

Confirmation of Eligibility – Appendix Four

1.0 Overview

The Waikato Regional Council (WRC) has recently adopted the Waikato Regional Aquaculture Strategy towards Waikato being ‘*world-class in sustainable and innovative aquaculture management with a doubling of our export growth by 2044*’. However, the Waikato mussel industry has a critical need for a sustainable supply of resilient mussel spat and seed and the Waikato Regional Coastal Plan (WRCP) currently prohibits new applications, and therefore spat/seed innovation in the region. The industry cannot remain viable unless this initiative progresses at haste.

2.0 Consistency with the Purpose of the Act

A new 700 hectare mussel spat/seed nursery in the productive and cooler waters of the Waikato west coast will provide regionally significant spat/seed nursery infrastructure to the Waikato mussel industry, thereby ensuring its ability to meet its doubling export value potential.

The need for new spat nurseries has been expressly identified by the Government as a necessary pillar to enable the industry’s potential to contribute to Aotearoa’s export led economic recovery. This aquaculture project will implement the spat nursery actions of the Government’s Aquaculture Strategy³⁷³⁸ and deliver significant benefits to the Waikato region. The NWML spat nursery is the most advanced and by far the most productive of any sea based nursery opportunities.

3.0 Requirement for Fast-Track

Mussel farmers need to be able to respond to the environmental conditions of a given season by catching and moving spat between areas, in much the same way as a terrestrial farmer would move their stock to place them in the most favourable environment. As well as catching spat the industry needs to be able to hold spat, on spat ‘nurseries’ until resilient enough to move to production farms, otherwise the activity of catching wild spat is not feasible. The Waikato industry has no suitable nursery space available.

NWML have been developing this spat nursery proposal for more than ten years but have been hindered because the activity is currently prohibited under the WRCP. A decision was made in 2021 to progress a concurrent private plan change and resource consent application which was lodged with WRC in May 2023. WRC made a s92 further information request in January 2024 and NWML are responding with this further information.

NWML understands that the private plan change and resource application process may take some years to be resolved at hearing and then may be subject to Environment Court appeals. Aquaculture applications of this nature can take more than ten years and cost millions of dollars. The Waikato mussel industry needs spat now. There is a critical need for this project to be fast-tracked.

³⁷ <https://www.mpi.govt.nz/dmsdocument/15895-The-Governments-Aquaculture-Strategy-to-2035>

³⁸ <https://www.mpi.govt.nz/dmsdocument/60346-Accelerate-the-Aquaculture-Strategy-Investment-Roadmap-2023-progress-update>

4.0 Efficient Operation of the Fast-Track Process

NWML are in the late stages of compiling a response to the WRC s92 request for further information. All necessary information required for WRC to make a notification decision has been provided except for the following:

Requested Information	Comment	Due Date
Additional hydrodynamic monitoring	MetOcean found that hydrodynamic effects of the proposal would be no more than minor however the WRC peer reviewer Tonkin and Taylor recommended additional hydrodynamic modelling. This has been contracted from MetOcean.	30 May 2024.
Additional seabird assessment detail.	Wildlands found that the effects on seabirds would be no more than minor and in some ways positive. The WRC peer reviewer Pisces Consulting did not disagree with this assessment but has requested more detail be provided in the expert assessment. This has been contracted from Wildlands.	30 May 2024.
Update of marine mammal aspects of MWMP.	NWML have provided a draft Marine Wildlife Management Plan (MWMP) to WRC and DOC. The WRC marine mammal expert has provided some suggestions for amendment. NWML have provided these to DOC and intend to work with DOC to update the MWMP accordingly.	Depending on DOC's timing.
Expert review of seabird aspects of MWMP.	NWML have provided a draft Marine Wildlife Management Plan (MWMP) to WRC. The WRC peer reviewer Pisces Consulting has recommended this be reviewed by Wildlands to ensure it incorporates all their seabird mitigation recommendations.	30 May 2024.
Expert review of BMP.	NWML have provided a draft Biosecurity Management Plan (BMP) to WRC. The WRC peer reviewer Pisces Consulting has recommended this be reviewed by Coast and Catchment to ensure it incorporates all their biosecurity recommendations.	30 May 2024
Expert review of OMP.	NWML have provided a draft Operational Management Plan (OMP) to WRC. The WRC peer reviewer Pisces Consulting has recommended this be reviewed by Wildlands to ensure it incorporate all their seabird mitigation recommendations.	30 May 2024

All necessary information is expected to be available by 30 June 2024 at the latest. This should enable the efficient operation of the fast-track process.

