Appendix R Recreation and tourism assessment

Ngāi Tahu Seafood Resources Limited

Hananui Aquaculture Project

Recreation and Tourism Assessment

Evidence of Thrive Spaces and Places regarding Recreation and Tourism Assessment

Samantha Strong
10-24-2025

Introduction

My name is Samantha Strong.

My role in relation to the Hananui Aquaculture Project ("**HAP**") has been to provide expert evidence in relation to open space, recreation and tourism. I wrote / was the lead author of the Recreation and Tourism Assessment which is provided within **Appendix R** of the application.

This evidence has been prepared to accompany the application by Ngāi Tahu Seafood Resources Limited ("**NTS**") for approvals required for the HAP under the Fast-track Approvals Act 2024 ("**FTAA**"). It has been prepared on the understanding that the process for determining applications under the FTAA does not require a hearing to be held, and accordingly the purpose of this evidence is to confirm that, relative to my area of expertise, the Recreation and Tourism Assessment provides an appropriate description of the relevant environment, the proposed activities comprising the effects of the HAP on that environment, and the way those effects are proposed to be managed.

My findings are set out in full in the Recreation and Tourism Assessment included within **Appendix R** of the application.

While this application is not being considered by the Environment Court, I confirm that I have read the Code of Conduct for expert witnesses contained in the Environment Court of New Zealand Practice Note 2023 and that I have complied with it when preparing this evidence. Other than when I state I am relying on the advice of another person, this evidence is within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

Qualifications and Experience

I am Recreation and Open Spaces Planner

I graduated from Lincoln University with a Masters in Parks Management (2025) and a Bachelor's degree in Sport and Recreation Management (with Distinction)(2022) and from Conestoga College a Diploma in Recreation and Leisure Services Programming (2011).

Between 2011 and 2022 I was a Recreation Programmer across both Canada and Australia, developing and implementing a range of local and regional wide recreation programmes, working in outdoor recreation, tourism, and local government.

I am a published academic, co-authoring a tourism classification framework (TAC Framework) to assess nature-based tourism destinations through adaptive management, and have written articles on open space provision and impacts.

Since 2022, I have been a Recreation and Open Spaces Planner at Thrive Spaces and Places and have undertaken recreation and open spaces planning and management assessments. I have

provided open space, recreation and open space provision evidence in district plan changes, peer reviewed open space impact assessments and assisted and completed recreation impact assessments for other consent applications including Auckland Council PC94, Tasman District Council PC81, Santana Gold Mine (Bendigo), Bathurst Mine Expansion (Westport), Tekapo High Ropes Course development, the Doolans Expansion, and the Port of Tauranga).

In proving this evidence in relation to open space, recreation and tourism, I have considered the following matters as relevant to that topic:

- The project description provided by NTS as set out in section 6 of the application;
- The description of the existing environment, the effects of the HAP on that environment and their significance, and the proposed management and mitigation measures to manage those effects all as set out in the assessment of environmental effects accompanying the application;
- The technical assessments of:
    - Bennett, H. et., al. 2025. *Assessment of seabed effects associated with farming salmon offshore of northern Stewart Island / Rakiura*. Client report prepared by the Cawthron Institute.
    - Coombs, B., 2025. *Natural Character, Landscape, and Visual Assessment Report*. Client report prepared by Isthmus Architects.
    - Wilson, P. 2025. *Water Column Assessment*. Client report prepared by the SLR.
    - Taylor, P. & Dempster, T. 2021. *A discussion on the effects of salmon farming on the wild fish fauna of an area in Foveaux Strait and management options for avoiding, remedying, and mitigating any adverse effects including proposed methods for monitoring and investigating the impact of deploying a sea pen salmon farm in the area*. Statfishtics and Melbourne University report for Ngāi Tahu Seafood.
    - Navigatus, 2025. *Navigational Risk Assessment*. Navigatus Consulting Limited report for Ngāi Tahu Seafood.
    - Tipa & Associates, 2021. *Cultural Impact Assessment*. Client report prepared for Ngāi Tahu Seafood.
    - Te ao Mārama Inc, 2025. *Ngā Hua o Āpiti Hono Tātai Hono*. Client report prepared for Ngāi Tahu Seafood ; and
- This assessment draws on an extensive range of technical data, spatial information, planning material, and direct stakeholder input to describe the recreation, tourism, and cultural context of the Hananui Aquaculture Project and its surrounding environment. Information sources include:

1. **Policy and planning documents**: notably the
   Stewart Island/Rakiura Conservation Management Strategy and
   Rakiura National Park Management Plan (DOC, 2012), alongside the
   Southland Regional Coastal Plan, NZ Coastal Policy Statement, and supporting marine farming and public access policies.

2. **Technical assessments and environmental datasets:** prepared by SLR (2025), Navigatus (2025), Cawthron (2025), and Isthmus (2025) covering hydrodynamics, seabed ecology, navigation safety, and landscape and natural character.
3. **Cultural material and collaboration**: particularly the Cultural Impact Assessment (Tipa Associates 2020–2025) and direction from Ngā iwi o Murihiku and Ngā Rūnanga o Awarua through hui and correspondence, providing insight into cultural values, mahinga kai, and wāhi taonga species.
4. **Consultation:**
    a. Mana Whenua
    b. The Department of Conservation
    c. Tourism operators
    d. Hunting and fishing representatives; and
    e. Local community stakeholders.
    f. This process included multiple huis and workshops held in 2025 to inform recreation and tourism considerations, and mitigation measures.

1. **Site Visits**: On-site verification through site visits and field observations undertaken at Rakiura/Stewart Island in April 2025 to confirm physical access, visibility, and recreation characteristics of the proposed aquaculture area and adjacent coastline.
2. **Scientific and academic literature review (full reference list see report)**:
    a. Literature including (but not limited to): Carbines (1998), James et al. (2004), Davey & Hartill (2011), and the National Panel Surveys of Marine Recreational Fishers (MPI/Fisheries NZ 2014, 2019 , 2024).
    b. Recreation and visitor datasets, such as Sport NZ Active New Zealand Survey (2023), Southland Regional Development Agency Visitor Survey (2021), Levels of Acceptable Change and Recreation Opportunity Spectrum, and Strava (2024–2025) heatmaps to illustrate participation and activity distribution.
    c. Spatial and boating data from LINZ, including GIS layers, AIS vessel tracks, and DOC public access information for modelling recreational and navigation patterns.

Confirmation of Contents of Report and Proposed Conditions

I confirm that in my opinion the Recreation and Tourism Assessment contain an accurate and appropriate description of the environment, the actual and potential effects of the HAP, and the recommended actions to manage those effects within my area of expertise.

I confirm that in my opinion the contents of the Recreation and Tourism Assessment may be relied on in making a decision on the approvals sought for the HAP and confirm that provided effects within my area of expertise are managed as proposed in the application those effects will not be unacceptable and will be managed to a standard that I consider meets good practice.

