

Response ID ANON-URZ4-5F9D-D

Submitted to Fast-track approval applications
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Submitter details

Is this application for section 2a or 2b?

2B

1 Submitter name

Individual or organisation name:
P H Redwood & Co Limited

2 Contact person

Contact person name:
Emma Deason

3 What is your job title

Job title:
Associate Solicitor

4 What is your contact email address?

Email:
s 9(2)(a)

5 What is your phone number?

Phone number:
s 9(2)(a)

6 What is your postal address?

Postal address:

Gascoigne Wicks Lawyers,
79 High Street,
Blenheim 7240

7 Is your address for service different from your postal address?

No

Organisation:

Contact person:

Phone number:

Email address:

Job title:

Please enter your service address:

Section 1: Project location

Site address or location

Add the address or describe the location:

At Guards Bay, Outer Marlborough Sounds. Refer to attached map for exact location. It captures most of the area of existing marine farm 8164 (Marlborough District Council reference), plus seaward space adjacent. The project seeks to substantially extend the existing farm and sub-surface it. The total area sought is 88.8ha, although the final shape and size of the site can be considered through the decision making process. A cross-section diagram is also attached.

File upload:

Guards Bay Proposed Mussel Spat Site - Site Plan.pdf was uploaded

Upload file here:

Guards Bay Proposed Mussel Spat Site - Cross-section Diagram.pdf was uploaded

Do you have a current copy of the relevant Record(s) of Title?

No

upload file:

No file uploaded

Who are the registered legal land owner(s)?

Please write your answer here:

No one: Neither the Crown nor any person owns the common marine and coastal area, per s 11 Marine and Coastal Area (Takutai Moana) Act 2011.

Detail the nature of the applicant's legal interest (if any) in the land on which the project will occur

Please write your answer here:

The applicant is the holder of the existing resource consent U140631 for the existing marine farm 8164 (Marlborough District Council reference). The applicant is also an appellant in an appeal under the Resource Management Act 1991, relating to this marine farm and a proposal to extend this farm.

Section 2: Project details

What is the project name?

Please write your answer here:

Spat nursery development in Guards Bay, Outer Marlborough Sounds

What is the project summary?

Please write your answer here:

The applicant proposes to shift the existing marine farm further seaward, and extend the size of the marine farm to a total area of 88.8ha, in accordance with the map attached above in this application. Fully submerging (that is, sub-surfacing the structures) is proposed in line with the attached cross section diagram above in this application.

What are the project details?

Please write your answer here:

The site will primarily be a nursery site for juvenile Greenshell Mussels, but consent for full mussel farming is sought. The project includes reconsenting an existing marine farm, with a move slightly further seaward, and an extension, at Guards Bay, Outer Marlborough Sounds. The effect would be a substantial increase in the amount of marine farming in this Bay.

Reconsenting and a 28.8ha seaward extension was proposed via the proposed Marlborough Environment Plan (MEP) – Variation 1 in evidence of the applicant. The relief sought was not granted by the panel but has been appealed to the Environment Court. This project seeks further space than sought under that appeal, but it is fully submerged.

This would be a full 'shovel ready' project in 3 months. There is a large amount of existing assessment and evidence justifying the appropriateness of more marine farming in this Bay. Refer to the existing (most recent) resource consent file:

<https://www.marlborough.govt.nz/services/property-files-online?searchType=Resource+Consent+Number&resourceConsentNumber=U140631>

Also refer to the evidence filed in the MEP Variation 1 hearings: <https://eservices.marlborough.govt.nz/programmes/ListProgrammeEvents?id=2904026>

The only other information that is considered necessary to obtain to fully inform the proposal is continued consultation with tangata whenua and a benthic assessment of the areas of the proposed extension which has not already been captured in existing surveying.

Without good spat supply the industry is under threat. There is an urgent need for more supply. The applicant understands that the industry is getting 200t of mussel crop from one tonne of weed/spat (being spat encrusted seaweed from Kaitaia). The applicant is confident that this project will at least double this figure.