5.0 Significant Regional Benefits

5.1 Identified as a Priority in a Government and Sector Strategy

The importance of the aquaculture industry was recognised in the Government's 2019 Aquaculture Strategy³⁹. Aquaculture has also been recognised by the Government as a key primary sector to accelerate economic growth for the benefit of New Zealand. In response to the COVID-19 pandemic, the primary sector's Fit for a Better

³⁹ <https://www.mpi.govt.nz/dmsdocument/15895-The-Governments-Aquaculture-Strategy-to-2035>

World roadmap⁴⁰ emphasises the importance of accelerating aquaculture to stimulate sustainable regional growth, as well as leading the way to a more sustainable future economy.

The 2023 Aquaculture Strategy Implementation Plan⁴¹ sought to deliver support for the industry-led spat strategy. Aligned with the industry strategy the Government also has an ‘Agreed Plan for Securing Mussel Spat Supply’⁴². This includes a set of actions towards establishing sea-based nurseries. NWML have already undertaken most of these actions, **it only remains for Government to provide the regulatory pathway.**

Goal	Goal 2 Increase wild spat survival	
Workstream	Workstream 3 Sea-based nurseries	
	The majority of spat deployed to a marine farm doesn’t survive to harvest. Sea based nurseries offer an opportunity to on-grow spat in an environment that best provides for their needs before deploying to farms. Increased survivability and retention of spat would mean current wild spat supply can support greater production.	
		Assessment of NWML proposal
Research actions	Research to understand the characteristics of a good sea-based nursery and how these sites increase production.	NWML has ten years of research that proves that the proposed locations have the optimal characteristics.
	Research to test retention of spat on grown in a sea-based nursery.	NWML has ten years of research that proves that retention is unprecedented.
Investment actions	A business model to understand feasibility of new sea-based nurseries for wild and hatchery spat.	NWML has a business model and investment ready to commence the operation within three months of consenting.
	Establishment of new sea-based nurseries – if existing space is not suitable.	Existing space is not available, the proposed location is unprecedented for spat supply and retention.
Regulatory actions	Consider regulatory measures to plan for and consent sea-based nursery sites.	The activity is currently prohibited. Fast-track consenting is critical.

5.2 Enabling Regionally Significant Aquaculture Infrastructure that Provides Economic Benefits for Waikato

The Waikato mussel industry was found by NZIER in 2017⁴³ to contribute around 30% of New Zealand’s total Greenshell mussel production, an estimated 25,000 tonnes at the time. The report sought to quantify the contribution of aquaculture to the Thames-Coromandel District’s economic output, GDP and employment by modelling the likely impact of a 50% increase in productivity in both mussels and oysters as well as new finfish farming activity.

⁴⁰ <https://www.mpi.govt.nz/dmsdocument/41031Fit-for-a-Better-World-Accelerating-our-economic-potential>

⁴¹ <https://www.mpi.govt.nz/dmsdocument/56095-2023-aquaculture-strategy-implementation-plan>

⁴² <https://www.mpi.govt.nz/dmsdocument/58018-Agreed-plan-for-securing-mussel-spat-supply->

⁴³ Pambudi, D. and Clough, P. (2017). *The economic contribution of marine farming in the Thames-Coromandel District: A Computable General Equilibrium (CGE) analysis*. New Zealand Institute of Economic Research.

The following table shows the 2017 actual figures, the 50% increase and totalled values to enable comparison with the NWML projection of 35,500 tonnes of mussels.

	2017 actual	Added 50% modelled	Total	NWML
Tonnes	24,832	12,416	37,248	35,516
GDP	\$41 million	\$15.8 million	\$55.8 million	\$53.2 million
Export volume⁴⁴	7,450		11,225	
Export value	\$68.3 million		\$102.5 million ⁴⁵	\$97.7 million
FTEs	300	35	335	320

Note that in 2017 the total Greenshell export value was \$300 million but had increased to \$380 million by 2023 despite declining production. The GDP contribution will likely have increased proportionately.