I confirm that I have reviewed the conditions that NTS proposes for the approvals being sought as they relate to my area of expertise. I confirm that in my opinion, those proposed conditions are appropriate.

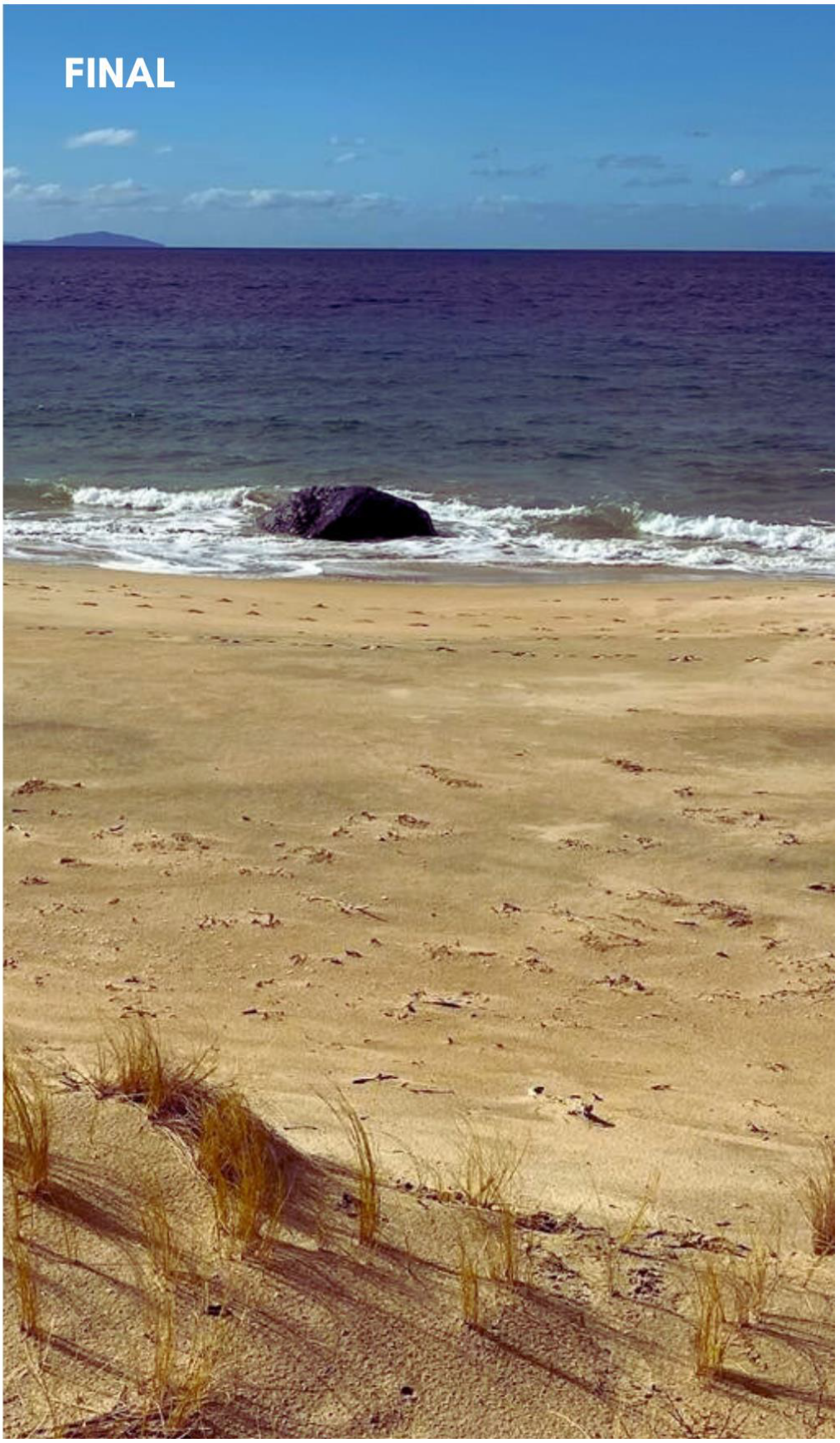
Samantha Strong

24/10/2025

THRIVE
SPACES & PLACES

Ngāi Tahu Seafood Limited.
Hananui Aquaculture Project
Recreation and Tourism Assessment

FINAL



Prepared for Ngāi Tahu Seafood Limited
By Thrive Spaces and Places
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1 Executive Summary

This report provides an assessment of the potential effects of the Hananui Aquaculture Project (HAP) on recreation and tourism values within the coastal waters northeast of Rakiura/Stewart Island. The proposed salmon farm is situated in a remote, coastal cruising environment, positioned 2–6 km offshore well outside the main areas of marine recreation and tourism activity.

The Stewart Island region is widely valued for its remote and natural character, attracting visitors seeking remote, wilderness experiences. The proposed farm area is within an exposed and potentially challenging boating area. It serves primarily as a transit zone for vessels rather than a destination, and a relatively high degree of competency is required of skippers navigating the area, as well as good vessel seaworthiness. A high degree of skipper competency is also required of fishing charters in the area, and good local knowledge to ensure the safety of any private fishing activity. While the salmon farm will represent an additional navigational hazard, considering its location and the use of aids to navigation, risks should be no greater than any other charted hazard at sea. Consultation with a range of stakeholders who either recreate, operate, and or visit the proposed farm area were undertaken. Stakeholders included both residents of Rakiura/ Stewart Island and non-residents, and those who are involved with fishing charters, yacht clubs, dive operations, hunters, and tourism providers. Engagement with these parties revealed a diversity of perspectives. While some concerns were raised regarding visual impacts and potential increases in vessel traffic, most stakeholders acknowledged that the proposed farm is not located on main transit or destination routes. Only minor operational impacts were anticipated and the provision of access to key coastal sites was acknowledged as maintained.

From a visual and amenity perspective, the farm's infrastructure will be minimally visible from land due to its offshore location, the low profile of the structures (unlike any vessel or ship), and the curvature of the earth as outlined in the Landscape and Natural Character assessment by Isthmus. Navigational lighting has been designed to meet the regulations and accepted guidance. Given that the area already experiences the presence of large cargo vessels, anchored or transiting, the introduction of the farm is not expected to significantly alter the sense of remoteness or natural character for most users. The project has been carefully designed to avoid restricting access to the coastline or popular fishing and hunting sites, with comprehensive navigational safety measures, such as cardinal marks and navigational lighting, planned to guide vessels and prevent hazards. The presence of trained mariners involved in the farm may aid safety. The addition of the markers may also aid some inexperienced mariners or mariners unfamiliar with the area to navigate this challenging environment.

