

Okuri Bay

Landscape and Natural Character Assessment

Prepared for
Clearwater Mussels Limited & Talley's Group Limited

1 October 2026





Project Name: Okuri Bay

Report Title: Landscape and Natural Character Assessment

Prepared for: Clearwater Mussels Limited & Talley's Group Limited

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Cover Photo: Okuri Bay – Drone (Captured 4 December 2025)

Status: FINAL

Issue Date: 1 October 2026



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Executive Summary

- i. This assessment considers the potential landscape, visual and natural character effects of the proposed Okuri Bay marine farm, which forms part of the broader Fast-track Approvals process for new aquaculture activities within the Marlborough Sounds. The Okuri Bay proposal is being progressed by Clearwater Mussels Limited and Talley's Group Limited and comprises two mussel farm blocks of approximately 3.43 hectares and 24.46 hectares, with a combined area of approximately 27.89 hectares and a total backbone length of approximately 6,667 metres.
- ii. Okuri Bay is located within Current Basin, in the Outer Marlborough Sounds. It lies within a broader area mapped as Very High Natural Character in the Marlborough Environment Plan, but is not within an Outstanding Natural Character area. The proposal is also located within Okuri Bay itself and would not extend into the mapped Outstanding Natural Feature / Landscape waters beyond the bay.
- iii. At the wider scale, Okuri Bay forms part of the Marlborough Sounds and Current Basin coastal environment, which is characterised by steep coastal landforms, rocky shorelines, open coastal waters, high-flow marine environments, and strong land–sea relationships. At the local bay scale, however, the receiving environment is more modified. Okuri Bay is a broad, generally U-shaped coastal basin enclosed by the Okuri Point / Okuri Hill, Orr Hill and Malvern Hill landforms, with surrounding slopes influenced by pastoral land use, forestry, regenerating vegetation, scattered buildings, access tracks / roading and an existing marine farm.
- iv. The key issue for the assessment is therefore one of scale. The Very High Natural Character mapping reflects a broad Current Basin and Outer Sounds coastal context, rather than a uniform site-scale condition across all parts of Okuri Bay. At the more local Okuri Bay scale, the bay retains important natural character and landscape qualities, but these are moderated by existing terrestrial and marine modification.
- v. The proposal would introduce additional aquaculture structures into Okuri Bay and would increase the visible working marine character of the local bay environment. However, it would not alter the underlying landform structure, coastal edge, broader land–sea relationship or wider Current Basin landscape context. Landscape effects are assessed as **Very Low to Low** at the wider landscape scale and **Low to Low-Moderate** at the local bay scale, primarily due to the perceptual change associated with additional marine farming structures.

- vi. Visual effects would be greatest for marine users within Okuri Bay and for some adjacent landowners where views are available. The proposed structures would be visible as low-lying linear elements on the water surface, but would be viewed within a bay already influenced by other productive activities such as existing aquaculture, pastoral land use and forestry. Effects on adjacent landowners vary depending on elevation, orientation, distance and vegetation screening. Wider views from Croisilles–French Pass Road and marine routes beyond the bay would be distant, intermittent or oblique. At most, adverse visual effects are assessed as **Low-Moderate**.
- vii. Natural character effects have been assessed in relation to abiotic, biotic and experiential attributes. Abiotic effects are assessed as **Very Low**, as the proposal would not alter the coastal landform, bay morphology, shoreline configuration, seabed morphology or broader Current Basin coastal processes. Biotic effects are assessed as **Low**, taking account of the 2026 EclA's finding that construction and operational ecological effects at Okuri Bay would be Very Low across all ecological domains, together with the refinement of the farm layout to avoid higher-value horse-mussel biogenic habitat and associated rocky reef.
- viii. The principal natural character effects would be experiential, arising from the increased visibility and presence of marine farming structures within Okuri Bay. These effects are assessed as **Low** to **Low-Moderate** at the local bay scale, reflecting a noticeable but localised reduction in perceived naturalness within an already modified working coastal environment. At the broader mapped Very High Natural Character scale, the proposal would not compromise the open coastal waters, Current Basin / French Pass context, rocky outcrops, wider marine values or broader outer Sounds seascape values that underpin the overlay. Overall natural character effects are assessed as **Low** to **Low-Moderate**.
- ix. Cumulative effects have also been considered, noting that Okuri Bay already contains an existing marine farm and nearby Waikawa Bay contains additional aquaculture activity. The proposal would increase the visible extent of aquaculture within Okuri Bay, but would not introduce marine farming as a new activity type within this part of Current Basin. Given the modified terrestrial backdrop, existing aquaculture baseline, low-profile nature of the structures and continued dominance of the enclosing landforms, cumulative landscape, visual and natural character effects are assessed as **Low** to **Low-Moderate**.
- x. Existing marine farming within Okuri Bay and nearby Waikawa Bay is now authorised to remain until 31 December 2050 under the Resource Management (Extended Duration of Coastal Permits for Marine Farms) Amendment Act 2024. This reinforces the relevance of



existing aquaculture as part of the enduring receiving environment for the life of the current planning framework, rather than as a short-term or transitional modification.

- xi. Policy 14.21.6(d) of the Marlborough Environment Plan identifies that additional marine farming activities are not appropriate within areas of High or Very High Natural Character where they would have significant adverse effects on the values and characteristics of those areas. On the findings of this assessment, natural character effects are **Low** to **Low-Moderate** overall, localised, and primarily experiential. They sit within the range of **minor adverse effects** and are well below the level of significant adverse effects on the values and characteristics of the mapped Very High Natural Character area.
- xii. Overall, I consider that the proposed Okuri Bay marine farm would result in localised landscape, visual and natural character change within Okuri Bay, but would not materially compromise the key landscape characteristics of the bay, the visual amenity of the wider receiving environment, or the broader values that underpin the Very High Natural Character mapping. In my opinion, the proposed marine farm can be accommodated within Okuri Bay without compromising the identified landscape and natural character values of the receiving environment.

Introduction

Purpose

- 1 This report provides a landscape, visual, and natural character assessment of proposed marine farming activity within Okuri Bay / Current Basin, Marlborough Sounds. The assessment has been prepared on behalf of Clearwater Mussels Limited and Talley's Group Limited to support consideration of proposed aquaculture activities within the Marlborough Environment Plan / Fast-track approvals context.
- 2 The purpose of the report is to identify the existing landscape and natural character context of Okuri Bay, assess the extent to which the proposed marine farm would influence that context, and determine whether the proposal would compromise the identified values of the receiving environment.

Scope

- 3 This assessment addresses:
 - the existing landscape character of Okuri Bay and its wider Current Basin / Marlborough Sounds context;
 - the relevant natural character attributes of the coastal marine area;
 - the visual catchment and likely viewing audiences;
 - the landscape, visual, and natural character effects associated with the proposed marine farm; and
 - whether the proposal can be accommodated without compromising the identified values associated with the mapped Very High Natural Character area.
- 4 This assessment acknowledges the Very High Natural Character overlay covering Okuri Bay and considers whether the proposal is compatible with the values identified by that overlay, having regard to the existing local baseline and the nature, scale and location of the proposed activity.
- 5 I have read the Code of Conduct for Expert Witnesses contained in section 9 of the Environment Court Practice Note 2023 and agree to comply with it. I have complied with the Code in preparing this assessment. Except where I state that I rely on the evidence or advice of another person, the opinions expressed are within my area of expertise. I have not omitted to consider any material fact known to me that might alter or detract from the opinions expressed.

Methodology

Assessment Approach

- 6 This landscape and natural character assessment has been prepared by Josh Hunt, a Registered Landscape Architect (NZILA), and is based on guidance from the NZ Landscape Assessment Guidelines¹, with the intention to determine the nature of effects and identify the degree of those effects, based on the following 7-point scale (Figure 1). The upper row reflects the commonly used NZILA effects rating scale, while the lower row provides a reference to the comparative terminology commonly used within the Resource Management Act (RMA), commonly applied to the section 95 notification test and the section 104D gateway test for non-complying activities.

Very Low	Low	Low - Moderate	Moderate	Moderate - High	High	Very High
Less than minor	Minor		More than Minor		Significant	

Figure 1: Effects rating scale.

- 7 This assessment has been tailored to suit the nature of the issues being considered within the Fast-track approvals process, with particular regard to matters relating to landscape and natural character within the coastal environment of Okuri Bay.
- 8 The methodology follows a structured process which includes:
- Identification of the existing landscape and natural character context of Okuri Bay;
 - Identification of the attributes and values associated with that environment;
 - Consideration of the characteristics of marine farming activity within the bay; and
 - Evaluation of the magnitude of change and resulting landscape and natural character effects.
- 9 This assessment considers both landscape character and natural character within the context of Okuri Bay. While these matters are closely related, they are recognised within the Resource Management Act as distinct considerations, and are therefore assessed using related but separate analytical frameworks.

Landscape Assessment Framework

- 10 The assessment of landscape character follows the commonly applied landscape assessment framework outlined in the NZ Landscape Assessment Guidelines – Te Tangi a te Manu (NZILA, 2022). This framework considers landscape through three broad attribute groups (identified below), which collectively contribute to the overall landscape character of Okuri Bay.

¹ 'Te Tangi a te Manu: Aotearoa New Zealand Landscape Assessment Guidelines'. Tuia Pita Ora NZILA, July 2022.



Physical Attributes

- 11 These relate to the physical and ecological characteristics of the environment, including:
- coastal landform and landform patterns
 - vegetation cover and patterns
 - marine and coastal ecological characteristics
 - coastal processes.

Associative Attributes

- 12 These relate to the cultural/historical associations connected with the landscape, including:
- cultural associations
 - historical patterns of land use
 - recreational values.

Perceptual Attributes

- 13 These relate to how the landscape is perceived and experienced by people, including:
- perceived naturalness
 - scenic qualities
 - spatial qualities such as enclosure or openness
 - the presence or absence of built structures.

Natural Character Assessment Framework

- 14 Natural character is assessed with reference to section 6(a) of the RMA, Policy 13 of the NZCPS and the relevant Marlborough Environment Plan provisions, including Chapter 7 and Appendix 4. For the purposes of this assessment, natural character is considered through three primary components:

Abiotic Factors

- coastal landforms
- geomorphology
- coastal processes
- water bodies and marine characteristics.

Biotic Factors

- indigenous vegetation
- marine habitats and ecological values
- ecological integrity and naturalness.

Experiential Factors

- perceived naturalness
- degree of human modification
- visual and sensory qualities associated with the coastal environment.

Existing Environment

Landscape Context and Scale

- 15 The landscape and natural character context of Okuri Bay is best understood as part of a sequence of nested coastal landscape scales. This reflects the way in which the Marlborough Sounds landscape and coastal natural character studies have been structured, while also allowing the more localised characteristics of Okuri Bay and the proposed site coastline to be considered at an appropriate level of detail.
- 16 For this assessment, the receiving environment has been considered across the following five scales (levels):
1. Marlborough Sounds – the broader regional coastal landscape
 2. Outer Marlborough Sounds – the wider coastal landscape
 3. Current Basin, including the Tasman Bay Coastline and Bulwer landform – broader landscape context
 4. Okuri Bay – the local embayment
 5. Site Coastline – the immediate coastal interface adjacent to the proposal area
- 17 Each of these scales contributes to the overall landscape and natural character context of the proposed marine farm. However, the relative importance of each scale varies depending on the matter being assessed. For example, the wider Marlborough Sounds and Outer Sounds context is important to understanding broader landscape character and natural character values, while the Okuri Bay and Site Coastline scales are more directly relevant to localised landscape, visual, and experiential natural character effects.
- 18 This scale framework is important because the Okuri Bay Very High Natural Character mapping reflects a broad assessment context (Level 3), whereas effects from the proposed marine farm will be experienced at a more localised scale (Level 4/5).

Marlborough Sounds (and the Outer Marlborough Sounds) – Level 1/2

- 19 The Marlborough Sounds comprise an extensive and highly indented coastal landscape at the north-eastern end of the South Island (Attachment 1: Sheet 1). The area is characterised by drowned river valleys, steep coastal hill country, a complex sequence of headlands and embayments, islands, sheltered waters, and more exposed outer coastal margins. These landforms create strong and legible relationships between land and sea, which are central to the identity and character of the Sounds.



- 20 The broader Sounds landscape is recognised for its scenic qualities, natural character values, recreational associations, and cultural importance. It also supports a long-established pattern of productive use, including pastoral farming, forestry, marine farming, settlement, jetties, moorings, and other coastal infrastructure. These activities form part of the working coastal character of many parts of the Sounds and are relevant to understanding the existing landscape context.
- 21 The Outer Marlborough Sounds generally include those parts of the Sounds that are more directly influenced by the open waters of Cook Strait and Tasman Bay. In comparison with the more enclosed inner Sounds, the Outer Sounds tend to exhibit a stronger sense of exposure, larger-scale coastal landforms, and a more direct relationship with open coastal waters. However, this wider landscape still contains a variety of modified and productive environments, including areas of pastoral land, forestry, and aquaculture.
- 22 Okuri Bay sits within this wider Outer Sounds context. It forms part of a coastal landscape where high natural character and scenic values coexist with productive coastal land uses. This broader context is important because the presence of marine farming is not, in itself, unusual within the Marlborough Sounds, although its appropriateness depends on the values, sensitivity, scale, and character of the particular location.

Current Basin – Level 3

- 23 At the broader landscape scale, Okuri Bay forms part of the Current Basin / Croisilles coastal setting associated with the Tasman Bay coastline and the Bulwer landform. The Marlborough Environment Plan identifies Okuri Bay within a mapped Very High Natural Character area, but not within an Outstanding Natural Character area. The coastal waters beyond Okuri Bay form part of the Outer Marlborough Sounds ONFL associated with District Landscape 13 – Croisilles.
- 24 This broader coastal setting is characterised by an irregular sequence of bays, inlets, small islands, rocky outcrops, peninsulas and headlands, including Croisilles Harbour, Current Basin, Greville Harbour and the south-western coastline of D'Urville Island. The adjoining Bulwer landform comprises steep to moderately steep, dissected coastal hill and mountain slopes, with relatively abrupt land–sea interfaces and limited intervening beach margins. While parts of the coastline are open to the wider waters of Tasman Bay, the inner reaches of the harbours and basins are more sheltered. The marine environment is influenced by relatively warm coastal waters associated with the D'Urville Current and Tasman Bay outflows, with strong tidal movement near French Pass and weaker to moderate currents elsewhere.

- 25 The coastal marine environment contains a varied sequence of rocky shores, near-shore bedrock and cobble reef, sandy beaches, gravels, sandy sediments and deeper offshore silts. These support a range of reef, sediment and estuarine habitats, including Whangarae Estuary, Greville Harbour, subtidal sand communities in Croisilles Harbour, and high-flow habitats associated with Current Basin and French Pass. The terrestrial vegetation pattern is more modified, with original indigenous forest cover substantially reduced across lower altitude coastal slopes and warmer aspects. Remaining indigenous forest is generally more confined to upper slopes, south-facing aspects and regenerating areas, while the wider Bulwer area now contains a mixed pattern of native shrubland, remnant forest, exotic trees, forestry and pasture.
- 26 Experientially, the wider Current Basin / Tasman Bay coastal waters have an expansive and often open coastal character, particularly where they extend toward Tasman Bay and south-western D'Urville Island. The adjoining terrestrial backdrop contributes a distinctive sequence of steep ridges, slender peninsulas, islands, broad bays and relatively remote coastal margins. However, this is not a uniformly unmodified environment. Aquaculture and coastal structures are present in parts of Croisilles Harbour, marine farms are present in two small embayments within Current Basin, commercial trawling occurs offshore in Tasman Bay, and the terrestrial margins include forestry, pastoral farming, regenerating bush, scattered dwellings and limited road access.
- 27 The broader Level 3 context therefore combines high natural character coastal waters and important marine values with a locally modified pattern of productive land and marine use. This is important for the Okuri assessment because the mapped Very High Natural Character rating applies at a broad scale, while the assessment of effects from the proposed farm requires closer consideration of the more localised Okuri Bay and site coastline receiving environment.