NWML calculate that the direct employment implications of the proposal will be:

Role	FTE
Four vessels each with four crew	16
Yard/depot	5
Drivers	4
Equipment maintenance	3
Subtotal spat/nursery employment	28

These jobs will be concentrated in the Whāingaroa/Raglan area and are assumed to be in addition to the 320 jobs that a 35,500 tonne increase in Hauraki Gulf mussel production would provide to the region.

The NZIER report also highlighted the following:

- *The incomes earned from this production and processing are direct benefits of aquaculture for the district.*
- *The aquaculture industry also indirectly stimulates other sectors in the district and also outside the district. It brings benefits to the district and national economies, including small local towns.*
- *‘Iwi are well represented in aquaculture participation in the Hauraki Gulf / Tikapa Moana via private, corporate and trust investments/ownership as well as through direct and indirect employment’ and that aquaculture is expected to be a significant revenue driver for Iwi in the future.*

By supporting consistency and increases in mussel production the proposal will contribute to an increase in the direct and indirect job opportunities in the Waikato region. These jobs will be associated with the farming and processing activities, and the employment of people in supporting services (e.g. transport and logistics). Aquaculture jobs can be wide and varied and provide many opportunities for career development both at sea and on land.

A study in Southland in 2015⁴⁶ found that:

⁴⁴ Extrapolated from industry data

⁴⁵ Inferred

⁴⁶ <https://www.mpi.govt.nz/dmsdocument/8211-The-Social-and-Community-Effects-of-Aquaculture-A-case-study-of-Southland-aquaculture>

- *‘The social effects in Stewart Island and Bluff are remarkable for their positive nature. Despite participants being asked about negative effects experienced, nothing remotely significant was described. Instead, a highly positive and significant social picture has emerged, where the companies and employees have jointly contributed. There is no doubt that the communities of Stewart Island and Bluff are significantly socially richer due to the presence of aquaculture’.*

NWML are developing an economic model, but high-level estimates are instalment costs of s 9(2)(b)(ii) per line equating to an initial investment (over stages) of s 9(2)(b)(ii) plus land-based infrastructure. Running costs are anticipated to be in the order of s 9(2)(b)(ii) per year at full production.

In summary, the project is expected to provide spat for **35,500 tonnes of production mussels** which will contribute s 9(2)(b)(ii) **in GDP to the Waikato region and 320 jobs**. This is sufficient resilient seed to enable the New Zealand Greenshell mussel industry to meet its goal of providing up to a third of the \$3 billion goal that the New Zealand Government set for the aquaculture industry by 2035. The spat nursery itself will **employ 28 additional people in the Whāingaroa/Raglan community**. Further GDP will be created from the infrastructure investment of at least s 9(2)(b)(ii).

5.3 Supporting Climate Change Mitigation

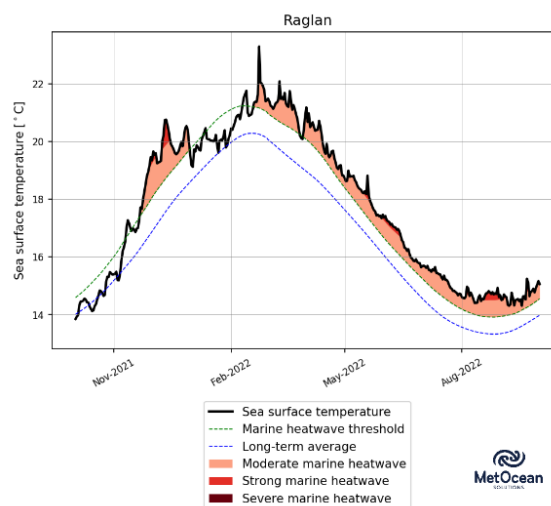
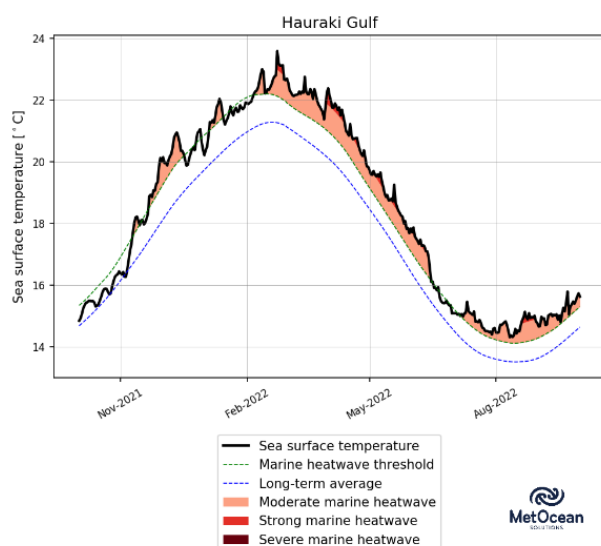
Aquaculture, like all coastal activities and all farming activities, is particularly susceptible to the effects of climate change and there is recognition that *‘adapting to the predicted changes in the short-term while taking mitigation measures in the long-term could be the only way toward sustaining the sector’s production’⁴⁷*. This proposal is an innovative and direct response to the change in farming conditions which have resulted from the warming waters of the Hauraki Gulf.