Recreational fishing within the proposed farm area is currently limited. The presence of the farm may generate new fishing opportunities by attracting wild fish, but environmental modelling and expert assessment suggest that impacts on wild fish populations and benthic habitats will be minor. The site is not a key destination for diving or shark cage diving, and transit routes for these activities will remain open. Environmental and cultural considerations have also been integrated into project

planning, with the farm sited to avoid sensitive biogenic habitats and cultural sites, and ongoing engagement with mana whenua ensuring that cultural values and kaitiakitanga are respected.

Overall, the two broad effects within the scope of the report are the effects on recreation or tourist activities and the effects on navigation, access and amenity (related to recreation and tourism activities). The Hananui Aquaculture Project will have a minor or less than minor effect on existing recreation or tourism activities in the proposed farm area. There will be a less than minor effect on navigation (specific to recreation and tourism), access, and amenity, provided that access to key coastal sites is maintained and navigational safety measures are implemented.

2 Introduction

2.1 Purpose of the assessment

This assessment examines the potential impacts of the Hananui Aquaculture Project (HAP) on recreation and tourism, including boating, fishing, recreational amenity, and public access, as well as the natural environment features that support these activities. This assessment was requested by the previous panel, as the initial recreation assessment from the previous application solely focused on recreation access, and not the wider recreation and tourism landscape inclusive of access. Key considerations include wild fish populations, landscape and amenity values, and interactions with other marine users, with specialist assessments conducted by others. This evaluation integrates their findings to assess how the proposal may affect various aspects of the recreation experience, alongside an independent review of its implications for marine navigation and access to areas adjacent to the proposed farm area.

The key assessments are:

- Bennett, H. et., al. 2025. *Assessment of seabed effects associated with farming salmon offshore of northern Stewart Island / Rakiura*. Client report prepared by the Cawthron Institute.
- Coombs, B., 2025. *Natural Character, Landscape, and Visual Assessment Report*. Client report prepared by Isthmus Architects.
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- Navigatus, 2025. *Navigational Risk Assessment*. Navigatus Consulting Limited report for Ngāi Tahu Seafood.
- Tipa & Associates, 2021. *Cultural Impact Assessment*. Client report prepared for Ngāi Tahu Seafood.
- Te ao Mārama Inc, 2025. *Ngā Hua o Āpiti Hono Tātai Hono*. Client report prepared for Ngāi Tahu Seafood.

This report does not interpret the findings of the assessments of effect on marine mammals, seabirds, and sharks, and reference should be made to the original documents:

- Finucci B (2025). *Shark assessment for the proposed fish farm off northern Stewart Island/Rakiura*. NIWA Report No. 2025150WN. Prepared for Ngāi Tahu Seafood Resources Limited.
- BlueGreen Ecology (2025). *Hananui Aquaculture Project: DRAFT Coastal & Marine Avifauna Assessment – Fast Track Approvals*. Report prepared for Ngāi Tahu Seafood Resources.
- Clement D. 2025. *Effects of Hananui Aquaculture Project on marine mammals*. Nelson: Cawthron Institute. Cawthron Report 4171. Prepared for Ngāi Tahu Seafood Resources Ltd.

2.2 Proposed Project

Ngāi Tahu Seafood Resources Limited (NTS) is applying for consent to develop an offshore site for salmon farming within the northeastern coastal waters of Rakiura/Stewart Island, within the takiwā of Ngāi Tahu. The proposed Hananui Aquaculture Project area of approximately 1,285 ha over various different sand habitat types and excludes large areas of biogenic habitat and ensure boundaries remain more than 2 km from the coastline. The site is located in the Coastal Marine Area (CMA), 2 to 6 km off the northern coast of Rakiura/Stewart Island and approximately 13 km northwest of Oban (see Figure 1). The main pen areas sit between Garden Point to the West and Newtons Rock/Gull Rock to the East. The proposed development will occur in two stages over an estimated 8 to 12 years.

Stage 1 will have an initial feed limit of 15,000 tonnes per annum (tpa), representing an increase of 5,000 tpa from Stage 1 of the previous application. This stage is expected to yield approximately 7,500 tonnes of harvestable salmon per annum at full production. Subject to environmental monitoring over two production cycles, Stage 2 would increase the total feed input to 25,000 tpa, producing an estimated 14,500 tonnes of harvestable salmon per annum. The farm layout will maintain a configuration of four farms. In Stage 1, each farm will consist of one block of 10 pens. For Stage 2, an additional block of 10 pens will be added to each of the four farms. The exact locations of the farms will be confirmed following depositional modelling.

This site is notably the second aquaculture farm in New Zealand to be located in exposed coastal waters rather than within the shelter of bays or sounds. Existing aquaculture farms around Rakiura/Stewart Island, such as those in Big Glory Bay in Paterson's Inlet, are in more protected environments, with higher encounter rates with recreationists due to the nature of the sites. The offshore location of Hananui requires the use of aquaculture infrastructure and equipment that has been employed for decades and is widely adopted in major fish farming regions around the world but is only recently being implemented in exposed and offshore finfish developments in New Zealand.

The farm design is shaped by the benthic environment, water currents, and structural and mooring requirements (see Cawthron Report, SLR, and Navigatus Report). Landscape and Natural Character effects are considered in the Isthmus assessment with all components of the development confined to the coastal permit consented area. It should be noted that within the overall 1,285ha project site boundary, the blocks of floating pens will occupy 96.8ha of water space, less than 8% of the project site area. The mooring lines and anchors on the sea floor will occupy an exclusive occupation area of approximately 500ha. The exclusive occupation area includes all the floating structures, the mooring lines and anchors, the feed barges, plus a 50m buffer around all the structures, leading to an area of exclusive occupation of 125ha per farm.