Okuri Bay - Level 4

- 28 At the local embayment scale (Attachment 1 – Sheet 03), Okuri Bay forms a broad, generally 'U' shaped coastal basin on the southern side of Current Basin. The bay is enclosed by a sequence of surrounding coastal landforms, including Okuri Point and the Okuri Hill landform to the west, Orr Hill to the south, and the Malvern Hill landform to the north-east. These landforms frame the bay and provide a legible sense of containment, while the open mouth of the bay maintains a clear visual and spatial relationship with the Tasman Bay waters.

- 29 The surrounding landforms (Attachment 1 – Sheets 05 & 06) comprise steep to moderately steep coastal slopes which descend toward the shoreline, creating a strong land–sea relationship around much of the bay. French Pass Road follows the broader Orr Hill / Okuri Hill ridgeline approximately one kilometre inland from the Okuri Bay coastline. Although this road corridor forms part of the wider terrestrial context, the immediate coastal edge is largely experienced from the water, with the surrounding slopes and headlands forming the principal visual backdrop.
- 30 The landcover pattern around Okuri Bay is mixed and modified. The surrounding slopes (Attachment 1 – Sheets 07, 08, 09, & 10) are predominantly characterised by grazing pasture, interspersed with areas of forestry, as well as areas of regenerating native vegetation and scrub. Areas of regenerating native cover are particularly associated with parts of the coastal slopes and the Okuri Hill landform. This creates a varied but clearly productive terrestrial backdrop, rather than a continuous sequence of intact indigenous vegetation extending from ridge to sea.
- 31 Plantation forestry forms part of the local modified context of Okuri Bay, with existing consented forestry present on the surrounding western slopes, and further regularly spaced planting has been identified toward the head of the bay (south-eastern slopes). I am not sure of the consent status of that recent planting, however its presence is consistent with the broader pattern of productive rural land use, forestry and regenerating vegetation that influences the local landscape and natural character baseline.
- 32 The coastal marine area of Okuri Bay is also not unmodified. Existing marine farming activity is present within the bay and forms part of the local working coastal character (Attachment 1 Sheet 11). This is important because aquaculture is already a recognised component of the bay's marine environment, rather than a wholly new activity type introduced into an otherwise unmodified coastal basin.
- 33 Experientially, Okuri Bay retains a strong coastal character through its broad basin form (Attachment 1 – Sheets 12 & 13), enclosing landforms on three sides, relative remoteness, and relationship with the wider Tasman Bay waters. However, these qualities are moderated at the local scale by the visible pattern of pastoral land use, forestry, regenerating vegetation and existing aquaculture. The bay is therefore best understood as a valued but modified coastal embayment within a broader Very High Natural Character setting, rather than as a pristine or highly remote marine environment.

- 34 This Level 4 context is particularly relevant to the assessment of effects because it represents the scale at which the proposed marine farm will be most clearly understood as part of the bay's local composition. While the broader Level 3 context explains the Very High Natural Character setting, the Okuri Bay scale allows the proposal to be considered against the actual local pattern of landform enclosure, vegetation, existing aquaculture, productive land use and marine-based activity.

Site Coastline - Level 5

- 35 At the most local scale, the site coastline comprises the immediate coastal interface between the waters of Okuri Bay and the coastal slopes that visually define and backdrop the proposed marine farm area. This area is located within the broader enclosed basin of Okuri Bay, but is experienced more directly from the water and from marine movements within the bay. It is therefore the scale at which the adjacent shoreline, coastal slopes and surrounding landform patterns are most closely perceived together.
- 36 The relevant coastline is characterised by relatively steep coastal slopes and low rocky coastal margins, with a narrow intertidal edge of rock, boulders and cobbles. The adjoining slopes are predominantly modified, with a mixture of grazing pasture, pine plantation, scrub and areas of long-term and regenerating native vegetation. This creates a varied but visibly productive coastal backdrop, where the natural coastal landform remains legible, but the landcover pattern is not intact or unmodified.
- 37 The marine environment adjoining this coastline includes deeper subtidal waters within the broader basin of Okuri Bay. Ecological survey by Robertson Environmental identifies a varied seabed environment within the wider bay, including areas of reef, biogenic habitat, softer sediment, horse mussel beds and areas of higher natural shell cover. That more detailed ecological context is addressed later in this assessment.
- 38 Existing marine farming is already present within Okuri Bay and forms part of the immediate working coastal context. While the site coastline retains valued coastal qualities, including landform enclosure, open water, relative remoteness and a strong land–sea relationship, these qualities are experienced alongside existing aquaculture and modified terrestrial landcover. The immediate receiving environment is therefore a locally modified coastal interface where natural landform, productive land use, marine ecological values and marine-based activity are already experienced together.

Summary of Existing Environment

- 39 The existing environment of Okuri Bay is understood through a hierarchy of coastal landscape scales. At the broadest level, the site forms part of the Marlborough Sounds and Outer Marlborough Sounds, a distinctive coastal landscape defined by drowned valleys, steep coastal landforms, indented shorelines, islands, headlands and strong land–sea relationships. At the Current Basin scale, Okuri Bay sits within a wider coastal marine area identified as having Very High Natural Character, with important marine values including rocky shores, reef and sediment habitats, high-flow environments associated with Current Basin and French Pass, and wider associations with seabirds and marine mammals. This broader context is not uniformly unmodified, with existing aquaculture, coastal structures, commercial trawling offshore in Tasman Bay, and a modified terrestrial backdrop of pasture, forestry, regenerating vegetation, scattered buildings and limited road access.
- 40 At the Okuri Bay and site coastline scales, the receiving environment becomes more locally defined. Okuri Bay forms a broad, generally U-shaped coastal basin enclosed by the Okuri Point / Okuri Hill, Orr Hill and Malvern Hill landforms, while maintaining an open relationship with the wider Current Basin waters. The relevant coastline is characterised by relatively steep coastal slopes, low rocky margins and a narrow intertidal edge, with surrounding landcover comprising a modified pattern of grazing pasture, pine plantation, scrub and regenerating native vegetation. Existing marine farming is already present within the bay, and the adjacent marine environment includes a varied seabed context identified through ecological survey. The receiving environment is therefore best understood as a locally modified coastal embayment within a broader Very High Natural Character setting, rather than as a pristine or highly remote marine environment.

Landscape Character Baseline Assessment

- 41 The assessment of landscape character has been undertaken using the landscape framework outlined in the New Zealand Landscape Assessment Guidelines – Te Tangi a te Manu (NZILA, 2022). Under this framework, landscape character is understood through consideration of three primary attribute groups:
- **Physical attributes** – the physical and ecological characteristics of the landscape;
 - **Associative attributes** – the cultural, historical and social associations connected with the landscape; and
 - **Perceptual attributes** – how the landscape is perceived and experienced.
- 42 While the broader landscape context of the Marlborough Sounds and Current Basin contributes to the overall character of the area, this assessment focuses primarily on the

landscape characteristics of Okuri Bay (Attachment 1: Sheets 2 & 3), which forms the immediate receiving environment for the potential marine farming activity.

Physical Landscape Attributes

Coastal Landforms

- 43 Okuri Bay is defined by a broad, generally U-shaped coastal basin enclosed by the Okuri Point / Okuri Hill landform to the west, Orr Hill to the south, and Malvern Hill to the north-east (Attachment 1: Sheet 03). These landforms create a clear sense of spatial containment, while the open mouth of the bay maintains a direct relationship with the wider Tasman Bay and Current Basin. The underlying geology of the area is siliceous sedimentary rock and shist. This coastal edge is generally narrow and rocky, with steep to moderately steep slopes descending toward eroding sea cliffs (Attachment 1: Sheet 08).

Vegetation Patterns

- 44 The surrounding landcover is mixed and modified. Pastoral grazing is the dominant land use across much of the bay's enclosing slopes, interspersed with areas of pine plantation, scrub and regenerating native vegetation (Attachment 1: Sheets 12 & 13). This creates a varied but visibly productive terrestrial backdrop, where the underlying coastal landform remains legible, but the vegetation pattern is not intact or continuous indigenous cover.
- 45 A comparison of historical imagery reveals that there are areas of remnant native vegetation comprising approximately 13% of the Okuri Bay terrestrial basin (Figure 2), the largest patch being on the upper slopes of Okuri Hill (to the south), leaving the vast majority as pasture with areas of plantation forestry. There are also other areas of regenerating scrub (both through intentional planting and natural reclamation), typically within steep ephemeral streams.

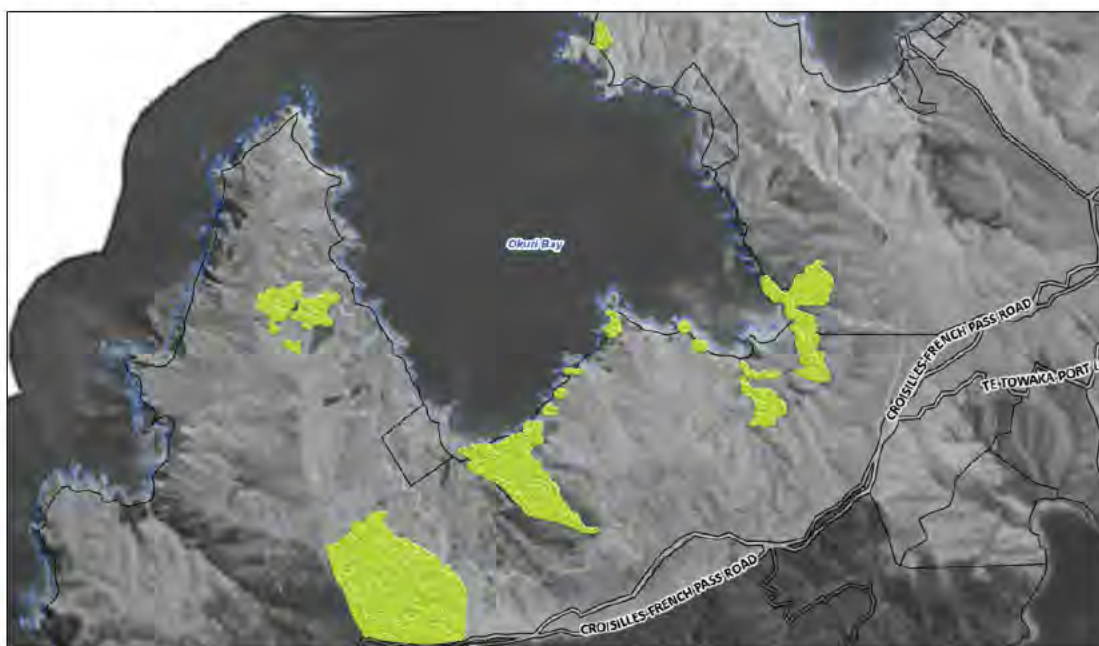


Figure 2: Remnant Native Vegetation: Identifies as existing in both the 1960s historic aerial and most recent aerial imagery.

Marine Environment

- 46 The marine environment contributes strongly to the bay's open coastal character and land–sea relationship. Existing marine farming is already present within Okuri Bay and forms part of the physical baseline. Ecological survey by Robertson Environmental² identifies a varied seabed environment within the wider bay, including softer sediment areas as well as reef, biogenic habitat, horse mussel beds and areas of higher natural shell cover. Those ecological features are addressed in more detail under the natural character baseline, but they confirm that the marine environment is varied rather than uniform.

Associative Landscape Attributes

Historical and Cultural Attributes

- 47 As part of the wider Marlborough Sounds coastal environment, Okuri Bay holds cultural and historical associations for tangata whenua and with patterns of coastal occupation, movement and resource use. However, at the local bay scale, no mapped Māori archaeological sites or geopreservation sites have been identified within Okuri Bay. In the absence of site-specific cultural evidence, this assessment does not make findings on cultural values, other than recognising that the wider coastal environment is likely to hold associations beyond those evident in mapped archaeological records.

Productive Landscape Associations

- 48 Productive use is a clear part of Okuri Bay's existing landscape character. The surrounding landforms are predominantly modified by grazing pasture, with areas of forestry (with a large area below Croisilles-French Pass Rd recently planted, likely in production forestry) and other productive rural land use. Existing marine farming is also present within the bay, reinforcing the working coastal character of the local environment. These productive associations are therefore not incidental, but form part of the established relationship between the bay, its surrounding landforms and the coastal marine area.

Recreational and Coastal Use

- 49 Okuri Bay is primarily experienced from the water, with limited land-based public access and French Pass Road set back from the coastline along the broader ridgeline. The bay contains a small number of dwellings, with two dwellings identifiable on aerial imagery, but not readily apparent from the waters within the bay. Recreational boating, fishing and general coastal use form part of the wider Sounds context, although Okuri Bay does not appear to function as a major public recreation destination in the same way as more accessible or settlement-focused parts of the Sounds.

² Robertson, B.P. 2022. *Ecological Impact Assessment for Proposed Aquaculture Management Areas, Okuri Bay, outer western Marlborough Sounds*.

Perceptual Landscape Attributes

Spatial Qualities

- 50 Okuri Bay has a strong and legible spatial structure, defined by its broad U-shaped basin and the enclosing landforms of Okuri Point / Okuri Hill, Orr Hill and Malvern Hill. The surrounding slopes and headlands provide containment and draw attention upward from the water to the undulating skyline, while the open bay mouth maintains long-distance views toward the wider Current Basin and Tasman Bay. This creates a balance between enclosure and openness, with the bay experienced as both a locally contained coastal basin and part of the wider Outer Sounds seascape.

Visual simplicity

- 51 The bay has a relatively simple visual composition (Figure 3), based on the clear relationship between open water, rocky coastal edge, pastoral slopes and enclosing landforms. That simplicity is moderated by visible human modification, including pasture patterns, fence lines, forestry blocks, roading and existing marine farm buoys. The headlands, including Okuri Point, as prominent and distinctive features that add to the memorability of the setting, while the presence of expansive farming landcover along with straight and unnatural lines (from forestry and some of the fenced off revegetation areas) are also present within the bay.



Figure 3: View across Okuri Bay from Croisilles-French Pass Rd (Source: Google Earth)

Working Coastal Landscape

- 52 Okuri Bay retains a degree of wildness through its eroding coastal cliffs, rocky shoreline, maritime exposure and relative remoteness. This quality is particularly evident along the steep rocky coasts and cliff faces, where natural coastal processes remain visually legible. However, this wildness sits within a modified working coastal landscape, where pastoral land use,

forestry and existing aquaculture are clearly present. The marine farm, within Okuri Bay (and also the adjacent Waikawa Bay), however remain subservient to the dominance of the hills, dramatic coastal edge and intricate landforms.

Summary of Landscape Character Baseline

53 The landscape character of Okuri Bay is defined by the interaction between its broad enclosed coastal basin, expressive rocky shoreline, modified pastoral slopes, and existing working coastal uses. Key characteristics include:

- a broad, generally U-shaped coastal basin enclosed by the Okuri Point / Okuri Hill, Orr Hill and Malvern Hill landforms, with a narrow rocky coastal edge, eroding sea cliffs and steep slopes descending toward the shoreline;
- a modified terrestrial landcover pattern dominated by pastoral grazing, with areas of pine plantation, scrub, regenerating native vegetation and limited remnant native vegetation;
- an open coastal marine environment that contributes strongly to the bay's land–sea relationship, while also containing existing marine farming; and
- established productive associations, including pastoral farming, forestry and aquaculture, set within a relatively simple visual composition of open water, rocky coastal edge, pastoral slopes and enclosing landforms.

54 Together these characteristics create a landscape that retains strong coastal landform expression, a degree of wildness along the rocky shoreline and sea cliffs, and a clear relationship with the wider Current Basin, while also reflecting the established working coastal landscape character of Okuri Bay.

Natural Character Baseline Assessment

55 The following baseline assessment considers natural character at the relevant spatial scales, having regard to section 6(a) of the RMA, Policy 13 of the NZCPS and the relevant Marlborough Environment Plan provisions, including Chapter 7 and Appendix 4. Consistent with the methodology described earlier, the assessment is structured under:

- **Abiotic attributes** – the physical characteristics of the coastal environment, including coastal landforms, geomorphology and marine processes;
- **Biotic attributes** – the ecological characteristics of the coastal environment, including vegetation patterns and marine habitats; and
- **Experiential attributes** – the perceived naturalness and degree of human modification, influencing how the coastal environment is perceived and experienced.