The mussel farms most used by NWML are located in the Hauraki Gulf and Firth of Thames. Over the last few years, the consequence of climate change has been the observed marine heat waves, increasing the sea temperatures. Corresponding during the summer months there is increasing spat and crop mortality. In the 2022 summer these east coast farms experienced an unprecedented 95% spat mortality. The industry cannot tenably continue under these conditions without the ability to adapt. One proposed climate change adaption is to locate spat in nursery areas where the waters are cooler.

Dr Malene Felsing has recently shown the significant difference in water temperatures between the east and west coast of Waikato using data from the Moana Project⁴⁸. *‘Below are figures showing that max temperatures in the Hauraki Gulf which reached almost 24 degrees C with many weeks exceeding 22 degrees C. Whereas off Raglan the temperatures had a similar maximum, but the average was consistently below 22 degrees C, even under marine heatwave conditions’.*

⁴⁷ Maulu S, Hasimuna OJ, Haambiya LH, Monde C, Musuka CG, Makorwa TH, Munganga BP, Phiri KJ and Nsekanabo JD (2021) *Climate Change Effects on Aquaculture Production: Sustainability Implications, Mitigation, and Adaptations*. Front. Sustain. Food Syst. 5:609097. doi: 10.3389/fsufs.2021.609097

⁴⁸ <https://www.moanaproject.org/>



Marine temperature differences between the east and west coast of Waikato

So, overall, it is a lot cooler normally, including last year, on the west coast than on the east coast. Both areas had significant marine heatwaves, but even so the west coast remained considerably cooler.'

NWML's future spat strategy, echoes that of the broader industry in the need to adapt to climate change. A diverse range of spat sources will be required including:

- Beach cast from Te Oneroa a Tōhe, as is currently undertaken.
- Hatchery spat.
- Wild caught spat, such as that proposed in this application.

The latter two options, hatcheries and wild spat catching offer opportunities to adapt to climate change. Hatchery technology and development is underway but has its challenges and difficulties as *Perna canaliculus* is a difficult animal to breed in a hatchery compared to species used elsewhere in worldwide hatcheries. Wild spat catching in this application is well developed and has a long-proven history in New Zealand.

All three spat sources have their challenges thus a diverse portfolio of spat sources is required to spread the risk of any one source having a low outcome at any one year. Long term hatcheries offer the advantage of genetic breeding to adapt to climate change, but nursery locations, as in this application will be required to transfer the hatchery spat to the marine environment, something that is lacking in the present farms in the Hauraki Gulf.

The proposed west coast sites will be used for spat catching and spat nursery activities. The first spat catches of the year in autumn will be transferred to east coast farms for the nursery stage. This early transfer will enable the spat to grow some size before summer and thus be more resilient to marine heat waves. Some winter and spring spat will be retained in this west coast nursery's cooler waters, over summer months, to spread the risk from marine heat waves, and the significant losses due to marine heat waves.

This proposal is an important climate adaptation opportunity for NWML, and for the broader mussel farming industry in the Waikato region and will enable the industry to continue to provide positive economic, social, cultural and ecosystem contributions.