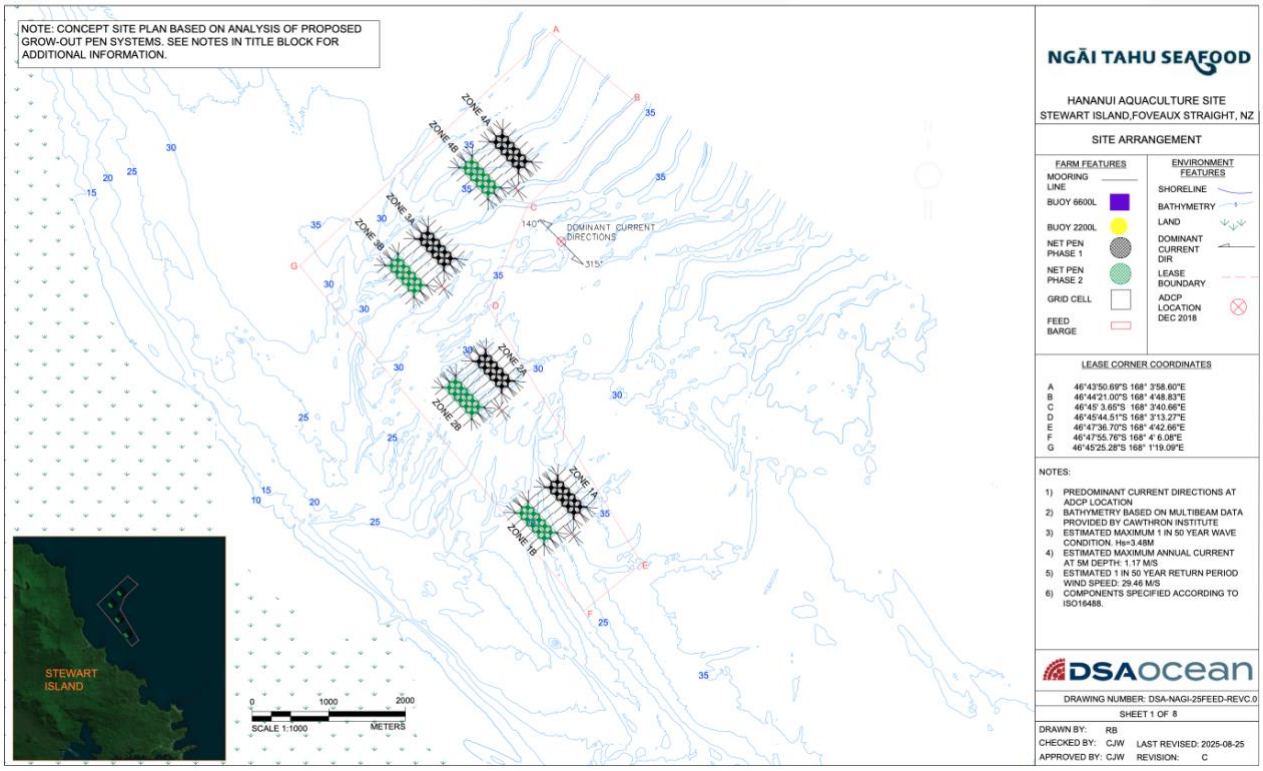


Figure 1: Preliminary site plan showing the proposed salmon farms and mooring lines (cite)

Figure 1 illustrates the preliminary site plan and location of the individual farms within the consented area.

A detailed navigational assessment was conducted by Navigatus Consulting Limited highlighting key considerations for the design and placement of Aids to Navigation (AtoN) for the proposed marine farming area. Due to the irregular shape of the site, AtoN may need to be positioned outside of the consented area to avoid mariner confusion, especially given the proximity to other navigation aids. The report recommends using cardinal marks, following international maritime requirements, to clearly indicate the hazardous areas such as Newton Rock, with careful attention to lighting, visibility, and robustness to meet Category 1 availability requirements. Lighting will be designed to ensure sufficient visibility for mariners under various conditions while minimising light spill and visual impact on the coastline. The overall approach aims to enable navigational safety for vessels in the area, in line with best practice guidelines.

3 Scope of assessment and relevant planning matter

The report assesses the effects of the proposal on, in particular, recreation, defined by the Resource Management Act 1991 (RMA) as an "amenity value" and on public access within the coastal environment, the latter a core focus of the New Zealand Coastal Policy Statement 2010 (NZCPS). Further, this report acknowledges the customary use of Rakiura to Mana Whenua using Ngā Hua o Āpiti Hono Tātai Hono and Stage 1 Āpiti Hono Tātai Hono (Te ao Mārama, 2025), Cultural Landscape Assessment (Tipa & Associates, 2021), and the Te Tangia Tauira-Iwi Management Plan to illustrate customary uses and recreational values to HAP. This section reviews the planning provisions which direct the assessment of effects for these values.

3.1 Resource Management Act 1991

In terms of Part 2 of the RMA (1991), the assessment connects to section 6 and 7 of the Act. The assessment relates to the requirements of:

- *s.6(d) shall recognise and provide for the maintenance and enhancement of public access to and along the coastal marine area, lakes and rivers; and*
- *s.7(c) shall have particular regard to the maintenance and enhancement of amenity values; and*
- *s.7(f) shall have particular regard to the maintenance and enhancement of the quality of the environment*.

Also relevant is s.6.(a) the requirement to recognise and provide for the preservation of the natural character of the coastal environment and the protection of it from inappropriate use and development. Specialist landscape and character assessments by Brad Coombs from Isthmus are relied on. From a landscape perspective, this assessment prioritises amenity considerations over purely natural character, which refers to the inherent qualities and attributes of the natural environment that people associate while recreating. Amenity has a more personal and experiential focus, though natural character remains an important factor.

3.2 New Zealand Coastal Policy Statement 2010 (NZCPS)

The NZCPS provisions which directly relate to recreation, amenity, and public access are Objective 4 and Policies 18 and 21. These are listed below. Other NZCPS provisions relate specifically to matters which can influence recreation (e.g. marine mammals, which are captured by Policy 11). These are not listed below and other relevant technical assessments prepared for Ngai Tahu Seafood Ltd. will apply.

Objective 4 of the NZCPS aims to *"maintain and enhance the public open space qualities and recreation opportunities of the coastal environment by:*

- *recognising that the coastal marine area is an extensive area of public space for the public to use and enjoy;*

- *maintaining and enhancing public walking access to and along the coastal marine area without charge, and where there are exceptional reasons that mean this is not practicable providing alternative linking access close to the coastal marine area; and*
- *recognising the potential for coastal processes, including those likely to be affected by climate change, to restrict access to the coastal environment and the need to ensure that public access is maintained even when the coastal marine area advances inland."*

Policy 18 of the NZCPS relates to public open space, as follows:

"Recognise the need for public open space within and adjacent to the coastal marine area, for public use and appreciation including active and passive recreation, and provide for such public open space, including by:

a) ensuring that the location and treatment of public open space is compatible with the natural character, natural features and landscapes, and amenity values of the coastal environment;
b) taking account of future need for public open space within and adjacent to the coastal marine area, including in and close to cities, towns and other settlements;
c) maintaining and enhancing walking access linkages between public open space areas in the coastal environment;
d) considering the likely impact of coastal processes and climate change so as not to compromise the ability of future generations to have access to public open space; and
e) recognising the important role that esplanade reserves and strips can have in contributing to meeting public open space needs."

Policy 21 of the NZCPS refers to considering whether the quality of the water in the coastal environment has an effect on, amongst other things, water-based recreation. The proposed farm area is not a swimming or primary diving setting due to the general rough sea conditions (see SLR assessment). Therefore, within the proposed farm area water contact recreation is not an issue. Otherwise, this assessment reviews the degree to which the proposal has an effect on amenity values in relation to the quality of water for recreation and tourism, and for the coastal cruising setting in which the proposed farm area is located (i.e., within the area of the coast but not a full blue water setting). The proposal setting is well beyond any area which may adversely affect inshore or terrestrial amenity values associated with recreation (see Isthmus assessment).