- 56 While natural character is influenced by attributes operating at a range of spatial scales, this assessment focuses primarily on the natural character of the environment within Okuri Bay.
- 57 In assessing potential effects on natural character, the MEP also identifies³ a range of relevant considerations including the status of the resource, the proportion of the resource affected, sensitivity to change, resilience and cumulative effects.

Abiotic

Marlborough Sounds Coastal System

- 58 At the broadest scale, Okuri Bay forms part of the wider Marlborough Sounds coastal system. This system is defined by drowned valley landforms, steep coastal hill country, indented shorelines, sheltered bays, headlands, islands and strong land–sea relationships. These abiotic characteristics provide the underlying physical structure for both landscape and natural character values across the Sounds.
- 59 The coastal environment is not uniform, with varying degrees of shelter, exposure, water depth, substrate type and tidal influence. Okuri Bay is located within the western / outer Sounds context, where the coastal system is influenced by the comparatively open waters of Tasman Bay.

Outer Sounds Context

- 60 Within the Outer Sounds context, the abiotic character becomes more open and ocean-influenced than many of the inner Sounds embayments. The coastline includes larger-scale coastal landforms, more exposed headlands, rocky shorelines and broader relationships with open coastal waters. These characteristics contribute to a stronger sense of maritime exposure, while still retaining areas of localised shelter within bays and basins.
- 61 This wider physical setting is relevant because Okuri Bay is not an isolated inner embayment. Its natural character is influenced by its relationship with Current Basin and the wider Tasman Bay coastal environment, including broader tidal movement, coastal water exchange and exposure patterns.

Current Basin Coastal System

- 62 At the Current Basin scale, the coastal system is characterised by an irregular sequence of bays, inlets, rocky outcrops, peninsulas and headlands, including Croisilles Harbour, Current Basin, Greville Harbour and the south-western coastline of Rangitoto ki te Tonga/D’Urville Island. Current Basin connects Okuri Bay with the wider Tasman Bay and Outer Sounds

³ Marlborough Environment Plan: Appendix 4: Determining Significant Adverse Effects on Natural Character

coastal environment and is subject to tidal influence that strengthens toward Te Aumiti/French Pass. The nearest mapped Ecologically Significant Marine Site (ESMS-1.5) is located more than 5km to the north, across Current Basin, on the southern coastline of Rangitoto ki te Tonga/D'Urville Island.

Okuri Bay embayment

- 63 At the local scale, Okuri Bay forms a broad, generally U-shaped coastal embayment enclosed by the Okuri Point / Okuri Hill, Orr Hill and Malvern Hill landforms. The bay has a clear sense of landform containment, while retaining an open relationship with the wider waters of Current Basin. The surrounding slopes descend toward a relatively narrow rocky shoreline, including areas of rock, boulders, cobbles and eroding coastal edge.
- 64 These physical characteristics contribute to the bay's natural character by maintaining a legible coastal basin form and a strong relationship between landform and water. However, the abiotic structure of the bay is experienced alongside modified landcover and existing coastal use, which are addressed under the biotic and experiential components.

Seabed Environment

- 65 The proposed Okuri Bay consent footprint comprises 27.89 ha of widespread muddy sand and soft-sediment seabed. The 2026 Coastal Ecological Impact Assessment (EclA) identifies no reef, horse-mussel bed or other high-value benthic feature within the consent footprint. Higher-value horse-mussel biogenic habitat and associated rocky reef occur outside the footprint, with the nearest mapped habitat approximately 5 m from the proposed western block⁴.
- 66 In broad terms, the seabed environment is not uniform. It includes both more structurally complex areas, such as reef and biogenic habitat, and softer sediment areas that are more typical of the deeper subtidal parts of the bay. This variability is important to the natural character baseline, as it indicates that the abiotic character of the bay is spatially differentiated rather than consistent across the full marine area.

Biotic

Terrestrial Vegetation

- 67 The terrestrial vegetation pattern around Okuri Bay is mixed and modified. The surrounding slopes are dominated by pastoral grazing, with areas of pine plantation, scrub and regenerating native vegetation, and wilding pines, including more established native cover

⁴ Robertson, B. 2026. Marlborough Sounds Aquaculture Project: Coastal Ecological Impact Assessment. Robertson Environmental Limited, Report ID REL174582, Version 1.0, 1 September 2026, Table 3-2.

associated with parts of the Okuri Hill landform. While this vegetation contributes to the bay's natural character, the pattern is fragmented and does not read as a continuous intact indigenous coastal forest sequence, unlike the adjacent landform to the south of Croisilles-Frence Pass Rd which retains a more intact coastal forest sequence.

Marine Habitats

- 68 The marine habitats within Okuri Bay are spatially varied. The muddy-sand and soft-sediment habitat beneath the proposed consent footprint is assessed in the 2026 EclA as having Low ecological value⁵. By contrast, the horse-mussel biogenic habitat and associated rocky reef outside the footprint are assessed as having High ecological value. The western farm block has been configured to avoid mapped biogenic and reef habitat, including habitat immediately adjacent to, but not mapped within, the proposed footprint, and the southern block likewise avoids mapped biogenic and reef habitat.

Seabirds and Mammals

- 69 The wider Current Basin is used by seabirds and marine mammals, and Okuri Bay forms part of that broader ecological context. A king shag was recorded roosting on the existing mussel farm in September 2020, while a New Zealand fur seal was also recorded on an existing farm structure⁶. The 2026 EclA notes that the proposed Okuri Bay site does not itself overlap marine mammal habitat identified as significant in MEP Appendix 28, and that the fur-seal observation does not indicate a unique or concentrated ecological sensitivity at Okuri Bay. These matters provide relevant supporting context for the biotic natural character baseline but are not independently assessed in this report.
- 70 A separate seabird review prepared by Dr Rachel McClellan⁷ also provides supporting ecological context, concluding that the proposed mussel production farms are not expected to have negative effects on seabird species of the Marlborough Sounds, including king shag.

Experiential

Perceived Naturalness

- 71 Okuri Bay retains a moderate to high degree of perceived naturalness through its broad coastal basin form, enclosing landforms, rocky shoreline, open water setting and relationship with the wider Current Basin. The eroding sea cliffs and rocky coastal margins contribute a degree of wildness and express the active coastal processes operating around the bay. These

⁵ Robertson, B. 2026. Marlborough Sounds Aquaculture Project: Coastal Ecological Impact Assessment. Robertson Environmental Limited, Report ID REL174582, Version 1.0, 1 September 2026, Table 3-2 and section 4.4.

⁶ Robertson, B. 2026. Marlborough Sounds Aquaculture Project: Coastal Ecological Impact Assessment. Robertson Environmental Limited, Report ID REL174582, Version 1.0, 1 September 2026, sections 3.2.3 and 3.2.4.

⁷ Rachel McClellan: Potential effects on seabirds of proposed longline aquaculture projects, Marlborough Sounds.

qualities are particularly evident when experienced from the water, where the scale of the surrounding landforms remains dominant.

- 72 Perceived naturalness is moderated by visible human modification. Pastoral grazing, pine plantation, scrubby regeneration, fence lines, limited roading, buildings and existing marine farming are all part of the local experience of the bay. As a result, Okuri Bay is not perceived as a pristine or highly remote coastal environment, but rather as a modified coastal embayment where natural landform and marine qualities remain strong.

Settlement and Human Presence

- 73 Human presence within Okuri Bay is relatively limited but apparent. The bay contains a small number of dwellings, with two dwellings evident, and French Pass Road is located inland along the broader Orr Hill / Okuri Hill ridgeline. Land-based public access to the immediate coastline appears limited, meaning the bay is primarily experienced from the water.
- 74 Existing marine farming forms the most apparent marine-based modification within the bay and contributes to its working coastal character. Together with surrounding pastoral and forestry land use, this establishes a baseline where human activity is present but not dominant. The experiential character of the bay is therefore one of relative coastal quietness and enclosure, moderated by an established pattern of productive land and marine use.

Summary of Natural Character Baseline

- 75 The natural character of Okuri Bay reflects the interaction between its wider Current Basin setting, enclosed coastal landform, modified terrestrial margins and varied marine environment. Key characteristics include:
- a broad, generally U-shaped coastal embayment enclosed by the Okuri Point / Okuri Hill, Orr Hill and Malvern Hill landforms;
 - a strong land–sea relationship, with rocky shorelines, eroding coastal edges, open water and a clear connection to the wider Current Basin;
 - a spatially varied seabed environment, including softer sediment areas, reef and biogenic habitat, horse mussel beds and areas of higher natural shell cover;
 - a modified terrestrial vegetation pattern, dominated by pastoral grazing, pine plantation, scrub, wilding pines and areas of regenerating native vegetation;
 - a broader ecological context associated with seabirds and marine mammals, including potential king shag use of the wider area, while recognising that these matters are addressed through ecological evidence; and

- a moderate to high degree of perceived naturalness arising from the bay's landform enclosure, rocky coastline and open water setting, moderated by visible pastoral land use, forestry, buildings, limited roading and existing marine farming.

76 Together, these characteristics indicate that Okuri Bay retains important natural character attributes, particularly through its coastal landform, rocky shoreline, open water setting and varied marine habitats. However, its natural character is also moderated by existing terrestrial and marine modification, meaning the bay is best understood as a locally modified coastal embayment within a broader Very High Natural Character setting.

Natural Character Sensitivity

77 The sensitivity of natural character to change depends on the attributes present, the degree to which those attributes are intact or modified, and the extent to which a proposed activity would alter the natural elements, patterns and processes that contribute to natural character. Natural character sensitivity is not uniform across a bay or wider coastal marine area. It is therefore important to distinguish between the broader mapped Very High Natural Character context and the more localised attributes of Okuri Bay itself.

78 At the broader Current Basin and Outer Sounds scale, the mapped Very High Natural Character rating reflects a wider set of values, including the largely open coastal marine setting, high-flow environments associated with Current Basin and French Pass, rocky outcrops, offshore islands, reefs and broader associations with seabirds and marine mammals. These are the values that support the broader overlay, and they are the values against which any potential activity needs to be considered.

79 At the more local Okuri Bay scale, the sensitivity is more moderated. The bay retains a strong coastal landform structure, open water, rocky coastal margins and a clear relationship with the wider Current Basin. However, these attributes are not rare or especially distinctive within the wider Sounds context, and the bay is also influenced by pastoral grazing, forestry, regenerating vegetation, scattered buildings, roading/access and existing marine farming. In this respect, the local bay-scale environment is not pristine, and its experiential natural character is less sensitive than the broader Very High Natural Character mapping may imply.

80 This distinction is consistent with the issue identified in James Bentley's Topic 5 evidence during the MEP Hearing process, where the broad Level 4 mapping approach was retained, but the more localised Okuri / Waikawa context was acknowledged as being potentially lower

at the level 5 scale due to adjacent terrestrial modification⁸. In practical terms, that indicates that the Very High Natural Character rating is most appropriately understood as a broad coastal marine area judgement, rather than a finding that every part of Okuri Bay displays uniformly very high sensitivity at the site scale.

- 81 On that basis, the natural character attributes most sensitive to change are not the general presence of rocky shoreline, open water or enclosing landforms in themselves, but the broader coherence of the Current Basin coastal system, the integrity of identified marine ecological features, and the experiential perception of the bay as part of a wider natural coastal setting. Conversely, the modified terrestrial backdrop, existing aquaculture context and deeper offshore waters provide a greater capacity to absorb appropriately located marine farming, provided that more sensitive ecological features are avoided and the activity remains visually subservient to the enclosing landforms.
- 82 Overall, Okuri Bay has a variable natural character sensitivity. The wider Current Basin context warrants careful management because of its Very High Natural Character rating, but the local bay-scale receiving environment has a reduced sensitivity to change due to its modified working coastal character and existing marine farming. The key assessment question is therefore whether the proposed marine farm would compromise the identified broader natural character values, rather than whether any additional marine farming would be inconsistent with the mapped overlay as a matter of principle.

Issues

- 83 Having regard to the landscape and natural character context described in the preceding sections, and the nature of the proposed marine farming activity, the following issues are considered relevant to this assessment.

Natural Character Mapping and Assessment Scale

- 84 Okuri Bay is located within a mapped area of Very High Natural Character, with an issue being how the mapped Very High Natural Character rating should be understood and applied at the more local Okuri Bay and site coastline scales. For context, the entire western edge of the Marlborough Outer Sounds waters (out approximately 2km offshore), from the boundary with Tasman District Council at the western edge of Croisilles Harbour to up north of D'Urville/Stephens Island, is all identified as Very High Natural Character (Figure 4).

⁸ Proposed Marlborough Environment Plan: Section 42A Report for Hearing (Report: 20 November 2017), James Bentley. Submissions and further submissions Topic 5: Natural Character – Technical Mapping, Values and Overlays. Section 4.5.4.

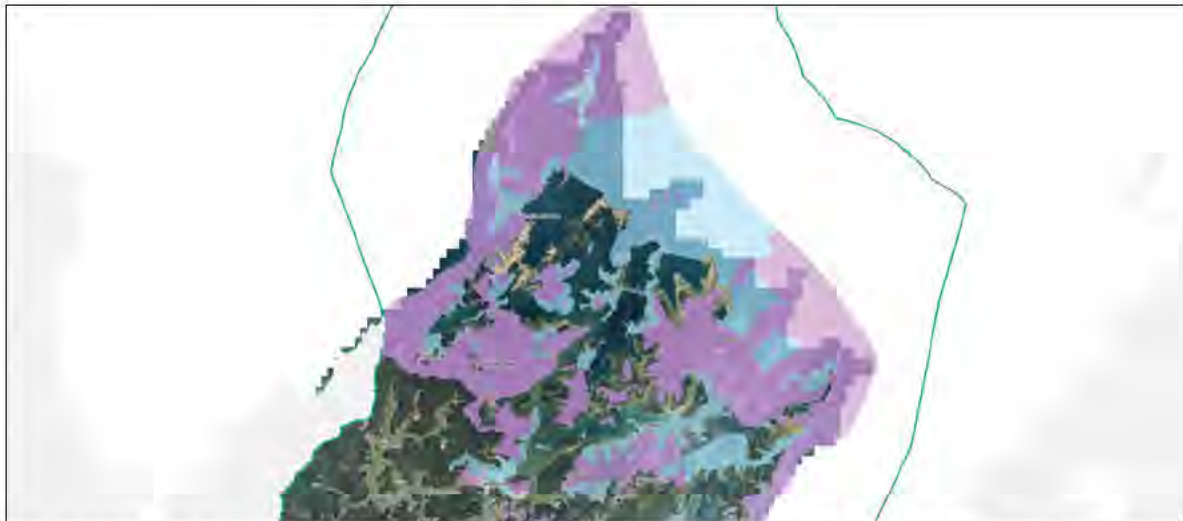


Figure 4: MEP Natural Character Map Extract (Pink Overlay = Very High Natural Character Mapping).

- 85 The Very High Natural Character mapping relevant to this assessment reflects a broader Current Basin and Outer Sounds coastal context, including values associated with the wider coastal marine system, open waters, high-flow environments, rocky outcrops, reef and sediment habitats, and wider seabird and marine mammal associations.
- 86 However, at the more local Okuri Bay scale, the receiving environment is more modified, including pastoral land use, forestry, regenerating vegetation, some existing buildings, roading and an existing marine farm. Accordingly, the key issue is whether the proposal would compromise the identified broader natural character values, rather than whether any change within the mapped overlay is inherently inappropriate.

Relationship Between Marine Farming and Landscape Character

- 87 A second issue relates to the compatibility of marine farming with the landscape character of Okuri Bay. The bay has a strong and legible coastal basin form, defined by enclosing landforms, open water, rocky shoreline and a relationship with the wider Current Basin. However, the surrounding landcover and existing use patterns also establish a working coastal landscape character, including pastoral farming, forestry and existing aquaculture.
- 88 The issue is therefore whether the proposed marine farm would materially alter the key landscape characteristics of Okuri Bay, or whether it would be experienced as a further marine-based productive activity within an already modified working coastal setting. This requires consideration of the scale, location and visual prominence of the farm in relation to the bay's enclosing landforms, shoreline, existing marine farm and broader coastal landscape context.