Furthermore, farming seafood is one of the most environmentally efficient ways of producing animal protein.⁴⁹ A recent study by thinkstep-anz found that New Zealand farmed mussels and oysters have among the lowest carbon footprints of all animal proteins and are similar in impact to plant-based proteins like tofu.⁵⁰ This research confirms that New Zealand's aquaculture industry is well paced to be part of our future sustainable, lower emissions economy.

5.4 Consistency with the Waikato Regional Policy Statement and Waikato Regional Coastal Plan

Mitchell Daysh provided a Proposed Plan Change and Section 32 Evaluation Report as part of the application to WRC. This included analysis of the proposed plan change against the Waikato Regional Policy Statement (RPS) and Waikato Regional Coastal Plan (WRCP). This analysis is summarised here:

- The RPS became operative in May 2016 and, as such, is considered to give effect to the overarching direction provided by the NZCPS with respect to the sustainable management of the coastal environment.
- The objectives and policies in the RPS cover a broad range of topics that are potentially relevant to the activities proposed in the Raglan Mussel Spat Catching and Holding Zone, noting that a number of the policies and methods target actions by the WRC and local authorities in the Waikato Region.
- It is considered that the proposed plan change does not impact upon the ability to achieve the management expectations for natural and physical resources in the coastal environment under the RPS. The approach adopted currently in the WRCP in terms of providing for specific aquaculture activities in specific zones, subject to limits and staged development expectations, is respected in this application.
- The WRCP was made operative in 2005. It pre-dates the NZCPS and RPS – such that a number of its provisions may not fully reflect the more recent, over-arching policy directives regarding the sustainable management of the coastal environment.
- Overall, it is considered that the proposed plan change is consistent with the objective and policy direction in section 6.1 of the WRCP relating to marine farming.
- It is considered that the proposed plan change can give effect to the management outcomes expected via the WRCP.

WRC notified the proposed reviewed WRCP in August 2023. It is currently subject to a further submission process and the hearing / decision-making process may substantially alter some provisions. As notified it seeks to:

- Acknowledge the benefits of aquaculture, which this proposal will align with given that it will provide much needed resilient spat to enable current productivity to stabilise and the industry's growth potential to be realised.
- Avoid commercial aquaculture in identified areas that reflect the likes of Policies 11, 13 and 16 of the NZCPS. The proposal is not located within one of these identified areas.
- Require aquaculture activities to avoid significant adverse effects, and avoid, remedy or mitigate other adverse effects on a range of values, including navigational safety / recreational use and marine mammals, seabirds and shorebirds. These matters have all been considered in the context of the NZCPS and RPS, and overall, it is not considered that any significant adverse effects will result from the proposal.
- Consider the suitability of the location for the proposed type of aquaculture and species to be farmed,

⁴⁹https://www.nature.org/content/dam/tnc/nature/en/documents/TNC_EncourageCapital_TowardsABlueRevolution_v1_1.pdf

⁵⁰<https://www.aquaculture.org.nz/resources/general>

including consideration of the cumulative effects of other aquaculture in the area. This matter has been considered in the assessment of effects and overall, it is considered that the proposed extension site is a suitable location and appropriate consideration has been given to cumulative effects.

- Adopts a similar approach to the NZCPS with respect to the utilisation of the precautionary approach. As such, the analysis of the proposal against the NZCPS apply equally to these provisions.
- Ensure public recreational use is provided for within aquaculture management areas or marine farms. The proposal does not preclude public recreational use amongst the marine farm lines, as is the norm for marine farms in the Waikato Region.

Overall, it is considered the proposal will be consistent with the relevant policy outcomes currently sought by the proposed WRCP.

5.5 Consistency with the New Zealand Coastal Policy Statement

Mitchell Daysh provided a Proposed Plan Change and Section 32 Evaluation Report as part of the application to WRC. This included analysis of the proposed plan change against the NZCPS which is provided over.

4.2 NEW ZEALAND COASTAL POLICY STATEMENT 2010

The NZCPS came into effect in 2010 and its purpose is to state policies in order to achieve the sustainable management of natural and physical resource in relation to the coastal environment of New Zealand.

Whilst the RPS was been prepared subsequent to the NZCPS coming into effect, consideration has still been given to the overarching directives of the NZCPS for context and recognition that the proposed plan change is required to give effect to the NZCPS.