Cooler oceanic sites like Guards Bay are rare in the Marlborough Sounds, as it is fed by the waters of Cook Strait. These flows start in Antarctica and come up the east coast of New Zealand and into Cook Strait. Golden and Tasman Bays receive warm flows from Australia. If the water is below 18 degrees Celsius, more oxygen is more readily available to the mussels and the PH is higher because of less CO2. This is great for the mussel spat that is more susceptible to these changes in the environment, than mature crop. In addition, there are other characteristics of this location making it ideal as a nursery site:

- It is not susceptible to blue mussel over settlement, which is a big problem in the majority of the Sounds. Blue mussels are a biofouling species that weigh down crop ropes and compete with farmed species.
- The applicant has regularly had retention of 1 metre of initial Kaitia weed to 5 meters of final seed. The industry average is understood to be about 1 to 2.27, so Guards Bay is more than twice as good as industry average.
- This site can be worked with a boat far more regularly, as it is sheltered from the majority of winds except NW. That is considered to be around 80% of the time workable, compared to a typical more exposed oceanic site that would be only workable about 25% of the time.
- It is on average about 30m deep at the site, so the farm can be suitably sub-surfaced with 22 metre droppers.
- The location, whilst remote, is easily accessible. For example, it is convenient when extra contractors are needed to help in busy periods, as the site is only a 30 minute steam from major mussel farming areas.
- Despite its accessibility, the site is 4 hours by work boat from Havelock, so we need economies of scale for the nursery to make it worth the steaming time.
- Because of the proposed submerging, most boats can pass over the whole farm without the need to navigate around it, or between lines. There will be a number of crayfish pot like floats on the surface as visual markers.

Marine farm 8164 was not provided for in an Aquaculture Management Area (AMA) in the MEP solely because of perceived effects on Outstanding Natural Landscape. The advice the applicant received is that the farm would not cause unacceptable adverse effects on such. The applicant is proposing to partially submerge the site 3 metres below the water's surface. That is shown on the cross-section diagram uploaded earlier in this application. That process has benefits for navigation as well, and for spat, but it also creates some challenges operationally and is very expensive. The project seeks larger farming space than the present site to account for this.

A substantial amount of evidence was obtained for the MEP hearing on submissions. That is available online:

<https://eservices.marlborough.govt.nz/programmes/ListProgrammeEvents?id=2904026>

The purpose and objectives of the project are to better utilise what is considered to be very productive marine farming space, as well as to secure the tenure of the existing level of farming at this location.

Describe the staging of the project, including the nature and timing of the staging

Please write your answer here:

No staging is proposed. The applicant considers that once consented the project should be up and running within 2 years.

What are the details of the regime under which approval is being sought?

Please write your answer here:

Resource consent under the Resource Management Act 1991 and an aquaculture decision under the Fisheries Act 1996.

If you seeking approval under the Resource Management Act, who are the relevant local authorities?

Please write your answer here:

Marlborough District Council

What applications have you already made for approvals on the same or a similar project?

Please write your answer here:

N/A

Is approval required for the project by someone other than the applicant?

No

Please explain your answer here:

The project would require resource consent from Marlborough District Council and an aquaculture decision from the chief executive of the Ministry for Primary Industries.

If the approval(s) are granted, when do you anticipate construction activities will begin, and be completed?

Please write your answer here:

The applicant considers that once consented the project would be up and running within 2 years.

Section 3: Consultation

Who are the persons affected by the project?

Please write your answer here:

Marlborough District Council, as the relevant local authority. Ngati Kuia as holding mana moana over the area.

In terms of the Marine and Coastal (Takutai Moana) Act 2011, the following applications for customary marine title and/or protected customary rights relate to the project area:

- a. Te Runanga o Ngāti Kuia Trust (MAC-01-12-020);
- b. Te Rūnanga o Rangitāne o Kaituna Inc (Michael David Bradley on behalf of) (CIV-2017-485-167);
- c. Te Rūnanga a Rangitāne o Wairau (CIV-2017-485-251 and MAC-01-12-010);
- d. Te Ātiawa o Te Waka a Māui Trust (CIV-2017-485-365 and MAC-01-12-018);
- e. Ngāti Apa ki te Ra To (MAC-01-12-006);
- f. Te Runanga o Ngati Rarua (MAC-01-12-008)
- g. Ngāti Toa Rangatira (MAC-01-12-021); and
- h. Ngāti Koata Trust (Hori Elkington on behalf of) (MAC-01-12-007 and CIV-2017-485-218) (note this application appears to not include the actual space of the proposed project, but iwi are included in this list out of an abundance of caution).

Detail all consultation undertaken with the persons referred to above. Include a statement explaining how engagement has informed the project.

