6 October 2025

APP-2025205407.00

Environmental Protection Agency
Private Bag 63002
Wellington 6140
Via email – subtstantive@fasttrack.govt.nz

Kia ora koutou,

TARANAKI VTM PROJECT – FTAA-2504-1048: WRITTEN COMMENT - HORIZONS REGIONAL COUNCIL

Thank you for the opportunity to provide comment on the application made by Trans-Tasman Resources Limited (TTR) for a marine consent under the Fast Track Approvals Act 2024.

This letter and attachments contains Manawatū-Whanganui Regional Council (trading as Horizons Regional Council (Horizons)) written comment on the Taranaki VTM Project application (the Application). It has been informed by the expertise of Horizons staff, and *"Technical assessment of Fast Track Application FTAA-2504-1048 (Taranaki VTM Project)"*, October 2025 by Pattle Delamore Partners (PD) (Attachment 1). Key findings of this report are summarised below, however the full report forms part of Horizons comment and should be read in its entirety.

Horizons has also reviewed the comments provided by Taranaki Regional Council (TRC) to this application, and supports and agrees with the comments and recommendations contained therein. Given TRC's Coastal Marine Area (CMA) is located immediately adjacent to the area of the proposed activities, with Horizons CMA located further to the south, Horizons acknowledges that TRC will be the primary Regional Council impacted by the application while noting some of the effects are predicted to travel south beyond their boundary.

Legislative Framework

1. Horizons supports the comments made by TRC relating to the need to ensure the application is appropriately weighted in accordance with the Fast Track Approvals Act 2024 (FTAA) and notes the threshold for declining an application is limited to when the adverse effects of an application are *"sufficiently significant to be out of proportion to the projects regional or national benefits"*.

2. We acknowledge that when there is uncertainty or insufficient information, that this is not likely to provide scope to decline an application given the FTAA provides pathways for the Expert Panel to commission reports, invite comments, request information or hold a hearing.

3. Horizons notes that there is uncertainty around the effects of the proposal. We encourage the Expert Panel to use the mechanisms available to them to ensure that

insufficient information and uncertainty is resolved to enable a decision to be made based on comprehensive data and assessment given the sensitive nature of the receiving environment. We note in this regard clause 6(1)(d) of Schedule 10 of the FTAA, requires the Expert Panel to take into account section 61(2) of the EEZ Act, which requires favouring caution and environmental protection.

4. We support TRCs recommendation that where there is uncertainty around adverse effects, the Expert Panel take a conservative view and adopt a plausible worst-case scenario, and if the Expert Panel decides to grant an application with significant uncertainty, that the requirement to favour caution and environmental protection is expressed through stringent consent conditions.

5. The relevant plan for the Horizons Region is the One Plan – Combined Regional Policy Statement, Regional Coastal Plan and Regional Plan.

Environmental Effects

6. PDP have been engaged by Horizons to assist in the review of the environmental effects of the proposed activities in the Horizons Region. The following section summarises the key points set out in their report (Attachment 1).

Existing Environment

7. Horizons combined Regional Policy Statement, Regional Coastal Plan and Regional Plan (One Plan) specifies water management areas for coastal management, which manages effects of activities within areas. In this case the 'Seawater Management Area' (SMA) is relevant. The SMA includes a management objective that seeks to support healthy aquatic life and ecosystems. Objective CE-CMA-O3 of the Regional Policy Statement requires water quality to be maintained in areas that meets the water quality targets and enhanced where it does not. A full copy of the relevant Objectives and Polices are attached in Appendix 2.

8. The One Plan also includes coastal water quality targets, with the ones relevant to this application being visual clarity and euphotic depth.

9. Habitats in the Horizons CMA have not been mapped however a number of reports provide guidance on habitats in the area[1].

10. The influence of river plumes and major ocean currents have also been assessed in a number of reports[2], which concluded that suspended sediment loads from river inputs have a greater impact on the CMA than offshore sources.

11. There are limited consents in the Horizons CMA on the western coast. These being limited to the discharge of municipal wastewater via an ocean outfall from the Whanganui Wastewater Treatment Plant (WWTP) near Whanganui, and the

---

[1] Jones et al., (2016), *Biogenic habitats on New Zealand's continental shelf. Part 1: Local Ecological Knowledge*. https://doi.org/10.13140/RG.2.2.35538.58404

[2] Colins, C. & Macdonald, H. (2019), *Oceanic flow patterns and their influence on receiving and transmitting material on the west coast of the Manawatu-Whanganui Region – Ocean flow and its influence on transporting material* (No. NIWA CLIENT REPORT No:2019169WN). NIWA (Prepared for Horizons Regional Council, and O'Callaghan, J (2020). *River plume dynamics in the coastal marine area* (No. NIWA CLIENT REPORT No: 2020033WN). NIWA (Prepared for Horizons Regional Council).

maintenance of a submarine fibre optic cable near Hokio Beach. Details of these consents have been previously provided to the EPA.

12. We note that TTR's information gathering for the previous applications to the EPA was based off oceanographic data collected within TRC's CMA rather than Horizons CMA. PDP consider that the figures presented in the application regarding background suspended sediment concentrations are difficult to interpret at a scale relevant to Horizons CMA.

Water Quality

13. The One Plan includes a visual clarity target for the SMA (equal or exceed 1.6 metres of horizontal visibility), as well as a euphotic target (no change greater than 10%) in the Estuarine Water Management Area[3]. While the euphotic target is not applicable in the SMA, it does provide a reasonable guideline for this application given water clarity is generally higher on the open coast than in estuaries. PDP considers a 10% reduction in the euphotic zone would represent a considerable change in water quality.

14. PDP have noted that the euphotic zone may be reduced by up to 50% in the Horizons CMA due to the proposed mining activities[4]. The application documents note that horizontal visibility could reduce by 10m[5]. This report also calculated some modelled optical sites, but we note that these did not include any within the Horizons CMA and are not at a scale which enables them to be interpreted at a regional scale. Therefore, it appears that the proposed activities may exceed water quality targets in the One Plan, noting that this has not been modelled.