The NZCPS contains provisions which address the following matters of relevance to the proposed plan change:

- Ecosystem values and coastal water quality (Objective 1 and its associated policies);
- Natural character and landscape values of the coastal environment (Objective 2 and its associated policies);
- Tangata whenua values and interests (Objective 3 and its associated policies);
- Public access and recreational opportunities in the coastal environment (Objective 4 and its associated policies); and
- Enabling social, economic and cultural wellbeing (Objective 6 and its associated policies).

An assessment of the relevant provisions is provided in the sub-sections below.

4.2.1 Ecosystem Values and Coastal Water Quality

Objective 1 seeks to safeguard the various elements of the coastal environment and sustain ecosystems. This is intended to be achieved by a range of measures, which seek to:

- Adopt a precautionary approach towards activities whose effects on the coastal environment are uncertain, unknown, or little understood, but potentially significantly adverse;¹⁰
- Avoid adverse effects on significant indigenous biodiversity (e.g. indigenous taxa that is threatened or at risk);¹¹
- Avoid significant adverse effects, and avoid, remedy or mitigate other adverse effects of activities on other habitats, areas and ecosystems in the coastal environment;¹²

¹⁰ Policy 3 of the NZCPS.

¹¹ Policy 11(a) of the NZCPS.

¹² Policy 11(b) of the NZCPS.

- Control activities in, or near, the coastal marine area that could have adverse effects on the coastal environment by causing harmful aquatic organisms to be released or otherwise spread;¹³
- Enhance water quality in areas where it has degraded¹⁴; and
- Have particular regard to the sensitivity of the receiving environment, the capacity of the receiving environment, and the potential for significant adverse effects on ecosystems and habitats when managing discharges to the coastal environment.¹⁵

The WRCP requires a precautionary approach to the development of aquaculture activities – such that aquaculture activities are generally directed to bespoke zones and adverse effects are avoided as far as practicable. The proposed plan change respects the existing policy framework requiring this approach.

With respect to the management of significant indigenous biodiversity, the proposed plan change does not provide for structures outside the Raglan Mussel Spat Catching and Holding Zone as a permitted activity, and any resource consent application for activities within the zone will need to be accompanied by an ecological investigation of the proposed disturbance locations (in accordance with Appendix I of the WRCP). In that regard, any effects on significant indigenous biodiversity associated with structures in the Raglan Mussel Spat Catching and Holding Zone would be considered and assessed through a discretionary resource consent process. In addition, any resource consent application would be considered against a policy context which seeks that adverse effects on significant ecological values be avoided (in line with Policy 11(a) of the NZCPS).

In terms of other habitats and ecosystems in the coastal environment, the NZCPS sets out an effects management framework whereby there is a focus on avoiding significant adverse effects, and avoiding, remedying or mitigating other adverse effects. As with the above, the proposed plan change will enable the potential environmental effects of structures in the Raglan Mussel Spat Catching and Holding Zone on habitats and ecosystems to be assessed and managed through the resource consent process.

Similarly, in response to Policy 12, any biosecurity risks requiring management will be identified and addressed in the context of the discretionary resource consent which would be required prior to establishment of any activities in the Raglan Mussel Spat Catching and Holding Zone.

In respect of the capacity of the receiving environment, the proposal's appropriateness in the context of the NZCPS policies is supported by independent expert assessments of

¹³ Policy 12(1) of the NZCPS.

¹⁴ Policy 21 of the NZCPS.

¹⁵ Policy 23 of the NZCPS.



landscape and natural character, ecological effects, effects on marine mammals and effects on seabirds. NWML have also ensured that the sites are located away from known reefs (such as Jackson's Reef south of Whāingaroa/Raglan) and sufficiently distant from shore to minimise any potential environmental effects.

4.2.2 Natural Character and Natural Features / Landscapes

Objective 2 and its related policies seek to:

- Avoid adverse effects on the characteristics and qualities that contribute to the outstanding natural character of areas in the coastal environment;¹⁶
- Avoid adverse effects on the characteristics and qualities that contribute to areas in the coastal environment areas that are outstanding natural features and landscapes;¹⁷ and
- Avoid significant adverse effects, and avoid, remedy, or mitigate other adverse effects of activities, on natural character and other natural features and natural landscapes in the coastal environment.¹⁸

There are no impediments to meeting this objective. The four proposed areas for inclusion in the Raglan Mussel Spat Catching and Holding Zone are located outside of any high natural character areas, whilst anticipated effects from the contemplated activities would be minimal, given the limited “footprint” of surface structures.