Please write your answer here:

The applicant reconsented the existing marine farm in 2014. In that 2014 application the applicant consulted with Ngati Kuia, the Moleta Family (who own and occupy the adjacent land), and the Pelorus Boating Club. There was no opposition expressed at that time. The applicant will inform Ngati Kuia and the Moleta Family of this application.

In terms of the current project (ie. the seaward move and extension) as noted above this is subject to a live appeal under the Resource Management Act 1991, following public notification, submissions and a hearing process. No one else is involved in that appeal besides the applicant here and the Council. In terms of the additional space sought as part of this project, and in relation to consultation with applicants under the Marine and Coastal (Takutai Moana) Act 2011, the timeframe for lodging this application has not given sufficient time to consult. Absence of consultation is why the applicant is seeking that the project be included in Schedule 2B.

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Describe any processes already undertaken under the Public Works Act 1981 in relation to the land or any part of the land on which the project will occur:

Please write your answer here:

N/A

Section 4: Iwi authorities and Treaty settlements

What treaty settlements apply to the geographical location of the project?

Please write your answer here:

The 2014 resource consent application included an assessment on effects regarding cultural heritage and iwi values, and is online here:

<https://www.marlborough.govt.nz/client-api/marlborough/property-files?url=https%3A%2F%2Fmdc-datascap.e.au-s1.cloudhub.io%2Fapi%2Fdatascap%2Fengagen>

In terms of all statutory acknowledgements, the following iwi have such over the area: Ngati Toa Rangatira, Ngati Apa ki te Ra To, Rangitane o Wairau, Ngati Koata, Ngati Rarua, Te Atiawa o Te Waka-a-Maui, Ngati Tama ki Te Tau Ihu, Ngati Kuia. It is the applicant's understanding that Marlborough District Council would have consulted with all iwi holding statutory acknowledgements at the time it received the application, as part of routine notification Council makes to tangata whenua in Te Tau Ihu. The applicant is unaware of any concerns of iwi in relation to the existing marine farm. The 2014 consent was supported by Ngati Kuia. The applicant will again consult with iwi regarding this application.

Are there any Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019 principles or provisions that are relevant to the project?

No

If yes, what are they?:

Are there any identified parcels of Māori land within the project area, marae, and identified wāhi tapu?

No

If yes, what are they?:

Is the project proposed on any land returned under a Treaty settlement or any identified Māori land described in the ineligibility criteria?

No

Has the applicant has secured the relevant landowners' consent?

No

Is the project proposed in any customary marine title area, protected customary rights area, or aquaculture settlement area declared under s 12 of the Māori Commercial Aquaculture Claims Settlement Act 2004 or identified within an individual iwi settlement?

No

If yes, what are they?:

Has there been an assessment of any effects of the activity on the exercise of a protected customary right?

Yes

If yes, please explain:

There are no protected customary rights relating to the application area.

Upload your assessment if necessary:

No file uploaded

Section 5: Adverse effects

What are the anticipated and known adverse effects of the project on the environment?

Please describe:

This site was re-consented in 2014. The application is available online:

<https://www.marlborough.govt.nz/services/property-files-online?searchType=Resource+Consent+Number&resourceConsentNumber=U140631>

In terms of any adverse effects from the extension proposed here, the benthic effects of Greenshell mussel farming are well studied and understood. They are also highly localised and reversible over time (See, for example, Overview of Ecological Effects of Aquaculture (Ministry for Primary Industries, 2013), available here: <https://www.mpi.govt.nz/dmsdocument/4300-Overview-of-ecological-effects-of-Aquaculture>; and Davidson, R.J.; Richards L.A. 2014. Monitoring of a relocated a mussel farm in Otanerau Bay, East Bay, Marlborough Sounds: 2002-2014. Prepared by Davidson E, available here: https://www.marlborough.govt.nz/repository/libraries/id:2ifzri1o01cxbymxkvwz/hierarchy/documents/environment/coastal/marine-farming-list/Monitoring_of_a_r

The site is approximately 30m deep. The part of the proposed extension that has been surveyed for the MEP process shows that the seabed consists of silt and clay, which is the most common subtidal habitat in sheltered areas of the Marlborough Sounds and is well-suited to marine farming (Davidson, R.J.; Richards, L.A.; Scott-Simmonds, T. 2021. Biological report for an extension to marine farm 8164 in Hikoekoea Bay, Guards Bay, outer Pelorus Sound. Prepared by Davidson Environmental Ltd. for P. H. Redwood & Company Limited. Survey and monitoring report no. 1103, at pp 25 and 34 – 35. Refer Marlborough District Council file U951181. That resource consent application was declined but not for any benthic reasons. Benthic report: Rankin, M., McLennan, N., Benthic Survey Report for a 3.5ha Proposed Marine Farm at Guards Bay, for Sealife Investments Ltd, 1995).