15. PDP further notes some concerns with uncertainties in modelling and difference in timing of data collection. This has results in uncertainty regarding how well the modelling is calibrated for conditions in the Horizons CMA.

Localised Impacts

16. Having an accurate understanding of the Horizons CMA is vital to ensuring an assessment of effects is accurate and to minimise uncertainty. Despite limited information on benthic habitats and species in the Horizons CMA, PDP consider there is anecdotal evidence that benthic habitats similar to those in the Taranaki CMA exist in the Horizons CMA. To understand the effects of the proposed activity on the Horizons CMA will require an assessment of localised impacts on species present in the Horizons CMA.

Optical Properties and Suspended Sediments

17. The applicant's sediment plume modelling considered the high sediment load from the Whanganui River and concluded that the sediment concentration from mining in comparison is insignificant. PDP acknowledge the high riverine sediment load, but

---

[3] Table 53 and 55, Schedule 9, One Plan (2025)
[4] Figure 2-3a, Pinkerton, M. (2017). *Optical effects of proposed ironsand mining in the South Taranaki Bight region – Worst case update* (No.2017089WNrev1). NIWA (Prepared for Trans-Tasman Resources, Ltd.).
[5] Figure 2-6b, Pinkerton, M. (2017). *Optical effects of proposed ironsand mining in the South Taranaki Bight region – Worst case update* (No.2017089WNrev1). NIWA (Prepared for Trans-Tasman Resources, Ltd.).

notes that offshore benthic habitats are likely to exist between the mining site and the near-shore environment, with offshore habitats being less likely to have been influenced by riverine sediment loads.

18. Horizons CMA includes filter feeding and shellfish habits offshore (horse mussels, scallops and dog cockles). PDP notes the benefits of shellfish beds on ecosystem services and that increasing sediment and disposition can clog the gills of filter feeders. While TTR considered no observable effect on oxygen consumption of dog cockles, PDP consider this is likely to relate to course sediment and a persistent increase in fine sediment could impact the survival of this species.

19. Bryzoan beds have been assessed by TTR in relation to those offshore of the mining site. No assessment of bryozoan beds in the Horizons CMA has been undertaken. PDP note that a known stressor of these beds is suspended sediment.

Sediment Deposition

20. The application recognises that attachment of macroalgal germlings can be impacted by a light dusting of sediment[6]. PDP note that the size of the depositional area is not provided in the application, and considers this to be a key information gap in determining the potential impacts and extent of the mining operation

Benthic Ecology

21. PDP has noted that there are a number of information gaps associated with benthic ecology, namely:
    a. Horse mussels are more sensitive to increasing sediment, and despite mention of scallops in the application, there does not appear to be an assessment of relevant studies to determine the impacts on those species.
    b. Absence of studies assessing the effects of elevated SSCs on sea pens that are present in the Horizons CMA;
    c. Species responses to sediment, where documented, are not consistent which makes it difficult to determine the effects of sand mining on the Horizons CMA. Without assessments of species present in the Horizons CMA, it is difficult to assess impacts on these species from increased sediment.

Seabirds

22. Important areas for bird occurrence, nesting and foraging extend between the Cook Straight and just south of Opunake in Taranaki, with the Manawatū Estuary an important migratory bird habitat and RAMSAR site. The South Taranaki Blight (STB) is located within the Cook Straight Important Bird and Biodiversity Area and is of international importance for seabird conservation.

23. PDP note that no systematic seabird surveys have been carried out. Potential effects on seabirds include displacement, effects on foraging from the sediment plume, noise, lighting and potential oil/fuel spills. It is understood that to date experts have not been able to agree on the magnitude of these effects.

---

[6] Schiel (2006), Rivets or bolts? *When single species count in the function of temperate rocky reef communities. Journal of Experimental Maine Biology and Ecology, 228(2)*, Article 2. https://doi.org/10.1016/j.jembe.2006.06.023

24. We note that Policy 11 of the New Zealand Coastal Policy Statement (NZCPS) requires adverse effects on these species to be avoided. It is recommended that the Expert Panel consider how the proposed activity is avoiding effects given that the experts have agreed that *"large numbers of seabirds may be present in the STB at night, including the proposed mining area, and that there is potential for significant mortality of seabirds attracted to mining vessel lights"*.

25. PDP note that there does not appear to be sufficient information to assess the impacts on seabirds in the STB based on the information provided.

Marine Mammals

26. The main effects on marine mammals include noise, vessel strike and effects of the sediment plume, as well as indirect effects such as reducing a predators ability to detect prey.

27. 11 marine mammal species have been sighted in the Horizons CMA (within the Department of Conservation sighting and standing database), including several 'Threatened' and 'At-Risk' species. PDP note the STB is of high marine mammal diversity with some parts being important habitat and foraging areas.

28. Horizons notes that careful consideration when determining the magnitude and scale of effects on species will be required, especially those close to extinction. Given limited data, there is some uncertainty about the potential effects on marine mammals

Effects Conclusion

29. TTR has commissioned a broad suite of reports, including additional work undertaken as part of previous consenting processes. However this assessment of effects is not directly relevant to the Horizons CMA, particularly on benthic habitats. Based on PDP's review, it is Horizons view that the application lacks sufficient resolution or scale to enable a determination of the magnitude of effects in the Horizons CMA.

Incident Response

30. TRC's comments identify concerns with the ability of rescue or salvage procedures in the event of a serious mishap to any of the vessel fleet, the level of insurance and oil spill responses.

31. With respect to oil spill response, Horizons is in agreement that engagement between all parties would be beneficial. Horizons operates a oil spill team and plan and engagement with all parties should be considered. Horizons recommends that the response capacity needed to respond to a large-scale incident should to be considered, and ensure consent conditions provide for any capacity gaps to be addressed.

32. Horizons also agree with TRCs question of why the worse-case scenario only considered 100 metric tonnes of oil over a two hour period, when vessels have much larger capacities.

Cultural Considerations

33. Horizons supports TRC in its support of the evidence of Ngā Iwi o Taranaki in consideration of mātauranga Māori and matters of tikanga. Horizons also supports the comments from iwi based within Horizons Region and considers that these will assist the Expert Panel in consideration of mātauranga Māori and matters of tikanga.

