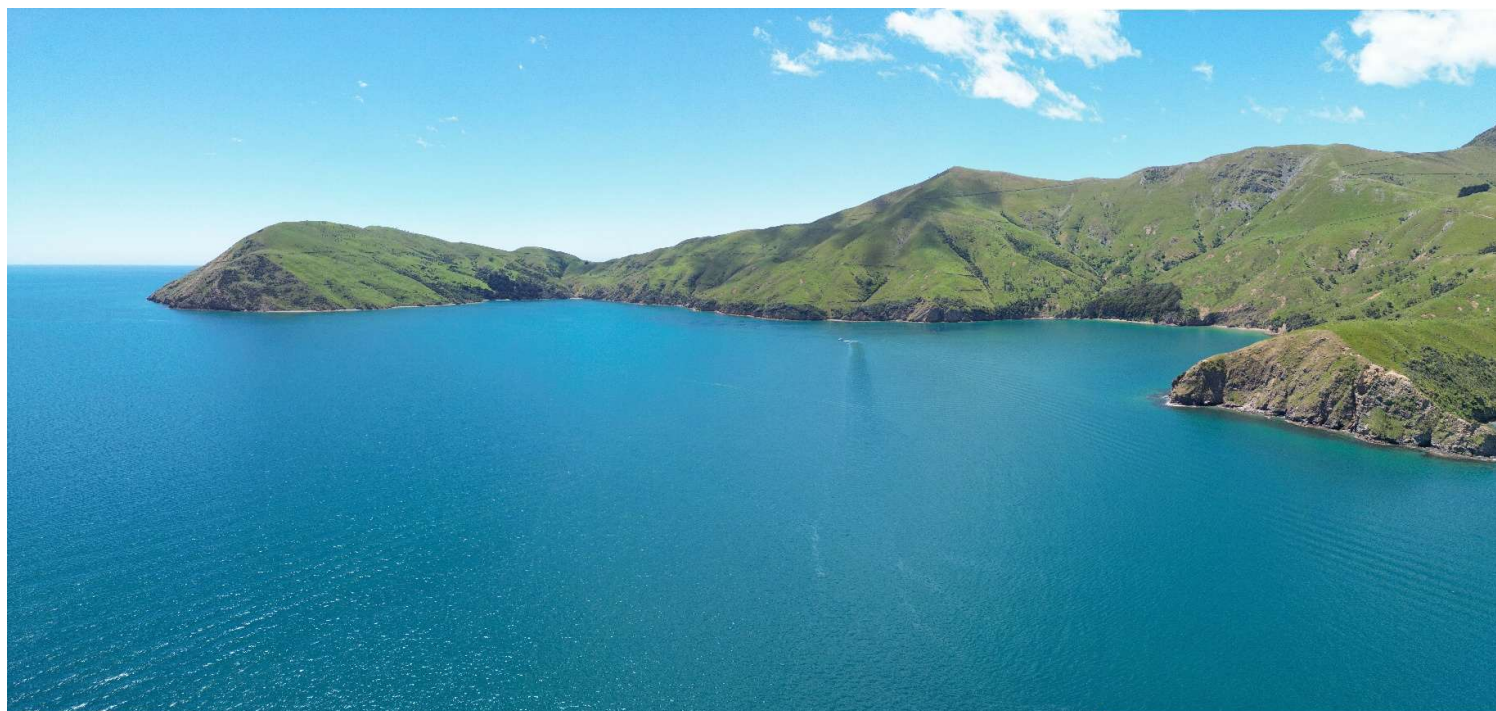




Marlborough Sounds Aquaculture Project – Guards Bay

LANDSCAPE, NATURAL CHARACTER AND VISUAL AMENITY ASSESSMENT

October 2026

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Client Name: **P H Redwood & Co Ltd.**
Project Name: **Marlborough Sounds Aquaculture Project – Guards Bay**
Document Name: **Landscape, Natural Character and Visual Amenity
Assessment**
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QA: **BC/QD/ED/EC/JH**

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Front cover photo - Josh Hunt.

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EVIDENTIAL INTRODUCTION

- i. My name is Braddyn (Brad) Thomas Coombs.
- ii. My role in relation to the Marlborough Sounds Aquaculture Project (“**MSAP**”) has been to provide expert evidence in relation to landscape, visual and natural character effects of the Guards Bay and Papatua marine farm sites. I was the lead author of the Landscape, Visual and Natural Character Assessments for the Guards Bay and Papatua sites which are provided with the application.
- iii. This evidence has been prepared to accompany the applications for approvals required for the MSAP under the Fast-track Approvals Act 2024 (“**FTAA**”). It has been prepared on the understanding that the process for determining applications under the FTAA does not require a hearing to be held, and accordingly the purpose of this evidence is to confirm that, relative to my area of expertise, the Landscape, Visual and Natural Character Assessment Report provides an appropriate description of the relevant environment, the proposed activities comprising the effects of the MSAP on that environment, and the way those effects are proposed to be managed.
- iv. While this application is not being considered by the Environment Court, I confirm that I have read the Code of Conduct for expert witnesses contained in the Environment Court of New Zealand Practice Note 2023 and that I have complied with it when preparing this evidence. Other than when I state I am relying on the advice of another person, this evidence is within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

QUALIFICATIONS AND EXPERIENCE

- v. I am a Principal Landscape Architect at Isthmus Group Limited.
- vi. I graduated from Lincoln University with a Bachelor of Landscape Architecture (with honours)(1997) and Massey University with a Bachelor of Horticulture (1995).
- vii. I have worked at Isthmus Group (Isthmus) for 20 years, focussing on resource management and landscape planning work. Prior to working at Isthmus I worked at consultancy and local government offices in Aotearoa New Zealand and the United Kingdom. I have 30 years of professional work experience as a landscape architect.
- viii. I have worked on the following projects which are relevant to my experience of assessing the landscape, visual and natural character effects of aquaculture, marine and coastal projects:
 - a) 2006 – 2007 Waihi Beach seawall for Western Bay of Plenty District Council.
 - b) 2013 Re-consenting of the Guards May Marine Farm, Marlborough.
 - c) 2014 Applications to abandon the wreck of the MV Rena on Otaiti (Astrolabe Reef) (for the Department of Conservation).
 - d) 2015 Review of the Admiralty Bay Marine Farm for Clearwater Mussels.

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- e) 2015 Scoping of several marine farm sites in the Marlborough Sounds.
 - f) 2015 – 2020 Orewa Beach Seawall application for Auckland Council.
 - g) 2015 Bledisloe Park Seawall, Little Waihi.
 - h) 2016 Western Firth of Thames Marine Farm (664 ha of new aquaculture space).
 - i) 2017 Plan Change application for the Colville Marine Farm Zone, Coromandel.
 - j) 2017-2018 Waikawa Marina extension for Port Marlborough Ltd.
 - k) 2018 Scoping of a spat marine farm site, Mercury Bay, Coromandel.
 - l) 2020/2021 Coromandel Fin Fish Farm application, for Pare Hauraki.
 - m) 2020-2022 Te Kouma / Sugar Loaf Wharf, Coromandel commercial and public boat ramp and wharf expansion.
 - n) 2021 Te Tumu Kuku Eastern Hauraki Gulf Marine Farm.
 - o) 2021 Guards Bay Marine Farm assessment for the Marlborough Environment Plan.
 - p) 2021 Cliffords Bay Marine Farm assessment for the Marlborough Environment Plan.
 - q) 2021 – 2026 Peer Review of the applications by the Port of Tauranga to develop the wharves in the Stella Passage, for the Bay of Plenty Regional Council.
 - r) 2023 - 2024 Novel aquaculture trails (submerged fin fish pens) at Rangitoto ki te tonga / D'Urville island.
 - s) 2024 Landscape and natural character evidence to support the Aquaculture New Zealand and Coromandel Marine Farmers Association submissions on the Waikato Coastal Plan.
 - t) 2024 – 2025 Waihi Beach Seawall, for private applicants.
 - u) 2025-2026. Hananui Aquaculture Project, in Te Ara a Kiwa (Foveaux Strait) for Ngāi Tahu Seafoods Ltd (recently consented under the Fast Track Approvals Act).
- ix. I am a Registered member and Fellow of Tuia Pito Ora - New Zealand Institute of Landscape Architects (TPO NZILA) and a past President of the Institute (2018-2021). I am a member of the Resource Management Law Association (RMLA) and have presented papers at the RMLA annual conference, including on marine management in September 2025. I have the Ministry for the Environments Making Good Decisions Resource Management Decision makers certificate and I have acted as an Independent Commissioner on several occasions.

CONFIRMATION OF CONTENTS OF REPORT AND PROPOSED CONDITIONS

- x. I confirm that in my opinion the contents of the Landscape, Visual and Natural Character Assessment Report may be relied on in making a decision on the approvals sought for the MAP and confirm that provided effects within my area of expertise are managed as proposed in the application those effects will not be unacceptable and will be managed to a standard that I consider meets good practice.
- xi. I confirm that I have reviewed the conditions that are proposed for the approvals being sought as they relate to my area of expertise. I confirm that in my opinion, those proposed conditions are appropriate.

A handwritten signature in blue ink, appearing to read 'Braddyn Coombs', is positioned above a horizontal line.

Braddyn Coombs
2 October 2026

EXECUTIVE SUMMARY

1. There is an established character of productive land and marine farming in the outer Te Hoiere / Pelorus Sound and enclosing landscapes.
2. Mussel nursery farms have a locational need to be in sheltered waters where the waters are cool enough and with sufficient tidal flush for the operational needs of the farm.
3. The Hīkoekoeā Bay site within Guards Bay is has an existing valued spat nursery farm, proposed to be extended in this new application.
4. The landscape and seascape of the site and the surrounding context is a productive landscape, with some areas of elevated natural character and landscape values.
5. The values of the Outer Sounds and Forsyth ONLs are broad scale and mainly pertain to the bold landscape, the natural values and the exposed headlands and rocky shores at an expansive scale.
6. The effects of the expanded mussel farm on the existing working landscape character of the site and its' context are assessed as **Very Low** (adverse).
7. The effects of the expanded mussel farm on the existing natural character of the site and its' context are assessed as **Low** (adverse).
8. The visual effects of the expanded mussel farm on land-based viewing locations are assessed as **Low** (adverse).
9. The visual effects of the expanded mussel farm on sea-based viewing locations are assessed as **Low** (adverse).
10. The cumulative effects of the expanded mussel farm will be **Low** (adverse).
11. The expansion of the mussel farm will **not have adverse effects** on the ONL values of the Outer Sounds or the Forsyth ONLs in the MEP.
12. Existing marine farming at Guards Bay is authorised to remain until 31 December 2050. Ongoing marine farming at Guards Bay reinforces the relevance of existing aquaculture as part of the enduring receiving environment for the life of the planning framework.
13. The proposed Guards Bay mussel nursery farm would result in localised landscape, visual and natural character change within Hīkoekoeā Bay and would not materially compromise the key landscape characteristics, the visual amenity of the wider receiving environment, or the broader values that underpin the ONL mapping.
14. The Hīkoekoeā Bay site within Guards Bay is a logical and accommodating site for an expanded mussel nursery farm and is appropriate in landscape, natural character and visual terms.

INTRODUCTION AND SUMMARY

- 1 Isthmus Group Ltd (IGL) has been engaged by P H Redwood & Co Ltd to undertake an assessment of the appropriateness of expanded marine farming at Guards Bay, in the Outer Marlborough Sounds ("the Site").
- 2 This assessment is part of a wider application for six aquaculture projects, collectively known as the Marlborough Sounds Aquaculture Project (MSAP). Each of these projects is assessed individually. The six projects are all within the Marlborough Sounds and are located at:
 - Guards Bay;
 - Papatua, Port Gore;
 - Okuri Bay;
 - Hapuku Rock;
 - Onapua Bay; and
 - Richmond Bay.
- 3 The purpose of this report is to undertake an evaluation of the existing landscape character, natural character and visual amenity values of the Guards Bay area and to assess the effects of the proposed expansion of marine farming activities on those values.
- 4 The following explanation of the strategic importance of the provision of reliable spat nursery farms to the mussel industry is provided from the briefing documents¹:

The sea temperatures are rising across all New Zealand marine farming areas. These and other environmental stressors are having effects on juvenile Greenshell™ mussels, known as spat. These issues have become more acute in recent times.

A significant issue is spat retention. Sites that tend to retain spat in above average numbers are known as nurseries. The industry needs space that has the qualities for good spat retention to respond to climate change. Such nursery sites tend to be in cooler oceanic water flow. Once the spat have reached a suitable size they can then be transferred to other farms. Increasingly, spat is not being retained on existing sites, leading to lost production.

METHODOLOGY

- 5 The following methods have been used to assess the site, the broad physical context, the proposal and its landscape and visual effects:

¹ Marlborough Aquaculture: Fit For a Changing World: Climate Adaptation Fast-track Approvals Act Project. Provided by Gascoigne Wicks for the Fast-Track Approvals Act briefing.

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- A desktop review of the site area, including relevant documents, statutory provisions and the nearby consented marine farms;
- A visit to the site and surrounding areas was undertaken on 4 and 5 December 2025. Photographs were taken during the site visit, included within **Appendix A – Graphic Attachments**;
- A description of the existing landscape context of the site and the surrounding area. The description includes reference to the site's existing uses, including historical and cultural associations;
- An analysis of the landscape character, natural character and values of the site and of the surrounding area;
- An assessment of the visibility of the Project from the surrounding areas;
- An assessment of the potential landscape and natural character effects of the marine farm expansion on the site and the wider context;
- An assessment of the potential visual effects of the Project on the site and on the wider context; and
- An assessment of the cumulative effects of the Project.