3.3 Environment Southland Regional Policy Statement 2017 (RPS)

The RPS refers to the contribution and management of the effects of aquaculture in its Section 7.2 under Objective Coast .5-Aquaculture:

> *(b) protecting outstanding natural features, landscapes and natural character in accordance with Policy COAST.3; and*
> *(c) avoiding, remedying, or mitigating other adverse effects. appropriate, while managing the adverse effects of those activities."*

Policy COAST .1 refers to considering whether activities are appropriate, inappropriate or may be inappropriate without the consideration of effects through a resource consent application, notice of requirement for designation or a Schedule 1 process under the Act

in respect to the "*provision of public open space, walking access and vehicle access"*. Further to this, Policy COAST .2- *Management of activities in the coastal environment* relates to public open space as follows:

"Ensure adequate measures or methods are utilised within the coastal environment when making provision for subdivision, use and development to:"

a) *maintain or enhance amenity, social, intrinsic, ecological and cultural values, landscapes of cultural significance to Tangata Whenua and coastal dune systems;*
b) *maintain or enhance public access;*

This assessment considers these matters, noting:

- The proposed farm area is outside Rakiura National Park and the Outstanding Natural Landscape and important navigation routes; and
- The proposed farm area sits within the Coastal Marine Area; and
- The proposed farm area and proposed farm, through design, aims to maintain amenity values and maintain public access by also enhancing navigation; and
- The application is not intended to provide for public recreation or tourism benefits, but that there may be some positive navigational safety outcomes from the Aids to Navigation (AtoN) in and around the site.

3.4 Environment Southland Regional Coastal Plan 2014

The Southland Regional Coastal Plan contains a suite of objectives and policies that directly address the relationship between marine farming (aquaculture), recreation, amenity values, and public access in the coastal marine area (CMA).

Amenity and Recreation Values

Objective 5.3.1 requires that use and development in the CMA, including marine farms, must not have significant adverse effects on amenity values, public safety, or the public's enjoyment of the coast. This objective is aligned with Policy 3.1.1 of the NZ Coastal Policy Statement and underlines the importance of protecting open space and safety as key components of amenity (s.5.3.1).

Objective 5.3.3 and Policy 5.3.2 specifically recognise, maintain, and enhance the contribution of open space to amenity values in the coastal environment. These provisions highlight that open space and coherent coastal panoramas are essential for public enjoyment (s.5.3.3, Policy 5.3.2). Specific to Policy 5.3.1.[2] *"Protect amenity values of the coastal marine area",* noting that each activity (including marine farming) will be assessed on its merits, with a higher level of scrutiny in unmodified or high-amenity areas. Where amenity is high and an activity detracts from it, there will be less acceptance of change.

HAP has been carefully designed and located to ensure it does not result in significant adverse effects on amenity values, public safety, or public enjoyment of the coast in

accordance with Objective 5.3.1. The farm's layout minimises visual intrusion as noted in Mr. Coombs Landscape Assessment, and navigational safety has been addressed through expert assessment and the implementation of appropriate Aids to Navigation. Public safety is further supported by clear demarcation and compliance with maritime safety standards. In reference to Objective 5.3.3 & Policy 5.3.2, the proposed farm is sited to avoid areas of high recreational use and is configured to preserve the sense of open space and coastal panoramas valued by the public. This relates directly. To *"maintain and enhance open space values of the coastal marine area"*. The design ensures that the majority or all of the coastline remains open and accessible, maintaining the character and enjoyment of the area.

A comprehensive assessment of the site confirms that the proposed location is not within an area classified as high amenity or unmodified natural character. The proposed Hananui aquaculture site is situated within Te Ara a Kiwa (Foveaux Strait), an area of significant cultural, historical, and spiritual importance to Ngāi Tahu ki Murihiku. It forms part of the Ngāi Tahu takiwā where ahi kā, manawhenua, and manamoana have been maintained for centuries, with these connections formally recognised in the Ngāi Tahu Claims Settlement Act 1998. The site supports customary practices such as the gathering of kaimoana, navigation, and the maintenance of ecological and spiritual relationships between land, sea, and people. It also holds recreational and visual value, forming part of established seascapes and traditional travel routes. As per Ngā Hua o Āpiti Hono Tātai Hono (2025), the proposal is considered appropriate for the location, as it aligns with geographical and cultural characteristics, supports aspirations for whānau reconnection, job creation, and intergenerational prosperity, while maintaining environmental integrity.

Additionally, visual simulations outlined in Mr. Coombs assessment demonstrate that the design of the farms ensure that they do not detract from existing amenity values. Where minor effects are identified, mitigation measures such as low-profile infrastructure and sensitive lighting have been incorporated. Further to this, the receiving environment of the farms are already clustered with other marine traffic, including large cargo vessels that anchor in this location waiting to port in Bluff. Therefore, the coastal amenity environment is minimally affected.

Policy 5.3.7 encourages enhancement of amenity values where practicable, especially in areas where amenity has previously been reduced. Where possible, the proposal includes measures to enhance local amenity.

Public Access and Recreation

Objective 5.5.1 seeks to maintain and enhance public access to and along the CMA specifically:

> *"Where appropriate, to maintain and enhance public access by suitable means to and along the coastal marine area"*.

Recognising that access is fundamental to a wide range of recreational activities, including public recreation and tourism, the plan acknowledges that both physical and

visual access are important for public enjoyment, and any restrictions (such as those associated with marine farms) must be carefully considered and justified.

The farm's placement and design ensures public access along the coast is maintained. There are no restrictions on land-based access, and the farm's footprint has been minimised to avoid obstructing popular boating or fishing routes. Visual corridors and physical access for recreational users are preserved, and the size of restricted-access areas minimised to just that required to only that required to ensure passing mariners are protected from hazards.

Marine Farming and Compatibility

Policy 5.3.6 limits activities and structures in the CMA to those with a functional need for that location, those that contribute to amenity, or those necessary for adjoining land activities. Marine farming is recognised as having a functional need to be in the CMA but must still be assessed for its effects on amenity and public use.

As marine farming has a clear functional need to be located in the CMA, the proposal is consistent with this policy. The location of the site does not affect public use of the CMA. As per the plan, zoning and discretionary activity status for the proposed site is not located within an area of high natural character or significant marine ecosystem, in line with the plan's zoning provisions. The ability to experience the natural character of the site and the surrounding area is restricted mainly to the Cargo, Fishing and Passenger vessels that are working in or pass through the Strait. The farm layout minimises spatial and visual impacts by concentrating structures in a compact arrangement and using materials and less prominent colours that blend with the marine environment. This is explored more in Mr. Coombs Landscape and Natural Character Assessment (2025). Although navigation aids and lighting will be present, they have been designed to ensure safety without causing unnecessary light spill or visual disturbance.