Statutory Acknowledgements and Settlement Act Considerations

34. Horizons note that Ngaa Rauru Kiitahi and Ngā Wairiki-Ngati Apa Charitable Trust have been invited to make comment on the application and acknowledges the statutory acknowledgments that these groups hold over the CMA. We note that Rangitane o Manawatu also have a statutory acknowledgement in the CMA in the vicinity of the Rangitikei River and Manawatu River (see Figure 1 below)..

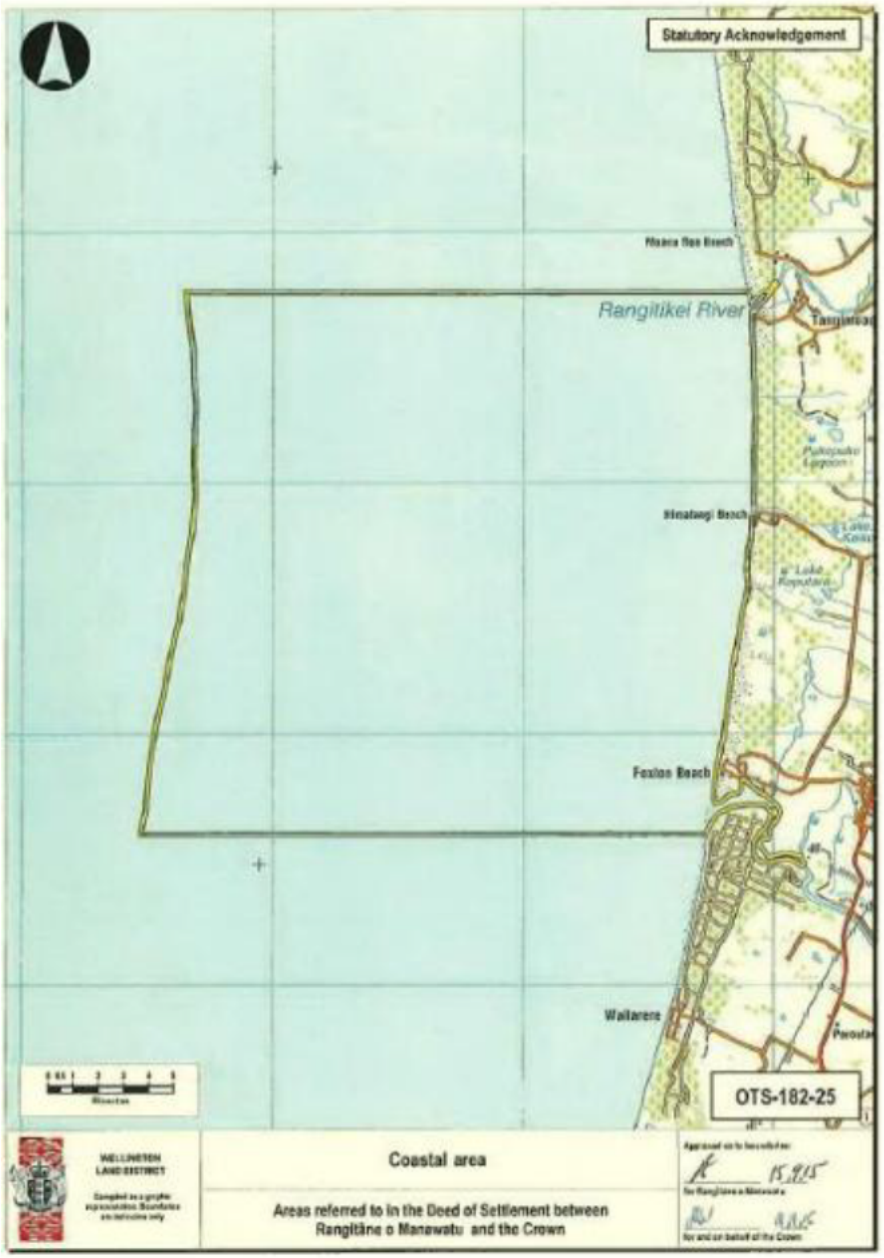

Figure 1 Rangitane o Manawatu Statutory Acknowledgement - Coastal Area - OTS-182025

Relevant Statutory Provisions – Horizons Regional Council Combined Regional Policy Statement and Regional Plan (One Plan)

35. Please see Appendix 2 for a list of RMA Objectives, Policies and Schedules that Horizons considers are relevant to this application.

Recommendations

36. Based on the above comments and assessment, Horizons recommends the Expert Panel consider the following:

    a. *The Expert Panel to use the mechanisms available to ensure that insufficient information and uncertainty is resolved to enable a decision to be made based on comprehensive data and assessment given the sensitive nature of the receiving environment.*

    b. *Where there is uncertainty around adverse effects, we consider a conservative view is taken including the adoption of a plausible worst-case scenario. If the Expert Panel decides to grant an application with significant uncertainty and/or information gaps, the requirement to favour caution and environmental protection should be expressed through stringent consent conditions.*

    c. *Reflect on the weighting of potential water quality targets in the One Plan in relation to changes in the euphotic zone and visual clarity (horizontal clarity). It is noted the data is unable to be interpreted at the scale its presented.*

    d. *The development of the sediment plume model used data collected over different years and timeframes has introduced potential uncertainty. We recommend the Expert Panel carefully weighs how this affects confidence in whether the model accurately reflects the potential effects in Horizons CMA.*

    e. *There is uncertainty without localised assessment of impacts on likely reef habitats in the Horizons CMA. We recommend the Expert Panel carefully considers this in its evaluation of ecological effects.*

    f. *Without an updated primary production assessment based on update worst-case optical effects modelling, there is not enough information to assess the magnitude of effects on kelp found in the Horizons CMA.*

    g. *We recommend the Expert Panel consider how the uncertainty regarding reef locations and the absence of updated primary production assessment impacts the confidence in conclusions about potential effects on reef ecosystems.*

    h. *Without knowing the size and extent of the depositional area, it is not possible to assess the magnitude of sedimentation effects on the receiving environment. We recommend the Expert Panel consider that this necessary information is missing.*

