MIKE MOORE
BSc, Dip LA, MRRP, ANZILA
LANDSCAPE ARCHITECT

To Lacey Bragg
Consents Manager
Environment Southland

From Mike Moore

Date 7 November 2025

Subject Proposed Hananui Aquaculture Project, Natural Character, Landscape and Visual assessment - Peer Review Report

Introduction

Ngāi Tahu Seafood Ltd have applied for resource consent for the staged construction and operation of a salmon farm, known as the Hananui Aquaculture Project (HAP). The application for referral of this project under the Fast-track Approvals Act 2024 has been accepted. The application is supported by a Natural character, Landscape and Visual Assessment report by Isthmus Group Ltd dated November 2025 (the Isthmus report).

This report has been commissioned by Environment Southland (ES) to provide a peer review of the Isthmus report. The brief for the review is as follows:

The Peer Review of the Assessment should address the following matters:

a) *The robustness and relevance of the methodology of the Assessment; including how the assessment integrates mana whenua perspectives on landscape and seascape;*
b) *Whether the existing environment has been accurately described and relevant attributes and values have been identified;*
c) *Whether the project has been accurately described and illustrated;*
d) *Whether the assessment has considered all relevant matters and effects that would be considered appropriate for an open ocean aquaculture project within the location, with a particular focus on landscape and seascape character and assessment, any relevant*

outstanding natural landscape matters (s.6b), natural character of the coastal environment matters (s.6a), amenity matters (s.7c), Te ao Māori and cultural matters (s.6e) and any other specific Regional or District matters;

e) *Whether the conclusions of the Assessment are relevant and are supported by the assessment work undertaken;*
f) *The robustness and relevance of the methodology for the production of the graphic materials (including the visual simulations) which support the Assessment;*
g) *The accuracy and supportability of the findings of the Assessment;*
h) *Any key landscape recommendations.*

In undertaking this review, I have:

- Read and considered the Isthmus report, including two iterations responding to initial comments.
- Reviewed the technical assessment report summaries underpinning the Isthmus report.
- Undertaken a one-day site visit via boat from Bluff on 1 October 2025. This was in the company of Brad Coombs (Isthmus), Thomas Hildebrand (Ngai Tahu Seafoods Ltd), and Lacey Bragg (Environment Southland). The trip included viewing existing salmon farms in Big Glory Bay, Rakiura. Land-based viewpoints have not been visited. Sea conditions were relatively rough with a strong westerly wind but visibility was good.
- Reviewed the decision report of the Expert Consenting Panel of the previous application for consents for a similar activity under the Fast Track Consenting Act 2020, dated 1 August 2023.

As outlined in Te Tangi a te Manu, the purpose of a peer review is an appraisal of the assessment, not a parallel assessment. This peer review report addresses the matters identified in the brief as follows:

The robustness and relevance of the methodology of the Assessment; including how the assessment integrates mana whenua perspectives on landscape and seascape;

General

The Isthmus Report contains a method statement in paragraphs 7 - 17. In paragraph 14 the report states that the method used is consistent with the methodology (principles and approaches) set out in Te Tangi a te Manu Aotearoa New Zealand Landscape Assessment Guidelines[1] (TTatM). I understand TTatM to represent current best practice in Aoteroa New Zealand landscape and natural character assessment, and I consider that the Isthmus report has been prepared in consistency with it.

Integration of mana whenua perspectives on landscape and seascape

I note that the overview memorandum jointly prepared by Ailsa Cain (Kauati) and Brad Coombs (Isthmus) makes it clear that the western and Mātauranga Māori perspectives work alongside each other and have different purposes. They do not misappropriate, isolate, assimilate, or validate points raised in the other. They intersect at ‘appropriateness’ and ‘effects’.

The Isthmus report acknowledges Āpiti Hono Tātai Hono: Ngā Whenua o Ngāi Tahu ki Murihiku (ĀHTH), the cultural landscape method prepared and followed by Ngāi Tahu ki Murihiku, and the method of understanding Murihiku in relation to Ira Atua and Ira Tangata, or layers of Whakapapa. Some relevant ‘creation’ and ‘people’ stories are briefly noted (paragraphs 46 – 54 and 157) to assist in understanding ‘relationships between commonly understood places, names and events’. I consider that this is appropriate.

