

Hapūkū Rock

Landscape and Natural Character Assessment

Prepared for
Clearwater Mussels Limited

1 October 2026





Project Name: Hapūkū Rock

Report Title: Landscape and Natural Character Assessment

Prepared for: Clearwater Mussels Limited

Prepared by: Narrative Landscape Ltd

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

Status: FINAL

Issue Date: 1 October 2026



Contents

EXECUTIVE SUMMARY	5
INTRODUCTION	7
Purpose	7
Scope	7
METHODOLOGY	8
Assessment Approach	8
Landscape Assessment Framework	9
Natural Character Assessment Framework	9
EXISTING ENVIRONMENT	10
Landscape Context and Scale	10
Marlborough Sounds (and the Outer Marlborough Sounds) – Level 1/2	10
Cook Strait and Bulwer Landform – Level 3	11
Hapūkū Rock / Outer Admiralty Bay – Level 4	12
Site Coastline – Level 5	14
Summary of Existing Environment	15
LANDSCAPE CHARACTER BASELINE ASSESSMENT	15
Physical Landscape Attributes	16
Associative Landscape Attributes	17
Perceptual Landscape Attributes	18
Summary of Landscape Character Baseline	19
Landscape Sensitivity	19
NATURAL CHARACTER BASELINE ASSESSMENT	20
Abiotic	21
Biotic	22
Experiential	24
Summary of Natural Character Baseline	24
ISSUES	25
PROPOSAL	27
STATUTORY PROVISIONS	27
Fast-track Approvals Act	28
Resource Management Act	28
New Zealand Coastal Policy Statement	28
Marlborough Environment Plan	29
LANDSCAPE EFFECTS	30
Landscape Effects at the Wider Scale	31
Landscape Effects at Hapūkū Rock / Site Coastline	32
VISUAL EFFECTS	34
Visual Catchment and Viewing Audience	34
NATURAL CHARACTER EFFECTS ASSESSMENT	38
Abiotic Attributes Effects	39
Biotic Attributes Effects	40
Experiential Attributes Effects	41
Natural Character Effects Summary	41



CUMULATIVE EFFECTS	42
OUTSTANDING NATURAL FEATURE/LANDSCAPE MAPPING AND SCALE DISCUSSION	43
STATUTORY FRAMEWORK COMMENT	44
CONCLUSION	45
APPENDIX 1: EFFECTS SCALE	47
APPENDIX 2: RELEVANT STATUTORY PROVISIONS	48
APPENDIX 3: RELEVANCE OF COOK STRAIT ONL VALUES TO HAPŪKŪ ROCK	53
REFERENCES	55

ATTACHMENT 1: GRAPHICS PACKAGE

FIGURES

FIGURE 1: EFFECTS RATING SCALE.	8
FIGURE 2: EXISTING MARING FARMING LOCATIONS (BLUE POLYGONS)	13
FIGURE 3: NZ ARCHAEOLOGICAL ASSOCIATION	17

Executive Summary

- i. Narrative Landscape has been engaged by Clearwater Mussels Limited to prepare a Landscape, Visual and Natural Character Assessment for the proposed Hapūkū Rock marine farm application, located in Outer Admiralty Bay, Marlborough Sounds. The proposal forms part of the Marlborough Aquaculture Fast-track Approvals Act application and involves two proposed marine farm blocks adjoining the existing Clearwater Mussels Limited marine farm.
- ii. The proposed northern block would occupy approximately 13 hectares, while the proposed southern block would occupy approximately 15 hectares, with a combined backbone length of 5,480 metres. The proposed farms are intended to provide Greenshell mussel spat nursery space, with mussels to be seeded onto another farm before harvest.
- iii. The Hapūkū Rock site is located within the mapped Outer Sounds Outstanding Natural Landscape. However, it is not located within an area mapped as High, Very High or Outstanding Natural Character in the Marlborough Environment Plan. Accordingly, the key assessment issue is whether the proposal would compromise the values and characteristics that underpin the broader Outstanding Natural Landscape, while also considering local natural character and visual amenity effects.
- iv. The receiving environment is best understood as a modified rural and working coastal setting within the broader Outer Sounds landscape. The site retains coastal landscape and natural character qualities associated with open outer-bay waters, steep coastal slopes, rocky shoreline edges and a legible land–sea relationship. However, those qualities are moderated by pastoral land use, access tracks, road access, powerline infrastructure, nearby forestry / wilding pines, vessel movement and the existing marine farm.
- v. The proposal would not modify the adjacent coastal landform, rocky shoreline, headlands, terrestrial vegetation pattern or broader physical processes of Outer Admiralty Bay. The main landscape and visual change would arise from an increase in the visible extent of marine farming within the immediate Hapūkū Rock setting.
- vi. Landscape effects are assessed as **Low** overall. At the wider landscape scale, the proposal would not compromise the identified values and characteristics of the broader Outer Sounds Outstanding Natural Landscape. At the Hapūkū Rock / Site Coastline scale, the proposal would intensify an existing working coastal activity, but would not alter the underlying coastal landform, open-water setting or legibility of the land–sea relationship.



- vii. Visual effects are assessed as **Low** at most. Land-based views are limited and primarily associated with intermittent and transitory views from Te Towaka – Port Ligar Road. The proposal would be more apparent to marine users travelling through or intentionally approaching this part of Outer Admiralty Bay, but the proposed structures would remain low-lying, linear and visually subordinate to the adjoining coastal slopes and wider open-water setting.
- viii. Natural character effects are assessed as **Low** overall. Abiotic effects are assessed as Very Low, as the proposal would not alter the coastal landform, shoreline, open-water setting or wider physical processes. Biotic effects are assessed as Low, recognising the predominantly Low-value soft-sediment seabed, avoidance of the discrete Moderate-value inshore corner reef, cobble and natural shell habitat, the absence of terrestrial modification, and the specialist ecological, seabird and marine mammal findings accompanying the application. Experiential effects are assessed as **Low**, arising from an increased visible extent of marine farming within an already modified rural and working coastal setting.
- ix. Cumulative effects are assessed as **Low**. The proposed blocks would straddle the existing marine farm and would consolidate marine farming activity within the immediate Hapūkū Rock setting. However, the scale of Outer Admiralty Bay, the separation from other marine farming areas, the low-profile nature of the structures and the continued dominance of the adjoining coastal landform mean the proposal would not read as part of a continuous or extensive aquaculture landscape across the wider bay.
- x. Overall, the proposal would result in localised landscape, visual and natural character change within the Hapūkū Rock setting. However, it would not materially compromise the key coastal landscape characteristics of the site, the visual amenity of the wider receiving environment, or the values and characteristics that underpin the mapped Outer Sounds Outstanding Natural Landscape. In my opinion, the proposed marine farms can be accommodated at Hapūkū Rock without compromising the identified landscape and natural character values of the receiving environment.

Introduction

Purpose

- 1 Narrative Landscape has been engaged by Clearwater Mussels Limited to prepare a Landscape, Visual and Natural Character Assessment for the proposed Hapūkū Rock marine farm application, located in Outer Admiralty Bay, Marlborough Sounds. The proposal forms part of the Marlborough Aquaculture Fast-track Approvals Act application and involves two marine farm blocks (approximately 13ha and 15ha respectively) adjoining the existing Clearwater Mussels Limited marine farm along this stretch of coastline. The proposed blocks are intended to provide Greenshell mussel spat nursery space, with mussels to be seeded onto another farm before harvest.
- 2 The purpose of this report is to assess the potential landscape, visual and natural character effects of the proposal, including the extent to which the proposed marine farm activity can be accommodated within this part of Outer Admiralty Bay.

Scope

- 3 The Hapūkū Rock site is not located within an area identified as High, Very High or Outstanding Natural Character in the Marlborough Environment Plan. However, it is located within the mapped Outer Sounds Outstanding Natural Landscape¹. Accordingly, this assessment gives particular consideration to whether the proposal would compromise the identified values of that broader landscape area. This assessment addresses:
 - the existing landscape character of Hapūkū Rock and its wider Admiralty Bay / Marlborough Sounds context;
 - the relevant natural character and landscape values 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 Outstanding Natural Landscape area.
- 4 This report is limited to landscape, visual and natural character matters. It has been informed by the accompanying graphic attachment, site visit observations, the Marlborough Environment Plan mapping and schedules, the relevant statutory provisions, Te Tangi a Te Manu: Aotearoa New Zealand Landscape Assessment Guidelines, and relevant ecological, marine mammal and seabird assessments prepared for the proposal.

¹ Marlborough Environment Plan (Operative in Part): Volume 3 – Appendix 1: Map 1. Extent of Outer Sounds

- 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 Guidelines², 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 in the vicinity of Hapūkū Rock.
- 8 The methodology follows a structured process which includes:
- Identification of the existing landscape and natural character context of Hapūkū Rock;
 - 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 Hapūkū Rock. 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.

² 'Te Tangi a te Manu: Aotearoa New Zealand Landscape Assessment Guidelines'. Tuia Pita Ora NZILA, July 2022



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 Hapūkū Rock area landscape character.

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 The assessment of natural character has been undertaken with reference to section 6(a) of the RMA, Policy 13 of the NZCPS, and the relevant Marlborough Environment Plan provisions relating to natural character within the coastal environment. Particular regard has also been given to the MEP natural character mapping, the Natural Character Schedule of Values, and the factors for assessing natural character effects contained in Appendix 4 of the MEP. The natural character is considered through three primary assessment 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 the Hapūkū Rock application site, located in Outer Admiralty Bay near the entrance to the wider Admiralty Bay coastal environment, is best understood as part of a sequence of nested coastal landscape scales. This reflects the way in which the landscape, natural character and coastal environment values are identified in the Marlborough Environment Plan, while also allowing the more localised characteristics of the surrounding waters of 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. Cook Strait and Bulwer landform – broader/nested landscape context
 4. Hapūkū Rock / Outer Admiralty Bay – the local coastal setting
 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 Outer Admiralty Bay and Hapūkū Rock coastline scales are more directly relevant to localised landscape, visual, and experiential natural character effects.
- 18 This scale framework is important because the Cook Strait Outstanding Natural Landscape mapping reflects a broad assessment context (Level 2/3), 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 Hapūkū Rock sits within this wider Outer Sounds context, near the northern entrance to Admiralty Bay. It forms part of a coastal landscape where high scenic and natural character values (particularly associated with the islands) coexist with productive coastal land uses, including pastoral farming, forestry and areas of marine farming. 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.

Cook Strait and Bulwer Landform – Level 3

- 23 At the broader scale, the Hapūkū Rock site forms part of the Cook Strait nested landscape identified in the Marlborough Environment Plan (MEP)³. This nested landscape extends across the outer north-eastern Marlborough Sounds and is described as an open, wild and exposed maritime landscape influenced by Cook Strait and Tasman Bay.
- 24 The coastal marine environment within this wider area is physically diverse, reflecting its complex coastal topography, bathymetry and hydrology. Sea conditions range from very exposed around north-western Rangitoto ki te Tonga/D'Urville Island and Stephens Island/Takapourewa, to more sheltered conditions within bays and inlets. Strong tidal mixing and high-current areas occur around headlands and between land masses, particularly through Te Aumiti / French Pass, Stephens Passage and Allen Strait, while currents are more moderate elsewhere.

³ Marlborough District Council, *Marlborough Environment Plan*, Volume 3, Appendix 1, Cook Strait Nested Landscape 08.

- 25 The wider coastal marine area includes exposed rocky headlands, islands, offshore stacks and reefs, sheltered bays and inlets, bedrock, cobble and boulder reefs, offshore sand and mud substrates, shelly gravels and deeper channels. This diversity supports a wide range of marine habitats and communities, including reef, sediment, fish, seabird and marine mammal values. Aquaculture is also present within parts of this broader coastal marine environment, including adjacent to the new sites, further south in Admiralty Bay, Anakoha Bay, Catherine Cove and parts of Port Gore.
- 26 The adjacent Bulwer coastal terrestrial area is characterised by steep to moderately steep dissected coastal hill slopes, peninsulas, headlands, inlets and broad bays. Landcover is mixed, including areas of native forest and shrubland, pasture, forestry and regenerating vegetation. The coastal landform retains strong natural character and landscape qualities in places, but the wider area also includes productive land uses, access tracks, dwellings and marine farming activity.
- 27 The MEP values schedule for the Cook Strait nested landscape is strongly focused on the more exposed island, reef, headland and passage features of the Outer Sounds, including Rangitoto ki te Tonga / D'Urville Island, Stephens Island / Takapourewa, the Trio Islands, the Chetwode Islands, Te Aumiti / French Pass, Clay Point, Cape Lambert and Alligator Head⁴. While there are broader values that are relevant to the Hapūkū Rock context, including remoteness, exposed coastal slopes and habitat values, there is limited specific commentary relating to the eastern waters of Outer Admiralty Bay or the coastline adjacent to the proposed sites.
- 28 The Level 3 landscape context is therefore important to the assessment, but it should not be treated as uniform. The broader Cook Strait nested landscape contains a range of outstanding values, while the Hapūkū Rock setting represents a more localised part of that landscape where open coastal waters and a modified rural coastal landform are experienced together.

Hapūkū Rock / Outer Admiralty Bay – Level 4

- 29 The Hapūkū Rock site is located within the eastern waters of Outer Admiralty Bay, between Hapūkū Rock / Clay Point to the north-east and Te Ekeatekonganui / Reef Point to the south-west (Attachment 1 – Sheet 03). The proposed marine farm blocks adjoin the existing Clearwater Mussels Limited marine farm and sit within a relatively open part of the northern Admiralty Bay coastal marine area.

⁴ Marlborough District Council, Marlborough Environment Plan, Volume 3, Appendix 1, Cook Strait Nested Landscape 08

- 30 Outer Admiralty Bay has a more open coastal character than many of the enclosed inner Sounds bays. The waters are influenced by the broader Outer Sounds context, with open views across Admiralty Bay and a stronger relationship with Cook Strait than is experienced within the more enclosed arms of the Sounds. However, the bay is not experienced as an isolated or unmodified seascape. Marine farming is established (Figure 2) within the southern waters of Admiralty Bay (as well as across in Catherine Cove, and over the hill in Port Ligar), and the existing Hapūkū Rock marine farm forms part of the immediate local context.



