- (e) MDC is to file a further case management and reporting memorandum in response to any memoranda so filed (and including any updated table of topics and sub-topics and sequencing) by **Friday 25 September 2020**.

[51] Leave is reserved for any party to apply for further (or other) directions.



J J M Hassan

Environment Judge

Issued: 21 August 2020

Annexure 1– Summary of MDC’s proposed topics (refer to MDC memorandum and table for complete list of related sub-topics and explanation)

(N.B: The sequencing and hence numbering of these topics will be determined by separate Minute)

Cultural matters (specific) (including 6 subtopics)
Water allocation and use (including 20 subtopics)
Natural character (including 3 subtopics)
Landscape (including 5 subtopics)
Indigenous biodiversity (including 13 subtopics)
Public access and open space (including 3 subtopics)
Heritage (including 2 subtopics)
Natural hazards (including 4 subtopics)
Urban environments (including 4 subtopics)
Coastal environments (including 18 subtopics)
Rural environment (including 6 subtopics)
Air quality (including 7 subtopics)
Water quality (including 9 subtopics)
Soil and land disturbance (including 6 subtopics)
Water and discharge to land (including 6 subtopics)
Transportation (including 6 subtopics)
Energy and climate change (including 5 subtopics)
Nuisance effects (including 6 subtopics)
Utilities (including 2 subtopics)
Zoning (including 10 subtopics)
Forestry (including 6 subtopics)
Miscellaneous (including 2 subtopics).



Annexure 2 – List of appellants

ENV-2020-CHC-21 Dominion Salt
ENV-2020-CHC-30 Timberlink
ENV-2020-CHC-31 G J Gardner
ENV-2020-CHC-32 Talley's Group Limited
ENV-2020-CHC-33 Friends of Nelson
ENV-2020-CHC-34 Omaka Valley
ENV-2020-CHC-35 Fish & Game
ENV-2020-CHC-36 Heritage
ENV-2020-CHC-37 Chorus/Spark
ENV-2020-CHC-38 Okiwi Bay Ratepayers
ENV-2020-CHC-39 Te Rûnanga a Rangitâne o Wairau
ENV-2020-CHC-40 Haro Partnership
ENV-2020-CHC-41 KPF Investments Limited & United Fisheries Limited
ENV-2020-CHC-42 Minister of Conservation
ENV-2020-CHC-43 Te Atiawa o Te Waka-a-Maui Trust
ENV-2020-CHC-44 Beleve Ltd, RJ Davidson Family Trust & Treble Tree Holdings Ltd
ENV-2020-CHC-45 Aroma (N.Z.) Limited and Aroma Aquaculture Limited
ENV-2020-CHC-46 Te Rûnanga o Kaikōura and Te Rûnanga o Ngāi Tahu
ENV-2020-CHC-47 Goulding Trustees Limited and Shellfish Marine Farms Limited
ENV-2020-CHC-48 McGuinness Institute
ENV-2020-CHC-49 Port Marlborough NZ
ENV-2020-CHC-50 Trustpower Limited
ENV-2020-CHC-51 The New Zealand King Salmon Co. Limited
ENV-2020-CHC-52 Matthew Burroughs Broughan
ENV-2020-CHC-53 Cochran
ENV-2020-CHC-54 OneFortyOne
ENV-2020-CHC-55 Clearwater Mussels Limited and Talley's Group Limited
ENV-2020-CHC-56 New Zealand Transport Agency
ENV-2020-CHC-57 KiwiRail Holdings Limited
ENV-2020-CHC-58 Federated Farmers of New Zealand
ENV-2020-CHC-59 Colonial Vineyard Limited
ENV-2020-CHC-60 Sanford Ltd
ENV-2020-CHC-61 Villa Maria Estate Limited
ENV-2020-CHC-62 Oldham & Others



ENV-2020-CHC-63 Apex Marine Farm Limited
ENV-2020-CHC-64 Forest & Bird
ENV-2020-CHC-65 Levide Capital Ltd
ENV-2020-CHC-66 Brentwood Vineyards Ltd
ENV-2020-CHC-67 Environmental Defence Society
ENV-2020-CHC-68 Transpower New Zealand Limited
ENV-2020-CHC-69 Jeffrey Val Meachen
ENV-2020-CHC-70 Te Runanga o Ngati Kuia Trust
ENV-2020-CHC-71 Horticulture New Zealand
ENV-2020-CHC-72 Oil Companies
ENV-2020-CHC-73 AJ King Family Trust and SA King Family Trust
ENV-2020-CHC-74 Marine Farming Association Inc and Aquaculture New Zealand
ENV-2020-CHC-75 Delegat Limited
ENV-2020-CHC-76 Minister of Defence
ENV-2020-CHC-77 Just Mussels Ltd, Tawhitinui Greenshell Ltd & Waimana Marine Ltd
ENV-2020-CHC-78 East Bay Conservation
ENV-2020-CHC-79 Rebecca Light