6 An assessment of effects on landscape character, natural character and visual amenity is included within this report, referring to a 7-point rating scale for the level of effect. The rating of effects provides a summary of the assessment only. The rating 'scores' are considered alongside the descriptive sections of the assessment; to reduce the likelihood of landscape effects being considered out of context and in a formulaic way.

7 Comparisons of how adverse value ratings assigned in accordance with Te Tangi a te Manu – Aotearoa New Zealand Landscape Assessment Guidelines (TTatM) relate to the Resource Management Act 1991 (RMA) terminology of 'less than minor', 'minor' and 'more than minor' are provided below.

			SIGNIFICANT			
LESS THAN MINOR		MINOR		MORE THAN MINOR		
VERY LOW	LOW	LOW-MOD	MODERATE	MOD-HIGH	HIGH	VERY HIGH

8 A change in a landscape does not in itself mean that a proposal will result in an adverse effect on the values of that landscape:

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“Change itself is not an effect: landscapes change constantly. It is the implications of change for a landscape’s values that is the effect.”²

- 9 The components of an effect are ‘nature x magnitude’. The nature of the effect is the description of what it is (for example, disruption of landscape pattern, reduction of naturalness, modification of landform etc). The nature of effect can be **Adverse** (negative) or **Beneficial** (positive). An assessment of effects combines both value ratings (Very Low – Very High) and the adverse or positive nature of the effect.
- An adverse effect relates to an activity which results in a reduction in landscape and / or visual amenity values; in this circumstance the RMA terminology of ‘less than minor’, ‘minor’ and ‘more than minor’ is applied.
 - A positive effect relates to an activity which enhances landscape and / or visual amenity values through restoration and / or provision of positive elements or features.
- 10 Where a proposal will result in a change, but that change will have no effect on the characteristics or values of a particular landscape or view, a nature of effect rating of ‘**no effect**’ will be provided.
- 11 The method used is consistent with the methodology (principles and approaches) set out in TTatM.
- 12 The methodology section above sets out a series of ‘steps’ that have been taken to assess the relevant landscape and visual effects of the proposal on the receiving environment. The methodology statement is provided for completeness to set out the key matters that have been taken into consideration. The detailed description of the work undertaken is contained under the relevant headings throughout the report.

DESCRIPTION OF THE EXISTING ENVIRONMENT

- 13 The author undertook a site visit on 4 and 5 December 2025 and took a series of photographs from the surrounds of the site, included as **Site Photographs 2 to 5** within **Appendix A** – which illustrate the site and the surrounding environment. Additional context photographs are also provided. The author has undertaken site visits to Guards Bay in the past for the 2013 re-consenting of the existing marine farm and in 2021 for the preparation of evidence for the Marlborough Environment Plan (MEP) hearings.

Description of the site and its setting

- 14 The Marlborough Sounds is a complex landscape formed by an intricate system of drowned river valleys and includes a range of land uses and vegetation patterns.

²

Refer 6.03 - Te Tangi a te Manu: Aotearoa New Zealand Landscape Assessment Guidelines’

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- 15 The two main inlets in the Sounds are Tōtaranui / Queen Charlotte Sound in the east and Te Hoiere / Pelorus Sound in the west. The Sounds are also broadly divided into the Inner Sounds, a relatively sheltered, enclosed environment, and the Outer Sounds, which are more exposed to the open sea and weather. The Sounds are broadly orientated north-east to south-west.
- 16 Guards Bay is located in the Outer Sounds, on the margins of Pelorus Sound. The location of Guards Bay is illustrated in **Figures 1 – 6** within **Appendix A – Graphic Attachments**.
- 17 The existing marine farm is the only marine farming activity in Guards Bay; however, marine farming is a well-established activity in Pelorus Sound, including parts of the Outer Sounds. See **Figure 2** in **Appendix A**.
- 18 Guards Bay is a moderately large bay orientated to the north-west. It is approximately 4km wide at the mouth, between Alligator Head and Tawaroa Point and varies between approximately 2km to 4km in depth (west to east). Its location in the Outer Sounds and exposure to Cook Strait means that weather, light and sea conditions are variable.
- 19 Guards Bay is made up of two smaller bays, Titirangi Bay to the north and Hīkoekoeā Bay to the south. They are visually and physically separated by a headland. The existing marine farm is located roughly centrally on the coastal edge within Hīkoekoeā Bay.
- 20 The enclosing landscape of Guards Bay is characterised by steeply rising hill slopes from a rocky shoreline to elevations of up to 500m above sea level (asl) at the ridgeline. The landcover of Guards Bay is dominated by managed grassland pasture with fragmented areas of regenerating native bush, notably within gullies.
- 21 Existing farm tracks, fencing and a small hut in the inner curve of Alligator Head are noticeable components that reinforce a working rural landscape character.
- 22 The broader landscape context is also characterised by steep slopes of managed grassland and pasture. The outer western headland and the upper slopes contain broadleaf/indigenous hardwoods with areas of regenerating mānuka/kānuka and the uppermost ridges and peaks have a cover of indigenous forest.
- 23 Titirangi Bay to the south-west includes roading infrastructure, an airstrip, sporadic development and campsite facilities. Titirangi Farm offers 'shearers quarters' accommodation on a 900 ha working farm³.
- 24 Guards Bay also includes three existing moorings, two of which are located in Hīkoekoeā Bay and one just south of Alligator Head; to the south and north of the marine farm respectively. The anchorage on the south side of Alligator Head is known locally as the 'Punt Rails'⁴.

³ [Titirangi Farm](#)

⁴ This headland is named after the ship Alligator. The shore is fringed with rocks. A shoal extends 900 m to the north-west from the point with a depth of 9 m shallowing to 1 m with 15 m from the shore. The shoal is made up of large rounds

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- 25 An open ocean salmon farming project known as Blue Endeavour has recently been consented for a site approximately 7km to the north of Cape Lambert, in the Cook Strait. At the time of writing, two trial pens have been installed at the site and fish are being introduced to the pens.

Description of existing marine farming in Guards Bay

- 26 As outlined above, an existing inshore marine farm (8164) is located broadly centrally within Hīkoekoeā Bay in the eastern part of Guards Bay.
- 27 The existing marine farm is well established and was re-consented in 2014 for the continuation of mussel farming. The Guards Bay marine farm was granted a twenty-year term, which was due to expire in 2034. The Resource Management (Extended Duration of Coastal Permits for Marine Farms) Amendment Act extends the expiry date of the coastal permit to 31 December 2050⁵.
- 28 The existing marine farm is approximately 12ha in size and is divided into three farming blocks. The existing farm utilises a 'conventional' line structure, which includes a series of buoys attached along each longline that float on the surface of the water. See **Figure 6** in **Appendix A**.
- 29 The outside of the existing marine farm is located approximately 200m from the mean low water mark and is constructed broadly parallel to the coastline, angling back towards the line of the headland.
- 30 The existing marine farm at Guards Bay was not provided for within the Proposed Marlborough Environment Plan (MEP) – operative in part, with the existing farm not included within an 'Aquaculture Management Area' (AMA). That was because of perceived effects of landscape values.⁶
- 31 Due to the strategic location of the marine farm and its success at growing Golden Bay and Kaitaia spat, P H Redwood & Co Ltd intend to expand the marine farm. The proposed project, see details below, includes reconsenting the existing 12-hectare marine farm and an extension of an additional 78.47 hectares. See **Figure 6** in **Appendix A**.
- 32 This Assessment considers the intended expanded marine farm, on the natural character, landscape character and visual amenity values of the area.
- 33 The existing and intended expanded marine farm is illustrated within **Appendix A**.

boulders. Small tiderips can occur over the shoal when wind and tide are opposed. The bay is tucked in behind the southern side of Alligator Head is locally known as the "Punt Rails". This has been as an anchorage for many years by people waiting to cross the Strait or to return to Queen Charlotte Sound. The holding is good in a shell bottom. This is sheltered anchorage with NW to E winds. There is a considerable roll pushed into the bay by NW winds. [Outer Sounds | Cruise Guide](#)

⁵ [Resource Management \(Extended Duration of Coastal Permits for Marine Farms\) Amendment Act 2024 | New Zealand Legislation](#)

⁶ Decision and Report Variation 1: Marine Farming at [570] – [586]:
<https://eservices.marlborough.govt.nz/download/files/QhN8EUeF97Z0GpvnvGRyp8AV4WiQVeWnEh2G11I7wHvEQ>

DESCRIPTION OF THE PROJECT

- 34 A new 78.47 ha site adjacent to the existing farm 8164 is proposed. The site is to be used as a mussel spat nursery. 8164 has a proven success rate for spat raising and is an extremely valuable site. Cooler oceanic sites like Guards Bay are rare in the Marlborough Sounds, as it is fed by the waters of Cook Strait.
- 35 The project comprises:
- Extending the existing 12ha farm by 78.47 ha.
- 36 A diagram of conventional line mussel farming is included within **Appendix A Graphic Attachments**, however as an overview conventional line farming typically includes:
- An anchor at the end of each line which is retained in-situ for the lifespan of the marine farm.
 - A series of buoys along each line which are adjusted in number and spacing, depending on the weight of the crop on the line.
 - An orange float at the end of each line to demarcate the mussel farm.
 - Cardinal buoys with lights as specified by the Harbourmaster to mark the extents of the farm.
- 37 The overall scale and footprint of the expanded mussel farm occupies a considerable proportion of Hīkoekoeā Bay, which is a smaller norther section of the overall Guards Bay, including Tītīrangi Bay to the south. The expanded mussel nursery farm broadly occupies the central part of Hīkoekoeā Bay, leaving some open water on the south side of Alligator Head and at the south end of the bay. This gives the seascape and landscape some room to breathe without filling in the edges of the water, close to the land, across the length of the bay. See **Figures 5 and 6 in Appendix A**.
- 38 In the context of the broader Guards Bay, enclosed by Alligator Head and Tawaroa Point, the expanded mussel nursery occupies a relatively small proportion of the bay. The broad scale of the footprint of the expanded mussel nursery farm is subservient to the scale of Guards Bay and the surrounding broad scale landscape, including the enclosing headlands and ridgelines. The broad scale of the landscape and topography is described in detail above. See **Figure 3 in Appendix A**.

PLANNING CONTEXT

- 39 The following section provides a brief overview of the statutory context of the site relevant to natural character, landscape character and visual amenity matters. This section of the report is not intended to provide a planning assessment, but rather to highlight relevant provisions to help frame the assessment of landscape effects. A full planning assessment of the Project has not been undertaken here as that is not within the

scope of this report. A full Planning Assessment is contained in the Assessment of Environmental Effects (AEE).

- 40 The site is located within the Marlborough District and Region.

Fast-Track Approvals Act

- 41 The applications are being made through the Fast-Track Approvals Act 2024. The Fast-track Approvals Act provides a separate approval pathway for projects with regional or national benefits, including a decision-making framework that requires adverse impacts to be considered in relation to those benefits.

- 42 Under section 85 of the Act, an application may be declined where there are adverse effects of an application are so significant to be out of proportion to the project's regional or national benefits, after taking into account any conditions or modifications proposed to address those impacts.

Resource Management Act (1991)

- 43 This application is not made under the RMA, but the RMA has general relevance. With regard to Part 2 of the RMA, the relevant sections are contained within section 6: Matters of National Importance, and section 7: Other Matters:

- S6(a) - the preservation of the natural character of the coastal environment (including the coastal marine area), wetlands, and lakes and rivers and their margins, and the protection of them from inappropriate subdivision, use, and development.
- S6(b) the protection of outstanding natural features and landscapes from inappropriate subdivision, use, and development
- S7(c) the maintenance and enhancement of amenity values.
- S7(f) maintenance and enhancement of the quality of the environment.

New Zealand Coastal Policy Statement (2010) – Amended 2025 (NZCPS)

- 44 The objectives and policies of the NZCPS address the management of the coastal environment. The site is located within the coastal environment. The provisions of the NZCPS are relevant to this assessment under the RMA.

- 45 Relevant objectives and policies include:

- **Objective 2** – Preservation of Natural Character
- **Policy 1** – The Extent and Characteristics of the Coastal Environment
- **Policy 2** – The Treaty of Waitangi, tangata whenua and Māori

- **Policy 6** – Activities in the Coastal Environment
- **Policy 8** – Aquaculture
- **Policy 13** – The Preservation of Natural Character
- **Policy 14** – The Restoration of Natural Character
- **Policy 15** – Natural Features and Natural Landscapes

Marlborough Environment Plan (2025) – operative in part (MEP)

46 Again, this application is not made under the MEP, but I understand the MEP has general relevance. Further, the Outstanding Natural Landscape (ONL) mapping and schedule of values is found in the MEP. The Marlborough Environment Plan (MEP) is the operative regional and district plan and provides the primary statutory framework at the local level.