3.5 Stewart Island/Rakiura Conservation Management Strategy and Rakiura National Park Management Plan 2012

While Conservation Management Strategies (CMS) and National Park Management Plans are typically produced as separate documents, the Department of Conservation took a combined approach for Rakiura in 2005. Although they remain legally distinct, they have been physically combined into a single publication for ease of reference. The Rakiura National Park Management Plan (NPMP) and Stewart Island/Rakiura Conservation Management Strategy (CMS) outline specific objectives and policies for recreation, amenity, public access, and aquaculture. The relevant provisions are:

Recreation and Amenity

- Objective 1.5.1 (1): *To provide and manage a range of high quality recreational opportunities while ensuring the preservation and protection of natural resources and historical and cultural heritage*[1].

[1] Stewart Island/Rakiura Conservation Management Strategy (CMS), pg. 70

- Objective 1.5.1 (2): *To avoid or otherwise minimise adverse effects of activities on the qualities of peace and natural quiet, solitude, remoteness and wilderness*.

Outlined in more detail in the Recreation Opportunity Spectrum (ROS) section of this report, the proposed farm area sits outside of the area categorised as a remote area on Rakiura/ Stewart Island, but is adjacent to it. The farm is situated far enough from the shore that recreationists participating in terrestrial activities seeking those remote qualities, including those tramping and hunting, will not have those qualities deteriorate.

- Objective 1.5.1 (3): *To work co-operatively with stakeholders and communities of interest to ensure appropriate management of recreational opportunities on public conservation lands and waters*.

Thorough consultation was undertaken with recreation and tourism providers throughout the process of the assessment and application process as outlined in the consultation outcomes section of this report.

- Objective 1.1.4: *To maintain and enhance public access to and within public conservation lands and waters, consistent with the protection of natural and historic resources*.

Policies

- Policy 1.5.1 (2): *Will ensure that the construction of new facilities is in accordance with the outcome sought for each Place and the recreational Opportunity Spectrum as it applies to the Stewart Island/Rakiura CMS area*.
- Policy 1.5.1 (3): *Will use the visitor settings for the Stewart Island/Rakiura CMS area as set out in Table 11 to guide the management of recreational and commercial activities on public conservation land*.
- Policy 1.7.1 (2): *Should encourage applicants to identify how their activities will promote the natural, historical, cultural and/or recreation values of the Stewart Island/Rakiura CMS area whilst avoiding, remedying or mitigating any adverse effects*.

The assessment considers these matters and notes:

- HAP's design does not restrict any public access to and within the conservation land and waters in and around the site.
- The proposed farm area is situated away from designated wilderness and remote recreation zones as identified in the CMS and National Park Management Plan. Operational noise and visual impacts as outlined in Mr. Coombs assessment have been assessed as insignificant due to distance of the farm from public use areas of Murray's Beach and the Northwest Circuit. The use of low-impact aquaculture infrastructure is also noted to be a minimal effect. As noted in Mr. Bermingham navigational assessment, navigational lighting will be minimally visible, unless close to the proposed site.

- The application is not intended to provide for public recreation or tourism benefits, but that there may be some positive navigational safety outcomes from having skilled mariners able to assist mariners in distress.

4 Northwest Coastline

Receiving Environment

The receiving environment around Rakiura/Stewart Island is defined by its remote, open, and rugged marine setting, shaped by strong currents, large waves, and prevailing westerly winds [2]. Te Ara a Kiwa/Foveaux Strait, which separates Rakiura/ Stewart Island from the South Island, is widely recognised as one of New Zealand's most challenging maritime environments, with frequent rough to stormy sea conditions and high winds that can reach gale force and even storm force winds of up to 130km/hr. The strait is approximately 70 nautical miles long and varies in width from 7.5 to 27 nautical miles, with depths generally increasing from east to west.

Te Ara a Kiwa was, and remains, a major ara tawhito (traditional route) and tauranga waka (landing network), providing maritime passage between Bluff (Motupōhue), Ruapuke Island, Rakiura, and outlying islands. The strait continues to support boating, fishing, eco-tour, and educational activities by whānau and iwi members, reflecting modern forms of customary practice grounded in kaitiakitanga[3]. Numerous nohoanga (seasonal camps) and settlements historically existed along this coastline, reinforcing enduring cultural connections with its resources[4]. Ensuring this route is maintained is essential.

For Ngāi Tahu, the relationship between the land and sea around Rakiura is inseparable. The entire landscape, from the maunga Hananui that anchors the island to the expanse of Te Ara a Kiwa (Foveaux Strait), is regarded as a single, living cultural entity in which each feature, reef, and trail carries its own name, story, and purpose[5]. Movement from land to sea and sea to land reflects an enduring rhythm of life, with pathways, fishing grounds, and settlements interlinked through whakapapa and sustained use over generations. Protecting the integrity of views from Hananui and the open, largely undeveloped vista across the Strait is a matter of cultural respect, reflecting Ngāi Tahu's recognition that both the whenua and moana are part of the same continuum of identity and wellbeing[6].

Te Ara a Kiwa is a high-energy, well-flushed marine environment with strong tidal currents (mean current speed 0.56 m/s near the surface) predominantly flowing along a northwest– southeast direction[7]. Water temperatures measured in 2018/2019 and 2025 ranged from 11–15°C, with minimal vertical stratification. The prevailing winds and waves are from the west and northwest, but Rakiura/ Stewart Island's topography provides some shelter to the northern coast, making it relatively more accessible and

[2] Department of Conservation. (2011). Rakiura National Park Management Plan
[3] Cultural Impact Assessment –Ngāi Tahu Seafood: *Hananui Aquaculture Project* (Tipa & Associates, 2020–2025)
[4] Cultural Impact Assessment –Ngāi Tahu Seafood: *Hananui Aquaculture Project* (Tipa & Associates, 2020–2025)
[5] Ngāi Tahu Settlement (1998)-Doug Graham
[6] Cultural Impact Assessment –Ngāi Tahu Seafood: *Hananui Aquaculture Project* (Tipa & Associates, 2020–2025, pg. 42)
[7] Water Column Assessment, SLR, 2025.

protected from the largest wave events compared to other parts of the island. Mean significant wave heights off the northern coast are typically around 1 metre, with maximums reaching approximately 3 metres over a 37-year period, whereas the western entrance to Foveaux Strait can experience mean wave heights of 3.7 metres and waves exceeding 10 metres more than 1% of the time [8].

Despite these extreme conditions, the northern coast of Stewart Island, including the proposed farm area, is considered relatively sheltered. However, the wildness and isolation of the area continue to limit recreational participation for most, while attracting those seeking adventure and solitude.

[8] Gorman, R.M., Bryan, K.R., & Laing, A.K. (2003). Wave Climate of New Zealand. NIWA Science and Technology Series No. 35

5 Recreation attributes of the study

There is no data or assessments that define the significance, at a national level and for all activities, that quantifies the overall significance of the recreation values of Stewart Island, or specific parts of it. There is minimal data for sailing, power boating, swimming, diving and other marine activities. However, several reports, management strategies, and studies provide substantial insight into the recreation values of Rakiura/ Stewart Island, specifically related to the National Park, and specific parts of the island itself, and collectively they highlight its national and regional significance. This section considers the available data which describe the recreation attributes of the study area.