[1] Te Tangi a te Manu: Aotearoa New Zealand Landscape Assessment Guidelines, Tuia Pito Ora New Zealand Institute of Landscape Architects, July 2022.

Whether the existing environment has been accurately described and relevant attributes and values have been identified;

Description

The Isthmus report provides a comprehensive description of the site, organized under the sub-headings of context, catchment, and site, in paragraphs 18 – 82. The coastal landscape is considered as interconnected sea and land.

The relevant wider coastal environment / landscape context is described as the marine environment of Te Ara a Kiwa (Foveaux Strait) framed by Rakiura (Stewart Island) to the south, Ruapuke and the Tītī (Muttonbird) Islands to the east, and the south end of Te Waipounamu (South Island) to the north.

The more specific relevant coastal environment / landscape context (described as 'catchment' in the Isthmus report) is described as the area focused on the north coast of Rakiura, encompassing the concave shaped coastline from Saddle Point to Potirepo / Port William (Pānui-o-Hau), the adjacent Coastal Marine Area (CMA), and defined inland by the Anglem massif.

The site is the identified L-shaped 1,285 ha occupation area within the CMA defined in the application.

I consider it useful to discuss the receiving environment / landscape at various scales and note that the broader context discussed appears to accord well with the context outlined in ĀHTH. I consider too, that addressing the coastal landscape holistically is consistent with best practice[2] and also fits with the approach expressed in ĀHTH.

In my review, the most relevant scale for the assessment to focus on is that of the catchment. My reasons are that the HAP site is located close to and within the shelter afforded by Rakiura, is visible as part of the surrounding waters from the land, and from the sea in this area Rakiura is a dominant presence. In this respect I agree with the Isthmus report in paragraphs 117 and 152 where it discusses the catchment scale as

[2] Te Tangi a te Manu para9.17

being the most relevant for the consideration of natural character and landscape values and effects of the proposal.

With regard to the context, catchment, and site descriptions, I consider that the Isthmus report is appropriately comprehensive and accurate.

Relevant attributes and values – Natural Character

In accordance with current best practice, the Isthmus report addresses the natural character attributes in terms of biotic, abiotic and experiential factors. Its commentary is organized in terms of the three receiving environment scales (context, catchment and site).

I am in general agreement with the natural character attributes and values identified. With regard to the commentary on the site 'catchment' I consider that the following additional matters are relevant:

Abiotic values

- The minimal presence of permanent built elements and lack of constraints of structures / human modification on natural coastal processes, resulting in largely natural seabed and coastal landforms.
- An essentially unmodified terrestrial environment with natural landforms.

Biotic values

- The heightened biotic values on the coastal edge include the presence of rocky reef environments / kelp forests[3].

Experiential values

- The area is overwhelmingly natural with minimal human / built elements either on land or at sea. The transient presence of boats / shipping within the CMA modifies this to a small extent.

[3] Mentioned under 'abiotic attributes' in the Isthmus report

- This naturalness / lack of modification contributes to qualities of wilderness remoteness (again, modified to an extent by the transient presence of boats / shipping).
- High natural darkness of the night sky values.

Relevant attributes and values – Landscape

In accordance with current best practice, the Isthmus report addresses the landscape attributes in terms of physical, perceptual and associative aspects. Its commentary is organized in terms of the Te Ara a Kiwa (context) and site catchment receiving environment scales.

I am in general agreement with the landscape attributes and values identified but consider that the following additional matters are relevant:

Physical aspects

- Largely unmodified terrestrial and marine environments with natural coastline and minimal built elements.
- High marine and terrestrial biodiversity / ecological values including habitat for endangered / at risk species.

Perceptual aspects

- The area is overwhelmingly natural with minimal human / built elements either on land or at sea. The transient presence of boats / shipping within the CMA modifies this to a small extent.
- This naturalness / lack of modification provides for qualities of wilderness / remoteness (again, modified to a small extent by the transient presence of boats / shipping)
- High aesthetic natural shoreline values.
- High natural darkness of the night sky values.
- Possibility of encounters with terrestrial or marine wildlife.
- High transient values associated with weather and sea states.