Natural Character Effects of Marine Farming

- 89 A further issue relates to the extent to which the proposal may affect the natural character attributes of Okuri Bay. This requires consideration of the proposal's relationship with abiotic, biotic and experiential attributes, including the bay's coastal landform, waterbody, seabed environment, marine ecological features, perceived naturalness and existing modification.
- 90 In this context, particular attention is required to the difference between physical effects on natural elements and processes, and experiential effects arising from the visibility and presence of marine farming structures. The ecological reporting, information on the distribution of marine habitats and whether more sensitive ecological features are avoided assist in understanding these effects on natural character. The issue is whether any residual change would materially reduce the natural character values of Okuri Bay or compromise the broader Very High Natural Character context.

Visual Amenity and Effects on Okuri Bay Landowners

- 91 The proposal will be most directly experienced from the water, including by recreational and commercial marine users moving within or through Okuri Bay and Current Basin. There are also a small number of landowners within this Okuri Bay basin to consider. The issue is whether the proposed marine farm would become visually dominant or detract from the experience of the bay's coastal landform, rocky shoreline, open water and relative remoteness, or whether it would remain a low-profile element within a larger landform-defined setting. This includes consideration of cumulative visibility with the existing marine farm and the extent to which the proposal would alter the perceived naturalness or working coastal character.
- 92 In summary, the key issue for this assessment is whether the proposed marine farm would materially alter or compromise the landscape, visual amenity and natural character values of Okuri Bay and its wider Very High Natural Character setting. This requires consideration of:
- how the broad-scale Very High Natural Character mapping should be applied at the more local Okuri Bay and site coastline scales;
 - whether marine farming is compatible with the existing landscape character of Okuri Bay, including its modified working coastal context;
 - whether the proposal would adversely affect the abiotic, biotic or experiential attributes that contribute to natural character, including having regard to the ecological information available for the bay; and
 - whether the proposal would give rise to adverse visual amenity effects for marine users and Okuri Bay landowners, either individually or cumulatively.

Proposal

- 93 This assessment has been prepared in relation to a proposed marine farming activity at Okuri Bay / Current Basin, forming part of a broader Fast-track Approvals process for new aquaculture activities within the Marlborough Sounds. The Okuri Bay farms are being progressed by Clearwater Mussels Limited and Talley's Group Limited.
- 94 At Okuri Bay, the proposal involves a new mussel farm comprising two blocks, being approximately 3.43 hectares and 24.46 hectares respectively, with a combined area of approximately 27.89 hectares and a total backbone length of 6,667m. The site is located within the exposed western Marlborough Sounds marine environment, and is identified as suitable for full production farming rather than solely as a spat nursery site.
- 95 The proposed Okuri Bay sites would also provide diversification and operational resilience in circumstances where storm events or other environmental conditions result in harvesting closures within the Inner Sounds.
- 96 Marine farming within the Marlborough Sounds typically involves longline aquaculture systems, comprising surface floats that support submerged lines used for the cultivation of shellfish species such as mussels. These structures are generally arranged in linear configurations and occupy defined areas of the coastal marine area, while allowing continued use of surrounding waters for navigation and other marine activities. Marine farming is a long-established activity within parts of the Marlborough Sounds and forms part of the broader working coastal landscape of the region.
- 97 For the purposes of this assessment, the proposal is assessed as a mussel farming activity of a type and form consistent with established aquaculture practices within the Marlborough Sounds. The specific 'Structure Layout' of both the Western Farm and the Southeastern Farm has been included within the application (Marlborough Aquaculture Fast-track Application – Schedule A). The assessment considers the potential landscape, natural character and visual implications associated with the presence of marine farming structures within Okuri Bay, having regard to the existing landscape and natural character environment described in the preceding sections.
- 98 The overall extent of the proposed farms was refined in response to the ecological assessment. The larger western block is configured to avoid mapped biogenic and reef habitats, including habitat immediately adjacent to, but not mapped within, the proposed footprint, and the southern block has likewise been positioned to avoid mapped biogenic and reef habitat. This has resulted in a notable reduction from the originally investigated extent

(Figure 5 white outline) to the proposed Fast-track application extent (Figure 5 orange outline).



Figure 5: Revised Marine Farm Extent (following Robertson Environmental Recommendations).

Statutory provisions

- 99 This section is not intended to provide a comprehensive planning assessment of the proposal against the provisions of the relevant statutory documents. The purpose of reviewing the statutory provisions is to assist in framing the landscape and natural character assessment contained within this report.
- 100 The application is being determined under the Fast-track Approvals Act 2024 (FTAA) rather than the standard RMA resource consent pathway. While there is no requirement to comply with the NZCPS under the FTAA, the RMA, NZCPS and Marlborough Environment Plan remain relevant considerations because they identify the landscape, natural character and coastal environment values that inform the evaluation of effects. Accordingly, this assessment draws on the statutory planning framework to understand the values and characteristics of the receiving environment, while recognising that the application is being considered under the FTAA.

Fast-track Approvals Act

- 101 The proposal is being advanced through the Fast-track Approvals Act 2024. The Fast-track Approvals Act establishes 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.
- 102 Under section 85 of the Act, an approval may be declined where the panel forms the view that there are one or more adverse impacts in relation to the approval sought, and those adverse impacts are sufficiently 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

- 103 Section 6 of the RMA identifies matters of national importance which decision-makers must recognise and provide for. Of particular relevance to this assessment is section 6(a), which requires the preservation of the natural character of the coastal environment (including the coastal marine area), wetlands, lakes and rivers and their margins, and the protection of them from inappropriate subdivision, use and development.
- 104 Landscape values are also recognised within the RMA framework through section 7(c), which requires decision-makers to have particular regard to the maintenance and enhancement of amenity values, and section 7(f) which relates to the maintenance and enhancement of the quality of the environment.
- 105 Within the context of the coastal environment, these provisions establish a statutory framework in which both the natural character of coastal environments and the landscape and amenity values associated with those environments are relevant considerations when assessing proposed activities.

New Zealand Coastal Policy Statement

- 106 The New Zealand Coastal Policy Statement 2010 (NZCPS) provides the national policy direction for the management of the coastal environment. Of particular relevance to this assessment is Policy 13, which addresses the preservation of the natural character of the coastal environment and requires the identification of areas where natural character is outstanding or high. Policy 13 also recognises that natural character may vary across the coastal environment, and that the level of protection afforded to different areas should reflect the degree of natural character present.
- 107 The NZCPS therefore establishes a framework in which the identification and evaluation of natural character values forms an important component of coastal planning and resource management.

Marlborough Environment Plan

- 108 At the regional level, the Marlborough Environment Plan (MEP) provides the primary statutory framework for the management of natural and physical resources within the Marlborough region, including the coastal marine area of the Marlborough Sounds.
- 109 The MEP mapping (Attachment 1: Sheet 4) identifies Okuri Bay, including the proposed marine farm areas, as Very High Natural Character. The coastal waters beyond the Okuri Bay headlands are also identified within the Outer Marlborough Sounds Outstanding Natural

Feature / Landscape. The relevant mapped values are addressed through the MEP Coastal Natural Character Schedule of Values (Volume 3, Appendix 2) and Landscape Schedule of Values (Volume 3, Appendix 1), while Appendix 4 provides the factors for determining significant adverse effects on natural character. The Plan also includes provisions relating to the management of aquaculture activities within the coastal marine area.

- 110 The purpose of these provisions is to provide a planning framework that enables aquaculture activities to occur in appropriate locations within the Marlborough Sounds while ensuring that the landscape and natural character values of the coastal environment are appropriately recognised and addressed. The Natural Character and Landscape mapping contained within the MEP therefore represents a strategic planning interpretation of the coastal environment, informed by technical studies but applied at a regional planning scale.
- 111 Objective 7.1 and its associated provisions address the identification of the degree of natural character within the coastal environment. Objective 7.2 and Policy 7.2.2 address the management of natural character outside areas of outstanding natural character, including the avoidance of significant adverse effects and the avoidance, remediation or mitigation of other adverse effects on the characteristics that contribute to natural character. The Okuri Bay proposal is located within a mapped Very High Natural Character area rather than an area identified as Outstanding Natural Character, making these provisions directly relevant to the assessment.
- 112 Objective 14.21 seeks to provide for marine farming in appropriate locations while protecting and maintaining the values of Marlborough's coastal environment. Policies 14.21.5, 14.21.6 and 14.21.7 identify matters relevant to the location and assessment of marine farming, including natural character, ecological values, reefs and cobble habitats, recreational and amenity values, cultural values, navigation and public access.
- 113 For the purposes of this assessment, the statutory provisions are relevant in providing the policy context for evaluating the potential landscape and natural character effects associated with marine farming activity within Okuri Bay. A summary of the specific statutory provisions relevant to landscape and natural character is provided in **Appendix 3** of this report.

Landscape Effects Assessment

- 114 'Landscape' can be understood as the interaction between the physical components and processes of the environment, the associations and meanings people attach to those places,



and the ways in which landscapes are perceived and experienced. These three dimensions collectively contribute to landscape character and values.

“A landscape effect is an outcome for a landscape value. While effects are consequences of changes to the physical environment, they are the outcomes for a landscape’s values that are derived from each of its physical, associative, and perceptual dimensions. Change itself is not an effect: landscapes change constantly. It is the implications of change for a landscape’s values that is the effect”⁹

115 The preceding ‘Landscape Character Baseline Assessment’ section describes the existing landscape character of Okuri Bay, including the interaction between the distinctive coastal landforms of the Marlborough Sounds and the productive land uses occurring within the adjacent hill country. The following assessment considers the potential landscape effects associated with marine farming structures within Okuri Bay, having regard to the existing landscape character and the statutory framework outlined earlier in this report.

116 Consistent with the scale hierarchy described earlier in this report, landscape effects are considered at two key spatial scales groupings to avoid unnecessary repetition. Firstly, the wider landscape context (Levels 1/2/3). Secondly, at the local bay environment (Levels 4/5).

Landscape Effects at the Wider Landscape Scale

117 At the wider Marlborough Sounds, Outer Sounds and Current Basin scales, the proposal would represent a localised addition to an environment where aquaculture is already an established activity in parts of the coastal marine area. The proposed Okuri Bay mussel farm would not alter the underlying landform structure, coastal morphology, broader land–sea relationships, or the spatial character of the Current Basin / Tasman Bay coastal setting, noting that existing marine farms are already present within Okuri Bay and Waikawa Bay (immediately to the north), and that an offshore farm has also been consented.

118 The wider landscape values are primarily associated with the scale and expressiveness of the coastal landforms, the relationship between open water and enclosing hills, and the broader values of the Current Basin coastal marine area. The proposal would occupy a small part of that wider setting and would not affect the principal headlands, ridgelines, islands, rocky outcrops, or broader seascape patterns that define the wider landscape context.

⁹ Te Tangi a te Manu: Aotearoa New Zealand Landscape Assessment Guidelines. Page 135, 6.01-6.03.

- 119 At this scale, marine farm structures would be read as low-lying, localised elements within a much larger coastal landscape. While a distant glimpse of the proposed farms may be visible to vessels traversing along this Outer Sounds coastline, or distant elevated views from the Croisilles-French Pass Rd, the proposal would not materially change the wider landscape character of the Outer Sounds or Current Basin landscape. Landscape effects at the wider scale are therefore assessed as **Very Low** to **Low** (based on proximity).

Landscape Effects at the Local Bay Scale

- 120 At the local bay scale, the proposed marine farming structures represent a change by expanding an activity already present in the bay. Landscape effects arise from the consequences of this change for the landscape values identified earlier, rather than from the presence of change itself. In this case, the relevant landscape values of Okuri Bay include:

- the broad enclosed coastal basin;
- the legibility of the Okuri Point / Okuri Hill, Orr Hill and Malvern Hill landforms;
- the rocky coastal edge;
- the open water setting, and the bay's relationship with the wider Current Basin.

- 121 The following sections consider how marine farming activity may influence these landscape values, recognising that the physical, perceptual and associative dimensions of landscape character often interact.

Physical Landscape Effects

- 122 At the Okuri Bay scale, the proposal would introduce additional marine farming structures within the coastal marine area of the bay. However, it would not alter the physical form of the bay, the surrounding landforms, the rocky coastal edge, or the relationship between the enclosing slopes and open water. The broad U-shaped basin, Okuri Point / Okuri Hill, Orr Hill and Malvern Hill landforms would remain the dominant physical features of the landscape.
- 123 The proposal would be located offshore within the bay, rather than requiring land-based structures or modification to the coastal edge. The application layout has also been refined following the Robertson Environmental assessment, including in response to identified biogenic habitats. While those ecological matters are addressed more fully in the natural character assessment, the refinement is relevant to landscape effects because it assists in maintaining the integrity of the more sensitive coastal and seabed features. Overall, physical landscape effects on the identified landscape values are assessed as **Low**.

Perceptual Landscape Effects

- 124 The main landscape effect would be perceptual, arising from an increase in the visibility of aquaculture structures within Okuri Bay. The proposal would introduce a larger area of marine farming than currently exists and would therefore increase the working marine character of the bay. This change would be most apparent from within the bay and from nearby marine viewpoints (Attachment 1: Sheets 7, 8 & 9).
- 125 However, the proposal would be experienced within an existing modified coastal setting. Pastoral land use, forestry, scattered buildings, roading and an existing marine farm already contribute to the bay's working coastal character. In this Marlborough Sounds context, marine farms can remain visually subservient to the scale of the surrounding landforms. In this case, the enclosing landforms and broad bay structure would remain visually dominant, with the proposed farm read as a low-lying marine element within that larger setting. Perceptual landscape effects are therefore assessed as **Low to Low-Moderate**.

Associative Landscape Effects

- 126 The proposal would be consistent with the existing productive associations of Okuri Bay and the wider Marlborough Sounds, including pastoral farming, forestry and aquaculture. Existing marine farming is already present within the bay, and aquaculture forms part of the established working coastal landscape of the region.
- 127 There are no mapped Māori archaeological sites or geopreservation sites identified within Okuri Bay¹⁰, and this assessment does not make findings on cultural values beyond recognising the broader cultural associations of the coastal environment. On the information available, the proposal would not materially alter the known associative landscape attributes of the bay. Associative landscape effects are therefore assessed as **Low**.

Landscape Effects Summary

- 128 The proposal would introduce additional aquaculture structures into Okuri Bay and would increase the visible working marine character of the local bay environment. However, the proposal would not alter the landform structure, coastal edge, or broader land-sea relationships that define the landscape character of Okuri Bay and the wider Current Basin.
- 129 The proposal is located within Okuri Bay and would not extend into the mapped ONFL waters beyond the bay; nor would it compromise the identified values associated with that wider overlay.

¹⁰ NZAA ArchSite Home: <https://nzaa-archsite.hub.arcgis.com/pages/public-map>

- 130 At the wider landscape scale, effects are assessed as **Very Low** to **Low**, reflecting the limited extent of change within the broader Marlborough Sounds / Current Basin context. At the local bay scale, effects are assessed as **Low** to **Low-Moderate**, primarily due to the perceptual change associated with additional marine farming structures. Overall, the proposal would result in localised landscape change, but would not materially compromise the key landscape characteristics of Okuri Bay or the wider Current Basin coastal setting.

Visual effects

- 131 The visual effects assessment considers the extent to which the proposed marine farm would be visible from surrounding viewing locations, and the degree to which that visibility may affect visual amenity and the experience of Okuri Bay. This assessment is informed by the existing landscape and natural character context described above, together with site observations, aerial imagery and the proposed farm layout.

*"A visual effect is a kind of landscape effect. It is a consequence for landscape values as experienced in views. Visual effects are a subset of landscape effects. A visual assessment is one method to help understand landscape effects."*¹¹

- 132 Visual effects are assessed with reference to both the sensitivity of the viewing audience and the magnitude of visual change likely to be experienced. Sensitivity is influenced by factors such as the nature of the viewer, their location, viewing duration, expectations, and the existing character of the view. Magnitude of change is influenced by factors such as distance, orientation, extent of visibility, contrast, scale, movement, duration of view and the degree to which the proposal would be seen in association with existing modification.
- 133 In this case, the principal visual change would arise from the introduction of additional surface floats and associated aquaculture structures within the waters of Okuri Bay. These structures would be low-lying and linear in form, but would increase the visible extent of marine farming within the bay. The visual assessment therefore focuses on whether the proposal would become visually dominant within the bay, or whether it would remain a subservient marine element within the broader landform-defined coastal setting.
- 134 The principal viewing audiences are expected to be marine users within Okuri Bay and the wider Current Basin, together with the small number of landowners / dwellings located within the bay. Wider views from beyond Okuri Bay are likely to be more limited and distant, with the proposal experienced, where visible, as part of a larger coastal marine setting.