5.1 Terrestrial recreation

Figure 2 shows a section of the Northwest Circuit, the only formed walking track linking the areas near the proposed farm area. The Northwest Circuit is challenging, undulating muddy terrain. Recreationists who tramp this route need to be relatively comfortable in backcountry and remote locations. Figure 3 shows the distance between the proposed farm area and terrestrial areas of publicly accessible land. The closest site is Gull Point, which is not directly accessible by foot (e.g., you would need to bush bash from the Northwest Circuit), just past Bungaree Hut off the Northwest Circuit, with 2.4km of separation. The other closest point is Garden Point, also not accessible by foot, but a rock outreach between Murrays Beach and Christmas Village Hut off the Northwest Circuit, with a 3 km separation.

Figure 2: Section of the Northwest Circuit

DOC also has track counters scattered around Rakiura, which have publicly available data to support the evaluation, including updated track counter information from Sawyers Beach (between Port William and Bungaree Hut). At time of going to print, the latest figures for this track counter were not available online, therefore they were not included at this time.

Figure 3: Walking Access Commission Public Access Area Map-showing distances to Proposed farm area from Northwest Circuit.

Figure 4: View out to the proposed farm area from the Northwest Circuit

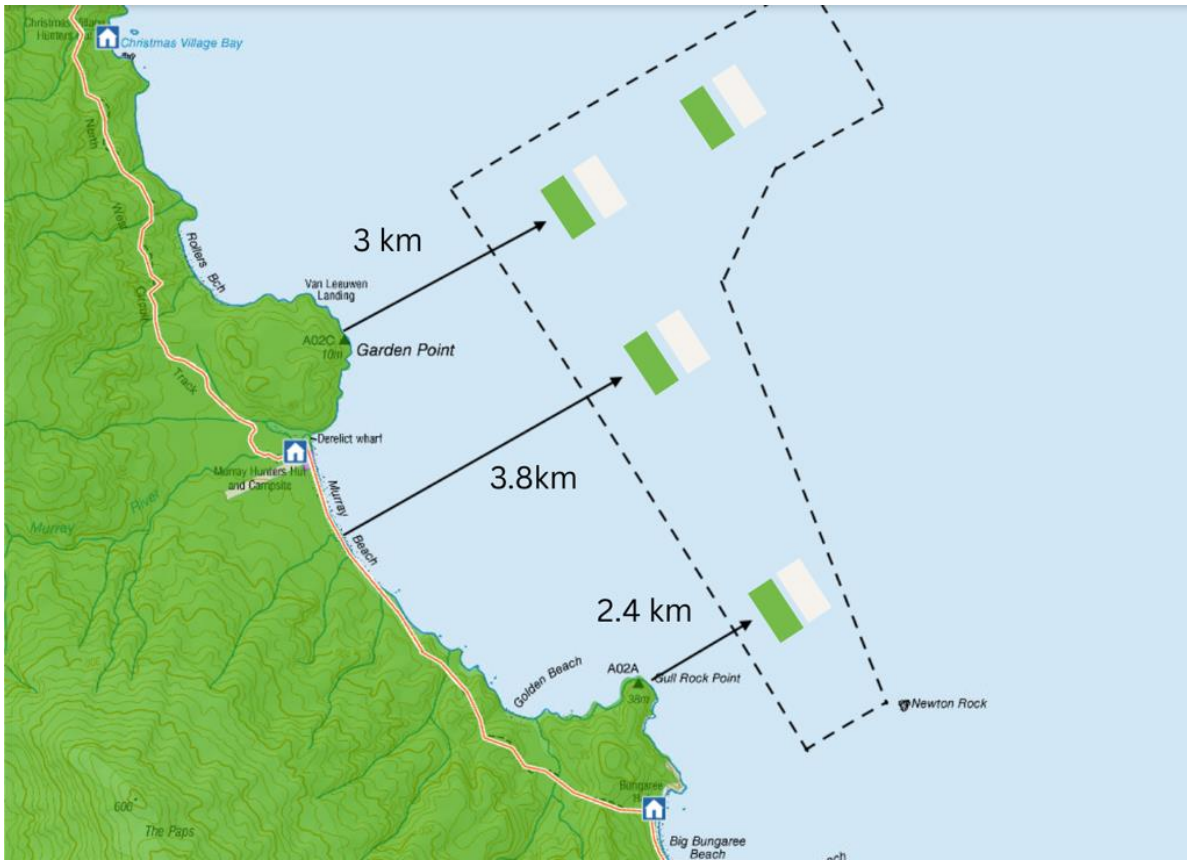


Figure 5: Strava Heatmap of "All Sports" June 24/June25

Mr. Coombs's (2025) landscape and natural character assessment indicates that the perceptual experience of the broad landscape patterns of Te Ara a Kiwa, including the long-distance views and experience from Rakiura and Te Ara a Kiwa back towards Motupōhue/Bluff, the southern coast of Murihiku, Ruapuke Island and the Tītī Islands will remain the dominant scale and experience of the strait while undertaking recreational activities. The HAP will be a small feature within that overall landscape composition and will only be experienced from localised parts of the strait, close to the Northwestern coastline of Rakiura/. The rest of the landscape pattern and experience will be largely unaffected[9].

Figure 5 shows the Strava heatmap for 'all sports" in Rakiura/ Stewart Island for the last 12 months (effectively June 2024-June 2025). Strava is a social media platform that utilises GPS data from users' smartphones and other devices, which is then uploaded to a central database. It enables individuals to track their performance, compare speed and time with other athletes performing the same activity, and monitor personal activity or training goals. While Strava is widely used by professional athletes, the majority of its users are recreational participants. As of early 2020, Strava reported having 50 million users worldwide, 80% of whom were outside the United States, with an additional million joining each month. The platform has since become particularly popular among regular cyclists and runners.

Comparisons between different data collection methods indicate that Strava data is relatively reliable, with 1% to 12% of on-site users also recorded on the platform, a figure

[9] Landscape and Natural Character Assessment, Isthmus, 2025, pg 68

that continues to grow. However, caution is needed when interpreting Strava data, as it reflects participation only among its members. This creates a bias toward more competitive and tech-savvy users, and some data may be skewed by users who remain logged in while engaging in other activities, such as driving. Additionally, GPS inaccuracies or map projection errors can cause location offsets by several meters, though most records are correctly positioned.

Heatmaps indicate the cumulative activity of Strava subscribers in any setting. The brighter the colour, the more activity there. Figure 3 indicates the Northwest Circuit connecting Port William to Mt Anglem/Hananui, through Murrays Beach which is visible from the proposed farm area. The "All Sports" option on Strava lets you record both terrestrial and water-based recreation. As Figure 5 illustrates, the only recorded recreation near the proposed farm area is terrestrial. This does not mean that water-based recreation like kayaking and swimming is not occurring, but people are not regularly recording it through the app. Recreational sailing, boating and fishing activities are reviewed in later sections.