Associative aspects

- (as expressed in the Isthmus report) the area has high natural environment / wilderness values but is also adjacent to an important shipping route and an important fishery. It is also an area of cultural significance to Ngai Tahu ki Murihiku including a strong contemporary relationship with kaitiakitanga, management and harvesting of kaimoana from Te Ara a Kiwa.
- There are also wider associative factors related to early European history in this area as a venue for sealing, whaling, early settlement etc.

Whether the project has been accurately described and illustrated;

Paragraphs 168 – 176 with accompanying figures describe the proposed salmon farms and the graphic attachment includes photo-simulations from representative viewpoints. I consider that the project has been accurately described and illustrated.

Whether the assessment has considered all relevant matters and effects that would be considered appropriate for an open ocean aquaculture project within the location, with a particular focus on landscape and seascape character and assessment, any relevant outstanding natural landscape matters (s.6b), natural character of the coastal environment matters (s.6a), amenity matters (s.7c), Te ao Māori and cultural matters (s.6e) and any other specific Regional or District matters;

I consider that the Isthmus report is comprehensive and considers the relevant matters.

Whether the conclusions of the Assessment are relevant and are supported by the assessment work undertaken;

The Isthmus report conclusions are outlined in paragraphs 383 – 397. I copy these below and provide comment.

Conclusion

The HAP site has been located, sized and shaped to avoid any elevated seafloor biogenic habitat in the area and is off-set from the Rakiura Northern coastline to provide a meaningful buffer from the outstanding terrestrial landscape values.

Comment

According to the maps[4] the HAP site appears to largely avoid elevated seafloor biogenic habitat.

Rakiura adjacent to the HAP site is identified in the Southland District Plan (SDP) as an Outstanding Natural Landscape (ONL) and it is also part of Rakiura National Park. A review of the relevant SDP and Rakiura National Park Management Plan provisions, along with the relevant section in the Stewart Island / Rakiura Landscape and Coastal Natural Character Study (SRLCNCS)[5] indicates that key terrestrial landscape values underpinning ONL status relate to naturalness, remoteness, and wilderness qualities.

I consider that introducing essentially permanent structures and associated human activity to the CMA off the coast of the ONL, the HAP will reduce existing qualities of naturalness, remoteness and wilderness in the wider landscape. I consider, however, that these values are already moderated by existing shipping / boating presence to an extent. The offset of the proposed HAP from the Rakiura coast will be an effective measure for mitigation of adverse visual effects on natural landscape qualities from the land and I agree with the visual effects ratings in the Isthmus report in this respect.

Terrestrial physical landscape values include habitat for indigenous bird species which utilize both the marine and terrestrial environments e.g. penguins and shags. The proposed separation is likely to provide a degree of mitigation of adverse effects on these as well.

[4] E,g. Figure 3, Isthmus report
[5] Boffa Miskell, 2019, Stewart Island / Rakiura Landscape and Coastal Natural Character Study, Environment Southland.

Conclusion

The HAP is located outside of the boundary lines of any outstanding natural landscape and natural character values that have been identified in recent technical reports.

Comment

The relevant reports are the Stewart Island / Rakiura Landscape and Coastal Natural Character Study 2019[6] (SRLCNCS) and the Southland / Murihiku Regional Coastal Environment Study – Coastal Natural Character Assessment 2019[7] (SMRCES). Neither study has yet been the basis of any draft or proposed plan change but they are in the public record and are relevant to consider, albeit with limited weight ascribed.

In the SRLCNCS the HAP site is mapped as having very high natural character and within an area of outstanding natural character (ONC). As regards landscape values, it is beyond the area of ONL identified extending 2km off the shoreline.

In the latest iteration of the SMRCES, the ONC has been reduced in distance from the coast, and the HAP is beyond this.

The ONC mapping in the two studies is inconsistent and it is my understanding that the SMRCES mapping is the most recent. Appendix 3 in that report addresses the refinement in the areas mapped, which largely relates to consideration of additional data relating to 'fishing effort'.

Conclusion

The HAP is in a location that is part of a comparatively well used area of Te Ara a Kiwa on the Northwest coastline of Rakiura.