Figure 2: Existing Marine Farming Locations (Blue Polygons)

- 31 The adjacent terrestrial backdrop (Attachment 1: Sheets 05-09) is associated with the Bulwer / Crichtons Hill landform sequence. It comprises steep coastal slopes, gullies, headlands and rocky coastal edges rising from the water. The underlying landform remains legible and visually important, but the landcover is modified and primarily includes pastoral grassland and access tracks, with regenerating vegetation and forestry located further south. There is also a powerline running along the adjacent ridgeline, as well as the Port Ligar Road, an airstrip and other access tracks located on the hillside adjacent to the Hapūkū Rock site. This gives the local setting a rural working coastal character, rather than a wholly natural or remote outer-coast character.
- 32 Experientially, the Hapūkū Rock setting retains a strong coastal character derived from the openness of Outer Admiralty Bay (Attachment 1 – Sheet 10), the steep coastal slopes and the wider relationship with the Outer Sounds. These qualities are moderated locally by the existing marine farm, the modified rural coastal backdrop and the broader pattern of productive use within Admiralty Bay. The setting therefore retains scenic and natural character qualities, but is not unmodified or devoid of coastal production activity.

- 33 The Level 4 context is important because it provides the local landscape setting within which the proposal would be perceived. It also assists in understanding how the broader Cook Strait / Outer Sounds values are expressed at Hapūkū Rock, rather than assuming that all parts of the mapped nested landscape express those values in the same way.

Site Coastline – Level 5

- 34 At the most local scale, the site coastline comprises the immediate coastal edge and adjacent waters between Hapūkū Rock / Clay Point and Te Ekeatekongānui / Reef Point. This section of coast forms part of the eastern side of Outer Admiralty Bay and is associated with the lower coastal slopes of the Bulwer / Crichtons Hill landform sequence.
- 35 The coastline is relatively simple and open when compared with the more enclosed and intricate embayments of the inner Sounds. It is characterised by steep rural coastal slopes, small gullies, rocky shoreline edges, and open coastal waters. The relationship between the coastal landform and the adjoining waters is visually legible, with the steep landform providing a clear backdrop to the eastern side of Outer Admiralty Bay.
- 36 The immediate coastal landcover is modified. Pastoral grassland, regenerating vegetation, forestry / woodlots and access tracks are present on the adjacent slopes (Attachment 1: Sheets 11 & 12). These elements contribute to a rural working coastal character, while the underlying coastal landform and rocky shoreline retain natural character and landscape qualities.
- 37 The coastal marine environment adjacent to this stretch of coastline is influenced by outer-bay conditions, including tidal movement, water depth and exposure to the wider waters of Admiralty Bay. The ecological assessment identifies the wider farm investigation area as being predominantly deep silt and clay substrate, with localised areas of cobbles, natural shell and mud associated with the northern inshore edge⁵.
- 38 The existing marine farm forms part of the immediate coastal marine setting. It is visible from nearby waters and contributes to the existing working coastal character of this part of Outer Admiralty Bay. At the same time, the immediate coastal setting retains a strong open-water character, with views extending across Admiralty Bay and toward the wider Outer Sounds context.

⁵ Davidson Environmental Ltd, Ecological report for two proposed marine farm AMA sites located near Hapūkū Rock, Admiralty Bay, Marlborough Sounds, October 2021.

Summary of Existing Environment

- 39 The Hapūkū Rock site is located within the Outer Marlborough Sounds, in the eastern waters of Outer Admiralty Bay. At the broadest scale, the site forms part of a coastal landscape recognised for its strong land–sea relationships, scenic qualities, natural character values, recreational associations and cultural importance.
- 40 The wider Cook Strait and Bulwer context contains a range of high landscape and natural character values, including exposed coastal landforms, islands, reefs, headlands, open coastal waters, habitat values and a strong sense of remoteness in places. However, these values are not expressed uniformly across the wider nested landscape. The MEP values schedule for the Cook Strait nested landscape is principally focused on the more exposed island, reef, headland and passage features of the Outer Sounds, with limited specific commentary relating to the eastern waters of Outer Admiralty Bay or the coastline adjacent to the Hapūkū Rock site.
- 41 At the local scale, the Hapūkū Rock setting is characterised by open outer-bay waters, a steep and legible rural coastal backdrop, and an existing marine farming presence. The adjacent Bulwer / Crichtons Hill landform retains clear coastal expression, but its landcover is modified by pastoral land use, access tracks, powerline infrastructure, forestry / woodlots and other rural activities.
- 42 The immediate site coastline retains scenic and natural character qualities associated with the steep landform, rocky shoreline and open water setting. However, it is not an unmodified or isolated outer-coast environment. Existing marine farming forms part of the immediate coastal marine setting, while marine farming and other productive coastal land uses are also present within the wider Admiralty Bay context.
- 43 Overall, the receiving environment is best understood as a modified rural coastal and outer-bay setting located within a broader Outstanding Natural Landscape context. This distinction between the broader mapped landscape and the more local receiving environment is important when considering the potential landscape, visual and natural character effects of the proposal.

Landscape Character Baseline Assessment

- 44 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.

45 While the broader landscape context of the Marlborough Sounds and outer Admiralty Bay contributes to the overall character of the area, this assessment focuses primarily on the landscape characteristics of the Hapūkū Rock context (Attachment 1: Sheets 2 & 3), which forms the immediate receiving environment for the potential marine farming activity.

Physical Landscape Attributes

Coastal Landforms

46 The Hapūkū Rock site is located adjacent to the eastern coastal edge of Outer Admiralty Bay, where steep coastal slopes rise toward the Crichtons Hill landform (Attachment 1: Sheet 03). The coastline between Hapūkū Rock / Clay Point and Te Ekeatekonganui / Reef Point is relatively open and simple in form, with rocky shoreline edges, small gullies and headland features providing a clear and legible relationship between land and sea (Attachment 1: Sheet 09).

47 At the wider scale, this landform forms part of the broader Cook Strait / Outer Sounds coastal landscape. However, at the local Hapūkū Rock scale, the adjacent coastal landform is more modified and rural in character than many of the more exposed island, reef and outer headland features emphasised in the Cook Strait nested landscape.

Vegetation Patterns

48 The immediate coastal backdrop is predominantly pastoral grassland, with an area of forestry located near Te Ekeatekonganui / Reef Point which has resulted in notable wilding pines adjacent to the proposed southern farm block. Further south there are areas of regenerating native vegetation associated with the Turner Peak landform. It is worth acknowledging that the native vegetation is much more coherent and extensive on the eastern side of this landform (i.e. the slopes that drop down into the sheltered Waitata Reach waters).

49 The vegetation cover adjacent to the proposal site does not present as a continuous or highly intact indigenous coastal sequence. Instead, it reflects a rural working landscape where productive land use has modified the coastal landcover, while the underlying landform remains visually legible.

Marine Environment

- 50 The coastal marine environment at Hapūkū Rock forms part of the eastern waters of Outer Admiralty Bay. The waters have a more open character than many of the enclosed inner Sounds bays and are influenced by the broader Outer Sounds and Cook Strait context, including tidal movement, water depth and exposure to outer-bay conditions.
- 51 Within the Hapūkū Rock locality, the ecological assessment identifies the wider farm investigation area as being predominantly deep silt and clay substrate⁶. The 2021 Davidson Environmental Ecological report identified that there were localised areas of cobbles, natural shell and mud near the inshore edge of the northern block, with the current northern farm block having subsequently been refined (the 'notch' cut out of the wider farm rectangle) to avoid backbones being able to locate in that more sensitive area. Additionally, the existing Hapūkū Rock marine farm (8057) forms part of the immediate coastal marine setting, meaning the waters are not experienced as an entirely unmodified seascape.

Associative Landscape Attributes

Historical and Cultural Attributes

- 52 The wider Cook Strait / Outer Sounds landscape contains important historical and cultural associations, including associations with Rangitoto ki te Tonga / D'Urville Island, Te Aumiti / French Pass, early Māori settlement and travel, argillite quarrying, European exploration, whaling, farming and maritime navigation. These associations contribute to the broader identity of the Outer Sounds landscape, although no specific historical or cultural attributes have been identified in the assessment material as being directly associated with the immediate Hapūkū Rock site coastline or adjacent waters. There is one mapped cultural archaeological site⁷ identified beyond the Hapūkū Rock Landform to the north-east (Figure 3), and a more notable cluster on the eastern side of the adjacent ridgeline, within Port Ligar.

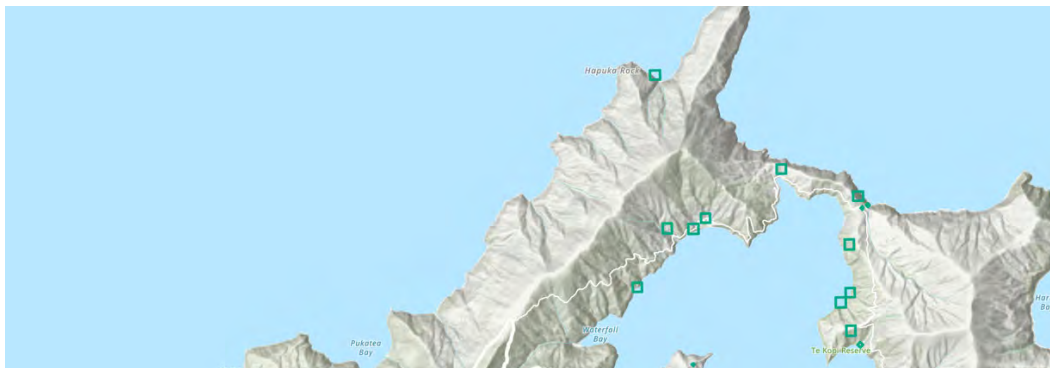


Figure 3: NZ Archaeological Association

⁶ Davidson Environmental Ltd, Ecological report for two proposed marine farm AMA sites located near Hapūkū Rock, Admiralty Bay, Marlborough Sounds, October 2021. Section 1.0, p4.

⁷ NZAA ArchSite Home: <https://nzaa-archsite.hub.arcgis.com/pages/public-map>

Productive Landscape Associations

- 53 Productive coastal land and water uses are an established part of the wider Admiralty Bay and Outer Sounds context (e.g. Figure 2 above). These include pastoral farming, forestry, access tracks (including Te Towaka / Port Ligar Road), rural infrastructure, maritime activity and marine farming. At the local scale, the adjacent Crichtons Hill landform has a modified rural coastal character, while an existing marine farm forms part of the immediate coastal marine setting.

Recreational and Coastal Use

- 54 Admiralty Bay and the wider Outer Sounds are used for boating, fishing, diving and other coastal recreation. The Hapūkū Rock setting is not a highly accessible or intensively settled recreational coastline, with viewing opportunities primarily from the water. Recreational and coastal users are therefore likely to experience the site as part of a wider Outer Admiralty Bay journey rather than as a fixed or highly frequented destination.
- 55 Outer Admiralty Bay also forms part of an important coastal movement route between the western Marlborough coastline, French Pass / Te Aumiti, and the inner Sounds. Vessel traffic passing through this part of Admiralty Bay may therefore pass within the general vicinity of Hapūkū Rock, although not necessarily in close proximity to the existing farm or the proposed site. This movement pattern is relevant to understanding the existing coastal use context and the nature of potential viewing audiences.

Perceptual Landscape Attributes

Spatial Qualities

- 56 The Hapūkū Rock setting has an open outer-bay character, with views extending across Admiralty Bay toward Rangitoto ki te Tonga / D'Urville Island and out across Cook Strait (Attachment 1: Sheet 10). The adjacent coastal slopes provide a clear eastern backdrop, while the headland sequence between Hapūkū Rock / Clay Point and Te Ekeatekonganui / Reef Point provides a degree of local containment.

Visual simplicity

- 57 The local landscape has a relatively simple and linear visual structure, formed by the relationship between open water, steep coastal slopes, rocky shoreline edges and modified rural landcover. While existing rural and coastal modifications are present, including access tracks, powerline infrastructure and the existing marine farm, they do not obscure the broader landform pattern or open-water qualities of the setting.

Working Coastal Landscape

- 58 The Hapūkū Rock setting forms part of a wider working coastal landscape, where pastoral farming, forestry, access tracks/road, marine farming and vessel movement are present within the broader Admiralty Bay context. The site retains scenic and natural character qualities, but is not experienced as a pristine or wholly undeveloped coastal environment.

Summary of Landscape Character Baseline

- 59 The Hapūkū Rock landscape character reflects the combination of its broader Outer Sounds setting and its more local rural working coastal context. Key landscape characteristics include:
- an open outer-bay coastal setting within the eastern waters of Outer Admiralty Bay;
 - steep, legible coastal slopes with rocky shoreline edges, small gullies and headland features;
 - modified rural landcover, including pastoral grassland, access tracks, powerline infrastructure, exotic forestry and regenerating vegetation;
 - an existing marine farming presence within the immediate coastal marine setting;
 - a wider Admiralty Bay context that includes marine farming, vessel movement, pastoral farming and forestry; and
 - scenic and natural character qualities associated with open coastal waters, steep coastal landform and the wider Outer Sounds context.
- 60 Overall, the site retains clear coastal landscape qualities, but is not experienced as a pristine or wholly undeveloped seascape. It is best understood as a modified rural and working coastal setting within the broader Outer Sounds landscape.

Landscape Sensitivity

- 61 The sensitivity of a landscape 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 physical, associative and perceptual values that contribute to landscape character. Landscape sensitivity is not uniform across a broad mapped landscape area. It is therefore important to distinguish between the wider Outer Sounds Outstanding Natural Landscape context and the more localised Hapūkū Rock receiving environment.
- 62 At the broader Cook Strait / Outer Sounds scale, the mapped Outstanding Natural Landscape reflects a wider set of values, including exposed coastal landforms, islands, reefs, headlands, open coastal waters, strong maritime qualities, ecological values, remoteness and important associative values. These broader values are relevant to the assessment and provide the context within which the proposal sits.