47 Relevant chapters of the MEP, and the relevance to Aquaculture, include:

- **Chapter 3:** Marlborough's Tangata Whenua Iwi
 - Relevant objectives within this chapter (3.1, 3.4 and 3.6) signal that frameworks associated with the management of aquaculture must have regard to the relationship of tangata whenua and the coast.
- **Chapter 4:** Sustainable Management of Natural and Physical Resources
 - Objectives 4.1 and 4.3 acknowledge the multiple values of the Sounds' natural resources and provide for a balanced approach to decision-making that integrates social, economic, cultural, and environmental wellbeing.
- **Chapter 7:** Natural Character
 - Objective 7.1 establishes the degree of natural character while objective 7.2 seeks to preserve and promote restoration of the natural character of the coastal environment, and lakes and rivers and their margins, and to protect them from inappropriate subdivision, use and development.
- **Chapter 8:** Landscape
 - Objectives 8.1 and 8.2 note that outstanding natural features and outstanding natural landscapes in Marlborough are to be protected from inappropriate subdivision, use, and development, while high amenity landscapes are to be maintained and enhanced.
- **Chapter 9:** Indigenous biodiversity

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- Objectives 9.1 and 9.2 provide a clear direction to protect and increase and improve existing indigenous marine biodiversity.
 - **Chapter 14: Use of the Coastal Environment and the Allocation of Coastal Space**
 - Objectives within Chapter 14, provide direction, both broadly and specifically, around recognising the need to establish appropriate uses in appropriate places within the coastal environment while managing adverse effects. The occupation of public space for private gain should be sustainably allocated and managed.
- 48 An assessment against the relevant schedule of values in **MEP Volume 3, Appendix 1**, is provided later in this report. Guards Bay is located within the Outer Sounds area and within nested landscape 7 – Forsyth.

Statutory Acknowledgements

- 49 Te Tau Ihu (the northern South Island) is home to eight mana whenua iwi⁷. Te Tau Ihu Statutory Acknowledgements (2014)⁸ provides details on the Statutory Acknowledgement areas, including Statements of Association.
- 50 Of specific relevance to this project are:
- Tītīrangi Bay (Ngāti Kuia);
 - Te Tau Ihu Coastal Marine Area – Coastal Statutory Acknowledgement (Ngāti Toa Rangitira, Ngāti Apa ki te Rā Tō, Rangitāne o Wairau, Ngāti Koata, Ngāti Rārua, Te Ātiawa o Te Waka-a-Maui, Ngāti Kuia, Ngāti Tama ki Te Tau Ihu); and
 - Coastal Marine Area – Statutory Acknowledgement and Deed of Recognition (Ngāti Koata, Ngāti Tama ki te Tau Ihu, Te Ātiawa o Te Waka-a-Maui, Ngāti Rārua).

ASSESSMENT OF EFFECTS

- 51 The following section assesses the Project's effects on the landscape and visual amenity values of the site and the wider landscape setting. The specific **Natural Character, Landscape Character, Visual Amenity** and **Cumulative** effects considered are:
- a) ***Natural Character effects:***
- i. ***Biotic attributes;***

⁷ Ngāti Apa ki te Rā Tō, Ngāti Koata, Ngāti Kuia, Rangitāne o Wairau, Ngāti Rārua, Ngāti Tama ki Te Tau Ihu, Te Ātiawa o Te Waka-a-Māui, and Ngāti Toa Rangitira.

⁸ Te Tau Ihu Statutory Acknowledgements (2014) - <https://v3au.zone-secure.net/drive/5063/375991/#page=1>

- ii. *Abiotic attributes; and*
- iii. *Experiential attributes.*
- b) **Landscape Character** effects:
 - i. *Effects on the Landscape and Character of Guards Bay*
- c) **Visual Amenity** effects:
 - i. *Water based public viewpoints and locations within the immediate setting of the site; and*
 - ii. *Landscape setting of Guards Bay*
- d) **Cumulative** effects

Natural Character Effects

52 Natural character is not defined in the RMA nor the NZCPS.

53 TTatM adopts the interpretation that:

Natural character is an area's distinctive combination of natural characteristics and qualities, including degree of naturalness. Natural character and naturalness are not the same thing.⁹

54 Policy 7.1 of the MEP provides guidance on what constitutes natural character in the Marlborough context:

Policy 7.1.1 – Recognise that the following natural elements, patterns, processes and experiential attributes contribute to natural character:

- a. *abiotic systems - physical processes, geomorphology, topography, landform, fresh and coastal water bodies, movement of water and sediment, water quantity/quality, natural darkness of the night sky;*
- b. *biotic systems - species, communities, habitats, and ecological processes; and*
- c. *experiential attributes - the way in which people experience those natural elements, patterns and processes in Policy 7.1.1.a. and b., including sounds and smell, and also in the case of Marlborough's tangata whenua iwi how natural character attributes form part of their cultural and spiritual values. [RPS]*

55 Guards Bay is not within an area that is identified as having Outstanding Natural Character in the MEP. See **Figure 2** in **Appendix A**.

⁹ Te Tangi a te Manu – Aotearoa New Zealand, Landscape Assessment Guidelines: Chapter 09 Āhuetanga Taia, Natural Character.

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- 56 As discussed above, Guards Bay includes an existing marine farm, which is part a modified coastal landscape and seascape. The surrounding landform, although relatively remote, is modified and characterised by managed pasture with intermittent areas of regenerating native vegetation, particularly within gullies. Additional farming elements such as farm tracks, fencing, and a small hut located on the inner edge of Alligator Head further reinforce the area’s working rural landscape character.

Biotic attributes

- 57 The biotic environment on the Guards bay site is described in detail in ‘Marlborough Sounds Aquaculture Project Coastal Ecological Impact Assessment’, by Robertson Environmental Ecological Assessment and Reporting Services. September 2026. (CEIA).
- 58 The seafloor below the marine farm is characteristic of a relatively low-diversity, soft-sediment habitat ecosystem typical of sheltered inner Marlborough Sounds environments. The seafloor supports sparse epifaunal and infaunal assemblages. All soft sediment habitat is assigned low ecological value¹⁰. The Guards Bay near shore reef, outside of the consent application, but within the ecological Zone of Influence (ZOI) is assessed as having moderate to high ecological value.
- 59 Wild fish habitat at the Guards Bay site is assessed as having moderate ecological value¹¹.
- 60 Seabird habitat values are assessed as being high at the Guards Bay site and very high across the broader ZOI for the MSAP¹².
- 61 Marine mammal habitat values are assessed as being high at the Guards Bay site and very high across the MSAP ZOI¹³
- 62 At a broader scale, the Marlborough Sounds region supports a high diversity of marine mammals (at least 22 species), including resident species such as bottlenose dolphins and occasional visitors such as orca and migratory whales. However, within Guards Bay itself, marine mammal presence is intermittent, and the bay is not identified as a significant habitat area for these species.
- 63 Avifauna use of the immediate site appears limited. Field observations recorded only a single little blue penguin, with no other seabirds or marine mammals observed during the survey. Nevertheless, wider evidence indicates that mussel farm structures can attract seabirds by providing feeding and roosting opportunities, suggesting some potential for localised increases in bird activity associated with aquaculture infrastructure. King Shags¹⁴ are known to forage outside and within marine farms.

¹⁰ ECIA.

¹¹ ECIA.

¹² ECIA.

¹³ ECIA.

¹⁴ “King shag (*Leucocarbo carunculatus*) is one of the world’s rarest seabird species. The species is endemic to the Marlborough Sounds and is seldom observed outside of this region.” – as discussed within the ‘Biological report for an extension to marine farm 8164 in Hikoeke Bay, Guards Bay, outer Pelorus Sound’ prepared by Davidson Environmental Ltd

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64 Ecologically significant sites, habitats, or species (as defined under regional or national criteria) are absent within the study area, and no reefs, biogenic habitats, or regionally significant benthic species were identified.

65 Overall, the biotic attributes reflect a modified but naturally low-complexity marine ecosystem, with limited ecological distinctiveness at the site scale.

Abiotic Attributes

66 The abiotic environment of Guards Bay is discussed in detail within the ECIA. As described above the soft sediment (silt/mud) benthic environment has low ecological value.

67 The bay is defined by a sheltered coastal embayment with relatively low-energy hydrodynamic conditions and predominantly soft sediment substrates.

68 The seabed within the study area is consistently composed of silt and clay sediments, forming a gently sloping benthic environment at depths ranging approximately from 15 m to 30 m. No rocky reefs, hard substrates, or abrupt bathymetric features are identified within the Guards Bay consenting area.

69 This soft sediment habitat is typical of sheltered Sounds environments and represents the dominant subtidal habitat type in the Marlborough Sounds.

70 Hydrodynamic conditions are relatively subdued, with light tidal flows along the shoreline and water movement influenced more strongly by wind, particularly northerly and northwesterly weather events. The bay's proximity to Cook Strait contributes to relatively fast tidal flush compared with the more enclosed inner Sounds environments.

71 Catchment influences are moderate to low, with surrounding land largely in pasture interspersed with regenerating and planted native vegetation. Sediment runoff into the marine environment is expected to be at the lower end of regional ranges.

72 The physical environment of Guards Bay is therefore characterised by:

- Uniform, soft (silt/mud) seabed substrates
- Low structural complexity
- Moderate water exchange and flushing
- Limited terrestrial sediment inputs

73 Overall, the abiotic attributes reflect a relatively homogeneous and typical coastal marine environment of the outer Pelorus Sound, with low natural physical variability at the site scale.

74 The proposed change in farm structure to an expanded mussel nursery site, which includes both anchor points and weights or weighted ropes will result in some disturbance to the soft substratum on the seafloor of the site. The initial installation of the anchors and regular lifting and re-submergence of weights and ropes will displace some of the soft

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material on the seabed, resulting in limited effects on the abiotic attributes of the seafloor, however the sediment will re-settle around the anchors and weights.

- 75 The ECIA concludes that all assessed ecological effects, including cumulative effects are considered to be no more than minor. The design and operation of the project¹⁵ incorporates a range of measures to avoid or minimise potential effects on ecological values within the Marlborough Sounds. These include retaining the proposed site locations and separation from King Shag breeding colonies, implementing the Marine Mammal Management (MMMP), vessel operating protocols, routine aquaculture good practice and biosecurity measures. No biodiversity offset or ecological compensation is required of proposed¹⁶.

Experiential Attributes

- 76 The existing conventional marine farm structure is visually well contained, enclosed by the landscape of Guards Bay which restricts publicly accessible land-based views of the site. However, the marine farm can be publicly experienced from both water and aerial views.
- 77 The experiential qualities of Guards Bay are influenced by its remote coastal setting, natural landform enclosure and generally undeveloped character, albeit with existing aquaculture activity present. The bay is moderately enclosed and framed by pastoral hill country with regenerating native vegetation along the coastal margins, contributing to a sense of naturalness and reduced human modification when viewed from the water. The landforms of Alligator Head (301m asl), Puzzle Peak (735m asl), the Titirangi Road Ridge (780m asl), Tahuakai (850m asl) and Tawaroa Point (315m asl) combine to provide a bold large-scale landscape backdrop which encloses Guards Bay. See **Figures 1 to 17** – Site Context and the Aerial Photographs in **Appendix A**.
- 78 The area has low levels of recreational activity compared with other parts of Pelorus Sound.
- 79 Experienced from the water, marine farms are very difficult to discern from beyond a distance of 2km. Where the marine farm is visible, it is seen against the junction where the water meets that land and the backdrop of Guards Bay which is a modified and working rural landscape with a dominant cover of exotic grassland. Beyond 250m to 300m distance mussel farms cease to be an important part of a view¹⁷.
- 80 At night the navigation marker lights could be visible within 2-3 km from the site, but not otherwise. If the harbourmaster specifies standard marine farm lighting, that consists of a group of five yellow flashes every 20 seconds. The lights would be positioned 1m above the surface of the water and have a nominal range of 1 nautical mile. In good viewing conditions the lights can be visible for more than its nominal range.

¹⁵ The wider MSAP and the individual sites, including Guards Bay.

¹⁶ ECIA. Conclusions.

¹⁷ *Stormhaven Limited v Waikato Regional Council* [2026] NZEnvC 170.

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- 81 Navigation safety lights do not interfere with the darkness of the night sky. They are a pinpoint of light which occurs below the horizon and are focussed horizontally. They do not interfere with night vision.
- 82 The marine farm will be visually recessive, with only limited infrastructure visible on the surface of the water which are required for buoyancy, navigational and safety reasons.
- 83 Passing aerial views of the marine farm will be possible from sight-seeing planes or helicopters and/or those landing at the airstrip in Tītīrangi. The broader area is visible from passing commercial aircraft, generally at 10,000 – 20,000 feet above the site. See **Figure 10 in Appendix A**. Note that it is impossible to see the existing marine farm within Guards Bay at this distance, other than as a faint pattern on the water surface.
- 84 Where the marine farm is visible from the air, it will be seen in the context of an existing marine farm, as a faint patterning on the surface of the water and will be visually subservient to the broad patterns of inlets and sounds set within the bold landscape topography of the enclosing landforms.

Summary of Natural Character Effects

- 85 In summary, the expansion of the existing marine farm at Guards Bay would likely result in **Low** (adverse) effects on the natural character of Guards Bay, for the following reasons:
- The seafloor conditions beneath the site are suitable for consideration of marine farming activities;
 - Installation of anchors will cause some disturbance to the seafloor; however, sediments are expected to re-settle naturally around the structures;
 - The proposal presents a low risk of entanglement for marine mammals;
 - Potential impacts on King Shags are expected to be neutral;
 - Continued and expanded marine farming within Guards Bay may enhance foraging and roosting opportunities for certain bird species;
 - Overall ecological effects are assessed as no more than minor;
 - The marine farm will be visually contained by the surrounding landform of Guards Bay, limiting wider visibility;
 - The development will primarily be experienced from water-based viewpoints; and
 - Conventional marine farming structures are generally visually recessive, particularly from a distance beyond 250m to 300m.

Landscape and Character Effects

Effects on the Landscape and Character of Guards Bay

- 86 Guards Bay is a visually and physically discrete north-west facing bay in the outer sounds which is made up of two smaller bays; Tītīrangi Bay and Hīkoekoeā Bay to the south and north respectively. The enclosing landforms are bold, as described above and illustrated

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in **Appendix A**. The landscape and seascape of the outer Marlborough Sounds is bold in scale, yet highly complex in its patterns. See **Figure 1** in **Appendix A**.