There is also existing benthic information available for part of the proposed extension area to the north-east of the existing marine farm in the bay (Refer Marlborough District Council file U951181. That resource consent application was declined but not for any benthic reasons. Benthic report: Rankin, M., McLennan, N., Benthic Survey Report for a 3.5ha Proposed Marine Farm at Guards Bay, for Sealife Investments Ltd, 1995.) That report found that at depths greater than 15-20m the substrate graduated into sand/silt and broken shell. For that reason, it is anticipated that there would be a change to the benthic environment from the proposed farm, but that change is unlikely to be adverse (ie. it would be a shift in community composition, with the change not being adverse). Effects would be limited to under and close to the growing structures, and would reverse in 5 to 7 years after the farm is removed (Davidson, report no. 1103 at 35. See also Davidson, R.J.; Richards L.A. 2014. Monitoring of a relocated a mussel farm in Otanerau Bay, East Bay, Marlborough Sounds: 2002-2014. Prepared by Davidson E, available here: https://www.marlborough.govt.nz/repository/libraries/id:2ifzri1o01cxbymxkvwz/hierarchy/documents/environment/coastal/marine-farming-list/Monitoring_of_a_r

In addition, marine farms can provide positive effects via ecosystem services (Stenton-Dozey, J., & Broekhuizen, N. 2019. Provision of ecological and ecosystem services by mussel farming in the Marlborough Sounds. NIWA CLIENT REPORT: 2019020CH. 141p, available here: https://www.marinefarming.co.nz/site_files/24792/upload_files/Fullreport_28.07.2021update.pdf?dl=1).

The site is located well away from any Ecologically Significant Marine Sites identified in the MEP.

In terms of water column effects, the farm would alter currents and would cause phytoplankton depletion within the farm boundaries, but water flows would quickly revert to background levels beyond the farm boundaries (Davidson, report no. 1103 at 36). A review of the available evidence shows that the effect of mussel farms on the water column is relatively small compared to other terrestrial and regional oceanographic drivers (Newcombe E, Broekhuizen N 2020. Measuring mussel farming effects on plankton in the Marlborough Sounds. Prepared for Marlborough District Council. Cawthron Report No. 3550. 49 p. plus appendices; available here: <https://www.marlborough.govt.nz/repository/libraries/id:1w1mps0ir17q9sgxanf9/hierarchy/Documents/Environment/Coastal/Mussel%20Farming%20List/Measuri>

Given the limited farming in Guards Bay, the relatively isolated nature of the project site, and the absence of feed discharge, it is not anticipated that there would be any adverse cumulative water column effects from the project.

No adverse effects on the endangered king shag are anticipated (Refer:

https://www.marinefarming.co.nz/site_files/24792/upload_files/MFASILKingShagResearchfinalreport-Oct2022.pdf?dl=1).

No adverse effects on other seabirds or marine mammals is anticipated. There is the existing mussel farm in Guards Bay. In addition, there is mussel farming throughout the Marlborough Sounds. This indicates that mussel farms can coexist with marine mammals and seabirds.

The project site is within a mapped outstanding natural landscape in the MEP. There will be some adverse visual effects on the values of that mapped area. However, those effects are minimised due to the low lying and recessive colour of the surface structures (typically black buoys, with the exception of orange floats required for maritime safety purposes), and given the proposed submerging to 3m deep. That will substantially reduce the amount of surface structures. Further, the structures will be visible in close proximity, and will reduce with distance from the farm. The closest land is pastoral farmland, with erosion and tracks cut into the hillside, visible for a much greater distance than the marine farm will be. The applicant will be farming indigenous Greenshell mussels, in their natural habitat, with no feed or additives. In that sense, mussel farming is 'close to nature.' Service vessels will only be at the site intermittently.

The farm would have lighting as required for maritime safety, and those would be visible at night. However, those lights are not of a nature that would interfere with the darkness of the night sky.