    i. *Based on the evidence, there does not appear to be adequate examples of species responses, particularly filter feeders, to the longevity of the proposed operation. We recommend the Expert Panel consider the limitations of the suppled information versus the proposed activity.*

j. *We recommend the Expert Panel considers the lack of sufficient information to assess the impacts of the mining activity on seabirds in the South Taranaki Blight.*

k. *A lack of knowledge regarding seabird presence, foraging areas and behavioural patters has remained a knowledge gap. We recommend the Expert Panel consider that the knowledge gap was noted in the previous EPA process, is yet to be substantially filled and seeks to fill this information gap as part of its considerations.*

l. *We recommend the Expert Panel consider whether the existing limited data on marine mammal populations, particularly given their threat classification status are sufficient to evaluation the potential impacts of the proposed mining activities.*

m. *We recommend the Expert Panel take into account that the potential noise-related impacts on marine mammals from mining is uncertain and lack empirical data support to full assess the magnitude and significance of effects.*

n. *Consider the response capacity needed to respond to a large-scale incident, and ensure consent conditions provide for any capacity gaps to be addressed. Consideration of cross over with MaritimeNZ would be beneficial.*

o. *With respect to oil spill response, consider why the worse-case scenario only considered 100 metric tonnes over a two hour period, when vessels have much larger capacities, noting the potential for cross over with MaritimeNZ jurisdiction..*

p. *Consider whether Rangitane o Manawatu should be invited to provide comment on this application.*

37. Horizons thank the Expert Panel for the opportunity to provide a written comment. We look forward to further engagement throughout this process and can provide any further advice or information that may assist the Expert Panel in its considerations.

If you have any questions regarding the above, please do not hesitate to contact us.

Yours sincerely,

[redacted]

REGULATORY MANAGER

[redacted]

TEAM LEADER CONSENTS

APPENDIX ONE: TECHNICAL ASSESSMENT OF FAST TRACK APPLICATION FTAA:2504-1048 (TARANAKI VTM PROJECT) – PREPARED FOR HORIZONS REGIONAL COUNCIL, OCTOBER 2025

Refer to separate attachment.

APPENDIX 2: RELEVANT RMA OBJECTIVES, POLICIES AND OTHER MATTERS

New Zealand Coastal Policy Statement – Relevant Objectives and Policies	
Objective 1	To safeguard the integrity, form, functioning and resilience of the coastal environment and sustain its ecosystems, including marine and intertidal areas, estuaries, dunes and land, by: • maintaining or enhancing natural biological and physical processes in the coastal environment and recognising their dynamic, complex and interdependent nature; • protecting representative or significant natural ecosystems and sites of biological importance and maintaining the diversity of New Zealand's indigenous coastal flora and fauna; and • maintaining coastal water quality, and enhancing it where it has deteriorated from what would otherwise be its natural condition, with significant adverse effects on ecology and habitat, because of discharges associated with human activity
Objective 2	To preserve the natural character of the coastal environment and protect natural features and landscape values through: • recognising the characteristics and qualities that contribute to natural character, natural features and landscape values and their location and distribution; • identifying those areas where various forms of subdivision, use, and development would be inappropriate and protecting them from such activities; and • encouraging restoration of the coastal environment
Objective 3	Objective 3 To take account of the principles of the Treaty of Waitangi, recognise the role of tangata whenua as kaitiaki and provide for tangata whenua involvement in management of the coastal environment by: • recognising the ongoing and enduring relationship of tangata whenua over their lands, rohe and resources; • promoting meaningful relationships and interactions between tangata whenua and persons exercising functions and powers under the Act; • incorporating mātauranga Māori into sustainable management practices; and • recognising and protecting characteristics of the coastal environment that are of special value to tangata whenua.
Objective 6	To enable people and communities to provide for their social, economic, and cultural wellbeing and their health and safety, through subdivision, use, and development, recognising that: • the protection of the values of the coastal environment does not preclude use and development in appropriate places and forms, and within appropriate limits;

	• some uses and developments which depend upon the use of natural and physical resources in the coastal environment are important to the social, economic and cultural wellbeing of people and communities; • functionally some uses and developments can only be located on the coast or in the coastal marine area; • the coastal environment contains renewable energy resources of significant value; • the protection of habitats of living marine resources contributes to the social, economic and cultural wellbeing of people and communities; • the potential to protect, use, and develop natural and physical resources in the coastal marine area should not be compromised by activities on land; • the proportion of the coastal marine area under any formal protection is small and therefore management under the Act is an important means by which the natural resources of the coastal marine area can be protected; and • historic heritage in the coastal environment is extensive but not fully known, and vulnerable to loss or damage from inappropriate subdivision, use, and development.
Policy 2	In taking account of the principles of the Treaty of Waitangi (Te Tiriti o Waitangi), and kaitiakitanga, in relation to the coastal environment: (a) recognise that tangata whenua have traditional and continuing cultural relationships with areas of the coastal environment, including places where they have lived and fished for generations; (b) involve iwi authorities or hapū on behalf of tangata whenua in the preparation of regional policy statements, and plans, by undertaking effective consultation with tangata whenua; with such consultation to be early, meaningful, and as far as practicable in accordance with tikanga Māori; (c) with the consent of tangata whenua and as far as practicable in accordance with tikanga Māori, incorporate mātauranga Māori in regional policy statements, in plans, and in the consideration of applications for resource consents, notices of requirement for designation and private plan changes; (d) provide opportunities in appropriate circumstances for Māori involvement in decision making, for example when a consent application or notice of requirement is dealing with cultural localities or issues of cultural significance, and Māori experts, including pūkenga, may have knowledge not otherwise available; (e) take into account any relevant iwi resource management plan and any other relevant planning document recognised by the appropriate iwi authority or hapū and lodged with the council, to the extent that its content has a bearing on resource management issues in the region or district; and (i) where appropriate incorporate references to, or material from, iwi resource management plans in regional policy statements and in plans; and