- 87 Both Tītirangi Bay and Hīkoekoeā Bay include land and marine based farming development and a level of noticeable modification. Tītirangi Bay to the south includes roading infrastructure, buildings and a campground, set within a modified and managed grassland landscape.
- 88 Hīkoekoeā Bay is enclosed by steep hill slopes predominantly covered in grazed pasture, interspersed with fragmented areas of exotic vegetation and regenerating native bush in the gullies. The surrounding landscape is further characterised by farm tracks (cut into hillsides and along ridgelines) and post-and-wire fencing, which, together with the existing hut located in the inner curve of Alligator Head, reinforce a working rural landscape character.
- 89 The inshore waters of Hīkoekoeā Bay similarly exhibit a modified, working character, containing three moorings and the existing marine farm (8164) located along the shoreline.
- 90 The broader landscape context of Guards Bay is contained by steep pastoral slopes. The outer western headland and upper slopes support areas of broadleaf and indigenous hardwood vegetation, along with regenerating mānuka and kānuka, while the upper ridgelines and peaks are characterised by indigenous forest cover.
- 91 The assessment of the landscape effects of the proposal on these characteristics is undertaken within three key groupings: physical, perceptual, and associative attributes, as outlined below. A more detailed assessment of the Guards Bay landscape values and how they relate to the Outer Sounds Outstanding Natural Landscape (ONL) values, of which Guards Bay forms a small part, is provided later in this report.
- 92 The principal **physical effects** of the mussel nursery farm will include the displacement of seabed sediments and the occupation of the water column by anchors, lines, buoys, and mussel crops (spat). While this will result in a reduction in the naturalness of the immediate site, these effects are assessed within the context of the enclosing, modified landscape of Guards Bay, which supports working rural land uses and existing marine farming. The marine farm will contribute to increase biological productivity and will enhance water filtration within and immediately surrounding the site.
- 93 In terms of **perceptual effects**, the scale and enclosure of the surrounding landforms within Guards Bay, combined with the visually recessive nature of marine farm, mean that the vividness and memorability of the landscape are expected to remain largely unchanged.
- 94 Given the visibility of the site and the limited surface expression of mussel nursery structures, effects on landscape perception will generally be confined to close-range viewpoints. It is only when approaching the site in proximity that the marine farm may influence the composition of the landscape or the visitor experience, noting that marine

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farms are very difficult to discern from beyond a distance of 2km. Beyond 250m to 300m distance mussel farms cease to be an important part of a view¹⁸.

- 95 With regard to **associative effects**, the broader landscape context, including the surrounding landforms, landcover and forested ridgeline, will remain unaffected by the proposal. Existing associative values relate to a remote, working rural environment, with the surrounding waters supporting both commercial and recreational fishing activities.
- 96 Overall, the presence of the expanded mussel nursery is unlikely to generate adverse effects on associative values and may, for some users, result in positive associations, particularly in reinforcing the working character of the coastal environment.
- 97 In summary, the expansion of the existing mussel nursery farm at Guards Bay is anticipated to result in **very low** (adverse) effects on landscape character, for the following reasons:
- While the proposal will lead to a localised reduction in naturalness within the immediate site, primarily due to seabed disturbance and occupation of the water column and water surface, the overall naturalness of Guards Bay will remain largely unchanged, as the development is viewed within the context of a large-scale enclosing, modified working rural landscape.
 - The scale of the surrounding landforms and seascape, combined with the visually recessive nature of the mussel nursery farm, will ensure that the vividness and memorability of the landscape setting are maintained.
 - The wider landscape context, including the surrounding landforms and forested ridgelines, will remain unaffected by the proposal.

Visual Amenity

- 98 The visible elements of a mussel nursery farm are limited to the lines of floating buoys, cardinal buoys and navigational safety lighting, which are required for navigation, safety, harvesting, and maintenance purposes. The primary operational infrastructure, including backbone lines and longlines, is located below the water surface and is not visible from either land-based or water-based viewpoints. The buoys lines are visible and will be adjusted in number, depending on the weight of the mussel spat on the lines.
- 99 While the proposal includes an expansion of the marine farm, the existing mussel farm infrastructure offers a marine farming character to the bay, complementing the land-based farming activities. An expansion and change in water surface visibility will occur around the site and across Hīkoekoeā Bay, with the presence of floating buoys and surface activity introducing a localised visual pattern of activity that remains largely recessive within the wider coastal setting.
- 100 The only visible parts of the marine farm itself are those components that are floating on the surface for operational, marine safety and navigation purposes.

¹⁸

Stormhaven Limited v Waikato Regional Council [2026] NZEnvC 170.

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101 There are a number of environmental and observational factors that influence the visibility of a marine farm:

- Weather and sea conditions – marine farms are generally more visible in calm clear conditions where reflections on smooth water may make buoys appear larger in size. In contrast, swell, wave action, sea spray, and coastal haze can obscure (fully or partially) or temporarily conceal surface features. Reduced light can further limit visibility.
- Viewing angle and/or elevation – visibility tends to increase with elevation and is lowest when viewed from sea level. From a low viewing angle only the front lines of floating buoys is generally visible.
- Viewing distance – the distance of the viewer from the visible structures of the marine farm. As described above, mussel farms are difficult to discern beyond a distance of 2km and beyond 250m to 300m distance mussel farms cease to be an important part of a view.

Water based public viewpoints and locations within the immediate setting of the site

102 From near sea level, and under favourable conditions, marker buoys are generally difficult to discern beyond distances of approximately 2km, with a noticeable decline in visibility at 1–1.5 km.

103 Vessels travelling past the entrance to Guards Bay would typically be located 1.5 - 2.0 km or more from the nearest edge of the expanded mussel spat raising farm. At these distances, buoys would be viewed against the land backdrop of Guards Bay, which assists in visually integrating the floating buoys into the setting. The marine farm will remain visually recessive, although it will be perceived by observers who are actively seeking it¹⁹. Vessels travelling through Allen Strait / Guards Pass would be unlikely to be able to see the expanded mussel farm. Therefore, only vessels travelling into Guards Bay would potentially have views of the mussel nursery farm.

104 The scale and enclosure of the surrounding landscape is dominant over the scale and water surface of Hīkoekoeā Bay.

Land based views in the setting of Guards Bay

105 Land-based viewing opportunities are limited, particularly from publicly accessible locations. The marine farm is located approximately 1.8 km to 3.3 km north of dwellings at the south end of Tītīrangi Bay, with no residences directly overlooking the site. There is an isolated hut at the inner curve of Alligator Head.

106 The site is not visible from Tītīrangi Bay, including its road, campground, and developed areas, which are visually and physically separated from Hīkoekoeā Bay by the intervening headland.

¹⁹ For example, fishers who may wish to fish by the mussel farm (although unlikely in the outer sounds) or maintenance crews heading to work at the farm.

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- 107 Potential views may be available from areas of conservation land at the head of the bay, although these are constrained by topography and largely limited to elevated positions on the western headland and upper slopes. While farm tracks exist, there are no formal public walking tracks in these areas.
- 108 The Herenga ā nuku Aotearoa Outdoor Access maps identify a Marlborough District Council access road (Titirangi Road) which provides access to Titirangi Bay from the south²⁰. However there are no public access roads or tracks on the farmland enclosing Hikoekoeā Bay or on Alligator Head. Puzzle Peak Scenic Reserve is approximately 2km to the south of the mussel nursery farm site. Tawaroa Point Scenic Reserve is approximately 3km to the west of the site and will not generally have views of mussel farm itself. The Sounds Foreshore Reserve²¹ occupies the foreshore around Hikoekoeā Bay, Titirangi Bay and Alligator Head, however no land-based access is provided and therefore any public visitors to the foreshore reserve would need to visit via the sea.
- 109 From elevated land vantage points, the site would typically be viewed at distances greater than 3 km where shadowing, reflections, and landscape complexity reduce visibility. In optimal conditions, buoys may be perceptible but would appear as minor and visually inconsequential elements within a broad panoramic view and would not adversely affect landscape amenity.
- 110 Marine traffic, including barges for maintaining and harvesting lines of spat will be visible, seen within the context of other commercial and recreational boats travelling past Guards Bay along the mouth of the Te Hoiere / Pelorus Sound.

Aerial Viewpoints

- 111 From aerial viewpoints, such as sightseeing flights, the expanded mussel farm may appear as a subtle pattern on the water surface. Any such visibility would remain visually subservient to other marine farming activities within adjacent bays and the wider Sounds and the scale of the enclosing landscape.

Visual Amenity Summary

- 112 Overall, the expansion of the existing mussel farm at Guards Bay is expected to result in **Low** (Adverse) effects on visual amenity, for the following reasons:
- Visible infrastructure is limited to above-water infrastructure, which is limited to floating lines of buoys, cardinal buoys and navigational safety lighting;
 - The mussel nursery lines are submerged and are not generally visible other than right on top of them;
 - From water-based viewpoints, the marine farm will be visually recessive, and set against a dominant landforms, and will be typically only discernible within

²⁰ [Outdoor Access Map](#)
²¹ Local Purpose Reserve.

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approximately 2 km, generally within the line between Alligator Head and Tawaroa Point or by observers actively looking for it;

- Land-based viewing opportunities are minimal, and where available, views occur at a considerable distance, with the mussel nursery farm forming a barely perceptible element within the wider landscape; and
- From the air, the farm will appear as a faint, low-contrast pattern on the water surface, remaining subordinate to the broader marine farming context of the Marlborough Sounds and the broad scale enclosing landscape.

Assessment against ONL Values

- 113 Guards Bay is identified as being within an ONL overlay in the MEP, part of the Outer Marlborough Sounds Regional Landscape (07 - Forsyth District Landscape).
- 114 The identification of Guards Bay within an Outstanding Natural Landscape (ONL) in the MEP reflects adjustments made to boundaries from the earlier Marlborough Landscape Study (2014) and the subsequent work of the Existing Marine Farms in Outstanding Overlays – Appropriateness of Marine Farms in the Marlborough Sounds (EMFOO) report.
- 115 The MEP formally identifies the Marlborough Sounds, including parts of the Outer Sounds such as Guards Bay, as an ONL based on biophysical, perceptual, and associative values (see **Appendix B**). The MEP identifies the Outer Sounds Landscape as an ONL and in a nested sequence of smaller areas of ONL, including Guards Bay, within the Forsyth Landscape.
- 116 The Outer Sounds ONL evaluation specifically mentions biophysical, perceptual and associative values for various areas, including but not limited to:
- i. Cape Jackson
 - ii. Te Aumiti / French Pass
 - iii. Cook Strait
 - iv. Tory Channel / Kura Te Au
 - v. Motutara, Brothers and White rocks
 - vi. Long Island, Kokomohua Islands
 - vii. Motutara Island
 - viii. D'Urville Island, Mount Stokes, Mt Furneaux, Bobs Peak
 - ix. Arapaoa Island
- 117 The evaluation of Perceptual and Associative values includes a strong emphasis on the remoteness of the Outer Sounds, the interplay between the headlands and bays and the

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open ocean environment of the Cook Strait, rocky outcrops, steep exposed coastal cliffs, low modification levels, high legibility and visual coherence, the windswept coast line, high winds and rough seas, high level of perceived naturalness, past Māori and European cultural uses, strong Tangata Whenua associations, including Kupe's visit, entry points to channels and sounds, strong recreational values and noted DoC Conservation areas.

- 118 Given the broad scale of the MEP landscape evaluation of the ONLs and in particular the larger Outer Sounds ONL area, the description of the values which contribute to the ONL are necessarily broad-brush.
- 119 The Forsyth ONL is more specific in the identification of values as it includes the Forsyth Bay, Anakoha Bay and Guards Bay seascape waters and surrounding steep and enclosing peninsulas and headlands. High levels of naturalness are noted, particularly at higher elevations, acknowledging higher levels of modification at lower elevations.
- 120 The Forsyth ONL evaluation specifically mentions biophysical, perceptual and associative values for various areas, including but not limited to:
- i. Mt Stokes – the highest point in the Marlborough Sounds at 1,203m asl²²
 - ii. Indigenous vegetation cover
 - iii. Steep, eroded sea cliffs and rocky shores, including high energy waves at Guards Bay and Alligator Head
 - iv. King shag habitat at Forsyth Bay and Waitata Reach
 - v. Bird Island – reef heron breeding
 - vi. High levels of natural character at Forsyth Island and Kaitira Headland
- 121 Specific perceptual and associative values note include the forested peaks and ridge of Mt Stokes, dramatic landscape and seascape passes, high experiential levels, night sky darkness, Māori archaeological sites, Forsyth Island and the entry and exit points to the Te Hoiere / Pelorus Sound.
- 122 As illustrated on **Figure 2** in **Appendix A** several areas of the Outer Sounds and Forsyth ONLs have been assessed has including ONL values, with the presence of existing marine farms. Some areas which have extensive areas of marine farms, including Anakoha Bay, have been excluded from surrounding areas of ONL. Limited areas of mussel farming and ONL values are therefore not mutually exclusive in the context of the MEP and the Marlborough Sounds.
- 123 The broad scale of the Outer Sounds ONL in relation to the project scale of the expanded mussel farm at Guards Bay, will not be affected by the proposal. The focus of the following evaluation is on the Forsyth ONL landscape.

²²

Noting that Mt Stokes is approximately 10km to the south of the mussel farm site.