- 63 At the more local Hapūkū Rock scale, landscape sensitivity is more moderated. The setting retains clear coastal landscape qualities, including steep coastal slopes, rocky shoreline edges, open outer-bay waters and a legible land–sea relationship. However, these attributes are experienced alongside a modified rural coastal backdrop, including pastoral land use, nearby forestry, access tracks, powerline infrastructure, road access, the existing marine farm and vessel movement. The local receiving environment is therefore not pristine or devoid of working coastal activity.
- 64 This distinction is important because the mapped ONL should not be understood as indicating that every part of the broader Cook Strait / Outer Sounds landscape has the same level of sensitivity to every form of change. The values schedule for the Cook Strait nested landscape places particular emphasis on the more exposed island, reef, headland and passage features of the Outer Sounds. While the Hapūkū Rock setting contributes to the wider ONL context, its local character is also shaped by rural land use and established marine farming.
- 65 On that basis, the landscape attributes most sensitive to change are not simply the presence of open water or steep coastal slopes in themselves, but the broader coherence of the Outer Sounds coastal landscape, the legibility of the coastal landform, the open-water character of Outer Admiralty Bay, and the perception of the area as part of a wider coastal landscape. Conversely, the modified terrestrial backdrop, existing aquaculture context and open outer-bay waters provide some capacity to absorb appropriately located marine farming, provided the activity remains visually subservient to the wider coastal landform and does not compromise the identified values of the broader ONL.
- 66 Overall, the Hapūkū Rock setting has a variable landscape sensitivity. The wider Cook Strait / Outer Sounds ONL context warrants careful consideration, but the local receiving environment has a more moderated sensitivity to change due to its modified rural coastal backdrop, existing marine farming and working coastal character. The key assessment question is therefore whether the proposed marine farm would compromise the identified values of the broader ONL, rather than whether marine farming is inconsistent with the mapped ONL as a matter of principle.

Natural Character Baseline Assessment

- 67 Natural character within the coastal context of Hapūkū Rock is assessed with reference to section 6(a) of the RMA, Policy 13 of the NZCPS and the relevant Marlborough Environment Plan provisions, including the Natural Character overlay mapping and the Natural Character Schedule of Values.

- 68 Under this framework, natural character is evaluated through three primary components:
- **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.
- 69 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 the vicinity of the Hapūkū Rock proposed marine sites. In assessing potential effects on natural character, the MEP also identifies⁸ a range of relevant considerations including the status of the resource, the proportion of the resource affected, sensitivity to change, resilience and cumulative effects.
- 70 The Hapūkū Rock site is not located within an area identified in the Marlborough Environment Plan as having High, Very High or Outstanding Natural Character. The nearest mapped High Natural Character area is associated with the Clay Point coastline to the north. However, as the site is located within the coastal environment and coastal marine area, a natural character baseline assessment has still been undertaken for completeness.

Abiotic

Marlborough Sounds Coastal System

- 71 At the broadest scale, Hapūkū Rock 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.
- 72 The coastal environment is not uniform, with varying degrees of shelter, exposure, substrate type and tidal influence. Hapūkū Rock is located within the northern outer Sounds context, where the coastal system is influenced by the comparatively open waters of Cook Strait.

Outer Sounds Context

- 73 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.

⁸ Marlborough Environment Plan: Appendix 4: Determining Significant Adverse Effects on Natural Character



Outer Admiralty Bay Coastal System

- 74 Outer Admiralty Bay forms part of this broader coastal system but is more contained than the most exposed Cook Strait and outer island environments. Its coastal marine setting is defined by open bay waters, tidal movement, water depth, and the relationship between the eastern coastal slopes and the wider Admiralty Bay seascape.

Hapūkū Rock Vicinity

- 75 In the vicinity of Hapūkū Rock, abiotic natural character is expressed through the steep coastal landform, rocky shoreline edges, small gullies, open water setting and the legible relationship between the coastal slopes and adjoining waters. The coastal edge remains physically intact, although the adjacent terrestrial backdrop is modified by rural land use and infrastructure.

Seabed Environment

- 76 The Davidson Environmental ecological assessment⁹ identifies the wider farm investigation area as being predominantly deep silt and clay substrate, with the northern block having been refined to avoid localised areas of cobbles and natural shell near the northern inshore edge. This indicates a predominantly soft-sediment seabed environment, with no nearby identified Ecologically Significant Marine Sites along the adjacent coastline (the nearest is 2.5km north).

Biotic

Terrestrial Vegetation

- 77 The immediate coastal backdrop is predominantly pastoral grassland, with forestry located near Te Ekeatekonganui / Reef Point and wilding pines evident near the southern farm block. Further south, areas of regenerating native vegetation are associated with the Turner Peak landform, although this vegetation is more coherent and extensive on the eastern slopes that fall toward the more sheltered Waitata Reach.
- 78 Adjacent to the Hapūkū Rock site, vegetation cover does not present as a continuous or highly intact indigenous coastal sequence. Instead, it reflects a rural working landscape where pastoral land use, forestry and access tracks have modified the coastal landcover, while the underlying coastal landform remains visually legible.

Marine Habitats

- 79 The marine habitat within the proposed consent area is predominantly Low-value soft-sediment habitat, comprising silt and clay typical of offshore environments within the Marlborough Sounds. The Coastal Ecological Impact Assessment (EclA) also identifies an inshore corner reef, cobble habitat and an area containing at least 40% natural shell

⁹ Davidson Environmental Ltd, Ecological report for two proposed marine farm AMA sites located near Hapūkū Rock, Admiralty Bay, Marlborough Sounds, October 2021.

approximately 21 metres inshore of the northern block. These discrete features lie outside the proposed consent area, are assessed as having Moderate ecological value, and are avoided by the proposed farm layout¹⁰.

- 80 Accordingly, the predominant soft-sediment habitat within the proposed farm footprint is not considered unusually sensitive or rare in a natural-character sense, while the discrete higher-value features identified inshore would not be directly occupied by marine-farming infrastructure.

Seabirds and Mammals

- 81 Admiralty Bay forms part of a wider habitat context for seabirds and marine mammals. The technical assessments identify relevant values associated with king shag, other seabirds, dolphins, fur seals and other marine mammals. These biotic values form part of the natural character baseline, although the detailed assessment of effects on these species is addressed by the relevant ecology, seabird and marine mammal specialists.
- 82 A seabird review prepared by Dr Rachel McClellan¹¹ provides supporting ecological context and concludes that the proposed spat nursery and mussel production farms are not expected to have negative effects on seabird species of the Marlborough Sounds, including king shag. The review also notes that longline mussel farms are used by a range of bird species for roosting and, in some cases, foraging.
- 83 Marine mammal effects are addressed separately in the specialist SLR assessments¹² and are consolidated in the EclA. The EclA identifies Hapū kū Rock as overlapping the mapped Admiralty Bay significant dusky-dolphin habitat in MEP Appendix 28. It assigns marine mammals High ecological value at the Site ZOI and Very High ecological value at the wider Project ZOI. Construction effects are assessed as Very Low, while operational effects are assessed as Very Low–Low at the Hapū kū Rock Site ZOI and Very Low at the wider Project and population scale. These findings rely on the non-continuous farm layout and implementation of the Marine Mammal Management Plan. I rely on these specialist findings and have not undertaken an independent assessment of effects on marine mammals¹³.

¹⁰ Robertson, B. (2026). Marlborough Sounds Aquaculture Project: Coastal Ecological Impact Assessment. Robertson Environmental Limited Report REL174582, Version 1.0, prepared for Aquaculture Direct Limited, 1 September 2026, sections 3.1, 3.2.1 and 4.4, Tables 3-1 and 3-2, pp. 11–14 and 27–28.

¹¹ Rachel McClellan: Potential effects on seabirds of proposed longline aquaculture projects, Marlborough Sounds. March 2026.

¹² McConnell: Technical Advice, Marine Mammals – Marlborough Aquaculture. May 2026.; McConnell, H., Establishment of Hapuku Rock Marine Farms – Assessment of Effects on Marine Mammals, SLR Consulting Ltd, 3 July 2025

¹³ Robertson, B. (2026), sections 3.2.4, 5.2, 5.3 and 6.1, Table 5-2, pp. 21–24, 31–33 and 37–39.

Experiential

Perceived Naturalness

- 84 Experientially, the Hapūkū Rock setting retains natural character qualities associated with open coastal waters, steep coastal slopes, rocky shoreline edges and legible landform pattern of this Outer Sounds context. These qualities contribute to a sense of openness and exposure.
- 85 Perceived naturalness is moderated by visible human modification. Pastoral grazing, wilding pines, access tracks, powerline infrastructure, road access, the existing marine farm and vessel movement are all part of the local experience of this section of Outer Admiralty Bay. As a result, the Hapūkū Rock setting is not perceived as a pristine or highly remote coastal environment, but rather as a modified rural coastal and outer-bay setting where natural landform and marine qualities remain evident.

Settlement and Human Presence

- 86 The immediate setting does not have a presence of buildings on the adjacent coastal slopes. Viewing opportunities are primarily from the water and a stretch of Te Towaka – Port Ligar Road. However, experiential natural character is moderated by the modified rural coastal backdrop, access tracks, powerline infrastructure, the existing marine farm, vessel movement and the broader working coastal character of Admiralty Bay. The site is therefore not experienced as a pristine or unmodified coastal marine environment.
- 87 Existing marine farming forms the most apparent marine-based modification in the immediate Hapūkū Rock setting and contributes to the working coastal character of this part of Outer Admiralty Bay. Together with surrounding pastoral and forestry land use, access tracks, road access and powerline infrastructure, this establishes a baseline where human activity is present but not dominant. The experiential character of the site is therefore one of relative coastal quietness and openness, moderated by an established pattern of productive land and marine use.

Summary of Natural Character Baseline

- 88 The Hapūkū Rock site is not located within an area identified as High, Very High or Outstanding Natural Character in the MEP. However, it retains natural character qualities associated with its Outer Sounds setting, including open coastal waters, steep coastal landform, rocky shoreline edges and a clear relationship between land and sea. Key characteristics include:
- Outer Admiralty Bay provides a relatively open coastal marine setting, while remaining more contained than the most exposed Cook Strait and outer island environments;

- the immediate coastal edge remains physically intact, with steep coastal slopes, rocky shoreline edges, small gullies and a legible land–sea relationship;
- the seabed and marine habitat within the proposed footprint are predominantly Low-value deep soft-sediment habitat, with the farm layout avoiding the discrete Moderate-value inshore corner reef, cobble and natural shell habitat near the northern inshore edge;
- the adjacent terrestrial vegetation pattern is modified by pastoral land use, forestry, wilding pines, regenerating vegetation and access tracks, contributing to a rural working coastal character;
- Admiralty Bay forms part of a wider habitat context for seabirds and marine mammals, with detailed effects on those values addressed by the relevant technical specialists;
- perceived naturalness is moderated by pastoral and forestry land use, road access, powerline infrastructure, the existing marine farm, vessel movement and the broader working coastal character of Admiralty Bay.

89 Overall, the Hapūkū Rock setting retains a moderate degree of natural character at the local scale. Its natural character values are derived primarily from the open coastal waters, intact coastal edge, steep landform and Outer Sounds context, but are moderated by modified rural landcover, existing marine farming and other working coastal activities.

Issues

90 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.

Outstanding Natural Landscape

91 The principal landscape issue is that the Hapūkū Rock site is located within the mapped Outer Sounds Outstanding Natural Landscape. The relevant assessment question is therefore whether the proposal would adversely affect the values and characteristics that contribute to that broader ONL classification.

92 This requires recognition of the wider Cook Strait / Outer Sounds landscape values, as well as consideration of potential effects at the local Hapūkū Rock scale. The receiving environment includes an existing marine farm, modified pastoral landcover, access tracks and road access, nearby forestry block and powerline infrastructure. The issue is therefore whether the proposal would compromise the broader ONL values, or whether it would be absorbed within a more localised working coastal setting without undermining those values.

Natural Character

- 93 The Hapūkū Rock site is not located within an area identified in the MEP as having High, Very High or Outstanding Natural Character. Accordingly, the natural character issue is not whether the proposal would be located within a mapped natural character protection overlay. Rather, the relevant issue is whether the proposal would result in any significant adverse effects to the existing natural character qualities of the local coastal environment.

Marine Farming and Working Coastal Character

- 94 Marine farming is already present within the immediate Hapūkū Rock setting and is also established within the wider Admiralty Bay context. The proposal would therefore be experienced as an extension of an existing coastal marine activity, rather than as an entirely new activity within an unmodified seascape. The relevant issue is whether the additional marine farm structures would remain consistent with the existing working coastal character of this part of Outer Admiralty Bay, or whether they would result in a level of intensification that would alter the balance between natural coastal qualities and productive coastal use.

Visual Amenity

- 95 The visual effects issue relates primarily to views from the water, including recreational and commercial vessel users moving through Outer Admiralty Bay, and from limited land-based viewpoints such as Te Towaka – Port Ligar Road. The adjacent coastline does not appear to have a residential viewing audiences overlooking the proposed sites. The key visual issue is therefore whether the proposed surface structures would become visually prominent or dominant within views of the Hapūkū Rock coastline, or whether they would remain visually subservient to the wider coastal landform.

Ecological and Seabed Interface

- 96 The proposal also needs to be considered in relation to the natural character values of the coastal marine environment. The seabed within the investigation area is predominantly deep soft-sediment habitat, with more localised cobble and natural shell habitat identified near the northern inshore edge. The relevant issue for this assessment is whether the proposal has been located and configured in a way that avoids the more sensitive localised seabed habitat, while recognising that detailed ecological, seabird and marine mammal effects are addressed by the relevant technical specialists.

Summary of Issues

- 97 Overall, the key issue is whether the proposed marine farms can be accommodated within the Hapūkū Rock setting without compromising the identified values of the mapped Outer Sounds Outstanding Natural Landscape or resulting in inappropriate effects on the natural character and visual amenity of the coastal environment.