A detailed assessment of any effects on natural character or landscapes should be undertaken at the resource consent stage as part of the proposed rule framework, and in this instance are included in the concurrent resource consent application by NWML.

4.2.3 Tangata Whenua Values and Interests

The objectives and policies of the NZCPS direct that the principles of the Treaty of Waitangi be taken into account and that the role of tangata whenua as kaitiaki of the coastal environment be recognised. Policy 2 further elaborates on this by recognising that tangata whenua have traditional and continuing cultural relationships with areas of the coastal environment, and that opportunities should be provided for tangata whenua to exercise kaitiakitanga over these waters.

NWML has sought to engage with local iwi in preparation of this plan change request and concurrent resource consent application. The engagement undertaken to date is summarised in more detail in the concurrent resource consent application, with further

¹⁶ Policy 13(1)(a) of the NZCPS.

¹⁷ Policy 15(a) of the NZCPS.

¹⁸ Policies 13(1)(b) and 15(b) of the NZCPS.



engagement expected once the plan change request is lodged. The relevant iwi environmental management plans are also assessed in this report.

There are no specifically identified sites of cultural or spiritual significance in the vicinity of the proposed zone, but NWML are committed to ongoing engagement with iwi as appropriate to further understand the enduring cultural relationships iwi may have in this location.

4.2.4 Public Access and Recreational Opportunities

Objective 4 seeks to maintain and enhance the public open space qualities and recreation opportunities of the coastal environment, including by recognising that the coastal marine area is an extensive area of public space for the public to use and enjoy. Policy 6 also recognises the recreation qualities and values of the coastal marine area.

The Raglan Mussel Spat Catching and Holding Zone will be located well offshore and out of range of most public users (other than what is anticipated to be a very small number of fishermen). This coast is used sparsely by recreational and commercial fishermen based on the relatively difficult weather and water conditions. As a result, any impact of the proposal on such use will be negligible.

Notwithstanding the above, any potential effects on public access and recreational opportunities will be able to be considered as part of the consenting pathway to be provided as part of the proposed plan change. The need for navigational and buoyancy markings will be able to be addressed through the assessment criteria proposed for Rule 16.5.5F.

The Raglan Mussel Spat Catching and Holding Zone is located outside of the identified swell corridors - such that will not have potential to create adverse effects on any regionally or nationally significant surf breaks (Policy 16 and Schedule 1 of the NZCPS).

4.2.5 Social, Economic and Cultural Wellbeing

Objective 6 and its associated policies (including Policy 6) recognise that the protection of values of the coastal environment should not preclude use and development in appropriate places and forms, and within appropriate limits. The objectives and policies specifically recognise those uses which depend on the natural and physical resources of the coastal environment, including for functional reasons.

Related to the above, Policy 8 recognises the significant existing and potential contribution of aquaculture to the social, economic and cultural well-being. Policy 8 also seeks that the regional policy statement and regional plans include provisions for aquaculture activities in appropriate places in the coastal environment and that the social and economic benefits of aquaculture be taken into account.

The establishment of policies and rules for the Raglan Mussel Spat Catching and Holding Zone is considered to directly respond to the directive provided by Policy 8(a). The proposed plan change will enable the future sustainable growth of the mussel farming industry in a manner that allows for effective and efficient use of space in the coastal marine area, whilst allowing potential environmental effects to be managed through the discretionary consent application process.

4.2.6 Summary

Overall, it is considered that the NZCPS seeks to provide for aquaculture activities in the coastal environment in recognition of the social and economic wellbeing that such activities provide. However, provision for aquaculture activities is to occur within the context of appropriate places and within appropriate limits, and where the effects of any specific proposal are managed in accordance with the various policy directives sets out in the various policies of the NZCPS.

The Raglan Mussel Spat Catching and Holding Zone is considered to be a location that is appropriate for aquaculture activities (particularly given its reliability of spat supply) and the proposed rule framework sought as part of this plan change provides for effective management of any adverse effects.

In light of the above, and subject to the outcomes of further engagement with iwi, it is considered that the proposed plan change gives effects to the NZCPS.