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- 124 The scale of the expanded mussel farm footprint, in relation to the overall scale of the landscape and seascape receiving environment, in conjunction with the limited biophysical effects of mussel farms ensures that the expanded mussel farm does not necessarily have adverse effects on identified ONL values for the Outer Sounds and Forsyth ONLs in the MEP. The expanded mussel farm is contained by the large scale landforms and it will not affect the values which contribute to the assessment and identification on the ONLs, for example, the mussel farm will not affect the rocky outcrops and coastal cliffs or any of the terrestrial landscape values identified in relation to the ONLs.
- 125 The broad scale of the Guards Bay waters and the bold topography of the enclosing ridges and headlands can accommodate a mussel farm proposal of this type without experiencing adverse physical effects. The expanded mussel farm will be almost completely enclosed within the Hīkoekoeā Bay part of Guards Bay and by Alligator Head. The physical effects of the expanded mussel farm would not extend outside of the enclosing landforms of Alligator Head and Tawaroa Point.
- 126 The perceptual values associated with the Forsyth ONL are similarly focussed on the broad scale and enclosing landscapes, particularly the elevated areas on and surrounding Mt Stokes. There will be no effects on the broad patterns of landform and land cover as a result of the proposed expanded mussel farm. The Hīkoekoeā Bay site, as a small part of the broader Guards Bay is an enclosed and recessed part of a much larger and bolder landscape.
- 127 The high experiential levels, night sky darkness and archaeological values of the surrounding ONL will not be affected by the presence of the mussel farm. The broader conservation values of surrounding scenic reserves and the experience of people visiting and using those reserves will not be adversely affected by the expanded mussel farm.
- 128 The expanded Guards Bay mussel farm will not have adverse effects on the ONL values of the Forsyth or Outer Sounds landscape areas for the following reasons:
- The Hīkoekoeā Bay site and the mussel farm proposal are relatively small and recessed features surrounded by broad scale seascapes and landscapes, which already accommodate productive farming on the sea and the land.
 - Mussel farms have very limited physical effects which are not generally experienced beyond the immediate site of the farm itself.
 - The ONL values are broad and accommodating of the ongoing use of the waters for a mussel nursery farm.
 - The outer Te Hoiere / Pelorus Sound waters accommodate a range of existing marine farm developments which are integrated into the landscape and natural character values of the Sounds and are not necessarily incompatible with outstanding landscape values.

Cumulative Effects

- 129 The cumulative effects of the expansion of the Guards Bay mussel farm to incorporate an additional 78.47ha of mussel nursery will be limited to those effects experienced from a close distance to the farm. As illustrated on **Figure 2** and **4** in **Appendix A**, extensive areas of marine farming exist within the Te Hoiere / Pelorus Sound. The travel experience through or into Te Hoiere / Pelorus Sound is through or past areas of marine farming, including salmon and mussel farms. Many of the marine farming areas are tucked into bays, providing shelter for the marine farms and leaving the central parts of the channels available for passage by vessels.
- 130 The expanded mussel farm site is tucked into Hīkoekoeā Bay within the broader Guards Bay and is outside of the main channels for vessel passage. Further marine farms are located in outer sounds locations, for example at Melville Cove, Papatua and Orchard Bay. Any of these marine farming areas could be experienced in addition to the existing and proposed Guards Bay marine farm, but are not on a logical sequence of vessel passage, unless they are being visited themselves. Tucked into the broader scale of Guards Bay and the enclosing landform of Alligator Head, the Guards Bay marine farm is unlikely to be experienced as part of this travel experience unless the bay is being visited or is sought out for the sheltered mooring on the south side of Alligator Head.
- 131 From land and/or overhead, views of the expanded marine farm would be experienced as a small part of an overall pattern of marine farming in the outer Te Hoiere / Pelorus Sound.
- 132 Given the recessed nature of Hīkoekoeā Bay and the accommodating nature and scale of the surrounding landscape, the cumulative effects of the expanded marine farm are assessed as **Low** (adverse).

Effects Summary

- 133 The assessment finds that the proposal will result in no more than **Low** effects (less than minor) on landscape character and natural character. Effects on visual amenity are summarised below for both land and sea-based viewpoints. Effects on ONL values are also summarised. A summary of effects is included in **Table 1** below:

Table 1: Overview of Effects

		Level of Effect
	Landscape Character Effects	Very Low (adverse) Less than Minor
	Natural Character Effects	Low (adverse) Less than Minor
	Cumulative effects	Low (adverse)
	Effects on ONL values of the Outer Sounds and Forsyth ONL	Neutral
Visual Amenity Effects	Views from the sea	Low (adverse) Less than Minor
	Views from private land (adjacent farmland)	Low (adverse) Minor
	Views from Public land	Low (adverse) Less than Minor

SUMMARY AND CONCLUSIONS

- 134 There is an established character of productive land and marine farming in the outer Te Hoiere / Pelorus Sound and broad-scale enclosing landscapes.
- 135 Mussel nursery farms have a locational need to be in sheltered waters where the waters are cool enough and with sufficient tidal flush for the operational needs of the farm.
- 136 The Hīkoekoeā Bay site within Guards Bay is an accommodating location for a valued mussel nursery farm, extended from the existing mussel farm location.
- 137 The landscape and seascape of the site and the surrounding context is a productive landscape, with some areas of elevated natural character and landscape values.
- 138 The values of the Outer Sounds and Forsyth ONLs mainly pertain to the bold landscape, the natural values and the exposed headlands and rocky shores at an expansive scale.
- 139 The effects of the expanded mussel farm on the existing working landscape character of the site and its' context are assessed as **Very Low** (adverse).
- 140 The effects of the expanded mussel farm on the existing natural character of the site and its' context are assessed as **Low** (adverse).
- 141 The visual effects of the expanded mussel farm on land-based viewing locations are assessed as **Low** (adverse).
- 142 The visual effects of the expanded mussel farm on sea-based viewing locations are assessed as **Low** (adverse).
- 143 The cumulative effects of the expanded mussel farm will be **Low** (adverse).
- 144 The expansion of the mussel farm will **not have adverse effects** on the ONL values of the Outer Sounds or the Forsyth ONLs in the MEP.
- 145 Existing marine farming at Guards Bay is authorised to remain until 31 December 2050. Ongoing marine farming at Guards Bay reinforces the relevance of existing aquaculture as part of the enduring receiving environment for the life of the planning framework.
- 146 The proposed Guards Bay mussel nursery farm would result in localised landscape, visual and natural character change within Hīkoekoeā Bay and would not materially compromise the key landscape characteristics, the visual amenity of the wider receiving environment, or the broader values that underpin the ONL mapping.
- 147 The Hīkoekoeā Bay site within Guards Bay is a logical and accommodating site for an expanded mussel nursery farm and is appropriate in landscape, natural character and visual terms.

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October 2026

Appendix A – GRAPHIC ATTACHMENTS (refer separate document)

Appendix B – Outstanding Natural Landscape Values (MEP Volume 3, Appendix 1)

OUTER SOUNDS LANDSCAPE
Regional Landscape: Outer Marlborough Sounds
Character Description: <i>The outer Sounds exhibit characteristics clearly influenced by the area's exposure to the sea. The area extends from the slopes around Croisilles Harbour, north to Admiralty Bay and D'Urville Island (Rangitoto ki te Tonga), east to Forsyth Island (Te Paruparu), the land around Te Anamāhanga / Port Gore and Arapaoa Island and south to Te Whanganui / Port Underwood.</i> <i>The range of peaks either side of Mt Stokes (the highest point in the Sounds) separates the outer Sounds area from the inner Sounds.</i> <i>The outer Sounds are remote and rugged in appearance. There are many dramatic and distinctive features characteristic of this area, including the swirling currents between the narrow passage at Te Aumiti / French Pass, boulder spits and sand dune systems, highly weathered coastal cliffs, rocky islands and jagged rock stacks and reefs, narrow elongated ridges and steep coastal hill country.</i> <i>There are a number of important Geopreservation Inventory Sites in the outer Sounds, most notably on Rangitoto ki te Tonga / D'Urville Island, that include the northernmost copper mine in the South Island and geological features within Greville Harbour / Wharariki. The Inventory also notes that Cape Jackson displays a superb example of a drowned narrow ridge crest.</i> <i>The maritime influence on the outer Sounds creates a temperate climate and distinctive marine vegetation communities such as the salt-tolerant, low growing herb and shrub species that can survive the constant winds off Cook Strait. The extensive areas of modified grassland are a characteristic of the outer Sounds. The outer, eastern Sounds contain some large areas of exotic forestry.</i> <i>Rangitoto ki te Tonga / D'Urville Island is the largest island in the Sounds and, despite the efforts of early pastoral runholders, retains much of its indigenous cover containing some important native species.</i> <i>A number of predator-free island sanctuaries are located in the outer Sounds such as Motuara Island, Blumine Island / Ōruawairua and Stephens Island (Takapourewa). Long Island-Kokomohua Marine Reserve is located at the entrance to Queen Charlotte Sound / Tōtaranui. These reserves contain a range of rare or threatened species such as kiwi, tuatara, Hector's dolphins and king shags.</i> <i>The outer Sounds are richly associated with early New Zealand Māori and European history. Rangitoto ki te Tonga / D'Urville Island is the site of numerous prehistoric quarries as well as early European copper mines. Other areas in the outer Sounds, such as Queen Charlotte Sound / Tōtaranui and Tory Channel / Kura Te Au contain extensive archaeological remains regarding the original Māori occupiers, early contact with Captain Cook, and later Māori and European whaling and farming families.</i> <i>The cable station at Pukatea / Whites Bay is accessed by an unsealed road that connects south to Rarangi and north to Te Whanganui / Port Underwood and Waikawa/ Picton. A cluster of small coves and bays pepper this coastline, where numerous small fishing and former whaling communities established, including at Ocean Bay. The 350kV transmission line extends northwards along these eastern bays towards Oraumoa / Fighting Bay on the Cook Strait side of Te Whanganui / Port Underwood. These bays contain rich historical and cultural associations for both Māori and Europeans. At Oyster Bay for example, a marker commemorates the signing of the Treaty of Waitangi on nearby Horahora Kakahu Island, while Pukatea / Whites Bay is the location of the first telegraphic link to the North Island in 1866.</i> <i>The outer Sounds are relatively remote, with less land-based development than in the more sheltered inner bays. Nonetheless, there are scattered baches and jetties and occasional homesteads and associated farm buildings, usually near to the shore. Marine farms are present along many of the more sheltered stretches of coastline.</i>
District Scale Landscape Areas: There are a number of smaller 'nested' landscapes within the broader Outer Sounds Landscape and these are described over the following pages. They are: 01 Robertson, 02 Te Whanganui / Port Underwood, 03 Exposed Eastern Coastline, 04 Tory Channel /

Kura Te Au, 05 Outer Queen Charlotte Sound / Tōtaranui, 06 Te Anamāhanga / Port Gore, 07 Forsyth, 08 Cook Strait, 09 Waitata, 10 Admiralty, 11 Northern D'Urville, 12 Eastern Tasman, and 13 Croisilles.	
Naturalness: This landscape area retains very high levels of naturalness due to the lack of modifications apparent. Where modification is apparent, it is generally localised. Some vegetation clearance has occurred for grazing and forestry along the eastern coastline, however there is a pronounced lack of structures associated with these areas. Aquaculture is very limited and contained to a few nodal areas (such as Melville Cove, Anakoha Bay, Admiralty Bay and Catherine Cove). The maritime influence is strong.	
Features of this landscape include: Slender peninsulas, islands, deep embayment's, Mt Stokes and other vegetated peaks and ridges containing the bays, Rangitoto ki te Tonga / D'Urville Island, broad open and exposed waters.	
Landscape Values associated with the Outer Sounds	
Biophysical	- Northernmost part of the highly legible drowned narrow ridge system, noticeably at Cape Jackson. - Numerous Geopreservation Sites of National and Regional Importance, including the submerged ridgeline under Te Aumiti / French Pass. - Nationally significant seascape (Cook Strait). - Swirling high flow currents of Te Aumiti / French Pass, Allen Straight, and Tory Channel / Kura Te Au. - Salt tolerant low growing herb and shrub species. - Island communities nationally and internationally important with distinct rare biotic assemblages (i.e. Motuara, Brothers and White Rocks, Long Island, Kokomohua Islands). - Many predator-free island sanctuaries (Motuara Island, Blumine Island / Ōruawairua and Stephens Island (Takapourewa)). - Extensive areas of vegetated elevated slopes, notably of D'Urville, Mt Stokes, Mt Furneaux, Bobs Peak. - Extensive areas of modified grasslands. - Subalpine vegetation of Mt Stokes. - Nationally significant broadleaf species and nationally significant endemic cliff vegetation on Arapaoa Island.
Perceptual	- Expansive views of the open sea broken up by the outer peninsulas, rocky outcrops, steep exposed seacliffs and Islands. - Exposed, remote and rugged seascape. - All islands have very low modification levels. - High legibility and visual coherency of the grasslands on the drowned ridge coastline. - High perceptual values associated with the wild windswept coast and high winds, rough sea, high-energy waves and associated sea spray. - Very high levels of perceived naturalness due to limited modification. - Impressive and weathered coastal cliffs and rocky windswept islands. - Prevalent high winds from Cook Strait and extreme weather conditions providing highly transient conditions.
Associative	- Rich in past Māori and European cultural use including prehistoric quarries and copper mines, whaling and pa sites. - Strong Tangata Whenua association and spiritual affinity with outer Sounds seascape and coastline. Many linked to Kupe's visit [Conservation Management Strategy, DoC, 1993]. - Noted 'entrance points' into Tory Channel / Kura Te Au, Queen Charlotte Sound / Tōtaranui and Pelorus Sound / Te Hoiere. - Strong recreational areas, including walking, boating, fishing and diving. - Noted DOC conservation areas.