Proposal

- 98 The proposal involves the establishment of two new marine farm blocks adjoining the existing Clearwater Mussels Limited marine farm at Hapūkū Rock, within Outer Admiralty Bay. The proposed northern block would occupy approximately 13ha, while the proposed southern block would occupy 15ha (Attachment 1: Sheet 02) resulting in a combined backbone length of 5,480m.
- 99 The proposed farms are intended to provide Greenshell mussel spat nursery space. The Hapūkū Rock location has proven spat retention characteristics, with the proposal intended to support the wider mussel farming industry by providing additional nursery capacity. It is understood that mussels would be seeded onto another farm before harvest, rather than the Hapūkū Rock farms operating as conventional full-cycle production farms.
- 100 The proposed marine farming activity would involve conventional longline mussel farming infrastructure, including surface floats, backbone lines, warps and anchors. The structures would be located within the coastal marine area and would not require physical modification of the adjacent coastal landform or shoreline, with resulting ecological effects reversible if the mussel farm is removed¹⁴.
- 101 The northern farm block has been positioned to avoid the inshore corner reef, cobble habitat and natural shell area identified above, with the nearest of these features approximately 21 metres inshore of the proposed block. The proposal also retains a non-continuous layout, with the longlines spaced approximately 27 metres apart, providing movement space for marine mammals through the site¹⁵.

Statutory provisions

- 102 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.
- 103 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

¹⁴ Davidson, R.J., Richards, L.A. 2014. Monitoring of a relocated a mussel farm in Otanerau Bay, East Bay, Marlborough Sounds: 2002-2014. Prepared by Davidson Environmental Limited for Marlborough District Council. Survey and Monitoring Report No. 788.

¹⁵ Robertson, B. (2026), sections 4.4 and 6.1, pp. 27–28 and 38–39.

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

- 104 The proposal is being advanced through the Fast-track Approvals Act 2024. The FTAA 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.
- 105 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

- 106 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(b), which requires the protection of outstanding natural features and landscapes from inappropriate subdivision, use and development.
- 107 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.
- 108 For this assessment, the key RMA matters are whether the proposal would represent inappropriate use or development in relation to the natural character of the coastal environment, and whether it would adversely affect the values of the mapped Outstanding Natural Landscape.

New Zealand Coastal Policy Statement

- 109 The New Zealand Coastal Policy Statement 2010 (NZCPS) provides the national policy direction for the management of the coastal environment. Policy 6 recognises that some activities have a functional need to be located within the coastal marine area, and provides for

those activities in appropriate places. Marine farming is an activity that has such a functional relationship with the coastal marine area.

- 110 Of particular relevance to this assessment is Policy 15, which addresses natural features and natural landscapes, including seascapes. The Hapūkū Rock site is located within the mapped Outer Sounds Outstanding Natural Landscape. Accordingly, the relevant assessment focus is whether the proposal would result in adverse effects on the values of that Outstanding Natural Landscape.
- 111 Additionally, Policy 13 addresses the preservation of the natural character of the coastal environment and requires that significant adverse effects are avoided within the coastal environment.

Marlborough Environment Plan

- 112 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. The MEP mapping (Attachment 1: Sheet 04) identifies the Hapūkū Rock site as being within the mapped Outer Sounds Outstanding Natural Landscape, but not within an area identified as having High, Very High or Outstanding Natural Character. The relevant mapped landscape is addressed through the MEP Landscape Schedule of Values, including the 'Cook Strait 08' landscape. The MEP also includes provisions relating to the management of aquaculture activities within the coastal marine area.
- 113 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 Hapūkū Rock site is not located within a mapped High, Very High or Outstanding Natural Character area, although natural character remains relevant because the site is located within the coastal environment and coastal marine area.
- 114 Objective 8.1 and its associated provisions address the identification and assessment of the characteristics and values of Marlborough's outstanding natural features and outstanding natural landscapes. Objective 8.2 and Policy 8.2.1 address the protection of outstanding natural features and outstanding natural landscapes from inappropriate subdivision, use and development. The site is located within the mapped Outer Sounds Outstanding Natural

Landscape, and the assessment therefore needs to consider whether the proposed marine farming activity would degrade or compromise the values that contribute to that mapped landscape.

- 115 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, outstanding natural landscapes, ecological values, reefs and cobble habitats, recreational and amenity values, cultural values, navigation and public access.
- 116 Together, these provisions establish 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 Outstanding Natural Landscape mapping in Volume 4 and the associated Cook Strait 08 values in Volume 3, Appendix 1 represent the relevant MEP identification of the landscape context and values at a regional planning scale. A summary of the specific statutory provisions relevant to landscape and natural character is provided in **Appendix 2** of this report.

Landscape Effects

- 117 '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" ¹⁶

- 118 The preceding 'Landscape Character Baseline Assessment' section describes the existing landscape character in the vicinity of Hapūkū Rock, including the interaction between the distinctive coastal landforms of the Marlborough Sounds and the productive land uses occurring on the adjacent hill country. The following assessment considers the potential landscape effects associated with the proposed Hapūkū Rock marine farming structures, having regard to the existing landscape character and the statutory framework.

¹⁶ Te Tangi a te Manu: Aotearoa New Zealand Landscape Assessment Guidelines. Page 135, 6.01-6.03.

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

Landscape Effects at the Wider Scale

- 120 At the wider landscape scale, the proposed marine farms would be located within the mapped Regional Outer Marlborough Sounds Landscape and the District Cook Strait Landscape. This broader landscape is recognised for its exposed coastal landforms, islands, reefs, headlands, open coastal waters, strong maritime qualities, ecological values, remoteness and important associative values.
- 121 The proposal would not alter the physical landform, shoreline or broader coastal structure of this landscape. The steep coastal slopes, rocky shoreline edges, open waters of Outer Admiralty Bay, and wider relationship with Cook Strait and the Outer Sounds would remain intact. The proposal would introduce additional marine farming structures within the coastal marine area, but these would be located adjacent to an existing marine farm and would not result in modification of the adjacent coastal landform.
- 122 The identified values of the Cook Strait ONL¹⁷ are strongly focused on the more exposed and dramatic components of the Outer Sounds landscape, including Rangitoto ki te Tonga / D'Urville Island, Stephens Island / Takapourewa, the Chetwode Islands, the Trio Islands, Te Aumiti / French Pass, Clay Point, Cape Lambert, Alligator Head, offshore reefs, rock stacks, steep sea cliffs and highly natural island seascapes. While the Hapūkū Rock site sits within the wider mapped ONL, the immediate receiving environment does not strongly express many of these core scheduled values. It is not an island, reef, stack, dramatic sea-cliff or high-current passage setting, and it is experienced in association with a modified rural coastal backdrop and the presence of existing marine farming. Accordingly, the proposal needs to be assessed in relation to the broader ONL context, but the values most directly affected at the local scale are more limited than the full suite of values identified for the Cook Strait nested landscape.
- 123 In that context, the proposal would represent a localised extension of existing marine farming activity rather than a new form of development within an otherwise unmodified seascape. It would add to the pattern of marine farming already present at Hapūkū Rock and within the wider Admiralty Bay context, but would not materially alter the broader spatial structure, landform pattern or open-water character of the Outer Sounds landscape. The proposal would

¹⁷ Marlborough Environment Plan: Volume 3 – Appendix 1. '08 – Cook Strait'

also remain visually and spatially subordinate to the wider coastal landform. The proposed surface structures would be seen against the scale of Outer Admiralty Bay and the adjacent coastal slopes, rather than as a dominant feature within the broader landscape. While the proposal would increase the visible extent of marine farming in this part of the bay, that change would be localised and would not compromise the broader coherence or legibility of the Outstanding Natural Landscape.

- 124 Overall, adverse landscape effects at the wider landscape scale are assessed as **Low**, and **Very Low** on the specific values identified in the MEP. The proposal would introduce additional marine farming structures within the mapped ONL, but would not compromise the identified values and characteristics of the broader Outer Sounds ONL.

Landscape Effects at Hapūkū Rock / Site Coastline

- 125 At the Hapūkū Rock / Site Coastline scale, the proposed marine farming structures would represent a localised change by expanding an activity already present along this section of Outer Admiralty 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 Hapūkū Rock landscape values include:

- the steep pastoral coastal slopes adjoining this section of Outer Admiralty Bay;
- the rocky shoreline edge, small gullies and headland sequence between Hapūkū Rock / Clay Point and Te Ekeatekonganui / Reef Point;
- the open water setting and wider relationship with Outer Admiralty Bay, Cook Strait and the Outer Sounds; and
- the modified rural and working coastal character of the immediate receiving environment.

- 126 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

- 127 At the Hapūkū Rock / Site Coastline scale, the proposal would introduce additional marine farming structures within the coastal marine area. However, it would not alter the physical coastal landform, rocky shoreline, gullies, headlands or terrestrial vegetation patterns that define the site coastline. The pastoral coastal slopes would remain the dominant physical landscape element, and the relationship between the coastal landform and the open waters of Outer Admiralty Bay would remain legible.

- 128 The proposed farms would sit offshore from the site coastline and would not require land-based structures or physical modification to the coastal edge. The northern farm block has also been refined to avoid more localised cobble and natural shell habitat near the northern inshore edge. 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 localised coastal marine features. Overall, physical landscape effects on the identified landscape values are assessed as **Low**.

Perceptual Landscape Effects

- 129 A perceptual landscape effect will arise from an increase in the visible extent of marine farming within the immediate Hapūkū Rock setting. The proposal would introduce additional surface floats and associated marine farming structures, resulting in a more extensive working coastal layer across the water surface.
- 130 However, the proposal would be experienced within an existing modified rural and working coastal setting. The receiving environment already includes pastoral land use, road and track access, powerline infrastructure, nearby forestry, vessel movement and the existing Clearwater Mussels Limited marine farm. The proposed farms would be read in association with that established activity, rather than as an isolated or unrelated form of development.
- 131 The proposed structures would remain low-lying surface elements within the coastal marine area and would be visually subordinate to the scale of the adjoining coastal slopes and wider waters of Outer Admiralty Bay. While the proposal would increase the marine farming character of this section of the bay, the open-water setting, coastal landform and legible land-sea relationship would remain evident. Perceptual landscape effects are therefore assessed as **Low**.

Associative Landscape Effects

- 132 The proposal would be consistent with the existing productive associations of Hapūkū Rock, Outer Admiralty Bay and the wider Marlborough Sounds, including pastoral farming, forestry, maritime activity and aquaculture. Existing marine farming is already present within the immediate Hapūkū Rock setting, and marine farming forms part of the established working coastal landscape of Admiralty Bay and the wider Sounds.
- 133 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 Hapūkū Rock setting. Associative landscape effects are therefore assessed as **Low**.

Visual effects

- 134 The visual effects assessment considers the extent to which the proposed marine farms would be visible from surrounding viewing locations, and the degree to which that visibility may affect visual amenity and the experience of the Hapūkū Rock / Outer Admiralty Bay setting. 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.”¹⁸

- 135 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.
- 136 In this case, the principal visual change would arise from the introduction of additional surface floats and associated aquaculture structures within the waters adjacent to the Hapūkū Rock coastline. These structures would be low-lying and linear in form, but would increase the visible extent of marine farming within this part of Outer Admiralty Bay. The visual assessment therefore focuses on whether the proposal would become visually dominant within the Hapūkū Rock setting, or whether it would remain a subservient marine element within the broader coastal landform and open-water setting.
- 137 The principal viewing audiences are expected to be marine users moving through Outer Admiralty Bay, together with more limited land-based views from Te Towaka – Port Ligar Road and associated rural access points. Wider views from beyond the immediate Hapūkū Rock setting are likely to be more limited and distant, with the proposal experienced, where visible, as part of a larger Outer Sounds coastal marine setting.

Visual Catchment and Viewing Audience

- 138 The potential visual catchment for marine farming structures at Hapūkū Rock is influenced by the open waters of Outer Admiralty Bay, the adjoining coastal landform, and the relatively limited land-based access to the immediate coastline. While the proposal may be visible from

¹⁸ Te Tangi a te Manu: Aotearoa New Zealand Landscape Assessment Guidelines. Page 135, 6.08.

a wider coastal marine area, due to the lack of surrounding landform enclosure, the viewing audience is limited and views will generally be experienced as part of movement through Outer Admiralty Bay rather than from fixed public viewing locations. The adjacent coastline and pastoral hillside does not appear to contain a residential viewing audience directly overlooking the proposed sites. Accordingly, the visual assessment focuses primarily on public and marine-based viewing experiences.

139 Recent Environment Court commentary in *Stormhaven Limited v Waikato Regional Council*¹⁹ is also relevant as general context when considering the visibility of marine farming structures. In that decision, the Court was not persuaded that mussel farm structures reliably demonstrated a dominating influence at distances beyond 250m, and accepted that broader water and island / coastal landform elements remained the dominant influences at most locations until viewers were close to the farms. While that decision was made in a different factual and statutory context, it supports the general proposition that the visual dominance of marine farming structures is strongly influenced by proximity, viewing angle, the scale of the receiving environment, and the presence of broader coastal landform elements.

140 Views toward the proposed marine farms are generally limited to:

- motorists travelling along Te Towaka – Port Ligar Road; and
- people travelling along the Outer Admiralty Bay coastline by boat.

Motorists travelling along Te Towaka – Port Ligar Road

141 Te Towaka – Port Ligar Road provides the principal land-based viewing opportunity toward the Hapūkū Rock setting. Views from the road are likely to be intermittent and are influenced by road alignment, elevation, landform and the direction of travel.

142 Where visible, the proposed marine farms would be seen within the broader context of Outer Admiralty Bay and against the scale of the adjoining coastal slopes. The viewing experience from the road would generally be transitory, with the proposal experienced as a low-lying marine element within a wider coastal view rather than as a dominant feature. The existing marine farm and modified rural coastal backdrop would also form part of the visual context.