[6] Boffa Miskell, 2019. Stewart Island / Rakiura Landscape and Coastal Natural Character Study, Environment Southland
[7] Boffa Miskell, 2029, Southland / Murihiku Regional Coastal Environment Study – Coastal Natural Character Assessment, Environment Southland

Comment

Isthmus report Figure 17 illustrates vessel movement data for cargo, fishing, passenger and pleasure vessels. These maps show that the HAP location is not within or adjacent to the most active alignments in the wider Te Ara a Kiwa / Foveaux Strait context. They show, however, that there is usage of the area by vessels, including cargo vessels.

More broadly, the Te Ara a Kiwa waters to the northeast side of Rakiura (including the HAP site) are a shipping lane associated with Southport, Bluff and there is also considerable boat traffic between Bluff and Oban (and other Rakiura destinations such as Big Glory Bay). In the context of the Rakiura coastal waters as a whole, the relatively more sheltered waters to the northeast of the island and the proximity of this area to Bluff and Oban make this area busier in terms of boat movements and fishing activities than other coastal areas.

Conclusion

While the seascape of the HAP site is relatively featureless, the landscape setting of Te Ara a Kiwa is broad and accommodating of the various commercial and cargo vessel activities that are associated with Bluff port.

Comment

I agree with this statement. I presume its relevance is that the wider landscape context of the site has high natural character and landscape values that are only modestly impacted by existing human elements and activity, due partly, to its expansive scale.

Conclusion

The context and the HAP is described and assessed at three scales – Te Ara Kiwa, the Site catchment and the HAP site. The appropriate scale for the assessment of landscape, natural character and visual effects is at the site catchment scale.

Comment

I consider that it is useful to contextualise the proposed project at the larger Te Ara a Kiwa / Foveaux Strait scale as the Isthmus report has done and agree that the most relevant spatial scale for assessing the natural character and landscape effects of this project is the 'catchment' scale (as described in the report). The reasons for this are:

- The site is close to, and related to, the north coast of Rakiura, being sited to take advantage of the shelter the land provides. Land and sea are strongly related experientially at this distance offshore.
- Saddle Point to Port William / Potirepo headland) is a spatial unit that can be differentiated from the coast to either side due to its gentle concave form, its aspect, and demarcation by significant headlands.
- The physical and experiential effects of the proposed development less significant with distance.

It is appropriate to describe the site (defined as the occupation area), particularly in terms of benthic habitats, but for the purposes of assessing natural character and landscape values and effects, the site scale has more limited rationale.

Conclusion

The overall effects of the HAP on the natural character values of the site catchment are low-moderate (adverse).

Comment

I agree with this assessment. In my review the natural character values of the relevant receiving environment (catchment) and the effects of the HAP are / will be as outlined in the table below. **Appendix A** contains my outline review and reasons.

	Natural character values	**HAP effects (nature / degree)**
Abiotic	Very high (terrestrial and close to shore) – high (at greater	Adverse / low-moderate

	distance from the shore)	
Biotic	Very high (terrestrial and close to shore) – high (at greater distance from the shore)	Adverse / low
Experiential	Very high	Adverse / low-moderate
Overall	Very high (terrestrial and close to shore) – high (at greater distance from the shore)	Adverse / low-moderate

Conclusion

The overall effects of the HAP on the natural character values of Te Ara a Kiwa are low (adverse).

Comment

Considering Te Ara a Kiwa / Foveaux Strait as a whole, I consider that the Isthmus assessment is fair and possibly overstates effects to an extent. The biophysical footprint of the project is small in relation to the Strait overall and the vigorous marine processes will ensure effects on water quality / benthic habitats etc are well diluted. The physical elements will have minimal visual impact beyond approximately 6km, from the sea surface.

Conclusion

The overall effects of the HAP on the natural character values of the HAP site are low-moderate (adverse).

Comment

I do not consider that the site scale is a particularly meaningful one for natural character effects assessment in this case. However, in close proximity the marine farm's physical effects are greatest and visibility of the structures and activity has greatest impact on experiential values. In my review, effects are more likely to be adverse / moderate than

adverse low-moderate within the site area. In terms of visual / experiential effects the Isthmus report Viewpoint 5 assessment[8] would appear to confirm this.