Evaluation	Based on the above values, the Outer Sounds Landscape (as mapped) has been identified as an ONL due to its exceptional biophysical and associative landscape values and very high perceptual landscape values. The Outer Sounds Outstanding Natural Landscape comprises the open waters and series of islands and exposed peninsulas, headlands and bays that extend out into Cook Strait and Tasman Bay / Te Tai-o-Aorere. This landscape encapsulates the wide variety of rugged, often windswept landforms which are imbued with rich cultural and historical associations. Perceptually the Outer Sounds Outstanding Natural Landscape provides uninterrupted open seascape vistas of the very end of this drowned landscape. This area of the Marlborough Sounds is the least modified. It contains some of the district's most important predator-free islands holding outstanding levels of natural character.
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07 – FORSYTH [C]
Regional Landscape: Outer Marlborough Sounds
District Landscape: 07 – Forsyth
Method of identification: Visual Catchment
Character Description: <i>This nested landscape area of the broader Outer Sounds Landscape encompasses the waters of Forsyth Bay to the west, the waters of Anakoha Bay and Guards Bay to the east and the surrounding steep enclosing peninsulas extending from Mt Stokes in the south; with Alligator Head and the Kaitira headland forming the north-east and north-west containing arms. Forsyth Island is centrally located, providing separation between the coastal areas to the east and west. Allen Strait is located at the southern point of Forsyth Island and the mainland and is a body of water known for its strong tidal currents. The land use at higher elevations around Mt Stokes comprises indigenous vegetation, with much of the lower slopes being more modified for grazing purposes, notably around Guards Bay and Anakoha Bay. The south-west boundary is notable for its very narrow isthmus separating Forsyth Bay from Beatrix Bay. The remaining parts of this landscape are a mosaic of regenerating scrub, pockets of indigenous vegetation and pasture. Bird Island, with the centre of Forsyth Bay is a collection of rocks significant for reef heron breeding. Development is focussed in Anakoha Bay and Titirangi Bay, which is south of Guards Bay. Aquaculture is prominent in Anakoha Bay and around the perimeter of Forsyth Bay and parts of western Forsyth Island.</i>
Naturalness: This landscape retains large amounts of indigenous vegetative cover, notably in its upper elevations, which form part of the broader Mt Stokes mountain range. Steep eroded cliffs, rocky shores, peninsulas, islands and reefs also have a very high level of naturalness. These areas are considered sufficiently high level of naturalness to be considered outstanding. At lower elevations, a greater level of modification is noted, particularly around the numerous bays, where

roads, power lines, buildings, pasture, commercial forestry and foreshore infrastructure, including aquaculture is present.	
	Landscape Values
Biophysical	- Mt Stokes, the highest peak and one of the most dominant landforms in the Marlborough Sounds, reaching 1,203m asl. - The slopes of Mt Stokes rises steeply from sea level. - Original forest covers most of the upper slopes of Mt Stokes and its summit supports the only occurrence of subalpine vegetation in the Marlborough Sounds. - The indigenous vegetation cover is internationally significant as it supports areas of alpine to coast vegetation sequences. - The natural biodiversity is high due to the range of altitude, landform and habitat. - Mt Stokes and its associated connecting peaks and ridges and hold outstanding levels of natural character due to regenerating bush and low modification. Remaining areas retain high and very high levels of natural character. - Steep eroded cliffs and rocky shores, dominated by high energy waves define the waters of Guards Bay, defined by Alligator Head - Areas within Forsyth Bay and Waitata Reach, including Port Ligar have been identified as being of national significance for king shag feeding and breeding habitat, including Duffers Reef. - Bird Island is nationally significant for reef heron breeding. - Both Forsyth Island and the Kaitira headland hold high levels of natural character. The open waters between Port Ligar, the Kaitira headland and northern Forsyth Island also hold high levels of natural character, principally due to low levels of modification.
Perceptual	- Impressive forested peak and ridges of Mt Stokes rising above Anakoha and Titirangi Bays. - The area is particularly memorable where the level of modification is least. - The mountain top and ridges define and frame the associated bays and exhibit very high remote and experiential values. - Interesting landform of Duffers Reef and the neck at the head of Forsyth Bay. - Dramatic pinch point at Allen Strait in to Forsyth Bay. - High experiential values, which are due to remote and expansive seascape vistas of a wild and exposed nature. - The darkness of the night sky adds to the sense of remoteness.
Associative	- There are numerous Māori archaeological sites around the shores of Mt Stokes, including many pa sites and middens and pre-historic stoneworks at Titirangi Bay. - Private Forsyth Island is a destination for travellers. - Recognised entry/ exit point of Pelorus Sound / Te Hoiere between Kaitira (East Entry Point) and Te Akaroa (West Entry Point).
Evaluation	Based on the above values, the vegetated upper slopes of Mt Stokes, Mt Robinson, Puzzle Peak and the noted peninsulas of Alligator Head and Tawaroa Point are identified as ONFs within the Outer Sounds ONL. These ONFs extend into landscape areas 05, 06, 08 and F. Further, the advanced regenerating Forsyth Island and its associated Duffers Reach and Allen Strait, the sanctuary of Bird Island, and the Kaitira Headland, are also considered to hold outstanding natural values and to be ONFs, with the interconnecting seascapes holding ONL value. These ONFs extend into landscape areas 08 and 09. All identified ONFs hold

	exceptional biophysical and associative landscape values and very high sensory landscape values. Mt Stokes is one of the most dominant landforms in the Marlborough Sounds, with upland ridge crests and summits reaching 1,203 m asl. A number of watercourses that extend from this central massif have long, high gradients in which the water quality is amongst the highest in the Sounds. Original forest covers most of the upper slopes of the Stokes massif and its summit. The ONF supports the only occurrence of subalpine vegetation in the Sounds. Alpine to coast vegetation sequences descend from the summit in several locations throughout the ONF, including at Titirangi Bay. There are also numerous areas of regenerating native bush within lower parts of Anakoha Bay. Natural biodiversity is high due to the range of altitude, landform and habitat types, especially enhanced by subalpine communities. This is part of the larger Mt Stokes area managed by the Department of Conservation and is identified as having internationally significant ecological values. The impressive peaks and connecting ridges define and frame the eastern bays and seascapes within this nested landscape and, due to their lack of modification, the area retains very high remote and experiential values. Key peaks surrounding Mt Stokes include Mt Robinson, Grants Lookout and Puzzle Peak. There is considerable evidence of early Māori settlement/activity throughout the area, a notable site being the stone workings at Titirangi Bay. Forsyth Island is naturally regenerating and contributes ecologically to the many islands in the broader Outer Sounds landscape. At the Island's northern point, Duffers Reef is considered a nationally significant nesting area for king shags. Within central Forsyth Bay, Bird Island is nationally significant for reef heron breeding. The narrow pinch point of Allen Strait, between southern Forsyth Island and the mainland, forms a visually enclosing entrance into Forsyth Bay. Modifications include moorings, vegetation clearance, forestry, roads and tracks, jetties, buildings, and powerlines. Aquaculture has been excluded from the overlay, apart from the sole farm in Guards Bay.
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Marlborough Sounds Aquaculture Project.

Guards Bay.

Graphic Attachments.

October 2026

Isthmus.

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Isthmus.

Document record

Issue	Revision	Author	QA	Date
Draft	A	SF	BC	17.08.2026
Draft	B	SF	BC	01.10.2026

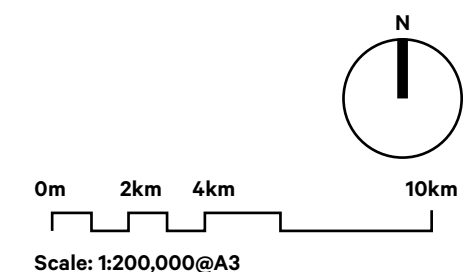
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Figure 01: Site Landscape Context.

Source: LINZ



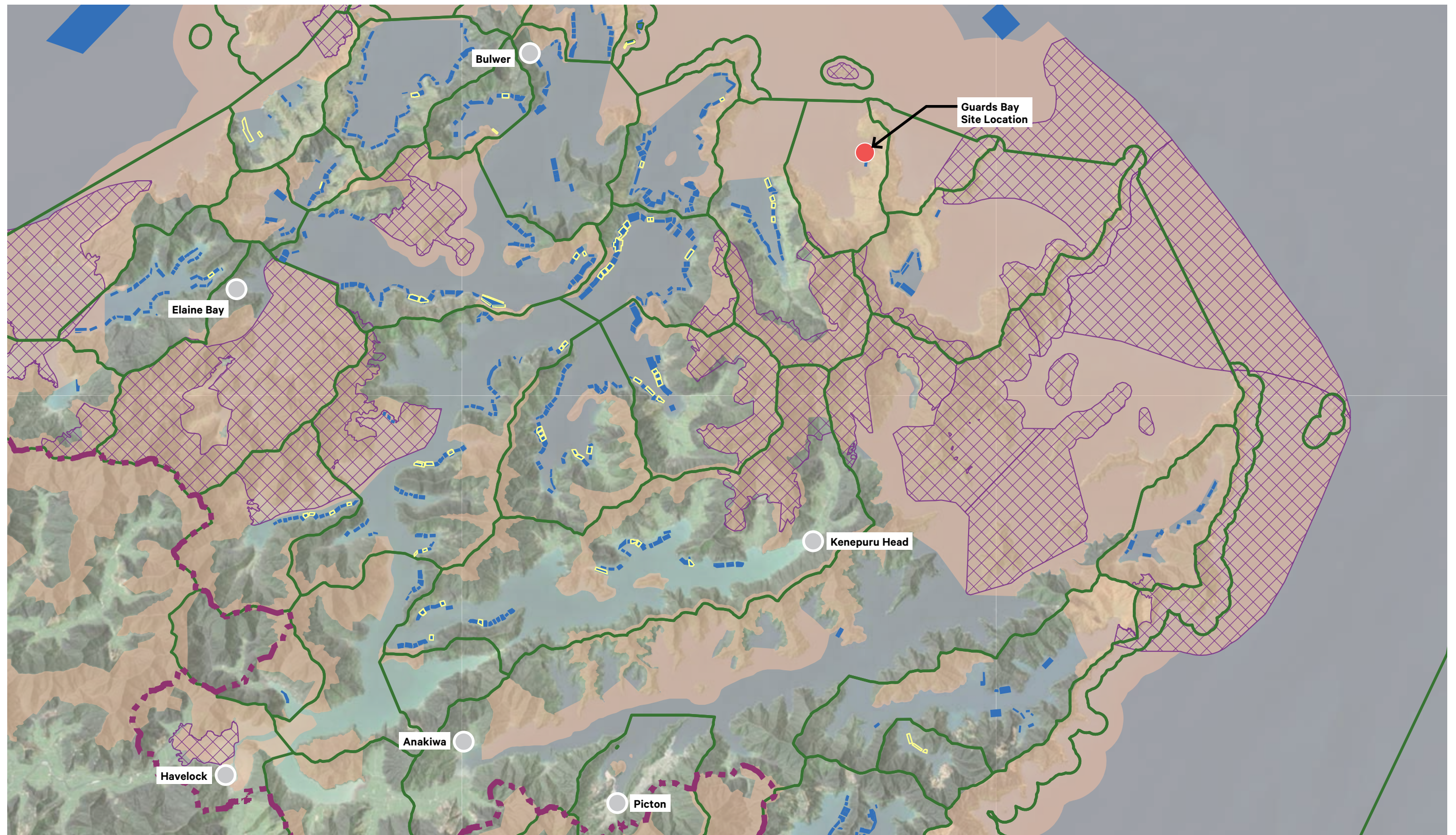


Figure 02: Statutory Context.

Legend

- Marine Farm: Granted
- Marine Farm: Processing
- Extent of Coastal Environment
- Coastal Management Unit
- Coastal Outstanding Natural Character
- Outstanding Natural Feature & Landscape

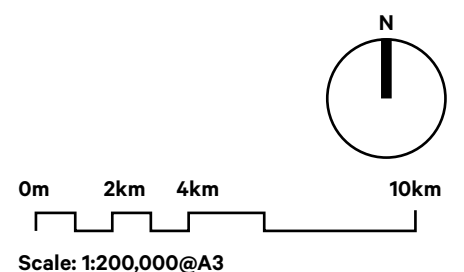
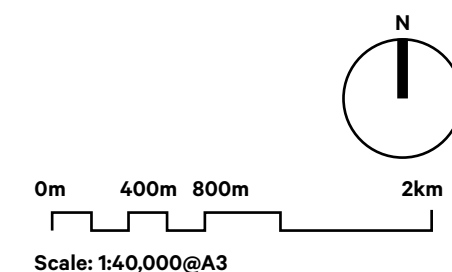




Figure 03: Guards Bay Site Context.