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Section 6: National policy statements and national environmental standards

What is the general assessment of the project in relation to any relevant national policy statement (including the New Zealand Coastal Policy Statement) and national environmental standard?

Please write your answer here:

Please refer to the resource consent application lodged in 2014:
<https://www.marlborough.govt.nz/services/property-files-online?searchType=Resource+Consent+Number&resourceConsentNumber=U140631>

Since that application was prepared, the only other relevant national level document is Resource Management (National Environmental Standards for Marine Aquaculture) Regulations 2020 (NES-MA). The NES-MA enables the re consenting of existing marine farms, as well change of species and structures, so are not directly relevant to this project.

The New Zealand Coastal Policy Statement 2010 (NZCPS) is relevant to this project:

- a. This project is consistent with Policy 8, to provide for aquaculture in appropriate places. There are only a limited number of sites suitable for mussel spat holding in Marlborough. Prime spat holding sites have not been provided for in AMAs in the MEP and are subject to Environment Court appeals.
- b. The project is consistent with indigenous biodiversity policy 11, in that adverse effects on species and habitats at policy 11(a) would be avoided, and significant adverse effects on policy 11(b) species and habitats would be avoided, remedied or mitigated (see Section 5 above).
- c. The project is consistent with policy 15(a), because the farm would be submerged. Mussel farming (and farming of other MEP Appendix 11 species) will have a relatively low visual impact and will change the ecology in a non-adverse way. In some places in the Marlborough Sounds, marine farms are consistent with mapped outstanding natural landscapes. For the reasons discussed in Section 5 above, effects are likely to be low, especially given the proposed for submerging, and the application is to farm an indigenous species that was once widespread in the Marlborough Sounds (Handley, S. 2015. The history of benthic change in Pelorus Sound (Te Hoiere), Marlborough. NIWA Client Report No: NEL2015-001: Marlborough District Council; and Handley, S., Gibbs M., Swales A., Olsen G., Ovenden R., Bradley A. 2017. A 1,000-year history of seabed change in Pelorus Sound/Te Hoiere, Marlborough. NIWA Client Report No: 2016119NE. 136p.)
- d. The application is consistent with the remainder of the NZCPS.

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Section 7: Eligibility

Will access to the fast-track process enable the project to be processed in a more timely and cost-efficient way than under normal processes?

Yes

Please explain your answer here:

Due to the rejection of an AMA for the existing site and an extension in this location, there would likely be significant attention on any new application, and a number of preconceptions. It would be inefficient to call substantive evidence and go through the usual consenting process in that context. The remaining issue is effects on landscape, which are inherently subjective.

What is the impact referring this project will have on the efficient operation of the fast-track process?

Please write your answer here:

The project contains a large amount of existing information. This is available in the 2014 resource consent application:
<https://www.marlborough.govt.nz/services/property-files-online?searchType=Resource+Consent+Number&resourceConsentNumber=U140631>
It is also available in terms of evidence filed in MEP Variation 1 hearings in 2021:
<https://eservices.marlborough.govt.nz/programmes/ListProgrammeEvents?id=2904026>
Therefore, a panel under the Fast-track process will already have a substantial amount of information to understand the proposal.

Further, the effects of mussel farming are otherwise well studied and understood. The effect of nursery sites is even less as the farming at the site would be less intensive.

Has the project been identified as a priority project in a:

Central government plan or strategy

Please explain your answer here:

The Aquaculture Strategy 2020 (<https://www.mpi.govt.nz/dmsdocument/15895-The-Governments-Aquaculture-Strategy-to-2025>) seeks substantial boost to the aquaculture industry in New Zealand. One of the points in the 'Resilient' category is to support industry-led spat strategy. The Guards Bay site has been successful for spat holding as well as for full grow-out to harvest size.

This site is essential for ensuring consistent spat supply because:

1. The farm performs exceptionally well at growing either Golden Bay or Kaitia spat. That is because of the characteristics of this water space, being close to the exposed cool waters of Cook Strait and because it is an isolated location. This is particularly important as many Sounds farms are struggling to hold spat.
2. The dry outer Sounds location means that it is very rarely closed under the Marlborough Shellfish Quality Programme (MSQP) testing regime. That allows access to supply while other inner Sounds sites are closed.

Spat supply is of crucial importance to the industry, both in terms of maintaining existing production levels and in terms of growing the sector. The conditions at the Guards Bay site are ideal for this purpose. That is directly in line with the Aquaculture Strategy.