143 Overall, visual effects for motorists travelling along Te Towaka – Port Ligar Road are assessed as **Very Low**.

¹⁹ *Stormhaven Ltd v Waikato Regional Council* [2026] NZEnvC 170 (Interim Decision) at [187]-[188]

Marine users travelling along the Outer Admiralty Bay Coastline

- 144 The primary viewing audience is expected to be marine users travelling through Outer Admiralty Bay, including recreational, commercial and aquaculture-related vessels. Vessels moving through this part of the bay may obtain views of the proposed marine farms, particularly when travelling along the eastern side of Outer Admiralty Bay or approaching the Hapūkū Rock coastline.
- 145 The proposal would increase the visible extent of marine farming in the immediate Hapūkū Rock setting. However, marine users would experience the farms within the expansive scale of Outer Admiralty Bay, where the adjoining coastal landform and wider open-water setting remain visually dominant. The proposed farms would also be read in association with the existing Clearwater Mussels Limited marine farm, rather than as an isolated activity within an unmodified seascape.
- 146 For most vessels passing through Outer Admiralty Bay, views would be temporary, transitory and experienced from a low viewing angle. Marine users are not required to pass close to the proposed farms, and at greater distances the structures would form a low-lying and linear component of the wider coastal marine view. Where users intentionally approach the farms at close range, the visual change would be more apparent, with the surface floats and lines occupying a greater proportion of the foreground view. However, such close-range views would be deliberate, localised and experienced in direct association with the existing marine farming context and the working coastal character of this part of Admiralty Bay.
- 147 The closest site photograph within Attachment 1 is approximately 450m from the nearest corner of the proposed farm and is considered representative of the proximity of a vessel traversing this part of Outer Admiralty Bay. Closer views have therefore been considered qualitatively, recognising that marine farm structures would be more apparent at close range, but would be experienced in direct association with the existing marine farming activity and modified rural/pastoral backdrop.
- 148 Overall, visual effects for people travelling along the Outer Admiralty Bay coastline are assessed as **Very Low**, increasing to **Low** for close-range views by vessels intentionally passing near the farms.

Visual Effects from Navigational Lighting

- 149 Navigational lighting would be required for marine safety and would form part of the operational marine farm infrastructure. Such lighting would be visible during night-time or low-light conditions, but would be limited in scale.
- 150 The Hapūkū Rock setting is not an urbanised night-time environment, and additional lights may be noticeable to marine users or from limited land-based viewpoints. However, navigational lighting would be functional, low intensity, and associated with a recognised marine activity. It would not introduce broad area lighting, illuminate the adjacent coastal landform, or materially change the night-time character of Outer Admiralty Bay.
- 151 The most likely marine users to experience the increase in navigational lighting, would be boats travelling around Clay Point toward French Pass. In the context of that travel, the French Pass Settlement and Lighthouse/Beacon would be a more prominent night-time light source.
- 152 Overall, visual effects associated with navigational lighting are assessed as **Very Low**.

Visual Effects Summary

- 153 The proposed marine farms would increase the visible extent of aquaculture within the Hapūkū Rock setting, with the most apparent change experienced from the water by vessels travelling through or intentionally approaching this part of Outer Admiralty Bay. The structures would be visible as low-lying, linear elements on the water surface, but would be seen in association with the existing Clearwater Mussels Limited marine farm, the modified rural coastal backdrop, and the broader working coastal character of Admiralty Bay.
- 154 Land-based views are limited. The principal public land-based viewing opportunity is from Te Towaka – Port Ligar Road, where views toward the proposed farms are likely to be intermittent, elevated and transitory. Where visible, the farms would be seen within the wider scale of Outer Admiralty Bay and against the adjoining coastal slopes, rather than as a dominant feature. Visual effects for motorists travelling along Te Towaka – Port Ligar Road are assessed as **Very Low**.
- 155 For marine users travelling along the Outer Admiralty Bay coastline, the proposal would be more readily visible, particularly when travelling along the eastern side of the bay or when passing close to the Hapūkū Rock coastline. However, for most vessels, views would be temporary, movement-based and experienced from a low viewing angle within a broad open-water setting. The proposed farms would increase the local working marine character of this

part of the bay, but would remain low-profile and visually subservient to the adjoining coastal landform. Visual effects for marine users are assessed as **Very Low**, increasing to **Low** for close-range views by vessels intentionally passing near the farms.

- 156 Navigational lighting would introduce additional safety-related point sources of light within the coastal marine area. These lights may be noticeable to marine users in low-light or night-time conditions, particularly for vessels travelling around Clay Point toward French Pass. However, the lighting would be functional, low intensity and limited in scale, and would not illuminate the adjacent coastal landform or materially alter the broader night-time character of Outer Admiralty Bay. Visual effects associated with navigational lighting are assessed as **Very Low**.
- 157 Overall, the proposal would be visible and would result in a localised increase in marine farming activity within the Hapūkū Rock setting. However, it would not become visually dominant within the wider coastal landscape. Visual effects are therefore assessed as **Low** at most, with most viewing audiences experiencing **Very Low** adverse effects, corresponding to effects within the less than minor range as set out in Appendix 1.

Natural Character Effects Assessment

- 158 The existing natural character of the Hapūkū Rock setting 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 farms are not located within an area mapped as High, Very High or Outstanding Natural Character in the Marlborough Environment Plan. However, the site is located within the coastal environment and coastal marine area, and natural character effects are therefore still relevant to the assessment.
- 159 As set out earlier, the Hapūkū Rock receiving environment forms part of the wider Outer Sounds coastal system, with natural character qualities associated with open coastal waters, steep coastal slopes, rocky shoreline edges, soft-sediment marine habitats, and wider associations with seabirds and marine mammals. At the local scale, those qualities are moderated by the modified rural coastal backdrop, existing marine farming, access tracks, road access, powerline infrastructure, vessel movement and the broader working coastal character of Outer Admiralty Bay.
- 160 In this respect, the key natural character assessment question is not whether the proposal would affect a mapped High, Very High or Outstanding Natural Character overlay, but whether it would result in significant adverse effects on the existing natural character qualities of the local coastal environment. Particular attention is therefore given to whether the proposal

would affect natural elements, patterns and processes, localised marine habitat values identified by Davidson Environmental, and the perceived naturalness of the Hapūkū Rock setting. Consistent with the natural character assessment framework set out above, and having regard to the factors identified in Volume 3, Appendix 4 of the MEP, 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)

Abiotic Attributes Effects

- 161 Abiotic natural character effects relate to the potential for the proposal to affect the physical characteristics of the coastal environment, including coastal landform, shoreline character, seabed form, water movement and broader coastal processes.
- 162 The proposal would not modify the adjacent coastal landform, rocky shoreline, gullies, headlands or terrestrial coastal edge. The steep coastal slopes and their relationship with the open waters of Outer Admiralty Bay would remain intact and legible. The proposed marine farms would be located entirely within the coastal marine area and would not require reclamation, earthworks, shoreline structures, or modification of the coastal margin.
- 163 Within the coastal marine area, the principal abiotic change would be the presence of marine farming infrastructure, including surface floats, backbone lines, warps and anchors. These elements would introduce additional structures into the water column and seabed environment, but would not alter the underlying coastal landform, bay form, tidal movement or broader water exchange patterns of Outer Admiralty Bay.
- 164 The seabed environment within the proposed consent areas is predominantly deep silt and clay substrate. The more physically distinct inshore corner reef, cobble and natural shell habitat near the northern inshore edge is outside of the site boundary approximately 21 metres inshore. In that respect, the farm layout has been configured to avoid this localised seabed feature.
- 165 Overall, the proposal would result in a localised modification of the coastal marine area through the placement of marine farming infrastructure, but it would not materially affect the abiotic attributes that contribute to natural character at Hapūkū Rock. The coastal landform, shoreline, open-water setting and wider physical processes of Outer Admiralty Bay would remain intact. Abiotic natural character effects are therefore assessed as **Very Low**.

Biotic Attributes Effects

- 166 Biotic natural character effects relate to the potential for the proposal to affect ecological characteristics of the coastal environment, including terrestrial vegetation, marine habitats, seabirds and marine mammals. The proposal would not involve modification to the adjacent terrestrial environment. It would not require vegetation clearance, earthworks, roading, land-based structures or modification to the coastal edge. The existing pattern of pastoral landcover and access tracks on the adjacent coastal slopes, in association with the nearby forestry/wilding pines and regenerating vegetation would therefore remain unchanged.
- 167 Within the coastal marine area, the proposal would introduce additional marine farming infrastructure into an environment that is predominantly Low-value soft-sediment habitat. The discrete Moderate-value inshore corner reef, cobble and natural-shell habitat lies outside the proposed consent area and is avoided by the farm layout.
- 168 The EclA assesses construction effects as **Very Low** across all ecological domains. Operational effects are also assessed as **Very Low**, except for marine mammals at the Hapūkū Rock Site, where effects are assessed as **Very Low–Low**. At the wider Project and population scale, marine-mammal effects are **Very Low**, and Project-scale cumulative ecological effects are also assessed as **Very Low**. These findings rely on the embedded siting and management measures described in the EclA, including habitat avoidance, the non-continuous farm layout and the Marine Mammal Management Plan. I rely on those specialist ecological findings and have not undertaken an independent ecological effects assessment²⁰.
- 169 I also note that the technical material identifies that longline mussel farms may provide some ecological functions, including roosting opportunities for seabirds, habitat structure, fish aggregation and shell material beneath farm structures. I have not relied on those potential ecological benefits to reduce the assessed adverse effects, but they provide relevant context when considering the biotic character of marine farming within the Marlborough Sounds.
- 170 Overall, the proposal would result in some localised biotic modification associated with the occupation and operation of additional marine farming space. However, the discrete higher-value seabed features are avoided, no terrestrial habitat would be modified, and the specialist assessments identify ecological effects as **Very Low** or, for marine mammals at the Hapūkū Rock Site, **Very Low–Low**. Having regard to those findings, the existing marine farming context and the predominantly Low-value soft-sediment habitat within the proposed footprint, biotic natural-character effects are assessed as **Low**.

²⁰ Robertson, B. (2026), sections 4.4, 5.2–5.4 and 6.1, Table 5-2, pp. 27–28 and 31–39.

Experiential Attributes Effects

- 171 Experiential natural character effects relate to the potential for the proposal to affect the way the coastal environment is perceived and experienced, including perceived naturalness, openness, remoteness, exposure and the degree of human influence.
- 172 The proposal would increase the visible presence of marine farming within the immediate Hapūkū Rock setting. This would reduce the perceived naturalness of the local coastal marine area to some degree, particularly for marine users passing close to the proposed farms. The additional surface floats and associated aquaculture structures would be recognisable as human-made elements within the open waters of Outer Admiralty Bay.
- 173 However, the proposal would be experienced within an existing modified rural and working coastal context. The receiving environment already includes the existing Clearwater Mussels Limited marine farm, pastoral coastal slopes, access tracks, road access, powerline infrastructure and vessel movement. The proposed farms would therefore be read as an extension of an established marine farming activity, rather than as the introduction of a new or unexpected form of modification within a highly natural seascape.
- 174 The broader experiential qualities of the Hapūkū Rock setting would remain evident. The openness of Outer Admiralty Bay, the scale of the adjoining coastal slopes, the rocky shoreline edge, and the wider relationship with Cook Strait and the Outer Sounds would continue to define the character of the setting. While the proposal would increase the working marine character of the immediate area, it would remain visually and spatially subordinate to these broader coastal qualities.
- 175 Overall, experiential natural character effects are assessed as **Low**. The proposal would result in a noticeable localised increase in marine farming activity, but would not materially alter the broader perception of Hapūkū Rock as an open outer-bay coastal setting with a modified coastal character.

Natural Character Effects Summary

- 176 The proposal would result in a localised increase in marine farming activity within the Hapūkū Rock coastal marine area. However, the site is not located within a mapped High, Very High or Outstanding Natural Character area, and the proposal would not modify the adjacent coastal landform, rocky shoreline, terrestrial vegetation patterns, or broader physical processes of Outer Admiralty Bay.

- 177 Abiotic effects are assessed as **Very Low**, as the proposal would be confined to the coastal marine area and would not alter the coastal landform, shoreline or open-water setting. Biotic effects are assessed as **Low**, recognising the predominantly Low-value soft-sediment seabed, avoidance of the discrete Moderate-value inshore corner reef, cobble and natural shell habitat, the absence of terrestrial modification, and the specialist ecological findings described above. Experiential effects are assessed as **Low**, as the proposal would increase the working marine character of the immediate setting but would be experienced in association with the existing marine farm, modified rural backdrop and wider working coastal context.
- 178 Overall, natural character effects are assessed as **Low**. The proposal would result in localised modification within the coastal marine area, but would not materially compromise the natural character qualities of the Hapūkū Rock setting.

Cumulative Effects

- 179 Cumulative effects are relevant because the proposed northern and southern farm blocks would straddle the existing smaller Clearwater Mussels Limited marine farm at Hapūkū Rock. The proposal would therefore not introduce marine farming as a new activity type within this part of Outer Admiralty Bay, but would increase the overall extent of aquaculture visible within the local coastal marine environment.
- 180 At the wider Outer Admiralty Bay scale, the cumulative effect is limited by the scale of the receiving environment and the degree of separation between the Hapūkū Rock setting and other established marine farming areas within Admiralty Bay. The proposal would not read as part of a continuous or extensive aquaculture landscape across the wider bay. The broader coastal landforms, open-water character and relationship with Cook Strait and the Outer Sounds would remain dominant.
- 181 At the local Hapūkū Rock scale, cumulative effects would be more apparent, as the proposed blocks would be seen in direct association with the existing marine farm. This would consolidate and increase the working marine character of the immediate setting, particularly for marine users passing near the farms. However, given the modified rural coastal backdrop, existing aquaculture baseline, low-profile nature of the structures and continued dominance of the adjoining coastal landform, cumulative landscape, visual and natural character effects are assessed as Low.