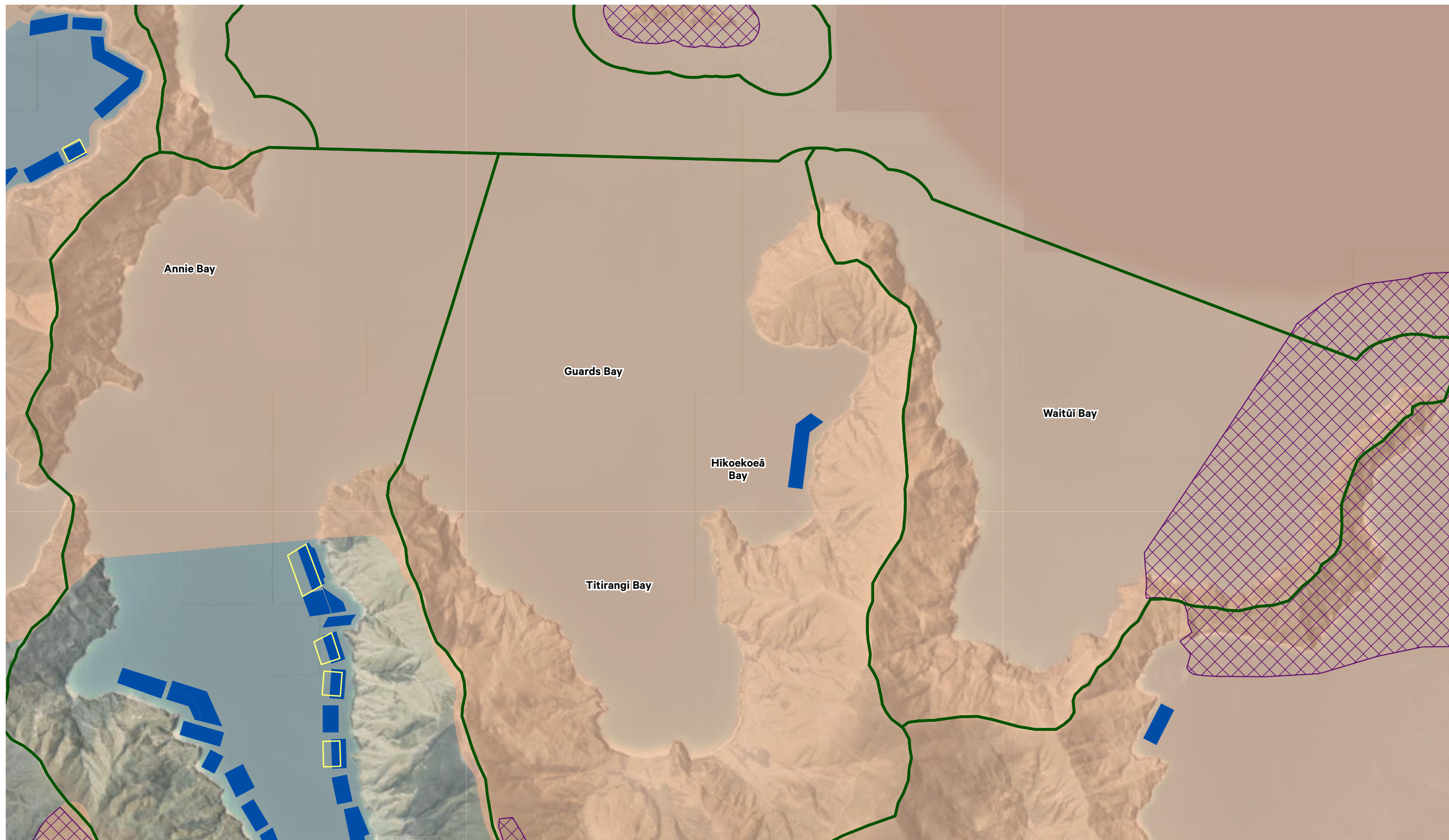


Figure 04: Guards Bay Statutory Context.

Legend

- Marine Farm: Granted
- Marine Farm: Processing
- Coastal Management Unit
- Coastal Outstanding Natural Character
- Outstanding Natural Feature & Landscape

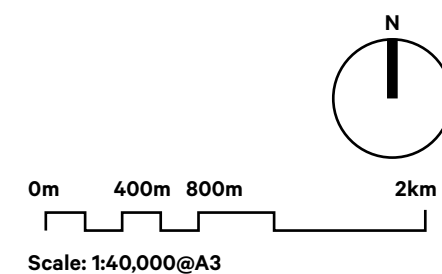
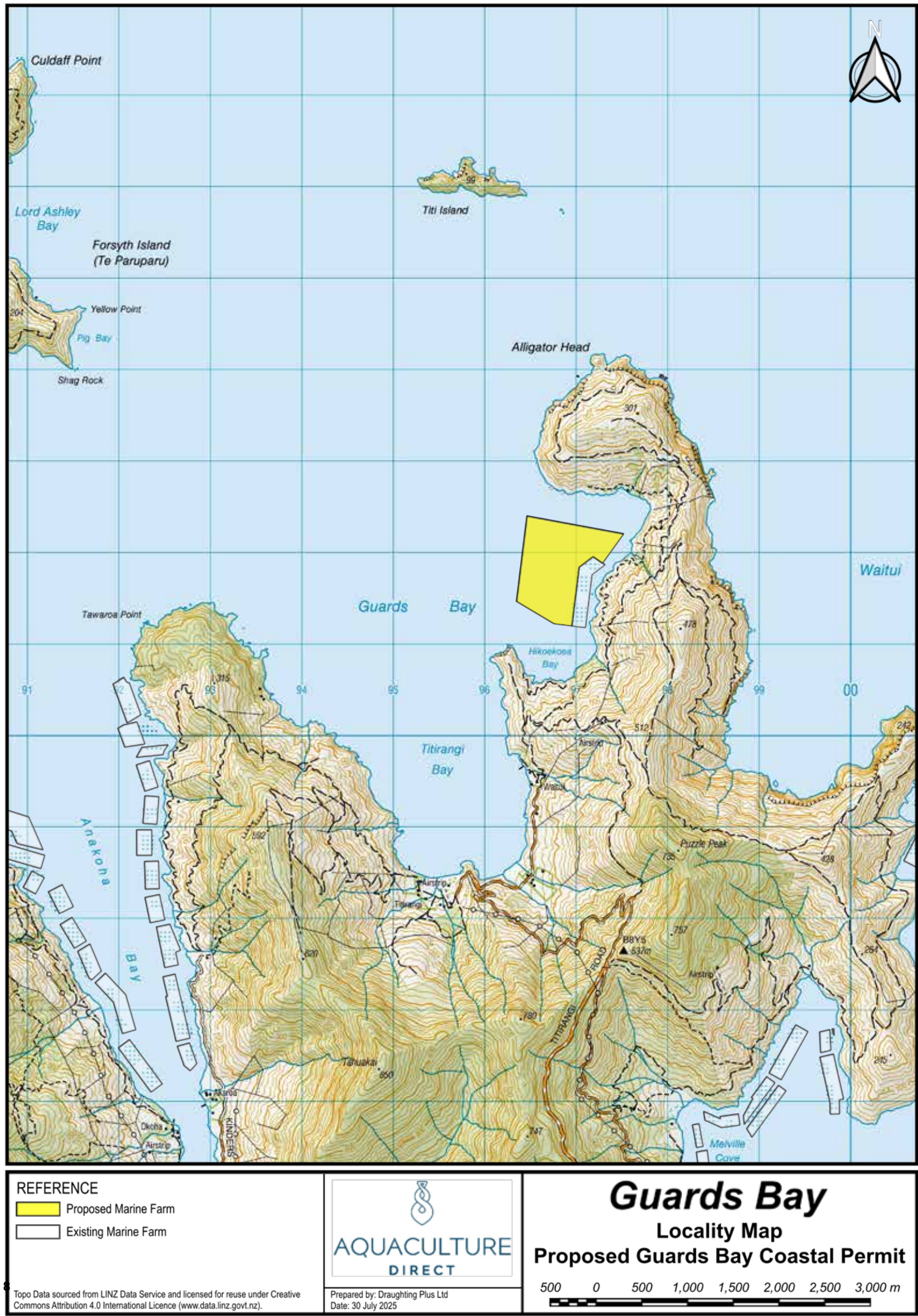


Figure 05: Locality Map.



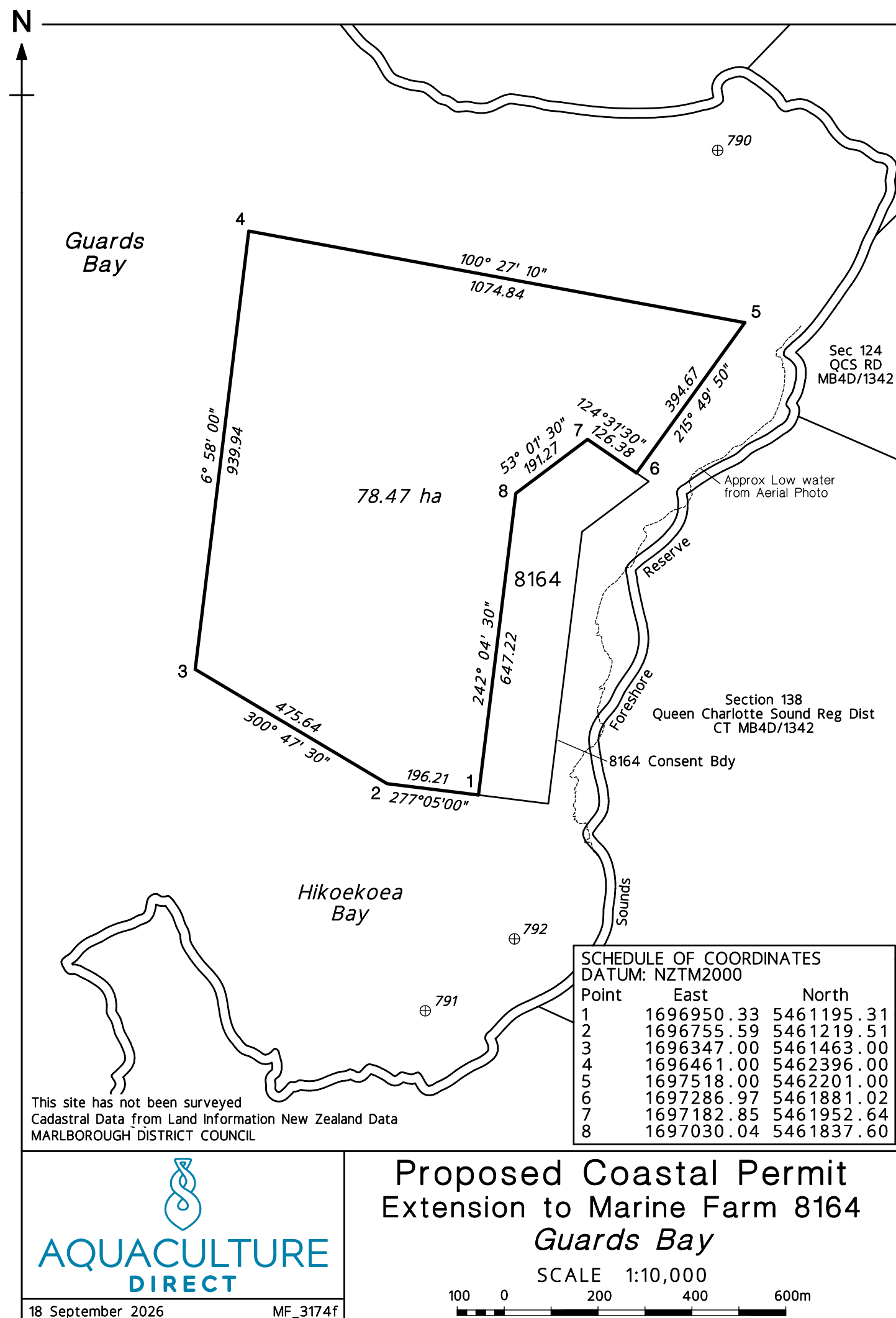


Figure 06: Existing and Proposed Layout.

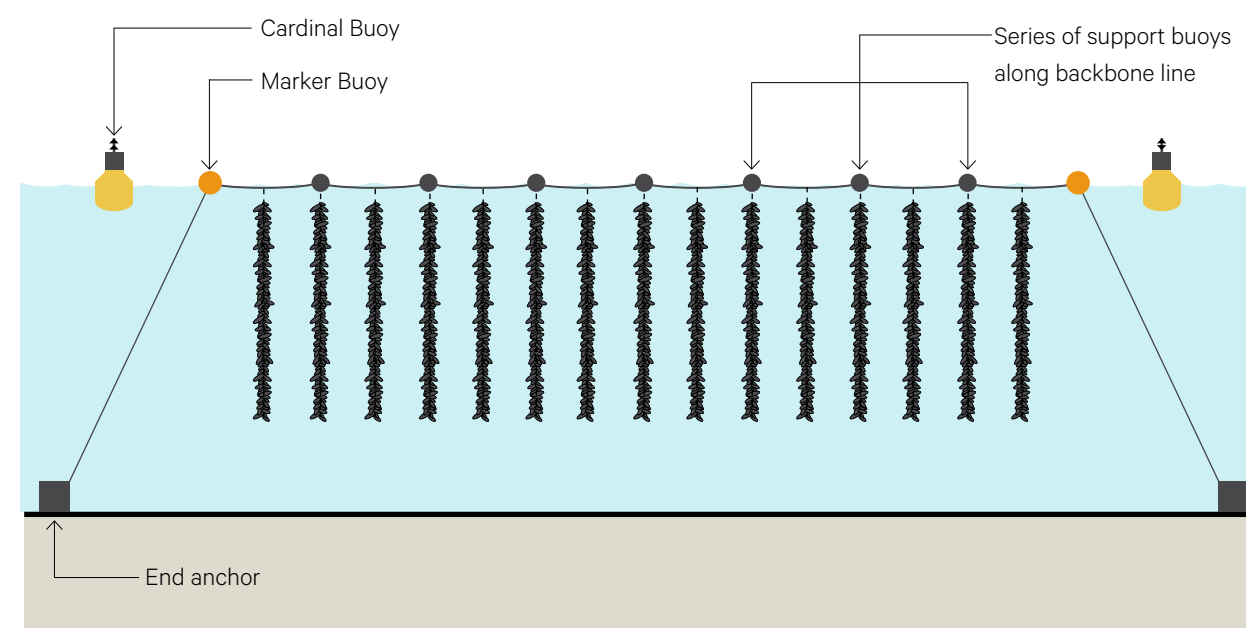


Figure 07: Indicative Illustration of Typical Conventional Mussel Farming.