The project is also in line with industry strategy (AQNZ, New Zealand Greenshell Mussel Spat Strategy: <https://drive.google.com/file/d/1L28eNXLLcdMoPv-ByVBMr85EdEk64RD1/view>). This application not only protects and maintains an existing nursery site, it also expands on how much space will be farmed for this purpose. One of the issues facing the industry is the inefficient use of spat in the early stages of production due to poor spat retention. It is rare to find a site that consistently produces. It is cheaper to shift and extend the existing marine farm rather than develop an entirely new site. This site has been trialled and found to be successful as a spat nursery location.

Will the project deliver regionally or nationally significant infrastructure?

Not Answered

Please explain your answer here:

Will the project:

Please explain your answer here:

Will the project deliver significant economic benefits?

Yes

Please explain your answer here:

As stated above, spat supply is crucial. The mussel industry has been experiencing issues of spat supply for the past two years or more. The inner Sounds sites have issues with increased summer water temperatures, marine biofouling oversettlement and sedimentation from forestry and other land uses. This has increasingly led to higher spat mortality and poor spat retention rates for several years.

Shifting and extending the Guards Bay site will increase productivity of the farm and will increase how much product is produced. The site will not only double the applicant's profitability per line producing spat rather than mussels, but the flow on effect to the country will be 4 fold.

Will the project support primary industries, including aquaculture?

Yes

Please explain your answer here:

This site is the most productive site for the applicant's business. Its processing plant is reliant on the production from this farm. Approximately 800t of the applicant's 1200t per annum production comes from the Guards Bay site. This project will directly boost production in Marlborough by providing a substantial increase in stable spat supply. All of this will lead to increased mussel production, which will increase employment and revenues from the on water growing sector through to factory processing and export sales.

The development of a new site such as this benefits many businesses. That includes those that supply anchoring systems and warps, backbone ropes, floats, and culture rope. It also includes those who manufacture and service marine farming vessels, as well as those who crew those vessels. A range of support services are also needed, including electricians, through to lawyers and accountants.

Will the project support development of natural resources, including minerals and petroleum?

No

Please explain your answer here:

Will the project support climate change mitigation, including the reduction or removal of greenhouse gas emissions?

No

Please explain your answer here:

Will the project support adaptation, resilience, and recovery from natural hazards?

Yes

Please explain your answer here:

As detailed above, the site has important characteristics to successfully hold and grow-out spat. The site is in cool waters, influenced by the Outer Marlborough Sounds/Cook Strait area. The farm is also isolated from other farms, which has biosecurity benefits.

Will the project address significant environmental issues?

No

Please explain your answer here:

Is the project consistent with local or regional planning documents, including spatial strategies?

No

Please explain your answer here:

In terms of the Operative Marlborough Sounds Resource Management Plan, the project would be consistent with the landscape and amenity policies because of the sub-surfacing proposed. In some places in the Marlborough Sounds, marine farms are consistent with mapped outstanding natural landscapes. Recent king shag research shows that the project is consistent with the biodiversity policies in the Operative Plan.

As stated above, the MEP Variation 1 decision did not grant an AMA for this marine farm. That is subject to a live appeal. At the present point in time, this project does not align with the MEP.

The MEP process has been going since 2006, but even when the MEP was notified the need for exposed semi-open ocean spat holding sites was not well understood. A shortage of spat and spat retention issues over the past two years has highlighted the need for nursery space and this application seeks to address that need.

Anything else?

Please write your answer here:

Nothing further to add.

Does the project includes an activity which would make it ineligible?

No

If yes, please explain:

Section 8: Climate change and natural hazards

Will the project be affected by climate change and natural hazards?

No

If yes, please explain:

Section 9: Track record

Please add a summary of all compliance and/or enforcement actions taken against the applicant by any entity with enforcement powers under the Acts referred to in the Bill, and the outcome of those actions.

Please write your answer here:

In terms of existing site 8164 there was an issue with extra longlines in 2015/2016 but that has all been resolved. We note that there was a transition under old consent to new 2014 consent, given imposition of a structures exclusion area inshore. That was resolved via correspondence with Council and removing the extra lines.

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Declaration

Do you acknowledge your submission will be published on environment.govt.nz if required

Yes

By typing your name in the field below you are electronically signing this application form and certifying the information given in this application is true and correct.

Please write your name here:

Emma Deason

Important notes