Outstanding Natural Feature/Landscape Mapping and Scale Discussion

- 182 The Hapūkū Rock site is located within the mapped Outer Sounds Outstanding Natural Landscape. As set out earlier in this assessment, that mapping reflects a broad landscape judgement associated with the wider Cook Strait / Outer Sounds context, rather than a finding that every part of the mapped area expresses the same values, or the same level of sensitivity, at the local scale.
- 183 The relevance of the Cook Strait ONL values to the Hapūkū Rock setting has been considered in **Appendix 3**, with specific reference to the Evaluation section for Cook Strait 08 in the MEP Landscape Schedule of Values. That review identifies that some values are relevant to the Hapūkū Rock setting, particularly the open outer-bay waters, steep coastal slopes, rocky coastal edge, maritime setting and broader habitat associations. However, many of the more specific values identified in the Evaluation section are associated with other parts of the wider Cook Strait ONL, including Rangitoto ki te Tonga / D'Urville Island, Te Aumiti / French Pass, Stephens Island / Takapourewa, the Trio Islands, the Chetwode Islands, Titi Island, Sentinel Rock, Cape Lambert and Alligator Head.
- 184 The Hapūkū Rock / Outer Admiralty Bay setting therefore forms part of that broader landscape context, but the immediate receiving environment does not strongly express the full suite of scheduled values. It is not an island, reef, stack, dramatic sea-cliff or high-current passage setting. Rather, it is experienced as a section of open outer-bay water adjoining a modified rural coastal backdrop and an existing marine farm.
- 185 Mr Bentley's Topic 5 section 42A report is relevant to understanding the MEP mapping history. In relation to the Hapūkū Rock proposed AMAs, Mr Bentley identified the existing Farm 8057 as a lone farm which, in his opinion, represented an incongruent activity within the outstanding landscape and affected the legibility and distinctive values of the open and remote outer Sounds coast.²¹
- 186 That evidence remains relevant as part of the background to the MEP mapping. However, it was prepared in a different statutory and factual context. In particular, the existing Farm 8057 has since had its coastal permit duration extended through to 31 December 2050. In practical landscape assessment terms, that means the existing farm is no longer appropriately treated

²¹ Bentley, J., 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. 20 November 2017 at page 23.

as a temporary or short-term element that may soon be removed from the receiving environment. It forms part of the existing environment against which the proposal is assessed.

- 187 This is a material distinction. The proposed northern and southern farm blocks would not introduce marine farming into an otherwise unmodified section of the coastal marine area. Rather, they would consolidate marine farming activity around an existing farm that is now expected to remain for the life of the MEP. The relevant assessment question is therefore not whether marine farming is present within the mapped ONL, but whether the additional marine farming would compromise the values and characteristics that support the ONL classification.
- 188 In my opinion, the local Hapūkū Rock context has capacity to accommodate the proposal without compromising those broader ONL values. The proposal would not modify the coastal landform, shoreline, headlands or terrestrial vegetation pattern. It would be located adjacent to existing marine farming, against a modified rural coastal backdrop, and within the expansive scale of Outer Admiralty Bay. The surface structures would increase the local working marine character, but would remain low-lying and visually subordinate to the adjoining coastal slopes and wider open-water setting.
- 189 Accordingly, while the mapped ONL provides an important statutory and landscape context, the effects of the proposal need to be understood at the scale at which they would occur. At that scale, the proposal would affect a more localised working coastal setting, rather than the core island, reef, cliff, passage and high-naturalness values that principally underpin the Cook Strait ONL.

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 outstanding natural features or outstanding natural landscapes, Policy 14.21.6(e) identifies that such activities are not appropriate where the AMA and any resulting marine farming would have adverse effects on the values and characteristics of that area.
- 191 The Hapūkū Rock site is located within the mapped Outer Sounds Outstanding Natural Landscape. On the findings of this assessment, the proposal would result in landscape effects that are Low overall. Those effects would be localised and primarily associated with an increase in the visible extent of marine farming within the immediate Hapūkū Rock setting. The proposal would not alter the coastal landform, shoreline, rocky coastal edge, headlands, terrestrial vegetation pattern, or the broader spatial relationship between Outer Admiralty Bay, Cook Strait and the Outer Sounds.

- 192 The identified values of the Cook Strait ONL are strongly associated with the wider Outer Sounds landscape, including exposed islands, reefs, stacks, dramatic sea cliffs, headlands, high-current passages, highly natural island seascapes, ecological values, remoteness and associative values. While the Hapūkū Rock site sits within the mapped ONL, the immediate receiving environment does not strongly express the full suite of those scheduled values that have been specifically identified. It is experienced as a localised section of open outer-bay water adjoining a modified rural coastal backdrop and an existing marine farm.
- 193 On that basis, and applying the assessment scale used in this report, the proposal would result in a localised low-level landscape change, but would not compromise the values and characteristics that support the mapped Outstanding Natural Landscape. This technical finding is relevant to the application of Policy 14.21.6(e), while recognising that the overall statutory assessment is a planning matter.

Conclusion

- 194 This assessment has considered the potential landscape, visual and natural character effects of the proposed Hapūkū Rock marine farms, comprising two blocks adjoining the existing Clearwater Mussels Limited marine farm within Outer Admiralty Bay. The proposed northern block would occupy approximately 13 hectares, while the proposed southern block would occupy approximately 15 hectares, with a combined backbone length of 5,480 metres. The site is located within the mapped Outer Sounds Outstanding Natural Landscape, but is not located within an area mapped as High, Very High or Outstanding Natural Character.
- 195 The Hapūkū Rock setting forms part of the wider Outer Marlborough Sounds coastal environment and retains important coastal qualities, including open outer-bay waters, steep coastal slopes, rocky shoreline edges, a legible land–sea relationship, and a wider relationship with Cook Strait and the Outer Sounds. However, at the local scale, these values are moderated by pastoral land use, access tracks, road access, powerline infrastructure, nearby forestry / wilding pines, vessel movement and the existing marine farm. The site is therefore best understood as a modified rural and working coastal setting within the broader Outer Sounds Outstanding Natural Landscape context.
- 196 Landscape effects: the proposal would introduce additional aquaculture structures adjacent to the existing marine farm, but would not alter the underlying coastal landform, rocky shoreline, headlands, terrestrial vegetation pattern, open-water setting or broader relationship with Outer Admiralty Bay and Cook Strait. At the wider landscape scale, effects are assessed as **Low** overall, and **Very Low** in relation to the specific values identified in the MEP schedule for

the Cook Strait ONL. At the Hapūkū Rock / Site Coastline scale, landscape effects are assessed as **Low**.

- 197 Visual effects: the proposal would be most apparent to marine users travelling through or intentionally approaching this part of Outer Admiralty Bay. Land-based views are limited and primarily associated with intermittent and transitory views from Te Towaka – Port Ligar Road. The structures would be visible as low-lying linear elements on the water surface, but would be viewed in association with the existing marine farm and against the scale of the adjoining coastal slopes and wider open-water setting. Visual effects are assessed as **Low** at most, with most viewing audiences experiencing **Very Low** adverse effects.
- 198 Natural character effects: the proposal would not alter the abiotic attributes of the coastal landform, shoreline, open-water setting or broader physical processes of Outer Admiralty Bay, with abiotic effects assessed as **Very Low**. Biotic effects are assessed as **Low**, recognising the predominantly Low-value soft-sediment seabed, avoidance of the discrete Moderate-value inshore corner reef, cobble and natural shell habitat, the absence of terrestrial modification, and the specialist ecological findings described above. Experiential effects are assessed as **Low**, arising from an increased visible extent of marine farming within an already modified rural and working coastal setting. Overall, natural character effects are assessed as **Low**.
- 199 Cumulative effects are also assessed as **Low**. The proposed blocks would straddle the existing marine farm and would consolidate marine farming activity within the immediate Hapūkū Rock setting. However, the scale of Outer Admiralty Bay, the separation from other marine farming areas, the low-profile nature of the structures and the continued dominance of the adjoining coastal landform mean the proposal would not read as part of a continuous or extensive aquaculture landscape across the wider bay.
- 200 On this basis, I consider that the proposal would result in localised landscape, visual and natural character change within the Hapūkū Rock setting, but would not materially compromise the key coastal landscape characteristics of the site, the visual amenity of the wider receiving environment, or the values and characteristics that underpin the mapped Outer Sounds Outstanding Natural Landscape. In my opinion, the proposed marine farms can be accommodated at Hapūkū Rock 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 and 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 of landscape character or visual amenity.	Significant Effect
High	Major loss/modification or loss of most key elements / features / characteristics, i.e. substantial change to the pre- development landscape character or visual amenity.	Significant Effect
High-Moderate	Loss/modification of several key elements / features / characteristics of the baseline, i.e. the pre-development landscape character or visual amenity 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 landscape or views.	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 landscape or views.	Minor Effect Less than 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 landscape or views.	
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.	

Appendix 2: 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 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.



Appendix 3: Relevance of Cook Strait ONL Values to Hapūkū Rock

The Hapūkū Rock site is located within the mapped Outer Sounds Outstanding Natural Landscape, associated with the Cook Strait 08 landscape identified in the Marlborough Environment Plan. The following table considers the relevance of the scheduled Cook Strait ONL values to the Hapūkū Rock setting and proposed marine farm sites.

Cook Strait 08 ONL Evaluation matter	Relevance to Hapūkū Rock
The entire Cook Strait nested landscape is identified as an ONL due to exceptional biophysical and associative landscape values and very high sensory landscape values.	Relevant at the broad scale. Hapūkū Rock sits within the mapped Cook Strait ONL and must therefore be assessed in relation to the values and characteristics that support that classification. However, the Evaluation is a broad nested-landscape judgement and does not mean that every part of the mapped ONL expresses the same values or sensitivity at the local scale.
The Cook Strait landscape contains many spectacular landforms and island sanctuaries.	Limited relevance at the site scale. Hapūkū Rock is part of the wider coastal setting, but the proposed farm sites are not associated with an island sanctuary, spectacular island landform, offshore stack or dramatic sea-cliff setting.
All of Rangitoto ki te Tonga / D'Urville Island is identified as an ONL, including its scale, position, relationship with Te Aumiti / French Pass, conservation land, ecological values and remote / highly natural setting.	Relevant as broader context, but not directly affected. Hapūkū Rock has visual and contextual relationships with Rangitoto ki te Tonga / D'Urville Island and the wider Outer Sounds, but the proposal would not affect the landform, vegetation, conservation values, or experiential values of Rangitoto ki te Tonga / D'Urville Island itself.
Te Aumiti / French Pass is identified as an ONF, including the submerged ridgeline, unusually swift tidal currents, geopreservation values and high sensory values.	Not strongly expressed at the site scale. Hapūkū Rock is located within the wider northern Outer Sounds context, but it is not part of Te Aumiti / French Pass, the submerged ridgeline, or the high-current passage environment that underpins this part of the Evaluation.
Argillite source sites on Rangitoto ki te Tonga / D'Urville Island have important archaeological and cultural associations.	Limited relevance to the immediate proposal. These associative values contribute to the wider Cook Strait ONL, but the assessment material does not identify equivalent argillite quarrying or directly related archaeological values within the proposed farm sites or immediately adjacent waters.
The northern to north-eastern islands of Rangitoto ki te Tonga / D'Urville Island display exposure to the sea, weathered sea cliffs and wind-shaped vegetation, and are highly memorable.	Limited relevance at the site scale. Hapūkū Rock has an open outer-bay and maritime setting, but the immediate site coastline does not display the same exposed island, weathered sea-cliff or wind-shaped island vegetation qualities described in this part of the Evaluation.
Sea conditions around north-western Rangitoto ki te Tonga / D'Urville Island, Stephens Island / Takapourewa and Stephens Passage are very exposed, with strong currents and complex reef habitats.	Relevant only as wider coastal context. Hapūkū Rock is influenced by the broader Outer Sounds / Cook Strait environment, but it is not located within Stephens Passage or the very exposed reef / high-current environments described in the Evaluation.



Stephens Island / Takapourewa is predator-free and supports nationally threatened species, including tuatara.	Not directly relevant to the proposal. These values contribute to the wider Cook Strait ONL, but they are associated with Stephens Island / Takapourewa and would not be directly affected by the proposed marine farms at Hapūkū Rock.
The Trio Islands, Nga Kiore / Jag Rocks and associated rock stacks support important ecological values, including tuatara, king shag and nationally significant brachiopod communities.	Limited to broader habitat context. Admiralty Bay forms part of a wider habitat context for seabirds and marine mammals, but the proposed sites are not located at the Trio Islands, Nga Kiore / Jag Rocks or associated rock stack habitats. Detailed effects on seabirds and marine mammals are addressed by the relevant technical specialists.
The Chetwodes, Titi Islands and Sentinel Rock are characterised by rugged, exposed isolation, very low modification, offshore reefs, predator-free status and nationally significant ecological values.	Not strongly expressed at the site scale. Hapūkū Rock is not part of the Chetwodes, Titi Islands or Sentinel Rock group. The immediate receiving environment is more modified, with pastoral land use, access tracks, powerline infrastructure, forestry / wilding pines, vessel movement and existing marine farming.
Cape Lambert and Alligator Head retain wild and rugged forms that are extremely legible and assist in defining outer Sounds bays, with exceptional biodiversity at Cape Lambert.	Limited relevance. Hapūkū Rock has a legible coastal landform and rocky coastal edge, but it is not associated with Cape Lambert or Alligator Head and does not express the same identified wild and rugged headland values at the site scale.
Listed modifications are mostly associated with Stephens Island / Takapourewa and include some vegetation clearance, buildings, a lighthouse, occasional tracks and moorings, and the lighthouse at Ninepin Rock.	Relevant by contrast. The Evaluation identifies limited modification in parts of the wider Cook Strait landscape. At Hapūkū Rock, the local receiving environment is more evidently modified by rural land use, road and track access, powerline infrastructure, nearby forestry / wilding pines, vessel movement and the existing marine farm. This moderates local sensitivity when compared with the more highly natural island and reef settings described in the Evaluation.

Overall, the Hapūkū Rock setting contributes to the broader Cook Strait ONL, particularly through its open outer-bay waters, steep coastal slopes, rocky shoreline edge, maritime setting and relationship with the wider Outer Sounds. However, the immediate receiving environment does not strongly express many of the specific values emphasised in the Cook Strait 08 Evaluation, which are principally associated with Rangitoto ki te Tonga / D'Urville Island, Te Aumiti / French Pass, Stephens Island / Takapourewa, the Trio Islands, Nga Kiore / Jag Rocks, the Chetwode Islands, Titi Island, Sentinel Rock, Cape Lambert and Alligator Head.

On that basis, the proposal should be assessed within the mapped Cook Strait ONL context, but with recognition that the values most directly engaged at Hapūkū Rock are more limited and localised than the full suite of values identified for the wider Cook Strait nested landscape.

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.

Davidson, R.J., Richards, L.A. and Scott-Simmons, T. (2021). *Ecological report for two proposed marine farm AMA sites located near Hapūkū Rock, Admiralty Bay, Marlborough Sounds.* Prepared by Davidson Environmental Limited for Clearwater Mussels Limited. Survey and Monitoring Report No. 1105.