Conventional mussel farming includes lengths of buoys on the surface of the water used to support crop. Buoys are more buoyant (and therefore more visible) when crop is lighter, or once crop has been harvested.



Figure 08: Proposed Layout.

Not to Scale

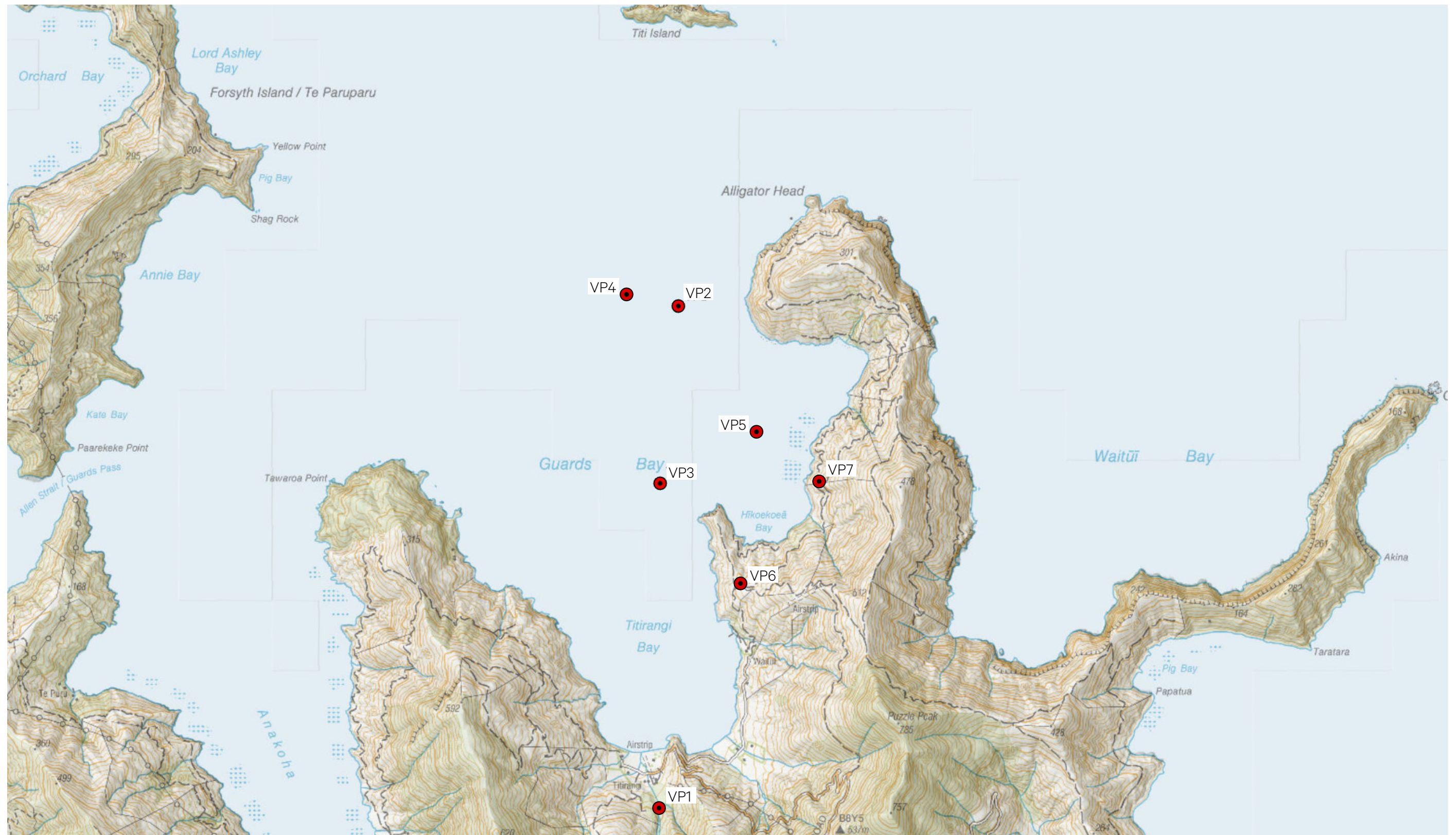
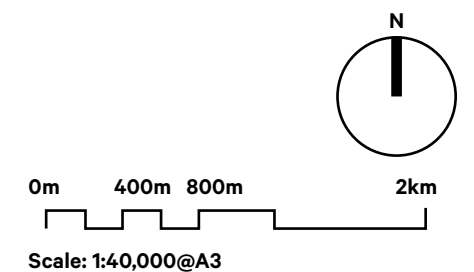


Figure 09: Viewpoint Location Map.

Legend

- Viewpoint Location



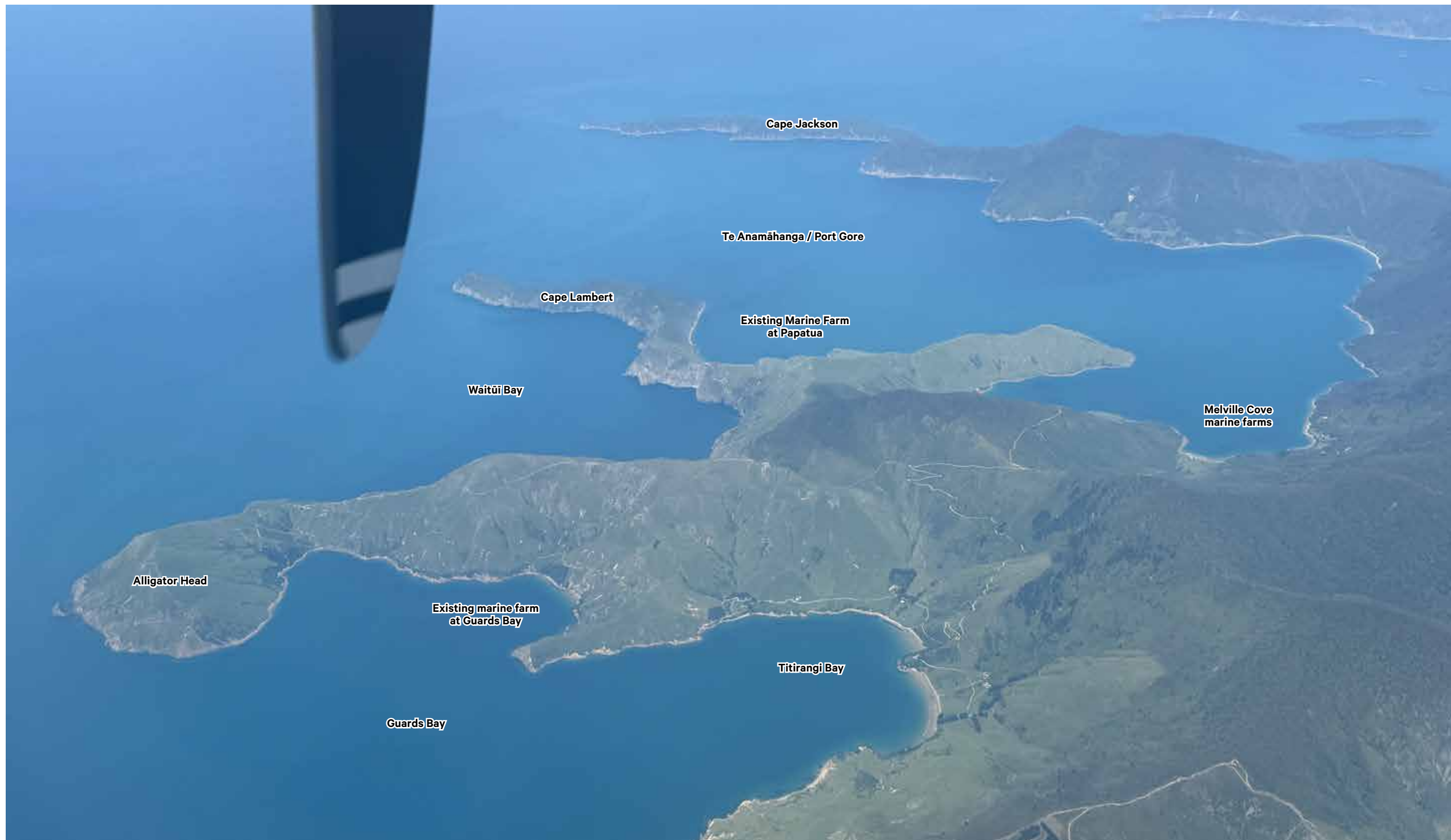


Figure 10: Context Aerial Imagery.

Aerial view from commercial flight over the site.



Figure 11: Viewpoint 1.

View towards Alligator Head and Guards Bay from over Titirangi Bay.



Figure 12: Viewpoint 2.

Aerial view of Hikoekoeā Bay (Alligator Head to the left).

Drone photo credit: Josh Hunt.







Figure 13: Viewpoint 3.

Aerial view of Hikoekoeā Bay (Alligator Head to the left).

Drone photo credit: Josh Hunt.







Figure 14: Viewpoint 4.

Water level view of Hikoekoeā Bay (Alligator Head to the left).







Figure 15: Viewpoint 5.

Water level view of Hikoekoeā Bay. Close to the existing marine farm.







Figure 16: Viewpoint 6.

Aerial view of Hikoekoeā Bay from helicopter over Titirangi Bay.

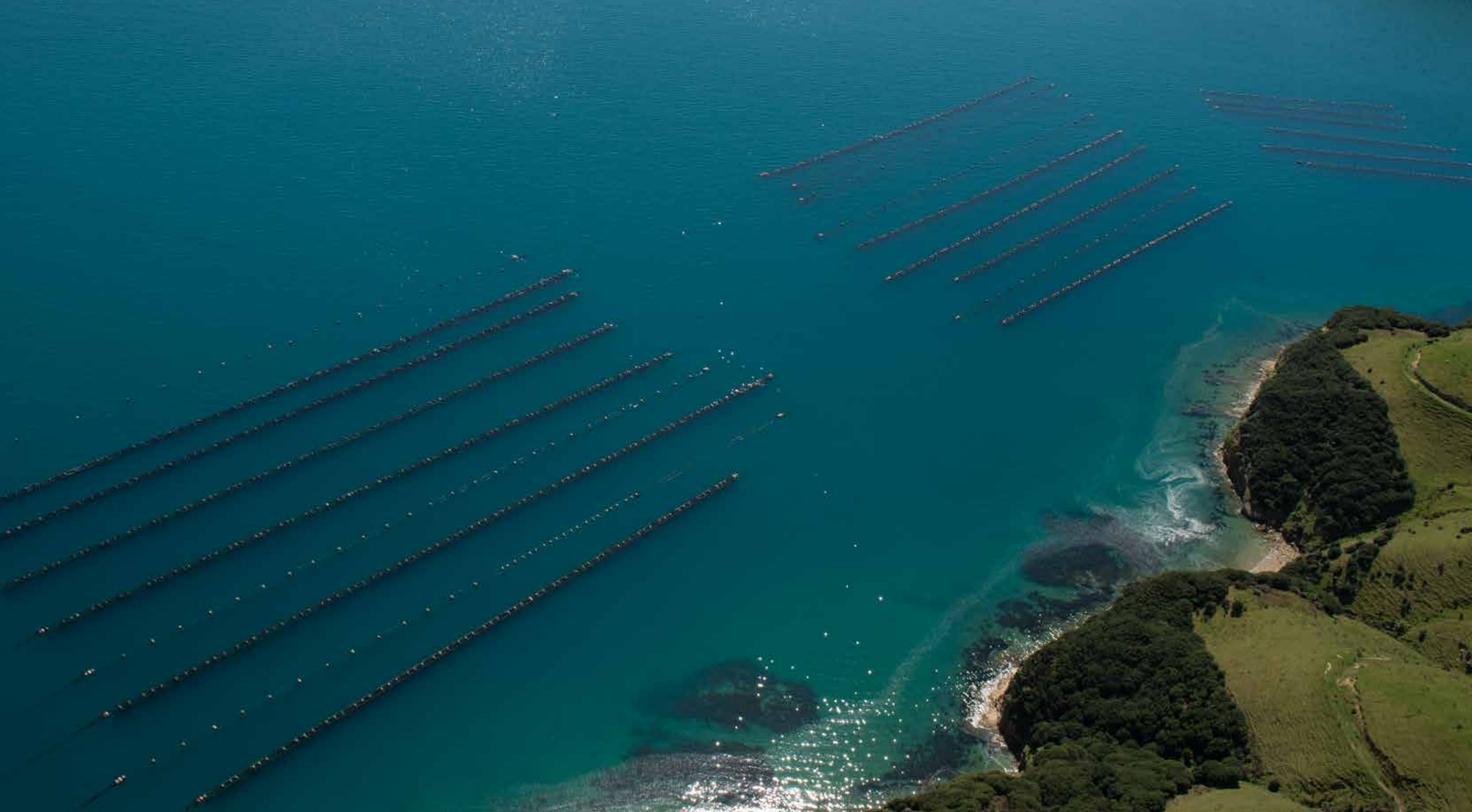


Figure 17: Viewpoint 7.

Aerial view of existing marine farm from helicopter.

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