	(ii) consider providing practical assistance to iwi or hapū who have indicated a wish to develop iwi resource management plans; (f) provide for opportunities for tangata whenua to exercise kaitiakitanga over waters, forests, lands, and fisheries in the coastal environment through such measures as: (i) bringing cultural understanding to monitoring of natural resources; (ii) providing appropriate methods for the management, maintenance and protection of the taonga of tangata whenua; (iii) having regard to regulations, rules or bylaws relating to ensuring sustainability of fisheries resources such as taiāpure, mahinga mātaitai or other non commercial Māori customary fishing; and (g) in consultation and collaboration with tangata whenua, working as far as practicable in accordance with tikanga Māori, and recognising that tangata whenua have the right to choose not to identify places or values of historic, cultural or spiritual significance or special value: (i) recognise the importance of Māori cultural and heritage values through such methods as historic heritage, landscape and cultural impact assessments; and (ii) provide for the identification, assessment, protection and management of areas or sites of significance or special value to Māori, including by historic analysis and archaeological survey and the development of methods such as alert layers and predictive methodologies for identifying areas of high potential for undiscovered Māori heritage, for example coastal pā or fishing villages
Policy 3	(1) Adopt a precautionary approach towards proposed activities whose effects on the coastal environment are uncertain, unknown, or little understood, but potentially significantly adverse. (2) In particular, adopt a precautionary approach to use and management of coastal resources potentially vulnerable to effects from climate change, so that: (a) avoidable social and economic loss and harm to communities does not occur; (b) natural adjustments for coastal processes, natural defences, ecosystems, habitat and species are allowed to occur; and (c) the natural character, public access, amenity and other values of the coastal environment meet the needs of future generations
Policy 11	To protect indigenous biological diversity in the coastal environment: (a) avoid adverse effects of activities on: (i) indigenous taxa4 that are listed as threatened or at risk in the New Zealand Threat Classification System lists; (ii) taxa that are listed by the International Union for Conservation of Nature and Natural Resources as threatened;

	(iii) indigenous ecosystems and vegetation types that are threatened in the coastal environment, or are naturally rare; (iv) habitats of indigenous species where the species are at the limit of their natural range, or are naturally rare; (v) areas containing nationally significant examples of indigenous community types; and (vi) areas set aside for full or partial protection of indigenous biological diversity under other legislation; and (b) avoid significant adverse effects and avoid, remedy or mitigate other adverse effects of activities on: (i) areas of predominantly indigenous vegetation in the coastal environment; (ii) habitats in the coastal environment that are important during the vulnerable life stages of indigenous species; (iii) indigenous ecosystems and habitats that are only found in the coastal environment and are particularly vulnerable to modification, including estuaries, lagoons, coastal wetlands, dunelands, intertidal zones, rocky reef systems, eelgrass and saltmarsh; (iv) habitats of indigenous species in the coastal environment that are important for recreational, commercial, traditional or cultural purposes; (v) habitats, including areas and routes, important to migratory species; and (vi) ecological corridors, and areas important for linking or maintaining biological values identified under this policy
Policy 13	(1) To preserve the natural character of the coastal environment and to protect it from inappropriate subdivision, use, and development: (a) avoid adverse effects of activities on natural character in areas of the coastal environment with outstanding natural character; and (b) avoid significant adverse effects and avoid, remedy or mitigate other adverse effects of activities on natural character in all other areas of the coastal environment; including by: (c) assessing the natural character of the coastal environment of the region or district, by mapping or otherwise identifying at least areas of high natural character; and (d) ensuring that regional policy statements, and plans, identify areas where preserving natural character requires objectives, policies and rules, and include those provisions. (2) Recognise that natural character is not the same as natural features and landscapes or amenity values and may include matters such as: (a) natural elements, processes and patterns; (b) biophysical, ecological, geological and geomorphological aspects; (c) natural landforms such as headlands, peninsulas, cliffs, dunes, wetlands, reefs, freshwater springs and surf breaks; (d) the natural movement of water and sediment;

	(e) the natural darkness of the night sky; (f) places or areas that are wild or scenic; (g) a range of natural character from pristine to modified; and (h) experiential attributes, including the sounds and smell of the sea; and their context or setting
Policy 15	To protect the natural features and natural landscapes (including seascapes) of the coastal environment from inappropriate subdivision, use, and development: (a) avoid adverse effects of activities on outstanding natural features and outstanding natural landscapes in the coastal environment; and (b) avoid significant adverse effects and avoid, remedy, or mitigate other adverse effects of activities on other natural features and natural landscapes in the coastal environment; including by: (c) identifying and assessing the natural features and natural landscapes of the coastal environment of the region or district, at minimum by land typing, soil characterisation and landscape characterisation and having regard to: (i) natural science factors, including geological, topographical, ecological and dynamic components; (ii) the presence of water including in seas, lakes, rivers and streams; (iii) legibility or expressiveness—how obviously the feature or landscape demonstrates its formative processes; (iv) aesthetic values including memorability and naturalness; (v) vegetation (native and exotic); (vi) transient values, including presence of wildlife or other values at certain times of the day or year; (vii) whether the values are shared and recognised; (viii) cultural and spiritual values for tangata whenua, identified by working, as far as practicable, in accordance with tikanga Māori; including their expression as cultural landscapes and features; (ix) historical and heritage associations; and (x) wild or scenic values; (d) ensuring that regional policy statements, and plans, map or otherwise identify areas where the protection of natural features and natural landscapes requires objectives, policies and rules; and (e) including the objectives, policies and rules required by (d) in plans
Policy 22	(1) Assess and monitor sedimentation levels and impacts on the coastal environment. (2) Require that subdivision, use, or development will not result in a significant increase in sedimentation in the coastal marine area, or other coastal water.