Davidson, R.J., Richards, L.A. (2014). Monitoring of a relocated a mussel farm in Otanerau Bay, East Bay, Marlborough Sounds: 2002-2014. Prepared by Davidson Environmental Limited for Marlborough District Council. Survey and Monitoring Report No. 788.

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.

Robertson, B. (2026). Marlborough Sounds Aquaculture Project: Coastal Ecological Impact Assessment. Robertson Environmental Limited Report REL174582, Version 1.0, prepared for Aquaculture Direct Limited, 1 September 2026.

HAPUKU ROCK

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

Prepared for
Clearwater Mussels Ltd

1 October 2026





Marlborough Aquaculture
Fast Track Assessment

HAPUKU ROCK
Aerial Viewpoint Map

SHEET 2

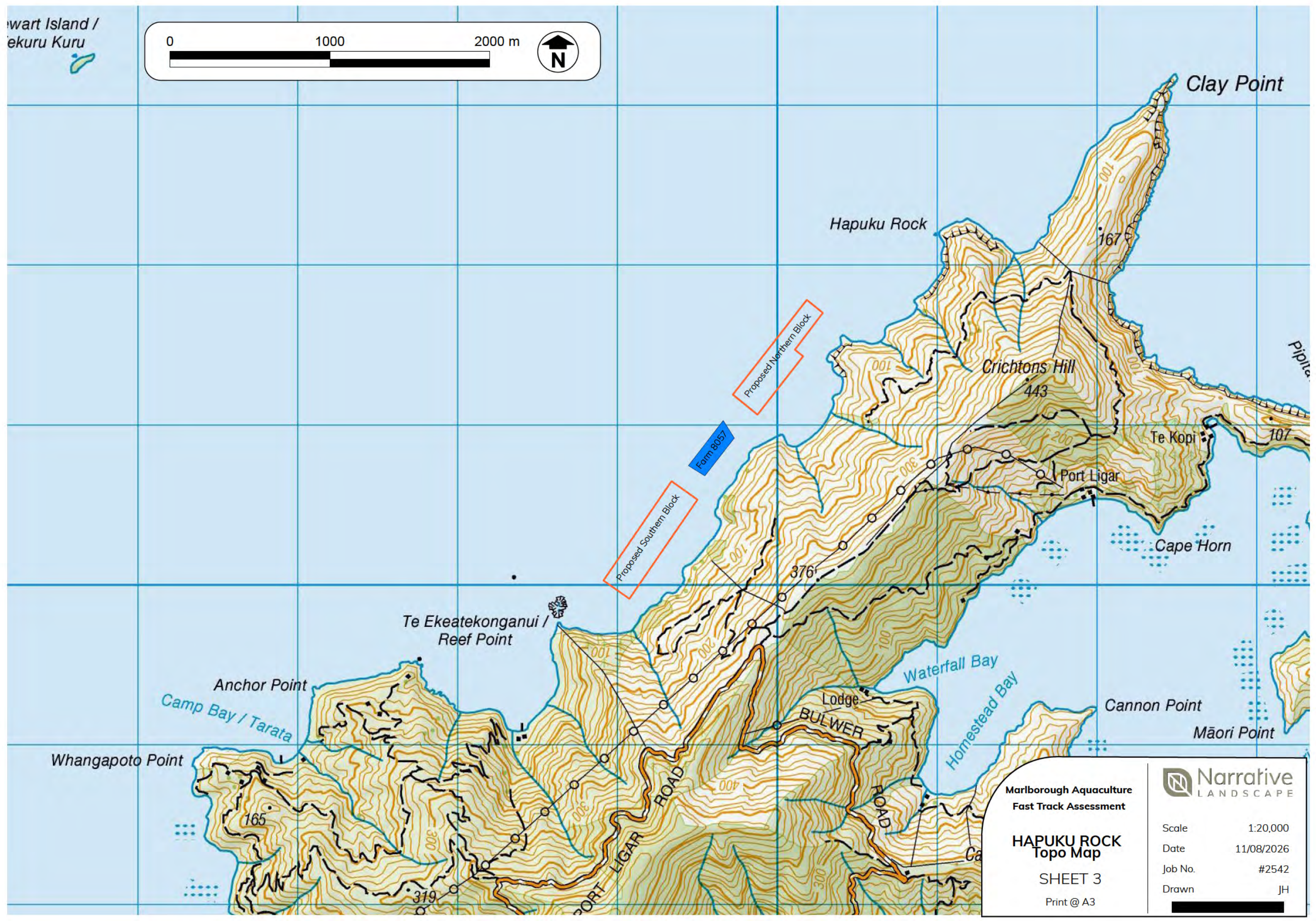
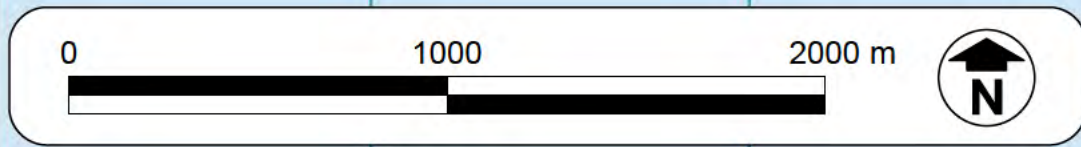
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Date 11/08/2026

Job No. #2542

Drawn JH



Marlborough Aquaculture
Fast Track Assessment

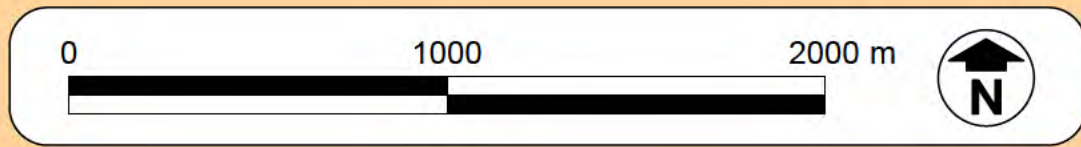
HAPUKU ROCK Topo Map

SHEET 3

Print @ A3



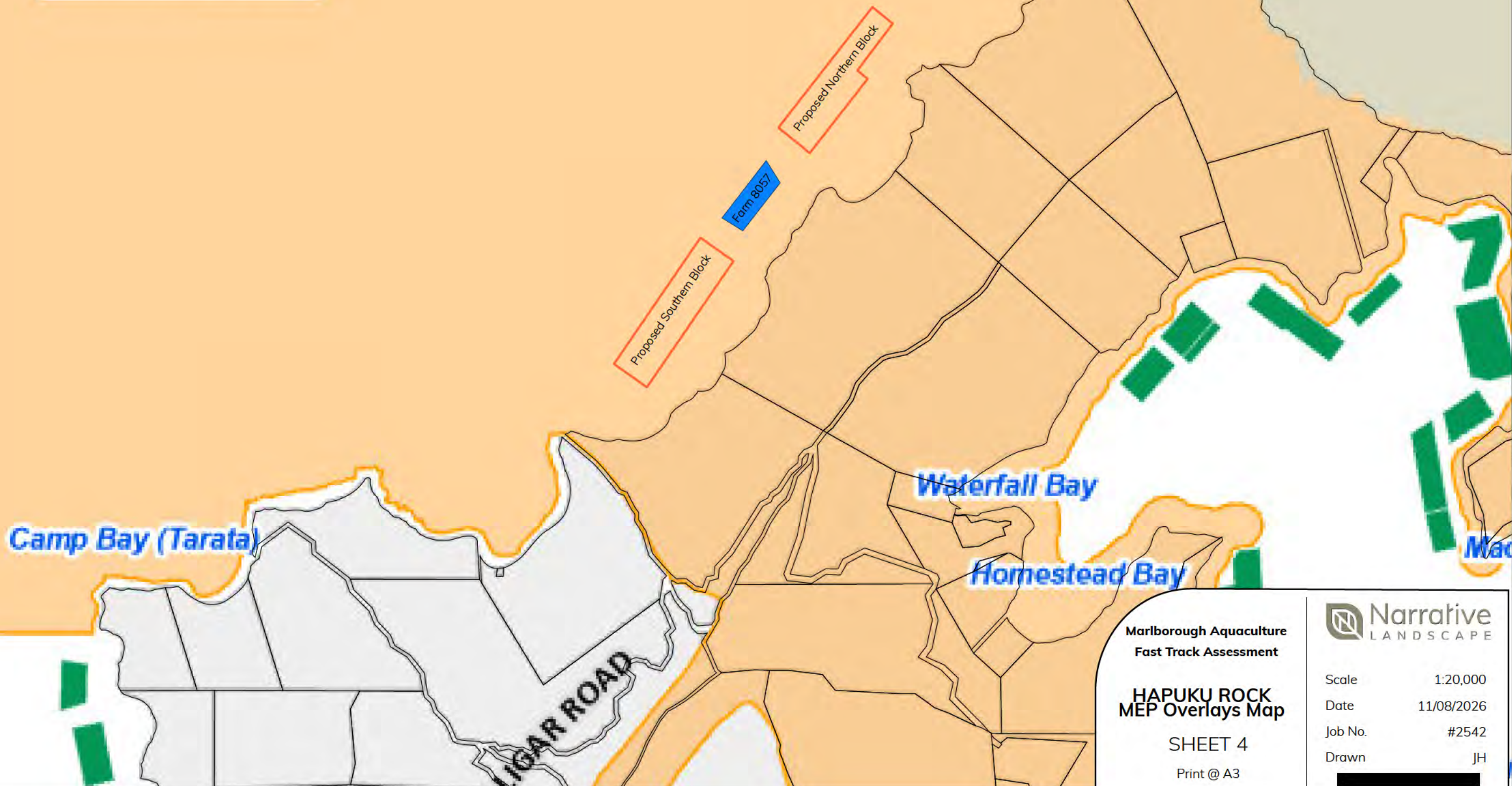
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Drawn	JH



LEGEND

MEP Outstanding Natural Feature Landscape

MEP High Natural Character & MEP Outstanding Natural Feature Landscape



Marlborough Aquaculture
Fast Track Assessment

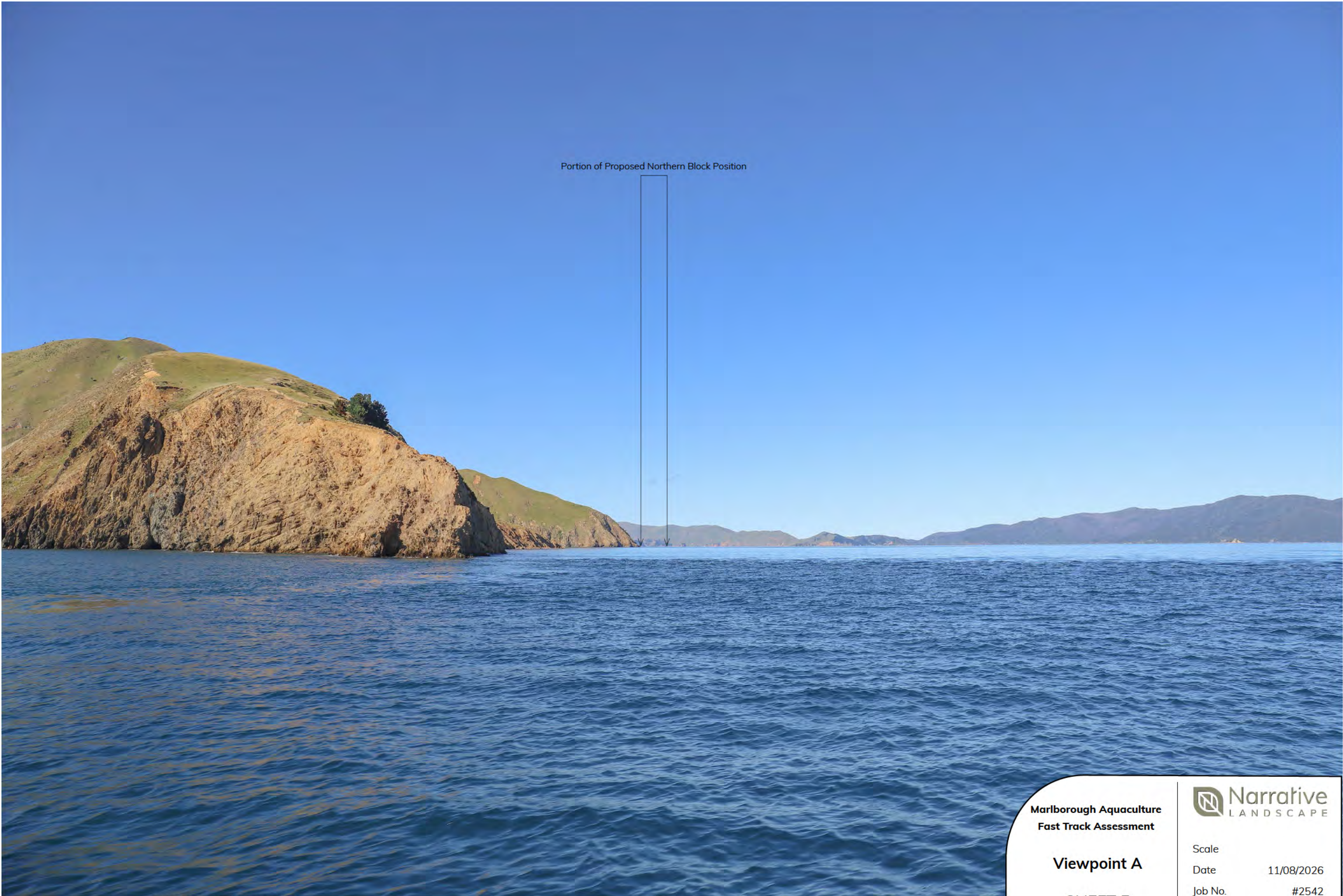
**HAPUKU ROCK
MEP Overlays Map**

SHEET 4

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Narrative LANDSCAPE

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Date	11/08/2026
Job No.	#2542
Drawn	JH



Portion of Proposed Northern Block Position

[+ Return to Map](#)

VIEWPOINT A - PHOTO DETAILS

Date: 04/12/2025
Time: 7:45AM
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**Marlborough Aquaculture
Fast Track Assessment**