Conclusion

The overall effects of the HAP on the landscape character of the site catchment are of a low-moderate (adverse).

Comment

I agree with this assessment. In my review the landscape values of the relevant receiving environment (catchment) and the effects of the HAP are / will be as outlined in the table below. **Appendix B** contains my outline review and reasons.

	Natural character values	**HAP effects (nature / degree)**
Physical	Very high	Adverse / low-moderate
Perceptual	Very high	Adverse / low-moderate
Associative	Very high	Adverse / low-moderate
Overall	Very high	Adverse / low-moderate

Conclusion

The overall effects of the HAP on the landscape character of Te Ara a Kiwa are low (adverse).

Comment

Considering Te Ara a Kiwa / Foveaux Strait as a whole, I consider that the Isthmus assessment is fair and possibly overstates effects to an extent. The biophysical footprint of the project is small in relation to the Strait overall and the vigorous marine processes will ensure effects on water quality / benthic habitats etc are well diluted. The HAP physical elements will have minimal visibility beyond approximately 6km, from the sea surface.

[8] Isthmus report para 324)

Conclusion

The overall effects of the HAP on the landscape character of the HAP site are of a moderate (adverse).

Comment

I do not consider that the site scale is a particularly meaningful one for landscape effects assessment in this case. However, in close proximity the marine farm's physical effects are greatest and visibility of the structures and activity has greatest impact on perceptual values. In my review, effects are more likely to be adverse / moderate than adverse low-moderate within the site area.

Conclusion

The overall effects of the HAP on the visual amenity values of Te Ara a Kiwa, the site catchment and the HAP site are of a low to very low order.

Comment

In my review, the visual amenity values associated with the site and its context currently, relate to the open natural character of the seascape in its various moods and with significant transient values associated with the presence / visibility of wildlife.

I consider that the HAP will have adverse effects on these values and that the degree of these effects will be strongly related to viewing distance. Significant viewpoints are land-based ones on the beaches and northwest circuit track on Rakiura nearby. There is also some viewing of the site from the sea with actual viewpoints being much less defined. The most significant sea-based viewing corridor in the wider area is on the Bluff to Oban ferry route. Viewpoints from the air are also relevant.

Considering that significant viewpoints are generally 3km or more distant, I agree with conclusion above.

Conclusion

The HAP will not have adverse effects on any identified outstanding natural feature or landscape values or outstanding natural character values within or close to the coastal edge of Rakiura.

Comment

The HAP location is not within areas identified in statutory or strategic planning documents as areas of ONC or ONL's[9] but ONC and ONL areas are within the receiving environment catchment of the HAP site. Being outside the identified ONC and ONL areas means that there will be no direct physical effects of the HAP on natural character or landscape values. I consider, however, that there will be some indirect experiential natural character and visual effects as perceptions of naturalness / wilderness will be reduced by visibility of HAP elements and activity in the Te Ara a Kiwa waters offshore from the Rakiura coastal edge.

It is my assessment that the degree of these adverse effects will be low-moderate (minor) given the buffer from the identified ONC and ONL areas. I consider that natural character and associated landscape values become less significant (although they are still high) away from the coast given that Te Ara a Kiwa / Foveaux Strait is utilized for shipping and fishing activities.

Conclusion

The HAP can be accommodated into the site and the broader landscape and seascape of Te Ara a Kiwa and is an appropriate activity in this location for the reasons set out above.

Comment

In my review the proposed HAP siting is responsive to the favourable environmental conditions for open water salmon farms. The presence of the HAP in this area would express this in the landscape.

[9] This assumes the SMRCES mapping has superseded the mapping in the SRLCNCS.

The wider context of the site is the more sheltered and settled, and less remote northeast facing coast of Rakiura. The proposed development will extend human modification within this area to an extent. Within the 'catchment' area I consider that there is a gradation from more to less significant natural character and landscape values seaward, given the high natural terrestrial environment values and the use of the Strait for fishing and as a shipping lane. This gradation is a relevant factor in considering the appropriateness of the proposed activity.