¹¹ Te Tangi a te Manu: Aotearoa New Zealand Landscape Assessment Guidelines. Page 135, 6.08.

135 Recent Environment Court commentary in *Stormhaven Ltd v Waikato Regional Council* is relevant as general context when considering the visibility of marine-farming structures. In that case, the Court was not persuaded that the identified characteristics of the mussel farms around Motukopake reliably demonstrated a dominating influence at distances beyond 250 metres. It also accepted that, at most locations within the receiving environment considered, the water and islands remained the dominating influences, with the marine farms having a significantly less prominent influence until the viewer was close. That was a fact-specific finding rather than a universal visibility threshold. Nevertheless, it supports the general proposition that visual dominance is influenced by proximity, viewing angle, the scale and form of the receiving environment, and the prominence of surrounding water and coastal landforms.¹²

Visual Catchment and Viewing Audience

136 The potential visual catchment for marine farming structures within Okuri Bay is limited by the surrounding coastal landform containment. The photographs contained within Attachment 1 provide useful context. Views toward the proposed marine farms within Okuri Bay are generally limited to:

- Four private landowners on the land surrounding Okuri Bay
 - Property owners may experience limited views across the bay waters toward the marine farms from the building locations.
- Motorists travelling along Croisilles-French Pass Rd
 - The proposed marine farm will be identifiable within the bay waters, however viewed at a distance of over 1.3km from this public road.
- Marine users travelling along the outer coastline via French Pass.
 - Vessels travelling along this stretch of coastline may obtain views into Okuri Bay. However, due to the containment provided by the bay and the surrounding headlands, views toward proposed marine farms are relatively limited and always backdropped by land-based production.
- Any marine users within the waters within Okuri Bay (e.g. recreational/seeking shelter)
 - People travelling within the waters of Okuri Bay, including recreational boat users may experience views of the proposed marine farms.

¹² *Stormhaven Ltd v Waikato Regional Council* [2026] NZEnvC 170 (Interim Decision) at [187]–[188]

137 In considering potential views from private land, I have reviewed available Council property file information where relevant, in an attempt to better understand the likely location, orientation and use of buildings around Okuri Bay. I understand that Council records for some older buildings, particularly those predating 1 January 1993, may be incomplete. Accordingly, this assessment does not make findings on the legal status of individual buildings. Where buildings or apparent dwellings are present, I have assessed potential visual effects on the basis of their observed or apparent use and their relationship to the proposed marine farm, while noting any uncertainty where relevant.

Adjacent Landowner Assessment

138 Typically, a visual assessment will consider a landowner's dwelling location and its surrounding curtilage as the key location to identify potential adverse effects. This is because the dwelling is the location associated with a higher level of lived amenity, as opposed to the surrounding pastoral/forestry productive setting.

139 In the Okuri Bay context (Figure 6), there are four identified landowners associated with land titles within the Okuri basin, along with 5 buildings. Three of these building locations appears to be farm sheds (White circles - Figure 6), while there are two potential dwellings (Yellow circles - Figure 6), neither of which have a building consent readily available on the Marlborough Smart Maps GIS system.

140 It is considered still relevant to acknowledge and assess potential effects on these properties adjacent to the Okuri Bay waters.

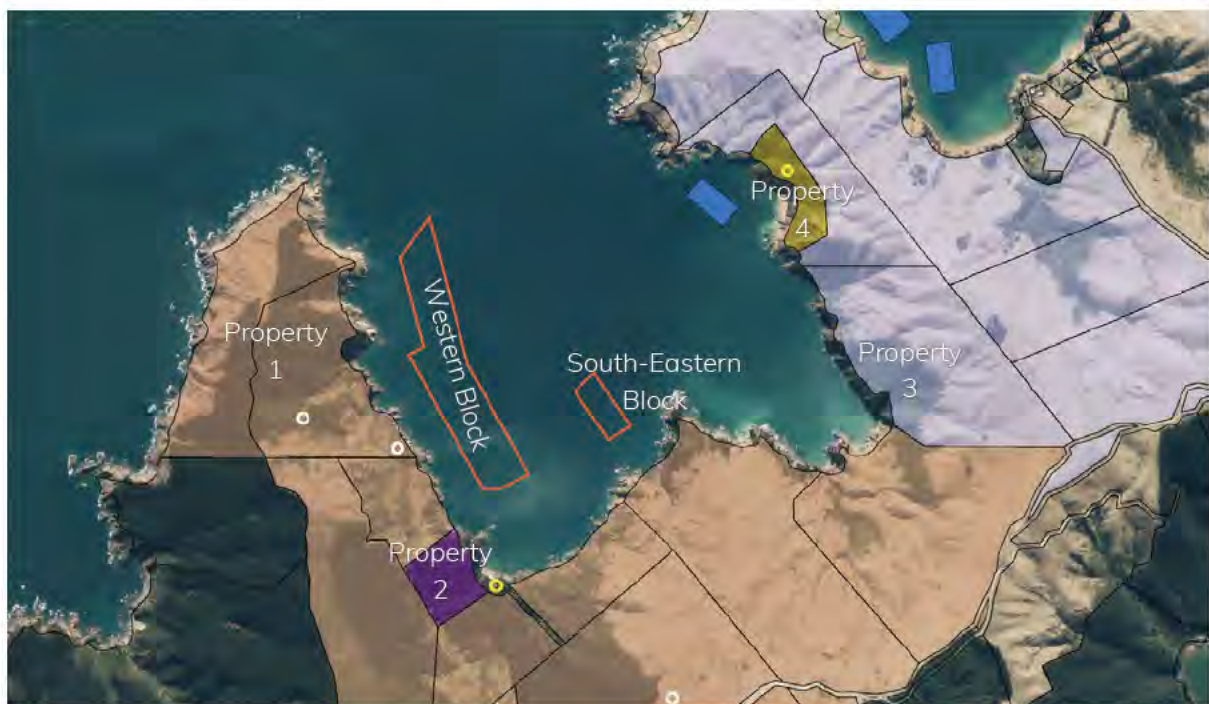


Figure 6: Property Ownership and Buildings

Property 1 – Section 7 Block I Whangamoa SD

141 This property comprises a large rural landholding of approximately 400 hectares within the Okuri basin, extending across much of the south-eastern and south-western landform surrounding Okuri Bay. The property is characterised by a combination of grazing land and production forestry, with recent photographs indicating some expansion of forestry cover above the proposed South-Eastern Block. Two buildings are identifiable to the west of the proposed marine farms, and appear to be associated with the productive rural use of the property.

142 Both building locations are set within a working rural / forestry context and are partially nestled into existing vegetation, which is expected to limit open views across the bay toward the proposed farm. To the extent that any accommodation or higher-sensitivity use is associated with these buildings, visual sensitivity would be moderated by the working nature of the setting and the degree of enclosure provided by vegetation and landform. Potential adverse visual effects are therefore assessed as **Very Low to Low**.

Property 2 – Lot 2 DP 20106

143 This property comprises a smaller landholding of approximately 9 hectares at the southern extent of Okuri Bay and is predominantly covered in production forestry. A building visible on aerial imagery appears to be located at low elevation, approximately 4m amsl, tucked into a small valley near the coastal edge. This building (Figure 7) was not readily noticeable during the site visit, but was subsequently identified through review of aerial imagery.



Figure 7: Property 2 Dwelling location

144 The building may have a narrow view northward (Figure 8) across the bay toward the proposed western marine farm block, at a distance of approximately 440m to the nearest proposed farm boundary. However, the low elevation, valley setting and constrained viewshaft would limit the extent of visibility. The refinement of the southern extent of the proposed western block (through the Robertson Environmental ecological recommendations) also reduces the potential visual presence of the farm from this location. It is noted that this building does not appear to have a readily identifiable building consent on Marlborough District Council Smart Maps and appears to be located within the road reserve parcel adjoining the coastal edge, rather than within the private landholding itself. Leaving those legal matters aside, potential adverse visual effects are assessed as **Low-Moderate**.

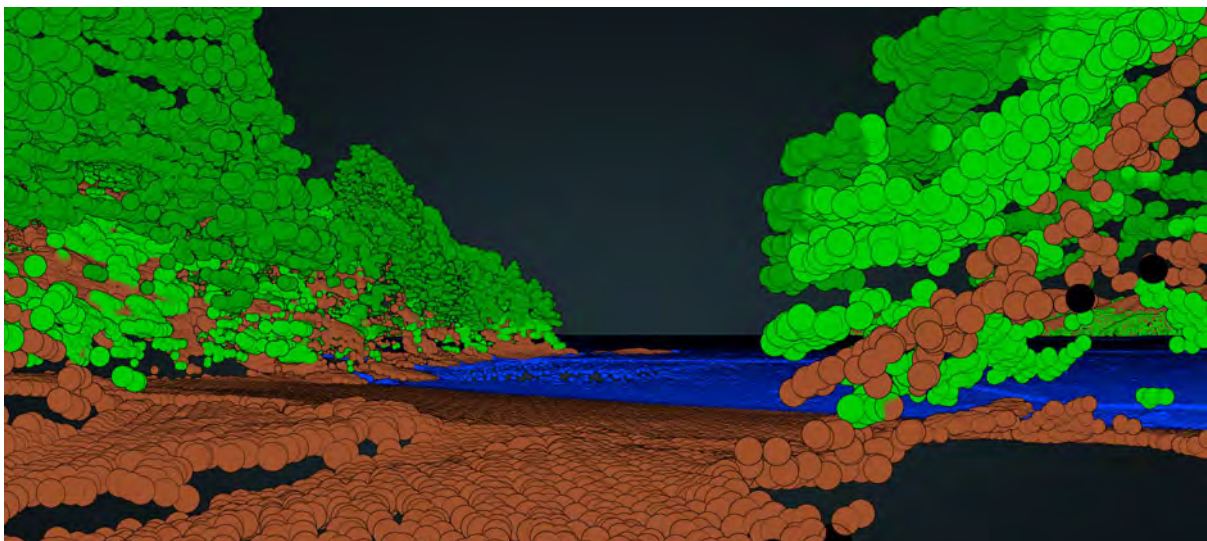


Figure 8: Indicative view across Okuri Bay from the Property 2 building location (Potree Viewer LiDAR)

Property 3 – Section 26 Block VIII French Pass SD

- 145 This property forms part of a wider rural landholding of approximately 100 hectares, encompassing much of the north-eastern landform of the Okuri Bay basin. The landcover pattern is associated with grazing and forestry use, consistent with the wider working rural character of the bay.
- 146 No dwellings or higher-sensitivity building locations have been identified within the Okuri Bay portion of this property. While parts of the landholding may have views across the bay, these would be experienced in the context of productive rural land rather than from a dwelling or domestic curtilage. Potential adverse visual effects on this property are therefore assessed as negligible, or **Very Low**.

Property 4 – Lot 1 DP 19533

- 147 This property comprises an approximately 8 hectare landholding on the northern / north-eastern side of Okuri Bay. It appears to have undergone substantial revegetation over recent decades, changing from a predominantly pastoral landcover at the time of sale in the late 1990s to a property now largely characterised by regenerating native vegetation.
- 148 A dwelling is located on a small spur above the coastline at an elevation of approximately 59m amsl. The dwelling (which also does not appear to have a readily identifiable building consent on Marlborough District Council Smart Maps) is surrounded by vegetation and is difficult to identify from the waters of Okuri Bay (Figure 9). It is located approximately 1.3km from the proposed south-eastern block and approximately 1.6km from the proposed western block. At this distance, and with the filtering and screening influence of on-site vegetation, views toward the proposed farm (Figure 10) are expected to be limited and/or partially filtered. Potential adverse visual effects are assessed as **Low**.



Figure 9: Property 4 Dwelling location

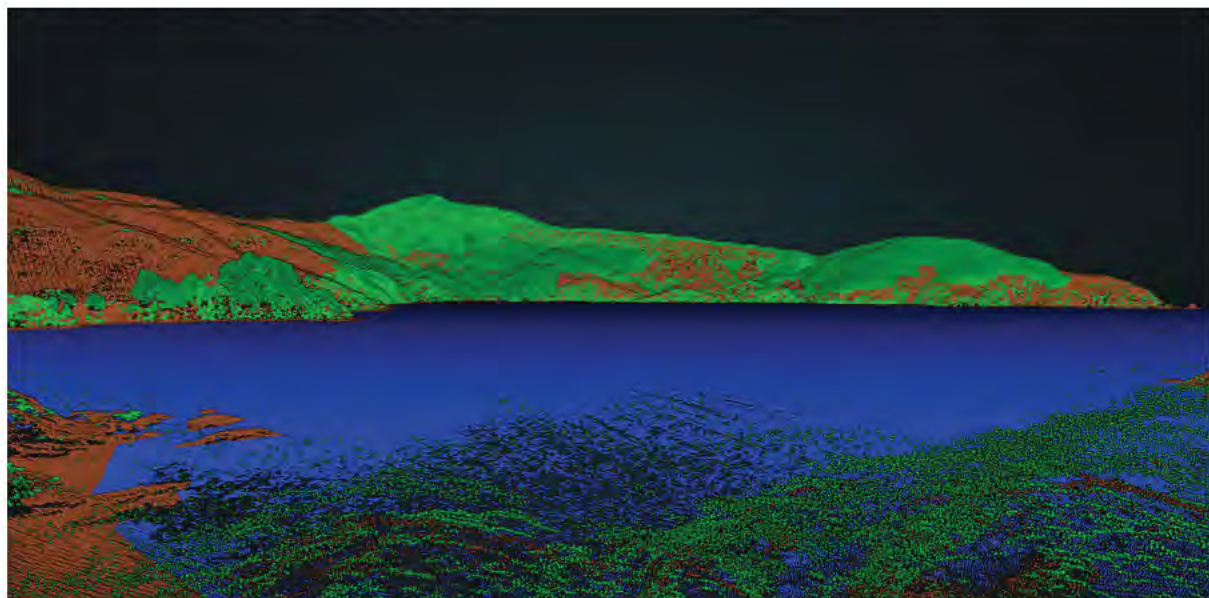


Figure 10: Indicative view across Okuri Bay from the Property 4 building location (Potree Viewer LiDAR)

Motorists Travelling along Croisilles–French Pass Road

- 149 Croisilles–French Pass Road follows the broader ridgeline inland of Okuri Bay, including along the Orr Hill / Okuri Hill landform. From a limited section of this road, elevated views are available toward the bay and proposed marine farm areas. However, the viewing distance is generally substantial, with the proposed farm viewed from more than approximately 1.3km away, and views are likely to be intermittent due to landform, vegetation and road alignment.
- 150 Where visible, the marine farm would be seen as a small-scale, low-lying element within a much broader coastal basin view, with the nearshore portion of both proposed farms screened by the intervening landform. The surrounding landform, open water and productive landcover would remain the dominant visual components of the foreground view, with a more impressive view being the mid-distant view across Current Basin to D'Urville Island. Given the transient nature of road-based views, viewing distance, and the scale of the wider landscape, adverse visual effects for motorists along this road are assessed as **Very Low** to **Low**.

People Travelling along the Outer Coastline / French Pass Route

- 151 Marine users travelling along the outer coastline and through the wider Current Basin / French Pass route may obtain temporary glimpses into Okuri Bay. However, these views would be influenced by viewing distance, vessel movement, orientation, and the containment provided by the surrounding headlands and bay landforms. The proposed farm would not generally be experienced as a prominent feature from the wider coastline, but rather as a low-lying element within the broader bay setting.
- 152 From these wider marine routes, the proposed farm would be viewed in the context of a large-scale coastal landscape, with open water, headlands, enclosing slopes and existing productive land use forming the dominant visual elements. Any views into Okuri Bay would be relatively brief and the proposed farm would be substantially contained within the bay rather than extending into the more open waters beyond. Furthermore, the views north (Figure 11) and south along this stretch of identified Outstanding Natural Landscape are more demanding of viewers' attention than the oblique views into side bays such as Taipare Bay, Papawai Bay, Okuri Bay and Waikawa Bay. Adverse visual effects for people travelling along the outer coastline / French Pass route, within this broader context, are assessed as **Very Low** to **Low**.