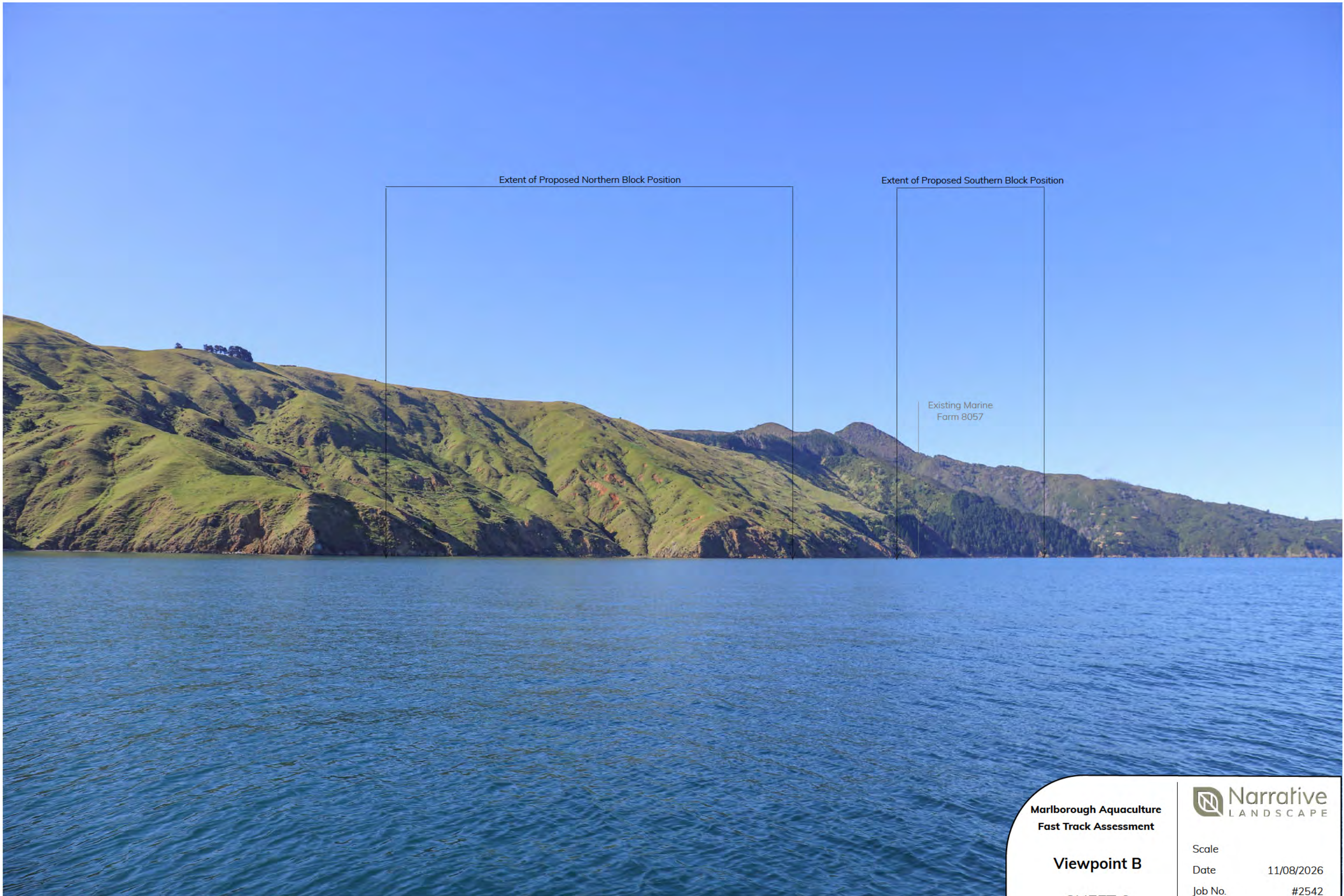


Viewpoint A

SHEET 5

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Scale
Date 11/08/2026
Job No. #2542
Drawn JH



Extent of Proposed Northern Block Position

Extent of Proposed Southern Block Position

Existing Marine Farm 8057

[Return to Map](#)

VIEWPOINT B - PHOTO DETAILS

Date: 04/12/2025
Time: 7:51AM
Camera/Lens: Canon 6D mkii / 24mm (Full Frame)
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**Marlborough Aquaculture
Fast Track Assessment**

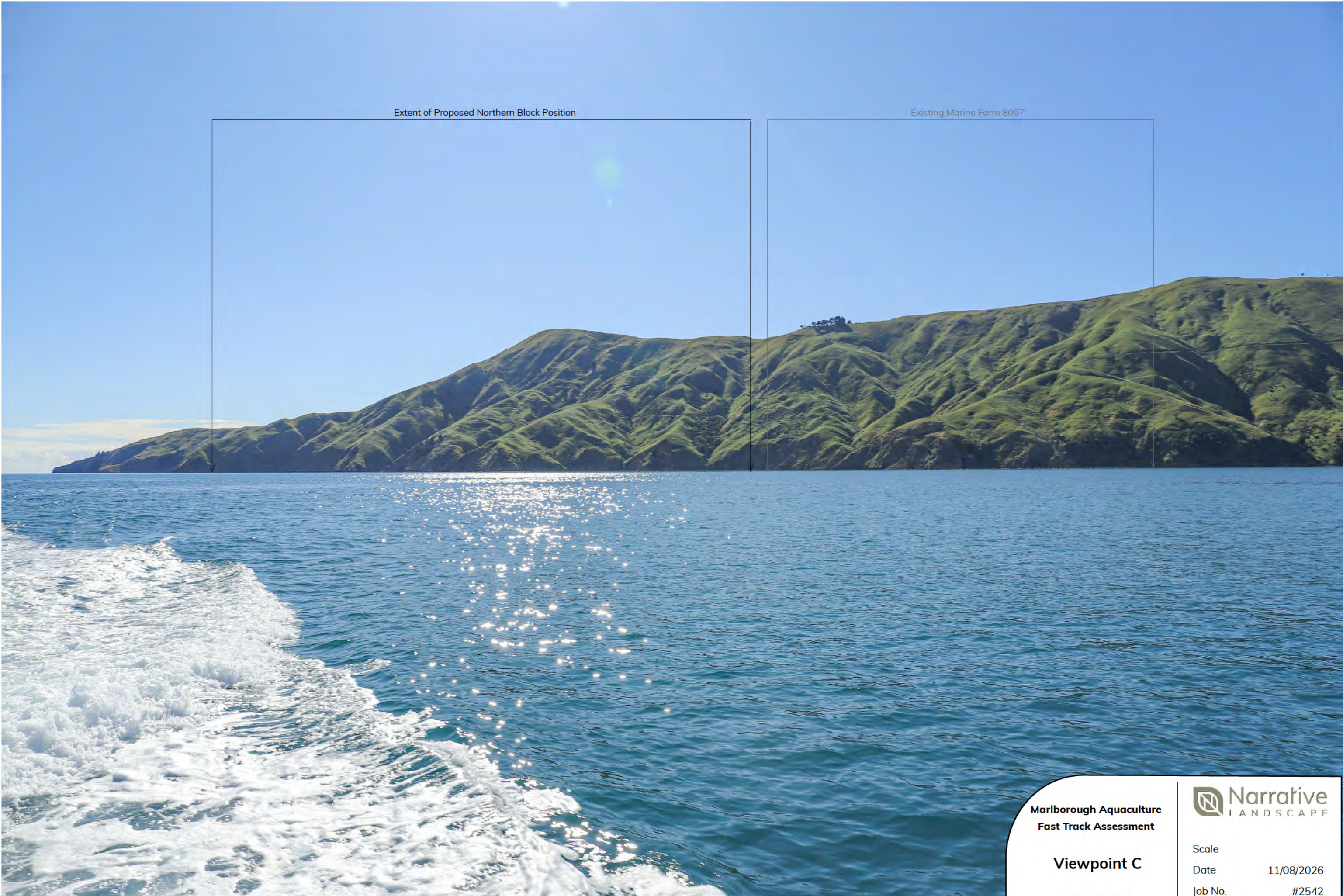
Viewpoint B

SHEET 6

Print @ A3



Scale
Date 11/08/2026
Job No. #2542
Drawn JH



Extent of Proposed Northern Block Position

Existing Marine Farm 8057

[+ Return to Map](#)

VIEWPOINT C - PHOTO DETAILS

Date: 04/12/2025
Time: 8:07AM

Camera/Lens: Canon 6D mkii / 24mm (Full Frame)
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Lat/Long: 40°54'16.314" S 173°56'3.246" E

**Marlborough Aquaculture
Fast Track Assessment**



Viewpoint C

SHEET 7

Print @ A3

Scale
Date 11/08/2026
Job No. #2542
Drawn JH

Extent of Proposed Southern Block Position



VIEWPOINT D - PHOTO DETAILS

Date: 04/12/2025
Time: 8:07AM

Camera/Lens: Canon 6D mkii / 24mm (Full Frame)
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[+ Return to Map](#)

**Marlborough Aquaculture
Fast Track Assessment**

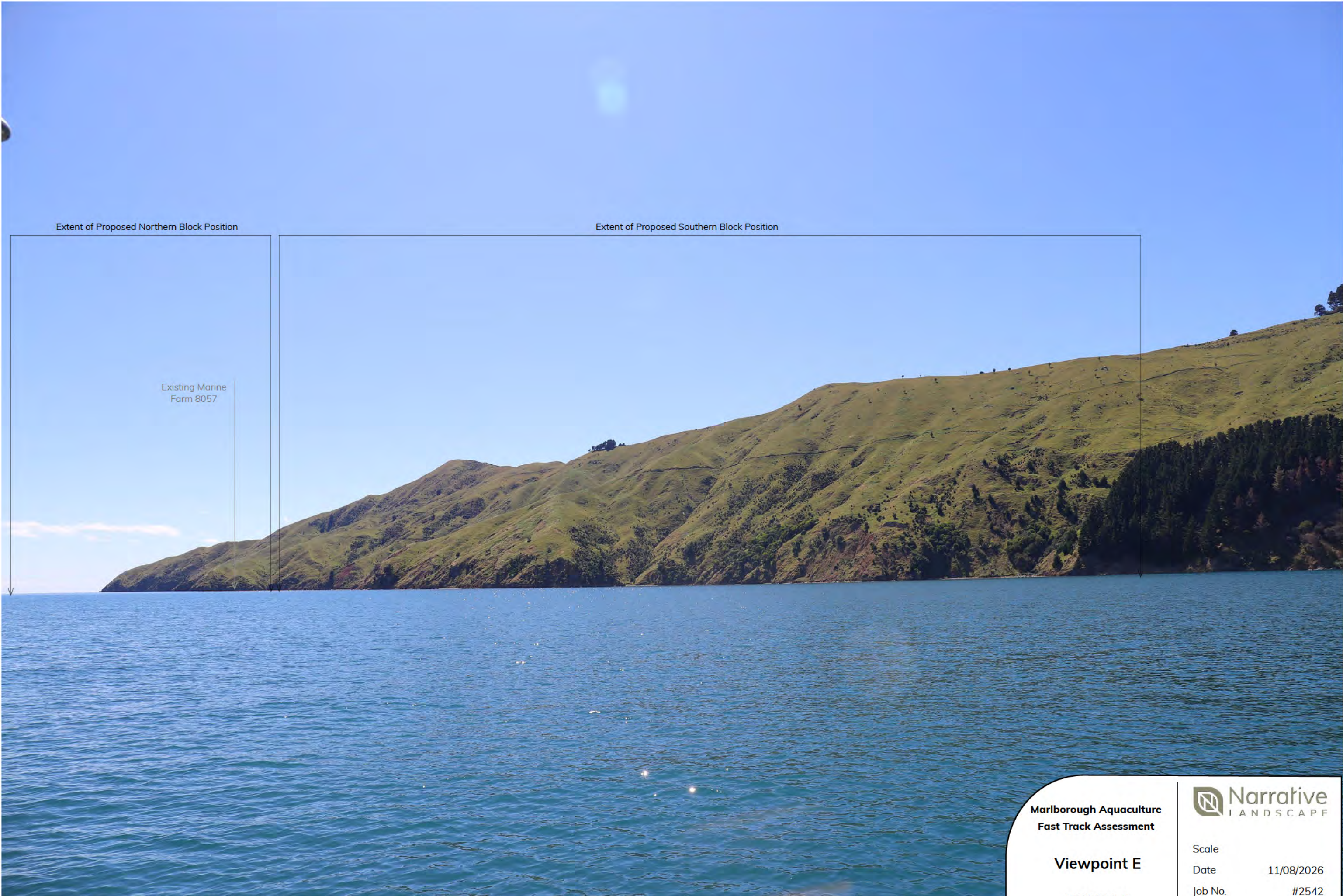
Viewpoint D

SHEET 8

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Scale
Date 11/08/2026
Job No. #2542
Drawn JH



Extent of Proposed Northern Block Position

Extent of Proposed Southern Block Position

Existing Marine
Farm 8057

[+ Return to Map](#)

VIEWPOINT E - PHOTO DETAILS

Date: 04/12/2025
Time: 9:34AM

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**Marlborough Aquaculture
Fast Track Assessment**

Viewpoint E

SHEET 9

Print @ A3



Scale
Date 11/08/2026
Job No. #2542
Drawn JH



[+ Return to Map](#)

VIEWPOINT F - PHOTO DETAILS

Date: 04/12/2025
Time: 8:11AM

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

Viewpoint F

SHEET 10

Print @ A3



Scale
Date 11/08/2026
Job No. #2542
Drawn JH



[+ Return to Map](#)

VIEWPOINT 4 - PHOTO DETAILS

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**Marlborough Aquaculture
Fast Track Assessment**

Viewpoint 1

SHEET 11

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Scale	
Date	11/08/2026
Job No.	#2542
Drawn	JH



[+ Return to Map](#)

VIEWPOINT 5 - PHOTO DETAILS

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Time: 8:35AM

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**Marlborough Aquaculture
Fast Track Assessment**

Viewpoint 2

SHEET 12

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Scale	
Date	11/08/2026
Job No.	#2542
Drawn	JH