In my assessment, whether the HAP is an appropriate activity in this location is a wider question involving consideration of numerous factors. The level of adverse effects (assessed as low-moderate) on natural character and landscape values (assessed as very high / high) within the relevant receiving environment is but one of them.

Conclusion

The HAP will continue and reinforce the ongoing associations that Ngāi Tahu ki Murihiku have with Te Ara a Kiwa and will provide for the broader community of Murihiku and Rakiura.

Comment

This conclusion appears to be consistent with the Ngā Hua o Āpiti Hono Tātai Hono report.

The robustness and relevance of the methodology for the production of the graphic materials (including the visual simulations) which support the Assessment;

I consider that the graphic material supporting the Isthmus report is relevant and robust. The photo-simulations appear to have been prepared in accordance with the NZILA best practice guide for visual simulations (BPG 10.2).

The accuracy and supportability of the findings of the Assessment;

Overall, I consider the assessment accurate and supportable. As noted above there are some areas of relatively minor difference between the Isthmus report and this peer review.

Any key landscape recommendations.

None.

Mike Moore
Registered NZILA Landscape Architect

Appendix A:

Summary Peer Review Assessment – Natural Character

Receiving environment / landscape: 'Catchment' area (as identified in the Isthmus report)

Natural Character Values

Natural character values	Significance rating	Reasons
Abiotic	Very high - high	• Some modification of the seabed by dredging but powerful natural processes (currents, waves) operate unconstrained and provide for high water quality and largely natural seabed morphology. Minimal impact on water quality by land use activities. • An essentially unmodified shoreline with natural processes operating unconstrained creating natural landforms. • An essentially unmodified terrestrial environment with natural landforms and some recognized geopreservation sites. • Shipping uses the area but is transient. Apart from this, and the huts and track on the land there are minimal 'built' elements.
Biotic	Very high - high	• Whilst modified by dredging, the CMA is habitat for Tio / Bluff oysters, paua, numerous fish, shark, and marine mammal species. • The CMA is habitat for numerous seabird species including threatened or at at-risk (hoiho, southern little penguin, Fiordland crested penguin, Tītī / sooty shearwater, Cook's petrel, diving petrel, white fronted tern, Foveaux shag, spotted shag, pied shag, little shag, black shag, and red-billed gull). • The coastline and beaches provide important habitat for birds including endangered yellow-eyed penguin / hoiho.

		• Whilst modified by pest species, terrestrial habitats are predominantly in their natural state and include (now rare) unbroken sequences from the tops of the Anglem massif to the coast.
Experiential	Very high	• The area is overwhelmingly natural with minimal human / built elements either on land or at sea. The transient presence of boats / shipping within the CMA modifies this to a small extent. • This naturalness / lack of modification provides for qualities of wilderness / remoteness (again, modified to a small extent by the transient presence of boats / shipping) • High natural darkness of the night sky values. • Possibility of encounters with terrestrial or marine wildlife.
Overall	Very high (Terrestrial and inshore) High (off-shore)	• The CMA is used for fishing and as a shipping route and the seabed and its benthic biota is modified. The SMRCES recognizes a transition from outstanding natural character in-shore to high natural character further offshore. This is supportable.

Natural Character Effects

Natural character values	Effect – nature / degree	Reasons
Abiotic	Adverse / low-moderate	• Introduction of essentially permanent built elements of significant scale and over a wide area on the seabed, within the water column and on the surface within an area already modified to a degree by fishing effects on the seabed and the transient presence of shipping • Water quality effects likely to be low due to the high energy / strong current environment. • Infrastructure can be removed (but the timeframe is significant). • Minimal impact on natural marine processes. • No impact on coastal landforms or terrestrial environments.
Biotic	Adverse / low	• Effects on fish (displacement) will be minor. • Effects on seafloor organisms due to deposition of organic material will be mitigated by the currents. • Effects on marine mammals and sharks (entanglement) will be mitigated by net design. • Effects on birds (habitat exclusion, entanglement, changes to food supply and roosting) will be largely minor. • Generally, monitoring and adaptive management will provide mitigation. • No impact on terrestrial biota.
Experiential	Adverse / low-moderate	• Introduction of permanent built elements of significant scale in a presently apparently largely unmodified marine environment. • Limited adverse effects of navigational lighting on dark-sky, naturalness, wilderness and remoteness values.