Figure 11: View North toward French Pass, position adjacent to Okuri Bay

Marine Users within Okuri Bay

- 153 Marine users within Okuri Bay would experience the closest and most direct views of the proposed marine farm. This viewing audience is likely to include recreational boat users, people associated with existing marine farming activity, and vessels seeking shelter within the bay. Views would generally be transient and experienced from a moving vessel, although more sustained views may occur where vessels slow, anchor, or move close to the proposed farm areas.
- 154 At close range, the proposed marine farm would be clearly visible as a series of low-lying linear float structures on the water surface. This would increase the visible extent of aquaculture within the bay and would introduce a more apparent working marine component than currently exists. However, these views would be experienced within a bay that already contains an existing marine farm and is backdropped by dominant modified pastoral and forestry landcover. The proposed structures would also remain visually low in profile and subservient to the surrounding landforms. For marine users within Okuri Bay, adverse visual effects are assessed as **Low-Moderate**, reducing with distance and where views are backdropped by the wider coastal landform.

Visual Effects from Navigational Lighting

- 155 Navigational lighting associated with the proposed marine farm would introduce small point sources of light within Okuri Bay. The effect of this lighting would be most relevant during low-light or night-time conditions and would be experienced primarily by marine users and potentially by nearby landowners with views across the bay.
- 156 The lighting would be safety-related, low in intensity, and limited to the coastal marine area rather than forming a broad or continuous source of illumination. Existing marine farming activity and limited coastal settlement already form part of the bay's modified baseline, although the night-time environment is likely to remain relatively dark. On that basis, navigational lighting would result in a localised change, but would not materially alter the broader night-time character of Okuri Bay. Adverse visual effects from navigational lighting are assessed as **Very Low**.

Visual Effects Summary

- 157 The proposed marine farm would increase the visible extent of aquaculture within Okuri Bay, with the most apparent change experienced from within the bay itself and from nearby landowner viewpoints where views are available. The structures would be visible as low-lying, linear elements on the water surface, but would be seen within a bay already characterised by productive land use, forestry, existing aquaculture and a modified working coastal backdrop.
- 158 For adjacent landowners, effects vary depending on elevation, distance, orientation and vegetation screening. The greatest potential effect is associated with the low-elevation building near the southern coastal edge, where views toward the western block may be available at approximately 440m. Even from this location, the viewshaft is relatively constrained (noting also that the building's legal/consent status is uncertain). Effects on adjacent landowners are assessed between **Very Low** and **Low-Moderate**, with most properties experiencing **Very Low to Low** effects.
- 159 For wider public and marine viewing audiences, effects are generally lower. Views from Croisilles–French Pass Road would be elevated but distant, intermittent and experienced as part of a broader coastal basin view. Views from the outer coastline / French Pass route would be brief and oblique, with the proposed farm contained within Okuri Bay and visually secondary to the broader Current Basin / D'Urville Island coastal landscape. Effects for these wider audiences are assessed as **Very Low to Low**.
- 160 The highest visual effects would occur for marine users within Okuri Bay, where the proposed farm would be seen at closer range and would increase the apparent working marine character of the bay. However, views would generally be transient, and the structures would remain low-profile and visually subservient to the surrounding landforms. Effects for marine users within Okuri Bay are assessed as **Low-Moderate**, reducing with distance. Navigational lighting would introduce small safety-related point sources of light, but would not materially alter the broader night-time character of the bay, with effects assessed as **Very Low**.
- 161 Overall, the proposal would be visible and would result in localised visual change within Okuri Bay, but it would not become visually dominant within the wider landscape. Visual effects are therefore assessed as **Low-Moderate** at most, with most viewing audiences experiencing **Very Low to Low** adverse effects and all visual effects being 'minor' or below on the NZILA rating Scale.

Natural Character Effects Assessment

- 162 The existing natural character of Okuri Bay has been described earlier in this assessment, having regard to the abiotic, biotic and experiential attributes that contribute to the character of the coastal environment. The proposed marine farm is located within an area mapped as Very High Natural Character in the Marlborough Environment Plan. This mapping forms part of the broader Current Basin and Outer Sounds coastal context, including the wider Tasman Bay and south-western D'Urville Island coastal marine environment. The values associated with this broader setting include open coastal waters, rocky shorelines, reef and sediment habitats, high-flow environments associated with Current Basin and French Pass, and wider associations with seabirds and marine mammals.
- 163 As set out earlier in this assessment, the local Okuri Bay receiving environment presents as a more intense area of modification than the broader mapped context. The bay contains existing aquaculture and is backdropped by pastoral land, forestry, regenerating vegetation, scattered buildings and limited roading. In this respect, the mapped Very High Natural Character rating is relevant, but its application requires attention to scale. The key assessment question is whether the proposal would compromise the values that underpin the broader Very High Natural Character overlay, rather than whether the presence of any additional marine farming structure within the overlay is inherently inappropriate.
- 164 Consistent with the natural character assessment framework set out earlier in the report, natural character effects are considered under the following headings:
- Abiotic attributes (physical and geomorphological characteristics)
 - Biotic attributes (ecological and vegetation characteristics)
 - Experiential attributes (perceived naturalness and human influence)
- 165 Particular attention is given to the degree to which the proposal would affect natural elements, patterns and processes, the distribution of marine ecological values identified by Robertson Environmental, and the perceived naturalness of Okuri Bay as a locally modified coastal embayment within the wider Current Basin setting.

Abiotic Attributes Effects

- 166 The proposal would not alter the underlying coastal landform, bay morphology, shoreline configuration or broader Current Basin coastal system. The broad U-shaped basin form of Okuri Bay, the enclosing Okuri Point / Okuri Hill, Orr Hill and Malvern Hill landforms, the rocky coastal margins, and the open relationship with Current Basin would remain unchanged. No

land-based works, reclamation, excavation, coastal edge modification, or alteration of the surrounding landform is proposed.

- 167 At the marine scale, the proposal would occupy part of the water surface and water column, but would not materially alter the physical structure of the bay or the broader coastal processes that contribute to abiotic natural character. The tidal and hydrodynamic relationship between Okuri Bay and Current Basin would continue to operate, and the proposal would not affect the broader high-flow environments associated with Current Basin and French Pass that form part of the wider mapped Very High Natural Character context.
- 168 The proposal would introduce additional aquaculture structures into the coastal marine area, but those structures would be surface and water-column elements rather than modifications to the underlying coastal landform or seabed morphology. On that basis, effects on abiotic natural character attributes are assessed as **Very Low**. The key abiotic values that support the broader Very High Natural Character rating would remain intact.

Biotic Attributes Effects

- 169 The biotic component of natural character is principally informed by the ecological assessments prepared for the proposal. I rely on those assessments for the identification and evaluation of ecological values and effects and have not undertaken an independent ecological assessment. The 2026 EclA assesses the muddy-sand and soft-sediment habitat beneath the proposed footprint as having Low ecological value and the adjacent horse-mussel biogenic habitat and associated rocky reef as having High ecological value. The farm layout has been configured to avoid those higher-value features.
- 170 From a natural character perspective, this distinction is important. The proposal occupies habitat assessed as having Low ecological value rather than the adjacent horse-mussel and rocky-reef habitat assessed as having High ecological value. The 2026 EclA assesses both construction and operational effects at Okuri Bay as Very Low across all ecological domains. Those conclusions support the view that the proposal would not physically compromise the principal identified marine ecological features that contribute most strongly to biotic natural character.
- 171 The terrestrial biotic context is also relevant. The surrounding landcover is already modified by pastoral grazing, forestry, scrub and regenerating native vegetation. While regenerating vegetation contributes positively to natural character, the terrestrial margin does not present

as an intact indigenous coastal forest sequence. The proposal would not affect terrestrial vegetation patterns or land-based ecological attributes.

- 172 The wider Current Basin context is associated with seabirds and marine mammals, including documented use of existing farm structures by a king shag and New Zealand fur seal. The 2026 EclA assigns High ecological value to the site-scale seabird and marine-mammal context but assesses the effects of the Okuri Bay proposal on those domains as Very Low. Those findings inform, but do not determine, this natural character assessment. Taking the identified avoidance and management measures into account, the proposal is not expected to compromise the wider biotic values underpinning the Very High Natural Character overlay, and biotic natural character effects are assessed as **Low**.

Experiential Attributes Effects

- 173 The principal natural character effects are experiential. The proposal would increase the visible extent of aquaculture within Okuri Bay and would introduce additional low-lying surface structures into the coastal marine area. This would reduce perceived naturalness in the immediate parts of the bay where the farm is visible, particularly for marine users travelling within or close to the proposed farm areas.
- 174 However, the experiential context of Okuri Bay is already moderated by human modification. Existing aquaculture is present within the bay, and the surrounding landform is visibly influenced by pastoral land use, forestry, scattered buildings, roading and regenerating vegetation. The bay therefore does not read as a pristine or wholly unmodified coastal environment at the local scale. Rather, it is experienced as a modified working coastal embayment within a broader high-value coastal marine setting.
- 175 The proposed farm would be seen as a low-profile marine element within a larger landform-defined basin. The enclosing landforms, rocky shoreline, open water setting and relationship with Current Basin would remain the dominant experiential attributes. The proposal would not remove the sense of enclosure, alter the wider coastal outlook, or obscure the key landform relationships that contribute to the bay's natural character. It would increase the working marine component of the bay, rather than fundamentally change the bay experience.
- 176 At the broader scale, the proposal would not compromise the experiential values of the wider Very High Natural Character area. The open coastal waters, Current Basin / French Pass context, wider rocky outcrops, and broader associations with the outer Sounds seascape would remain legible and dominant. At the local Okuri Bay scale, experiential natural character

effects are assessed as **Low** to **Low-Moderate**, reflecting a noticeable but localised reduction in perceived naturalness within an already modified bay. At the broader mapped VHNC scale, experiential effects are assessed as **Low**.

Natural Character Effects Summary

- 177 The proposal is located within a mapped Very High Natural Character area, but that mapping reflects the broader Current Basin and Outer Sounds coastal context rather than a uniform site-scale condition across all parts of Okuri Bay. At the local bay scale, the receiving environment is more modified, with existing aquaculture, pastoral land use, forestry, regenerating vegetation, scattered buildings and limited roading already influencing natural character.
- 178 Effects on abiotic attributes are assessed as **Very Low**, as the proposal would not alter the underlying coastal landform, bay morphology, shoreline configuration, seabed morphology or broader Current Basin coastal processes. Effects on biotic attributes are assessed as **Low**. that rating takes account of the 2026 EclA, which assesses both construction and operational ecological effects at Okuri Bay as Very Low across all ecological domains, and the avoidance of higher-value horse-mussel biogenic habitat and associated rocky reef through the farm layout.
- 179 The main natural character effects are considered to be experiential, arising from the increased visibility and presence of marine farming structures within Okuri Bay. These effects are assessed as **Low** to **Low-Moderate** at the local bay scale, reflecting a noticeable but localised reduction in perceived naturalness within an already modified working coastal environment. At the broader mapped Very High Natural Character scale, the proposal would not compromise the experience of open coastal waters, Current Basin / French Pass context, rocky outcrops, wider marine values, or broader outer Sounds seascape values that underpin the overlay. Overall natural character effects are assessed as **Low** to **Low-Moderate**.

Cumulative Effects

- 180 Cumulative effects are relevant because Okuri Bay already contains an existing marine farm, and nearby Waikawa Bay also contains existing aquaculture activity. The proposed farm would therefore not introduce marine farming as a new activity type within this part of Current Basin, but would increase the overall extent of aquaculture visible within the local coastal marine environment.

- 181 At the wider Current Basin scale, the cumulative effect is limited by the scale of the receiving environment and the degree of separation between Okuri Bay, Waikawa Bay and other coastal areas. The proposed farm would remain contained within Okuri Bay and would not read as a continuous or extensive aquaculture landscape across the wider Current Basin / Tasman Bay coastal setting. The broader coastal landforms, open water character and relationship with the wider Outer Sounds would remain dominant.
- 182 At the local Okuri Bay scale, cumulative effects would be more apparent, as the proposal would be seen in addition to the existing marine farm within the bay. This would increase the working marine character of Okuri Bay, particularly for marine users within the bay itself. However, given the modified terrestrial backdrop, existing aquaculture baseline, low-profile nature of marine farming structures and the continued dominance of the enclosing landforms, cumulative landscape, visual and natural character effects are assessed as **Low to Low-Moderate**.

Natural Character Mapping and Local Scale Discussion

- 183 This assessment has considered whether the proposed marine farm would compromise the natural character values that underpin that broader mapping. In this regard, I consider the distinction between the Level 4 and Level 5 mapping scale context to be important. Mr Bentley's Topic 5 evidence¹³ acknowledges that the marine environment in this area was mapped at a Level 4 scale, where modification is less apparent across the broader coastal marine area. However, he also acknowledged that, when considered at a more local Level 5 scale, terrestrial modification in Okuri Bay and Waikawa Bay becomes more relevant, and that Okuri Bay would likely rate as High rather than Very High natural character if assessed at that more detailed scale.
- 184 That acknowledgement is consistent with my own assessment. The wider Current Basin and Outer Sounds coastal context retains values consistent with Very High Natural Character, including open coastal waters, high-flow environments, rocky outcrops, reef and sediment habitats, and broader ecological associations. However, the local Okuri Bay receiving environment is influenced by the terrestrial based modifications to landcover. These factors reduce the sensitivity of the local bay environment to appropriately located marine farming. Those pastoral and plantation-forestry modifications contribute to the more modified local expression of natural character within Okuri Bay.

¹³ Proposed Marlborough Environment Plan: Section 42A Report for Hearing (Report: 20 November 2017), James Bentley. Submissions and further submissions Topic 5: Natural Character – Technical Mapping, Values and Overlays. Section 4.5.4.

- 185 It is also relevant that existing marine farms in Okuri Bay and Waikawa Bay were present within the broader Level 4 area, yet did not prevent the wider waters from being identified as Very High Natural Character. This indicates that the presence of marine farming, in itself, does not necessarily compromise the natural character values of the broader coastal marine area. The relevant question is therefore whether the proposed farm would materially affect the attributes that support the wider Very High Natural Character rating.
- 186 Mr Bentley has also noted through the MEP Hearings process that, following a site visit to Okuri Bay, he considered the bay as having a modified local context, including pastoral grazing, pine plantation, limited buildings and the existing marine farm¹⁴. While he recognised that Okuri Bay and adjacent Waikawa Bay are influenced by broader Outer Sounds values, including remoteness, wildness and scenic quality, he also concluded that Okuri Bay has capacity for some further limited aquaculture development from a landscape perspective. In particular, he identified parts of the western side and head of the bay as having greater ability to absorb aquaculture where development is contained by topography and associated with more modified landcover. This is consistent with my interpretation that the mapped Very High Natural Character context requires careful consideration, but does not mean that appropriately located aquaculture within the locally modified Okuri Bay receiving environment would necessarily compromise the broader values of the area.
- 187 Furthermore, the MEP natural character mapping predates the Resource Management (Extended Duration of Coastal Permits for Marine Farms) Amendment Act 2024. The effect of that legislation is that existing marine farming activities within Okuri Bay (Farm 8009) and nearby Waikawa Bay (Farms 8010, 8011 & 8012) remain part of the consented coastal marine environment until 31 December 2050. In practical terms, this reinforces the relevance of existing aquaculture as part of the enduring receiving environment for the life of the current planning framework, rather than as a short-term or transitional modification.
- 188 A similar temporal point applies to plantation forestry within the bay. While plantation forestry is rotational and will change over time through harvesting and replanting cycles, it forms part of the present and reasonably foreseeable landcover context of Okuri Bay. On that basis, I have treated forestry as part of the local modified receiving environment, rather than as a temporary or incidental influence on landscape and natural character.