	(3) Control the impacts of vegetation removal on sedimentation including the impacts of harvesting plantation forestry. (4) Reduce sediment loadings in runoff and in stormwater systems through controls on land use activities.
Policy 23	(1) In managing discharges to water in the coastal environment, have particular regard to: (a) the sensitivity of the receiving environment; (b) the nature of the contaminants to be discharged, the particular concentration of contaminants needed to achieve the required water quality in the receiving environment, and the risks if that concentration of contaminants is exceeded; and (c) the capacity of the receiving environment to assimilate the contaminants; and: (d) avoid significant adverse effects on ecosystems and habitats after reasonable mixing; (e) use the smallest mixing zone necessary to achieve the required water quality in the receiving environment; and (f) minimise adverse effects on the life-supporting capacity of water within a mixing zone. (2) In managing discharge of human sewage, do not allow: (a) discharge of human sewage directly to water in the coastal environment without treatment; and (b) the discharge of treated human sewage to water in the coastal environment, unless: (i) there has been adequate consideration of alternative methods, sites and routes for undertaking the discharge; and (ii) informed by an understanding of tangata whenua values and the effects on them. (3) Objectives, policies and rules in plans which provide for the discharge of treated human sewage into waters of the coastal environment must have been subject to early and meaningful consultation with tangata whenua. (4) In managing discharges of stormwater take steps to avoid adverse effects of stormwater discharge to water in the coastal environment, on a catchment by catchment basis, by: (a) avoiding where practicable and otherwise remedying cross contamination of sewage and stormwater systems; (b) reducing contaminant and sediment loadings in stormwater at source, through contaminant treatment and by controls on land use activities; (c) promoting integrated management of catchments and stormwater networks; and (d) promoting design options that reduce flows to stormwater reticulation systems at source. (5) In managing discharges from ports and other marine facilities: (a) require operators of ports and other marine facilities to take all practicable steps to avoid contamination of coastal waters, substrate, ecosystems and habitats that is more than minor;

	(b) require that the disturbance or relocation of contaminated seabed material, other than by the movement of vessels, and the dumping or storage of dredged material does not result in significant adverse effects on water quality or the seabed, substrate, ecosystems or habitats; (c) require operators of ports, marinas and other relevant marine facilities to provide for the collection of sewage and waste from vessels, and for residues from vessel maintenance to be safely contained and disposed of; and (d) consider the need for facilities for the collection of sewage and other wastes for recreational and commercial boating

One Plan – Regional Policy Statement – Relevant Objectives and Policies	
CE-CMA-O2: Appropriate protection, use and development in the CMA	Managing the CMA as a public area that is fundamental to the social, economic and cultural wellbeing of the people in the Region, while ensuring that the characteristics and Values listed in Tables 49, 50 and 51 of RCP-SCHED9 and natural character are protected from inappropriate use and development.
CE-CMA-O3: Water quality	*Water** quality in the CMA is managed in a manner that has regard to the Values set out in RCP-SCHED9: Part C so that: 1. *water** quality is maintained in those parts of the CMA where the existing *water** quality is sufficient to support the *water** management Values of the relevant area in the CMA set out in Tables 50 and 51 and the *water** quality targets in Tables 52 to 55 of RCP-SCHED9, and 2. *water** quality is enhanced in those parts of the CMA where the existing *water** quality is not sufficient to support the *water** management Values of the relevant area in the CMA set out in Tables 50 and 51 and the *water** quality targets in Tables 52 to 55 of RCP-SCHED9.
CE-CMA-P2: Zones	Activities in the CMA must be managed using Zones. The Zones comprise: 1. a Port Zone for the purposes of enabling the efficient and practical *operation** of Whanganui Port and associated industries and boating facilities, as shown in RCP-SCHED9: Part B, by providing for activities which:

	a. facilitate the *operation** of the Whanganui Port and marina, including restricting public access where it is necessary for safety reasons b. involve maintenance dredging and associated disposal to maintain a navigational depth c. involve the *maintenance**, *upgrade** or extension of existing *structures**. 2. various Protection Zones for the purposes of protecting the ecological and other important characteristics within each specified Zone (as shown in Table 49 of RCP-SCHED9: Part B). These Zones are sensitive and must be protected from adverse *effects** of activities other than activities which: a. appropriately enable or restrict public access, or b. are essential for public safety, or c. are intended to restore or conserve a *site** or characteristics within a *site**, or d. have no more than minor adverse environmental *effects** on the characteristics to be protected in each Protection Zone. 3. a General Zone for the purposes of managing activities in all areas other than areas covered by the Port Zone and Protection Zones. The purpose of the General Zone is to ensure that adverse *effects** are avoided as far as reasonably practicable and, where they cannot be avoided, are remedied or mitigated.
CE-CMA-P4: Appropriate use and development	Any use or development in the CMA must: 1. have a *functional necessity* to be located in the CMA, 2. facilitate restoration or rehabilitation of natural features where reasonably practicable, and 3. avoid, as far as reasonably practicable, any adverse *effects** on the following important values: a. any characteristic listed in Table 49 in RCP-SCHED9: Part B for each Protection Zone b. elements and processes that contribute to the natural character and open space characteristics of the CMA c. the landscape and seascape elements that contribute to the natural character of the CMA

	d. areas of significant indigenous vegetation and significant habitats of indigenous fauna, and the maintenance of indigenous *biological diversity*^ e. the intrinsic values of ecosystems f. the natural integrity and functioning of physical processes (including recognition of *sea level rise**) g. *historic heritage**. When avoidance is not reasonably practicable, the adverse *effects** must be remedied or mitigated.
CE-CMA-P5: Public Access	1. Activities in the CMA must be established and operated in a manner which readily provides for public access. Public access must be restricted only where necessary for commercial, safety, cultural or conservation purposes, or to ensure a level of security appropriate for activities authorised by a *resource consent*^. 2. Public access in the CMA for recreational purposes must be provided in a manner that protects bird habitat areas, estuarine plant communities and dune stability.
CE-CMA-P6: Water Quality	For the purposes of maintaining or enhancing *water** quality, the CMA is divided into a *Seawater Management Area** and various Estuary *Water Management Sub-areas** which are described in RCP-SCHED9: Part C and shown in Part A. *Water** in the CMA must be managed in a way which: 1. has regard to the Values and *water** quality targets for the *Seawater Management Area** and Estuary *Water Management Sub-areas**, as set out in RCP-SCHED9: Part C 2. applies Policies RPS-LF-FW-P6 (ongoing compliance where *water** quality targets are met), RPS-LF-FW-P7 (enhancement where *water** quality targets are not met), RPS-LF-FW-P12 (point source *discharges** to *water**) and RPS-LF-FW-P14 (*sewage** *discharges**) to the CMA as if any reference to *water** in those policies is a reference to *water** in the CMA.
NFL-O1: Outstanding natural features and landscapes and natural character	1. The characteristics and values of: a. the Region's outstanding natural features and landscapes, including those identified in RPS-SCHED7, and b. the natural character of the coastal *environment**, *wetlands**, *rivers** and *lakes** and their margins are protected from inappropriate *subdivision**, use and development.