		• The north-facing coast gets shipping / mooring use and the facility will be removed from the shoreline and have limited visual impact from land.
Overall	Adverse / low-moderate	• Natural character effects will be greatest in close proximity. The most sensitive part of this coastal environment is the terrestrial and near-shore area from which impacts are buffered by distance.

Appendix B:

Summary Peer Review Assessment – Landscape

Receiving environment / landscape: 'Catchment' area (as identified in the Isthmus report)

Landscape Values

Landscape values	Significance rating	Reasons
Physical	Very high	• Some modification of the seabed by dredging but powerful natural processes (currents, waves) operate unconstrained and provide for high water quality and largely natural seabed morphology. Minimal impact on water quality by land use activities. • An essentially unmodified shoreline with natural processes operating unconstrained creating natural landforms. • An essentially unmodified terrestrial environment with natural landforms and some recognized geopreservation sites. • Shipping uses the area but is transient. Apart from this, and the huts and track on the land there are minimal 'built' elements. • Whilst modified by dredging, the CMA is habitat for Tio / Bluff oysters, paua, numerous fish, shark, and marine mammal species. • The CMA is habitat for numerous seabird species including threatened or at at-risk (hoiho, southern little penguin, Fiordland crested penguin, Tītī / sooty shearwater, Cook's petrel, diving petrel, white fronted tern, Foveaux shag, spotted shag, pied shag, little shag, black shag, and red-billed gull). • The coastline and beaches provide important habitat for birds including endangered yellow-eyed penguin / hoiho. • Whilst modified by pest species, terrestrial habitats are

		predominantly in their natural state and include (now rare) unbroken sequences from the tops of the Anglem massif to the coast.
Perceptual	Very high	• The area is overwhelmingly natural with minimal human / built elements either on land or at sea. The transient presence of boats / shipping within the CMA modifies this to a small extent. • This naturalness / lack of modification provides for qualities of wilderness / remoteness (again, modified to a small extent by the transient presence of boats / shipping) • High aesthetic natural shoreline values. • High natural darkness of the night sky values. • Possibility of encounters with terrestrial or marine wildlife. • High transient values associated with weather and sea states.
Associative	Very high	• Rakiura and Te Ara a Kiwa are of strong cultural significance to Ngai Tahu ki Murihiku including a strong contemporary relationship with kaitiakitanga, management and harvesting of kaimoana from Te Ara a Kiwa. • Te Ara a Kiwa is a shipping route close to Bluff and a fishing ground with fishing fleets based in Bluff and Oban. • The site is within the more sheltered waters surrounding Rakiura where greatest boating activity takes place. • The Northwest circuit track provides a high natural environment / wilderness experience.
Overall	Very high	• The SRLCNCS identifies Rakiura and the CMA to 2km off-shore in this area as ONL. This is generally reflective of the reduced CMA natural character values beyond the immediate coastal fringe in the SMRCES. • Te Ara a Kiwa has high landscape values generally, including high tangata whenua cultural landscape values. • The ONL mapping in the LCNCS is supportable.

Landscape Effects

Natural character values	Effect – nature / degree	Reasons
Physical	Adverse / low-moderate	• No change to the terrestrial environment and no effects on the coastal natural processes or landforms. • Introduction of an essentially permanent large-scale built element within the marine environment which is currently largely unmodified. • Minimal impacts on marine processes or water quality. Low impacts on biota.
Perceptual	Adverse / low-moderate	• No impact on geomorphic legibility. Will express the more sheltered favoured conditions in the lee of Rakiura. • Will reduce naturalness of the seascape and night sky. • Introduces structures and activity to the marine environment but visual prominence minimised by distance from shore-based viewpoints and the low profile / below water nature of the facility.
Associative	Adverse / low	• A modern expression of Mahika kai and tangata whenua association with Te Ara a Kiwa. • No impact on named features of cultural significance. • Adverse effects on qualities of wilderness / remoteness but these are already modified to a degree by the shipping activity in the Strait. • Extension of the commercial fishing associated with the waters around Rakiura.
Overall	Adverse / low-moderate	