¹⁴ James Bentley, *Minute 15 Response and End of Hearing Report, Proposed Marlborough Environment Plan - Variation 1 and 1A: Marine Farming*, Boffa Miskell Limited, 31 January 2022, pp 15-17.

189 For the reasons set out in the preceding effects assessment, I consider that the proposal would not compromise the broader natural character values that underpin the mapped Very High Natural Character Area. The proposal would be located within a locally modified bay environment, would not alter the underlying coastal landform or broader Current Basin processes, and has been refined in response to ecological information. While it would increase the visible extent of aquaculture within Okuri Bay, that change would be localised and limited in scale.

Statutory Framework Comment

- 190 Policy 14.21.6 of the Marlborough Environment Plan addresses additional Aquaculture Management Areas and marine farms within the relevant coastal marine units. In relation to areas identified as having high or very high natural character, Policy 14.21.6(d) identifies that such activities are not appropriate where they would have 'significant' adverse effects on the values and characteristics of an area identified as having high or very high natural character.
- 191 Okuri Bay is located within a mapped area of Very High Natural Character. On the findings of this assessment, the proposal would result in natural character effects that are **Low to Low-Moderate** overall. Those effects are primarily experiential and localised within Okuri Bay, and would not alter the underlying abiotic attributes, materially affect the identified biotic attributes, or compromise the broader Current Basin and Outer Sounds coastal values that underpin the Very High Natural Character mapping.
- 192 On that basis, and applying the assessment scale used in this report, the natural character effects of the proposal are considered to sit within the range of **minor adverse effects**. They are well below the level of **significant adverse effects** on the values and characteristics of the mapped Very High Natural Character area. This technical finding is relevant to the application of Policy 14.21.6(d), while recognising that the overall statutory assessment is a planning matter.

Conclusion

- 193 This assessment has considered the potential landscape, visual and natural character effects of the proposed Okuri Bay marine farm, comprising two blocks with a combined area of approximately 27.89 hectares. The proposal is located within Okuri Bay / Current Basin, within a broader area mapped as Very High Natural Character, but outside the nearby Outstanding Natural Feature / Landscape overlay associated with the waters beyond Okuri Bay.

- 194 Okuri Bay forms part of the wider Marlborough Sounds coastal environment and retains important coastal qualities, including a broad enclosed basin form, a strong land–sea relationship, rocky coastal margins and a visual connection with the wider Current Basin. However, at the local bay scale, these values are moderated by pastoral land use, forestry, regenerating vegetation, scattered buildings, access tracks/roading and an existing marine farm. The bay is therefore best understood as a locally modified working coastal embayment within a broader Very High Natural Character setting.
- 195 Landscape effects: the proposal would introduce additional aquaculture structures into Okuri Bay, but would not alter the underlying landform structure, coastal edge, broader land–sea relationship or wider Current Basin landscape context. At the wider landscape scale, effects are assessed as **Very Low** to **Low**. At the local bay scale, effects are assessed as **Low** to **Low-Moderate**, primarily due to the perceptual change associated with additional marine farming structures within the bay.
- 196 Visual effects: the proposal would be most apparent to marine users within Okuri Bay and to some adjacent landowners where views are available. The structures would be visible as low-lying linear elements on the water surface, but would be viewed within a bay already influenced by existing aquaculture and productive land use. Visual effects are assessed as **Low-Moderate** at most, with the most likely adverse effects being **Very Low** to **Low**.
- 197 Natural character effects: the proposal would not alter the abiotic attributes of Okuri Bay or the broader Current Basin coastal system, with abiotic effects assessed as Very Low. Biotic natural character effects are assessed as Low, taking account of the 2026 EclA's finding that construction and operational ecological effects at Okuri Bay would be Very Low across all ecological domains, together with the refinement of the farm layout to avoid higher-value benthic habitat. Those experiential effects are assessed as **Low** to **Low-Moderate** at the local bay scale. Overall natural character effects are assessed as **Low** to **Low-Moderate**.
- 198 On this basis, I consider that the proposal would result in localised landscape, visual and natural character change within Okuri Bay, but would not materially compromise the key landscape characteristics of the bay, the visual amenity of the wider receiving environment, or the broader values that underpin the Very High Natural Character mapping. In my opinion, the proposed marine farm can be accommodated within Okuri Bay without compromising the identified landscape and natural character values of the receiving environment.

Joshua Hunt
Registered NZILA Landscape Architect

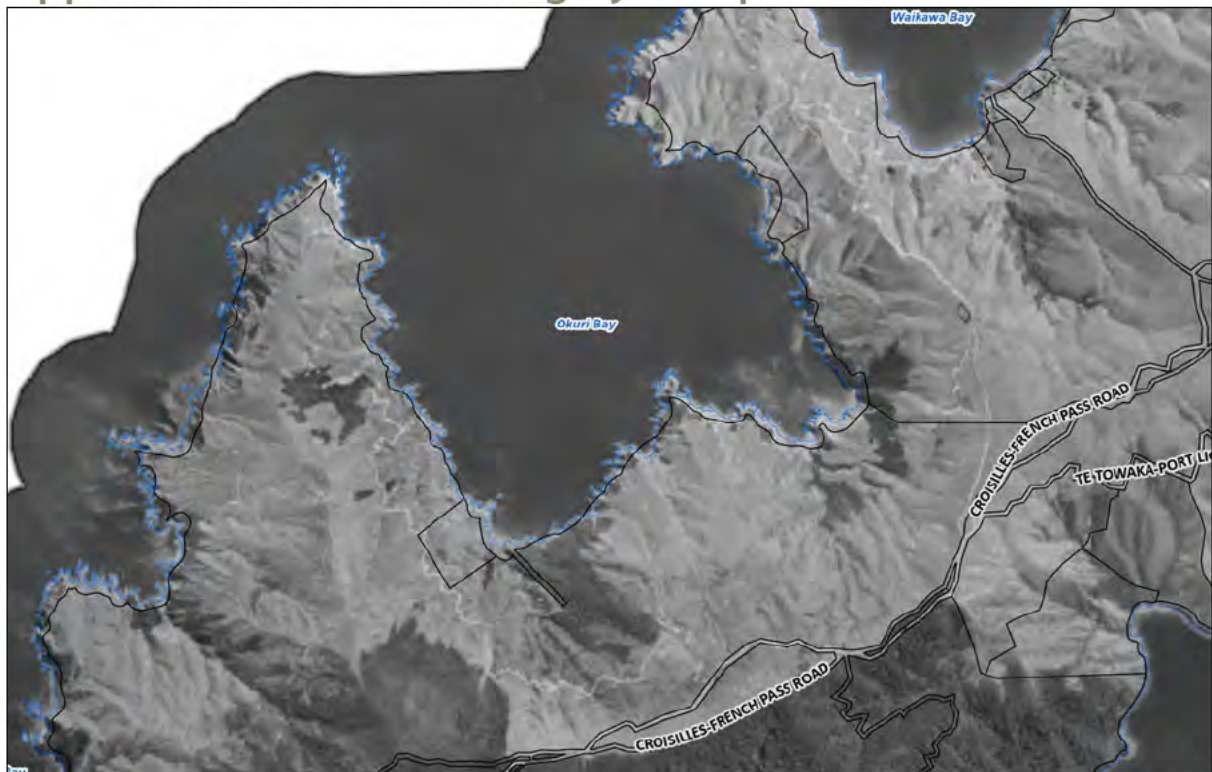


Appendix 1: Effects Scale

The following table outlines the scale of effects used within this assessment. Rather than duplication of this table for Landscape Effects, Visual Amenity Effects and Natural Character Effects, the conjunction 'or' has been used within the table to provide for all three effects assessment categories. It is noted that while the primary consideration is typically in relation to negative effects of a proposal, effects can also be neutral or positive.

Very High	Total loss/modification of key elements / features / characteristics, i.e. amounts to a fundamental change	Significant Effect
High	Major loss/modification or loss of most key elements / features / characteristics, i.e. substantial change to the pre- development environment	Significant Effect
High-Moderate	Loss/modification of several key elements / features / characteristics of the baseline, i.e. the pre-development environment remains evident but is distinctly changed.	More than Minor Effect
Moderate	Partial loss/modification to key elements / features / characteristics of the baseline, i.e. new elements may be prominent but not necessarily uncharacteristic within the receiving environment	More than Minor Effect
Low-Moderate	Minor loss/modification to one or more key elements / features / characteristics, i.e. new elements are not prominent or uncharacteristic within the receiving environment.	Minor Effect
Low	No material loss/modification to key elements / features / characteristics. i.e. modification or change is not uncharacteristic and integrates seamlessly within the receiving environment.	
Very Low	Little or no loss/modification to key elements / features / characteristics of the baseline, i.e. approximating a 'no change' situation that is barely discernible.	
		Less than Minor Effect

Appendix 2: Historical Imagery Comparison



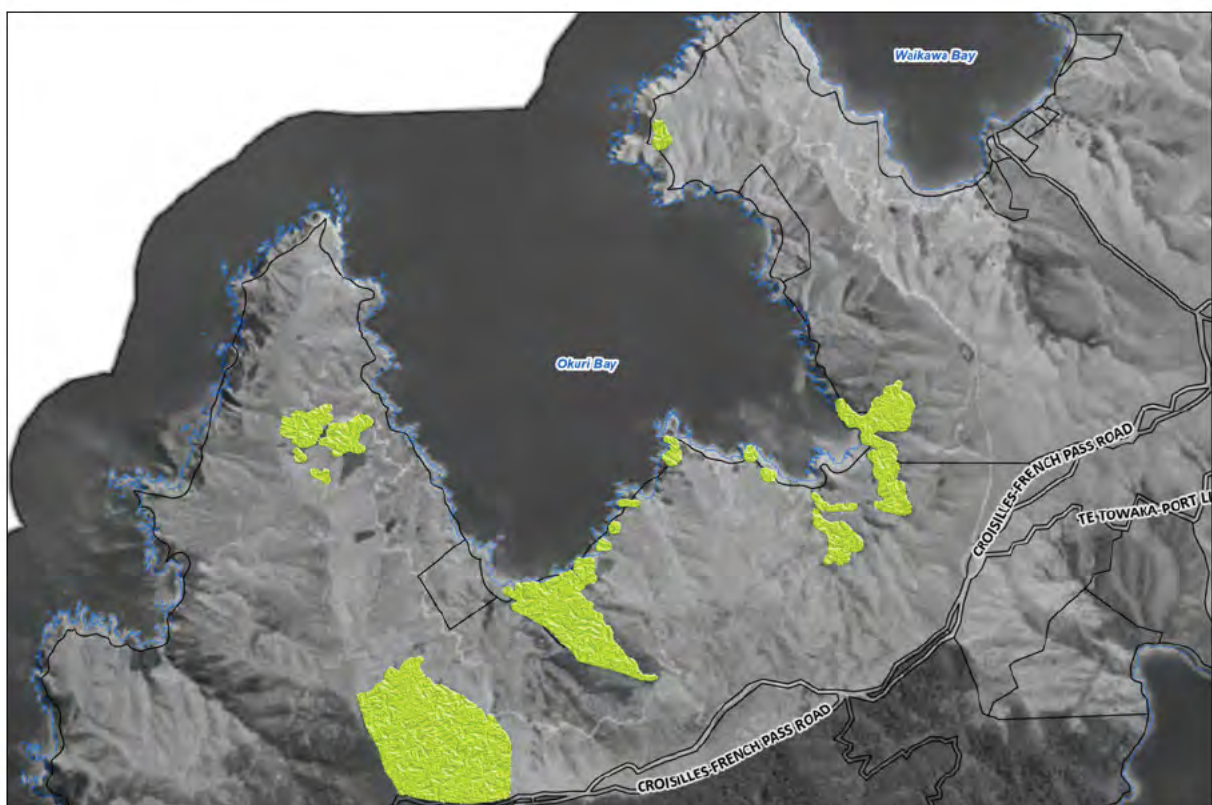
Circa 1960 (Source: Marlborough Smart Maps: Historic Aerial Photos)



Circa 2004 (Source: Marlborough Smart Maps: Historic Aerial Photos)



Latest Aerial Photo – Circa 2024 (Source: Marlborough Smart Maps: Historic Aerial Photos)



Broadly identified native vegetation patches remaining since 1960 - Green overlay (Source: Marlborough Smart Maps: Historic Aerial Photos 1960)



Appendix 3: Relevant Statutory Provisions

The following statutory provisions are relevant to the landscape and natural character matters addressed within this assessment. The purpose of this appendix is to identify the key provisions that provide the statutory context for the landscape assessment.

FAST-TRACK APPROVALS ACT 2024

The Fast-track Approvals Act 2024 establishes a separate approval pathway for eligible projects with regional or national benefits. The Act includes provisions for the consideration and determination of substantive applications, including the circumstances in which an expert panel must or may decline an approval.

Section 85

(3) A panel may decline an approval if, in complying with Section 81(2), the panel forms a view that –

- a) there are 1 or more adverse impacts in relation to the approval sought; and
- b) those adverse impacts are sufficiently significant to be out of proportion to the project's regional or national benefits that the panel has considered under section 81(4), even after taking into account-
 - i. any conditions that the panel may set in relation to those adverse impacts; and
 - ii. any conditions or modifications that the applicant may agree to or propose to avoid, remedy, mitigate, offset or compensate for those adverse impacts.

RESOURCE MANAGEMENT ACT (1991)

Section 5 - Purpose

- (1) The purpose of this Act is to promote the sustainable management of natural and physical resources.
- (2) In this Act, **sustainable management** means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural well-being and for their health and safety while:
 - (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and
 - (b) safeguarding the life-supporting capacity of air, water, soil, and ecosystems; and
 - (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment.

Section 6 – Matters of National Importance

In achieving the purpose of this Act, all persons exercising functions and powers under it, in relation to managing the use, development, and protection of natural and physical resources, shall recognise and provide for the following matters of national importance:

- (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;
- (b) the protection of outstanding natural features and landscapes from inappropriate subdivision, use, and development;



Section 7 – Other Matters

In achieving the purpose of this Act, all persons exercising functions and powers under it, in relation to managing the use, development, and protection of natural and physical resources, shall have particular regard to:

- (c) the maintenance and enhancement of amenity values;
- (f) maintenance and enhancement of the quality of the environment:

NEW ZEALAND COASTAL POLICY STATEMENT (2010)

Policy 6 – Activities in the coastal environment

- (2) Additionally, in relation to the coastal marine area:
 - (c) recognise that there are activities that have a functional need to be located in the coastal marine area, and provide for those activities in appropriate places;

Policy 13 – Preservation of Natural Character

- (1) To preserve the natural character of the coastal environment and to protect it from inappropriate subdivision, use, and development:
 - (a) avoid adverse effects of activities on natural character in areas of the coastal environment with outstanding natural character; and
 - (b) avoid significant adverse effects and avoid, remedy or mitigate other adverse effects of activities on natural character in all other areas of the coastal environment;
- including by:
- (c) assessing the natural character of the coastal environment of the region or district, by mapping or otherwise identifying at least areas of high natural character; and
 - (d) ensuring that regional policy statements, and plans, identify areas where preserving natural character requires objectives, policies and rules, and include those provisions.

Policy 15 – Natural features and natural landscapes

To protect the natural features and natural landscapes (including seascapes) of the coastal environment from inappropriate subdivision, use, and development:

- (a) avoid adverse effects of activities on outstanding natural features and outstanding natural landscapes in the coastal environment; and
- (b) avoid significant adverse effects and avoid, remedy, or mitigate other adverse effects of activities on other natural features and natural landscapes in the coastal environment;

MARLBOROUGH ENVIRONMENT PLAN (VOLUME 1)

Objective 7.1 – Establish the degree of natural character in the coastal environment, and in lakes and rivers and their margins

Policy 7.1.2 – The extent of the coastal environment is identified in the Marlborough Environment Plan to establish the areas of land and coastal marine area to which management may need to be applied in order to protect the natural character of the coastal environment from inappropriate subdivision, use and development.



Objective 7.2 – Preserve and promote the restoration of the natural character of the coastal environment, and lakes and rivers and their margins, and protect them from inappropriate subdivision, use and development.