	2. Adverse *effects**, including cumulative adverse *effects**, on the natural character of the coastal *environment**, *wetlands**, *rivers** and *lakes** and their margins, are: a. avoided in areas with outstanding natural character, and b. avoided where they would significantly diminish the attributes and qualities of areas that have high natural character, and c. avoided, remedied or mitigated in other areas. 3. Promote the rehabilitation or restoration of the natural character of the coastal *environment**, *wetlands**, *rivers** and *lakes** and their margins.
NFL-P1: Regionally outstanding natural features and landscapes	The natural features and landscapes listed in RPS-SCHED7 Table 48 must be recognised as regionally outstanding and must be spatially defined in the review and development of district plans. All *subdivision**, use and development directly affecting these areas must be managed in a manner which: 1. avoids significant adverse cumulative *effects** on the characteristics and values of those outstanding natural features and landscapes, and 2. except as required under (1), avoids adverse *effects** as far as reasonably practicable and, where avoidance is not reasonably practicable, remedies or mitigates adverse *effects** on the characteristics and values of those outstanding natural features and landscapes.
NFL: P2: Assessing outstanding natural features and landscapes	The Regional Council and *Territorial Authorities** must take into account but not be limited to the criteria in Table 8 when: 1. identifying outstanding natural features and landscapes, and consider whether the natural feature or landscape is conspicuous, eminent, remarkable or otherwise outstanding, and 2. considering adding to, deleting from, or otherwise altering, redefining or modifying the list of outstanding natural features or landscapes listed in Table 48 of RPS-SCHED7, or 3. considering the inclusion of outstanding natural features or landscapes into any *district plan*^, or 4. establishing the relevant values to be considered when assessing *effects** of an activity on: a. outstanding natural features and landscapes listed in Table 48 of RPS-SCHED7, or b. any other outstanding natural feature or landscape. Table 8 Natural Feature and Landscape Assessment Factors

Assessment factor	Scope
1. Natural science factors	These factors relate to the geological, ecological, topographical and natural process components of the natural feature or landscape: 1. Representative: the combination of natural components that form the feature or landscape strongly typifies the character of an area. 2. Research and education: all or parts of the feature or landscape are important for natural science research and education. 3. Rarity: the feature or landscape is unique or rare within the district or Region, and few comparable examples exist. 4. Ecosystem functioning: the presence of healthy ecosystems is clearly evident in the feature or landscape.
2. Aesthetic values	The aesthetic values of a feature or landscape may be associated with: 1. Coherence: the patterns of *land** cover and *land** use are largely in harmony with the underlying natural pattern of landform and there are no, or few, discordant elements of *land** cover or *land** use. 2. Vividness: the feature or landscape is visually striking, widely recognised within the local and wider community, and may be regarded as iconic. 3. Naturalness: the feature or landscape appears largely unmodified by human activity and the patterns of landform and *land** cover are an expression of natural processes and intact healthy ecosystems. 4. Memorability: the natural feature or landscape makes such an impact on the senses that it becomes unforgettable.
3. Expressiveness (legibility)	The feature or landscape clearly shows the formative natural processes or historic influences that led to its existing character.

	4. Transient values	The consistent and noticeable occurrence of transient natural events, such as daily or seasonal changes in weather, vegetation or wildlife movement, contributes to the character of the feature or landscape.
	5. Shared and recognised values	The feature or landscape is widely known and is highly valued for its contribution to local identity within its immediate and wider community.
	6. Cultural and spiritual values for *tangata whenua*^	Māori values inherent in the feature or landscape add to the feature or landscape being recognised as a special place.
	7. Historic Heritage values	Knowledge of historic events that occurred in and around the feature or landscape is widely held and substantially influences and adds to the value the community attaches to the natural feature or landscape. Heritage features, *sites** or *structures** that are present and add to the enjoyment and understanding of the feature or landscape.
ECO-O1: Indigenous biodiversity	Protect areas of significant indigenous vegetation and significant habitats of indigenous fauna and maintain indigenous *biological diversity*^, including enhancement where appropriate.	

One Plan – Regional Coastal Plan – Relevant Objectives and Policies	
CMA-O1: Activities in the CMA	The regulation of activities in the CMA in a manner that enables or restricts activities within the Port, Protection, or General Zones or Aquaculture Precincts, in a way that reflects the Table 49 characteristics of the Zones.
CMA-O2: Water quality in the CMA	*Water** quality in the CMA is managed in a manner that sustains its life-supporting capacity and has regard to the Values, management objectives and the *water** quality targets set out in RCP-SCHED9: Part C.
CMA-MTU-P8: Consent decision making for activities involving disturbance,	When making decisions on *resource consent*^ applications and setting consent *conditions*^ for activities involving the disturbance of the *foreshore*^ or seabed, the deposition of substances in, on or under the *foreshore*^ or seabed, or the removal of any sand, shell, shingle or other natural materials from the CMA, the Regional Council must have regard to: 1. the Regional Policy Statement, particularly all the objectives and policies of RPS-RMIA and RPS-CE, RPS-EIT-O1 and RPS-EIT-P1, RPS-EIT-P2, RPS-EIT-P3, RPS-EIT-P4 and RPS-EIT-P5, RPS-NATC-O1 and RPS-HCV-O1, RPS-NFL-