Policy 7.2.2 – Avoid the significant adverse effects of subdivision, use or development, and otherwise avoid, remedy or mitigate adverse effects on the characteristics that contribute to natural character, having regard to the factors in Appendix 4, within:

- (a) all areas of the coastal environment outside of areas of outstanding natural character; and
- (b) lakes and rivers, and their margins of high and very high natural character.

Objective 8.2 – Protect outstanding natural features and outstanding natural landscapes from inappropriate subdivision, use and development and maintain and enhance landscapes with high amenity value.

Policy 8.2.1 – Control activities that have the potential to degrade those values contributing to outstanding natural features and outstanding natural landscapes by requiring activities and structures to be subject to an assessment of effects on landscape values through the resource consent process.

Additional Assessment Frameworks (Appended to the MEP)

- Volume 3: Appendix 1 – Landscape Schedule of Values
- Volume 3: Appendix 2 – Coastal Natural Character Schedule of Values
- Volume 3: Appendix 4 - Determining Significant Adverse Effects on Natural Character

Objective 14.21 – Provide for marine farming in appropriate locations while protecting and maintaining the values of Marlborough's coastal environment.

Policy 14.21.5 – AMAs established through Variation 1 (other than ASAs) provide for existing marine farms within the Enclosed Water CMUs. AMAs within the Enclosed Waters CMUs are generally located:

- (a) In the coastal ribbon between 100 and 300 metres from mean low water (other than those AMAs that provide for intertidal marine farms or those marine farms set out in ai)) to protect natural, recreational and amenity values of the coastal marine area of the Marlborough Sounds;
- (b) In the same location as the existing marine farm in the Admiralty Bay CMU, Port Ligar CMU, Forsyth Bay CMU and Port Underwood CMU when a seaward move into the coastal ribbon in (a) may have adversely affected the ecological values within those CMU;
- (b) To reflect a similar consented area to accommodate the same or shorter total consented length of backbone or intertidal structures;
- (c) 20m from reefs (including cobble habitat);
- (d) 20 metres from sites that met Policy 9.1.1 and the ecological significance criteria in Appendix 3, including ecologically significant marine sites identified in Appendix 25 and shown on the Volume 4 planning maps, except where the installation or operation of the marine farm is consistent with Policy 9.3.1;



- (e) Away from residences, publicly accessible boat launching facilities, jetties, publicly accessible beaches, moorings, anchorages of refuge and recognised navigational routes where this is necessary to maintain and enhance the recreational and amenity values of the Marlborough Sounds, by taking into account existing and future public need;
- (f) To recognise and provide for the traditional and continuing relationship of Marlborough's tangata whenua iwi with the moana and sites of significance;
- (g) Outside areas identified as having high, very high or outstanding levels of natural character in Appendix 2, and outside areas identified as outstanding natural features and outstanding natural landscapes in Appendix 1, (both shown on the maps in Volume 4), where this is necessary to avoid adverse effects on the characteristics and values of those areas;
- (h) To avoid significant adverse effects on natural character, or on natural features and natural landscapes;
- (i) To avoid significant adverse effects on the areas, habitats and ecosystems set out in Policy 11(b) of the NZCPS; and
- (j) Away from significant feeding or breeding habitat for New Zealand King Shag, elephant fish, dolphins and other important species except where the installation or operation of the marine farm is consistent with Policy 9.3.1.

Policy 14.21.6 – Additional AMAs in the Enclosed Waters CMUs, and AMAs in Near-shore CMUs, and marine farms in the offshore CMU are not appropriate in:

- (a) Queen Charlotte Sound CMU to protect the particularly high recreational, scenic, and amenity values present in that area;
- (b) The National Transportation Corridor;
- (c) Areas identified as outstanding natural character in Appendix 2, if the AMA and any resulting marine farm would have adverse effects on the values and characteristics of that area;
- (d) Areas identified as high or very high natural character in Appendix 2, if the AMA and any resulting marine farm would have significant adverse effects on the values and characteristics of that area;
- (e) Areas identified as outstanding natural features or outstanding natural landscapes in Appendix 1, if the AMA and any resulting marine farming would have adverse effects on the values and characteristics of that area; and
- (f) Ecologically significant marine sites identified in Appendix 25 and shown on the Volume 4 planning maps except where the installation or operation of the marine farm is consistent with Policy 9.3.1.

Policy 14.21.7 – Unless already considered inappropriate under Policy 14.21.6, the appropriateness of additional AMAs in the Enclosed Waters CMUs and AMAs in the Near-shore CMUs will be assessed considering adverse effects on any of the natural and human use values of the coastal marine area and may be provided only where Policy 14.21.5 is met and:



- (a) an assessment of the seafloor beneath a proposed AMA and its immediate environs has been completed which shows that there are;
 - (i) no areas that meet Policy 9.1.1 and the ecological significance criteria in Appendix 3 as having significant marine biodiversity value underneath or within 20 metres of the AMA that may be adversely affected by the installation or operation of a marine farm;
 - (ii) no reefs (including cobble habitats), biogenic habitats, or indigenous algae beds within 20 metres of the AMA that may be significantly adversely affected by the installation or operation of a marine farm;
- (b) the location, installation and/or operation of the marine farm avoids significant adverse effects on areas, habitats and ecosystems set out in Policy 11(b) of the NZCPS;
- (c) the location of an AMA and subsequent marine farm will not unreasonably adversely affect navigation that would be caused by introducing speed restrictions across the majority of a bay;
- (d) public access for recreational opportunities is maintained;
- (e) the operation of the subsequent marine farm would have no more than minor adverse effects on amenity values, including visual amenity, resulting from lighting and noise;
- (f) the AMA is located away from areas with significant cultural values where that is necessary to protect the relationship of Marlborough's tangata whenua iwi with those places.

Key References

Bentley, J. 2017. Proposed Marlborough Environment Plan: Section 42A Hearings Report for Hearing Commencing 26 February 2018. Report on submissions and further submissions, Topic 5: Natural Character – Technical Mapping, Values and Overlays

Bentley, J. 2022. Minute 15 Response and End of Hearing Report, Proposed Marlborough Environment Plan - Variation 1 and 1A: Marine Farming, prepared by Boffa Miskell Limited for Marlborough District Council, 31 January 2022, pp 15-17.

McClellan, R. (2026). *Potential effects on seabirds of proposed longline aquaculture projects, Marlborough Sounds.* Letter prepared for Gascoigne Wicks Lawyers, 20 March 2026.

McConnell, H. (2026). *Technical Advice, Marine Mammals – Marlborough Aquaculture.* Letter prepared by SLR Consulting New Zealand for Aquaculture Direct Limited, 8 July 2026.

Potree Viewer LiDar Dataset Citation: Marlborough District Council, Toitū Te Whenua Land Information New Zealand (LINZ) (2023). Marlborough, New Zealand 2020-2022. Collected by Aerial Surveys, distributed by OpenTopography and LINZ. <https://doi.org/10.5069/G97D2SB0>. Accessed 2026-03-29

Robertson, B.P. 2022. Ecological Impact Assessment for Proposed Aquaculture Management Areas, Okuri Bay, outer western Marlborough Sounds. Report Prepared by Robertson Environmental for Clearwater Mussels Limited. Robertson Environmental Report No. 0156

Robertson, B.P. 2026. *Marlborough Sounds Aquaculture Project: Coastal Ecological Impact Assessment.* Prepared by Robertson Environmental Limited for Aquaculture Direct Limited. Report ID REL174582, Version 1.0, 1 September 2026.

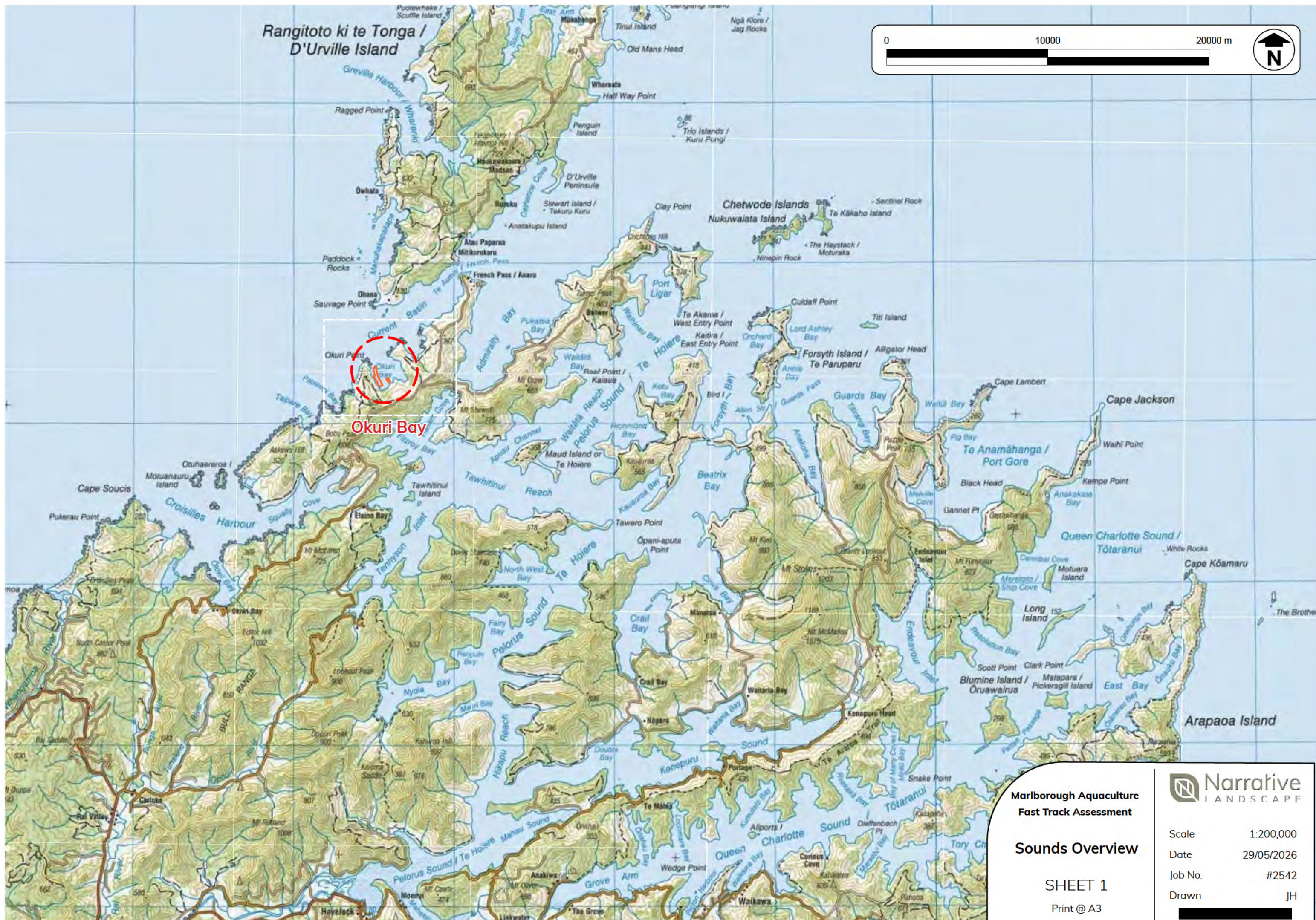
OKURI BAY

MARLBOROUGH AQUACULTURE FAST TRACK APPLICATION
Landscape, Visual and Natural Character Assessment

Prepared for
Clearwater Mussels Ltd and Talley's Ltd

1 October 2026





Marlborough Aquaculture
Fast Track Assessment

Sounds Overview

SHEET 1

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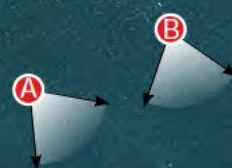


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Date 29/05/2026
Job No. #2542
Drawn JH

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2000 m



Western Farm

Southeastern Farm

Marlborough Aquaculture
Fast Track Assessment

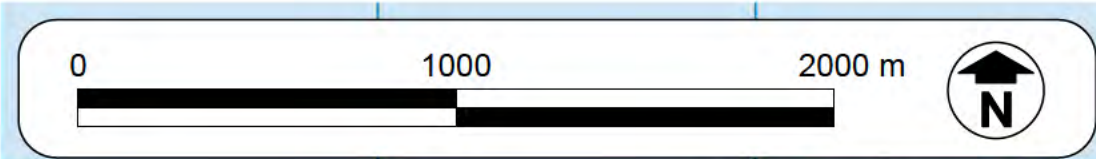
OKURI BAY
Aerial Viewpoint Map

SHEET 2

Print @ A3



Scale	1:20,000
Date	29/05/2026
Job No.	#2542
Drawn	JH



Bay / Te Tai-o-Aorere



Marlborough Aquaculture
Fast Track Assessment

**OKURI BAY
Topo Map**

SHEET 3

Print @ A3

Narrative
LANDSCAPE

Scale	1:20,000
Date	29/05/2026
Job No.	#2542
Drawn	JH

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1000

2000 m



Waikawa Bay

Okuri Bay

Papawai Bay

CROISILLES-FRENCH PASS ROAD

CISSY BAY ROAD

Marlborough Aquaculture
Fast Track Assessment

OKURI BAY
MEP Overlays Map

SHEET 4

Print @ A3

 Narrative
LANDSCAPE

Scale 1:20,000

Date 29/05/2026

Job No. #2542

Drawn JH



[+ Return to Map](#)

VIEWPOINT A - PHOTO DETAILS

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Time: 8:33AM

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**Marlborough Aquaculture
Fast Track Assessment**

Viewpoint A

SHEET 5

Print @ A3



Scale	
Date	29/05/2026
Job No.	#2542
Drawn	JH



[+ Return to Map](#)

VIEWPOINT B - PHOTO DETAILS

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Time: 8:37AM

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**Marlborough Aquaculture
Fast Track Assessment**

Viewpoint B

SHEET 6

Print @ A3



Scale
Date 29/05/2026
Job No. #2542
Drawn JH



[+ Return to Map](#)

VIEWPOINT C - PHOTO DETAILS

Date: 04/12/2025
Time: 8:43AM

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Lat/Long: 40°58'25.176" S 173°46'34.674" E

**Marlborough Aquaculture
Fast Track Assessment**

Viewpoint C

SHEET 7

Print @ A3



Scale
Date 29/05/2026
Job No. #2542
Drawn JH



[+ Return to Map](#)

VIEWPOINT D - PHOTO DETAILS

Date: 04/12/2025
Time: 8:45AM

Camera/Lens: Canon 6D mkii / 24mm (Full Frame)
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**Marlborough Aquaculture
Fast Track Assessment**

Viewpoint D

SHEET 8

Print @ A3



Scale
Date 29/05/2026
Job No. #2542
Drawn JH



[+ Return to Map](#)

VIEWPOINT E - PHOTO DETAILS

Date: 04/12/2025
Time: 8:45AM

Camera/Lens: Canon 6D mkii / 24mm (Full Frame)
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**Marlborough Aquaculture
Fast Track Assessment**

Viewpoint E

SHEET 9

Print @ A3



Scale
Date 29/05/2026
Job No. #2542
Drawn JH



[+ Return to Map](#)

VIEWPOINT F - PHOTO DETAILS

Date: 04/12/2025
Time: 9:02AM

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**Marlborough Aquaculture
Fast Track Assessment**

Viewpoint F

SHEET 10

Print @ A3



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Date	29/05/2026
Job No.	#2542
Drawn	JH



[+ Return to Map](#)

VIEWPOINT G - PHOTO DETAILS

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Time: 8:58AM

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**Marlborough Aquaculture
Fast Track Assessment**

Viewpoint G

SHEET 11

Print @ A3



Scale

Date 29/05/2026

Job No. #2542

Drawn JH



[+ Return to Map](#)

VIEWPOINT 1 - PHOTO DETAILS

Date: 04/12/2025
Time: 8:16AM

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**Marlborough Aquaculture
Fast Track Assessment**

Viewpoint 1

SHEET 12

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Scale
Date 29/05/2026
Job No. #2542
Drawn JH



[+ Return to Map](#)

VIEWPOINT 2 - PHOTO DETAILS

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**Marlborough Aquaculture
Fast Track Assessment**

Viewpoint 2

SHEET 13

Print @ A3



Scale	
Date	29/05/2026
Job No.	#2542
Drawn	JH