removal or deposition	P1 and RPS-HCV-P1, RPS-HAZ-O2 and RPS-HAZ-NH-P11 to RPS-HAZ-NH-P13 and any relevant policies in the NZCPS; 2. the applicable *Water Management Area** or *Sub-area** and the relevant *water** quality Values and targets in RCP-SCHED9; 3. avoiding any restrictions on public access, other than for commercial, safety, cultural or conservation purposes, or to ensure a level of security appropriate for activities authorised by a *resource consent*^, and any adverse *effects** on natural character and any known and publicly used shellfish *beds*; 4. any *effects** on any feeding, breeding, spawning, nesting or roosting areas; 5. avoiding as far as reasonably practicable, any resultant adverse *effects*^ on coastal erosion, the risk of inundation, the stability of banks or *foreshore*^, or flood control *structures**; 6. avoiding any adverse *effects** on *tikanga Māori*^ or on *historic heritage**, and avoiding, remedying or mitigating any adverse *effects*^ on any characteristic identified within any Protection Zone set out in Table 49; 7. mitigating any adverse *effects** on recreational and *amenity values*^; 8. ensuring, where non-marine material is being deposited within the CMA, that it is does not contain any *hazardous substances** or commercial or household *wastes**; and 9. where the removal of sand, shingle, shell or other natural materials is for commercial purposes, the available alternatives to the applicant's proposal and the applicant's reason for making the proposed choice.
CMA-DISCH-P11: Consent decision making for discharges into the CMA	When making decisions on *resource consent*^ applications and setting consent *conditions*^ for *discharges** into the CMA, the Regional Council must have regard to: 1. the Regional Policy Statement, particularly all the objectives and policies of RPS-RMIA RPS-CE, RPS-EIT-O1 and RPS-EIT-P1, RPS-EIT-P2, RPS-EIT-P3, RPS-EIT-P4 and RPS-EIT-P5, RPS-NATC-O1 and RPS-NFL-P1, RPS-HAZ-O2 and RPS-HAZ-NH-P11 to RPS-HAZ-NH-P13 and any relevant policies in the NZCPS;

	2. the applicable *Water Management Area** or *Sub-area** and the relevant *water** quality Values and targets in RCP-SCHED9; 3. restricting the use of *hazardous substances** in any estuary or *river** (including stream) in the CMA to those necessary to control pest plants or marine fauna identified pursuant to a pest management strategy prepared under the Biosecurity Act 1993; 4. *tikanga Māori^*, *amenity values^*, recreational values and public health and safety, and ensuring any adverse *effects** are avoided as far as reasonably practicable. Where avoidance is not reasonably practicable, the adverse *effects** must be remedied or mitigated; and 5. ensuring that any *discharge**, after *reasonable mixing*, must not result in: a. the production of any conspicuous *oil** or grease films, scums or foams; b. floatable or suspended materials; c. any conspicuous change in the colour or visual clarity of *water** in the *coastal marine area^*; or d. any emission of objectionable odour, or any significant adverse *effects** on aquatic life.

One Plan – Schedule 7 – Regionally Outstanding Natural Features and Landscapes	
Outstanding Natural Features or Landscapes	**Characteristics / Values**
1. Parts of the Coastline of the Region, particularly the Ākitio Shore Platform, Castlecliff to Nukumaru coastal cliffs, Foxtangi Dunes, Hokio Beach South Dune Fields and Santoft parabolic dunes	a. Visual and scenic characteristics, particularly its special coastal landscape features b. Coastal geological processes c. Ecological value, particularly the Whanganui, Whangaehu, Turakina, Rangitīkei, Ākitio, Ōhau, Waikawa and Manawatū River estuaries as habitats for indigenous fauna d. Recreational value e. Significance to tangata whenua f. Scientific and educational values g. *Historic heritage**, in particular historical importance, archaeological sites and high potential for archaeological site discovery.

horizons
REGIONAL COUNCIL

<table>
<tr><th colspan="2">One Plan – Schedule 9 – Coastal Marine Area Activities and Water Management</th></tr>
<tr><td>Part B: Zones</td><td>This Plan includes three different Zones being the Port, Protection and General Zones. These Zones delineate discrete areas of the CMA within which different presumptions apply regarding the protection, use and development of the foreshore^ and seabed.

The General Zone is not mapped. It comprises the entire CMA except those parts of the CMA covered by the Port Zone and the various Protection Zones. In the Whanganui River, the General Zone includes part of the CMA comprising a band of 100 m from the line of MHWS of the northern bank of the River, as well as a band of 50 m from the edge of the Port Zone and includes the river* entrance between the South Mole and the North Mole and northern river* bank as shown in Figure 37.</td></tr>
<tr><td>Table 50: Seawater Management Area and Estuary Water Management Sub-areas: Values and Management Objectives</td><td>The following Values and Management Objectives apply in the Seawater Management Area* and Estuary Water Management Sub-areas* listed in Table 51.

<table>
<tr><th>Value group</th><th colspan="2">Values</th><th>Management Objective</th></tr>
<tr><td rowspan="4">Ecosystem Values</td><td>LSC</td><td>Life-supporting Capacity</td><td>The CMA supports healthy aquatic life / ecosystems.</td></tr>
<tr><td>SOS-A</td><td>Sites of Significance - Aquatic</td><td>Sites of significance for indigenous aquatic biodiversity within the CMA are maintained or enhanced.</td></tr>
<tr><td>SOS-R</td><td>Sites of Significance - Riparian</td><td>Sites of significance for indigenous riparian biodiversity within the CMA are maintained or enhanced.</td></tr>
<tr><td>IS</td><td>Inanga Spawning</td><td>The CMA sustains healthy inanga spawning and egg development.</td></tr>
</table>
</td></tr>
</table>

	WM	*Whitebait** Migration	The CMA is maintained or enhanced to provide safe passage of inwardly migrating juvenile native fish known collectively as *whitebait**.
Recreational and Cultural Values	CR	Contact Recreation	The CMA is suitable for contact recreation.
	Am	Amenity	The amenity values of the CMA are maintained or enhanced.
	Mau	*Mauri**	The *mauri** of the CMA is maintained or enhanced.
	SG	Shellfish Gathering	The CMA is suitable for shellfish harvesting.
	SOS-C	Sites of Significance - Cultural	Sites of significance for cultural values are maintained.
*Water** Use	IA	Industrial Abstraction	The CMA is suitable as a *water** source for industrial abstraction or use.
Social and Economic Values	CAP	Capacity to Assimilate Pollution	The capacity of the CMA to assimilate pollution is not exceeded.
	EI	Existing *Infrastructure^*	The integrity of existing *infrastructure^* is not compromised.