5.2 Hunting

Recreational hunting on Rakiura/ Stewart Island is a long-established and highly valued activity, drawing hunters from across New Zealand and beyond for its unique wilderness experience challenge. The island is divided into 35 restricted hunting blocks managed by the Department of Conservation (DOC), which are bookable online for exclusive use by hunting parties, as well as an open hunting area covering much of the island's interior and some coastal sections. Figure 6 illustrates the hunting blocks across the island.

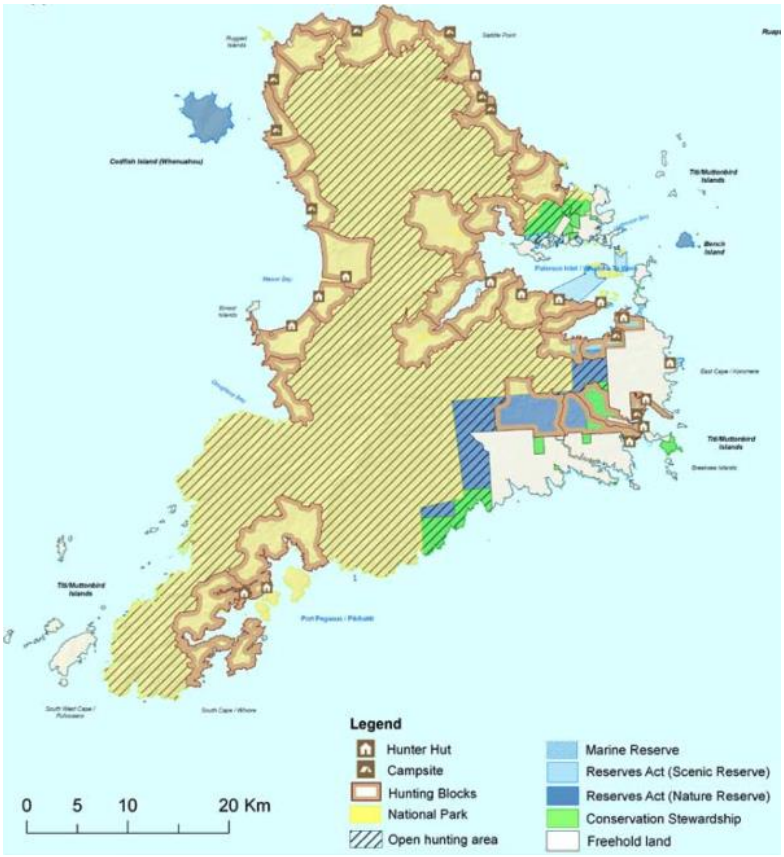


Figure 6: Recreational hunting blocks on public conservation land in the Stewart Island/Rakiura CMS area

Figure 7: Recreational facilities in the Rakiura/ Stewart Island CMS area (north)

In addition, there are 12 hunting blocks managed by the Rakiura Māori Land Trust, which require separate permits (DOC, 2012). The hunting blocks are distributed around the entire island, with many concentrated along the coastline and several specifically on the northwest coast, including Christmas, Rollers, Murrays, and Bungaree. Figure 7 illustrates all of the recreational facilities across the North part of Rakiura/ Stewart Island. There are 5 accommodation options near the HAP. Access to these blocks is typically by boat, water taxi, or air (fixed-wing or helicopter), as there is no road network outside Oban township or nearby bays.

Studies highlight the significance of hunting on Rakiura/ Stewart Island, both as a recreational activity and as a means of managing deer populations. In 2023, the Game Animal Council survey reported that around 2,500 hunters visit the island each year, harvesting over 1,000 white-tailed deer annually [10]. The survey also emphasised hunting's important role in food gathering, recreation, and as an economic contributor to the local community. Reis (2008) investigated interactions between hunters and trampers, noting that while occasional tensions arise, particularly regarding shared use of huts and tracks, these conflicts are generally minor and manageable [11]. In summary, the proposed farm area is adjacent to several hunting blocks along the Northwest Circuit,

[10] McIver.A., Barr.H., DeLury.J. (2009), Rakiura NPMP & Stewart Island CMS - Whitetail Deer herd – Request for Section 4 (2) (b) Determination. Southland Branch NZDA

[11] Reis, A. C. (2008). An empirical study of visitor conflicts in New Zealand's Southland Conservancy: The case of hunters and trampers on Stewart Island. University of Otago. https://researchportal.scu.edu.au/esploro/outputs/report/An-empirical-study-of-visitor-conflicts/991012821998802368

but it is not expected to adversely affect hunting activities provided that access for drop-offs and pick-ups remains unrestricted. As noted early, HAP will be seeking exclusive occupation around respective farm blocks. The HAP may provide further interest in booking these specific hunting blocks off the Northwest circuit, as many hunting parties also participate in fishing, and may want to visit the HAP site during their stay.

5.3 Marine recreation demand generally

The northern coastal waters of Rakiura/Stewart Island, including the area proposed for the Hananui Aquaculture Project, are part of a deeply significant customary and cultural landscape for Ngāi Tahu ki Murihiku. Key concerns outlined in the cultural impact assessment in relation to recreation included cultural landscape, mauri, mana, and mahinga kai. These waters form a key mahinga kai (food gathering) environment and continue to support customary, recreational, and subsistence uses. As outlined in Tipa & Associates (2021) Cultural Impact Assessment, Many whanau in Murihiku live and work on the sea including:

- Customary fishers;
- Commercial fisherman;
- Tourist operators e.g. caged
- Shark diving;
- Recreational fishing; and
- Titi harvesters[12]

Traditional food species harvested from the wider Te Ara a Kiwa include tuaki (cockles), pāua, tio (oysters), kōura (crayfish), and various finfish such as blue cod, groper, and flounder, along with rimurapa (bull kelp) used for pōhā and food preservation[13]. Seasonal bird and egg harvesting, notably the ongoing tītī (muttonbird) harvest on nearby Tītī Islands and Whenua Hou, remains a cornerstone of cultural practice, identity, and intergenerational continuity[14]. Historic and contemporary fishing grounds throughout this coastal area sustain both customary and community food needs, with the ocean regarded as a living pātaka kai (food store) connecting generations[15].

In regards to recreational fishing, according to the Sport New Zealand (2023) Active New Zealand Survey, fishing was the sixth most popular active leisure activity among New Zealand adults in 2023. The survey found that 19.8% of the adult population were interested in fishing, which includes both freshwater and marine fishing, during that year. Participation was 10.2% of the total population. The survey also reported on other outdoor and water-based activities. Swimming/Diving was ranked ninth and undertaken

[12] Cultural Impact Assessment –Ngāi Tahu Seafood: *Hananui Aquaculture Project* (Tipa & Associates, 2020–2025, pg. 30)
[13] Cultural Impact Assessment –Ngāi Tahu Seafood: *Hananui Aquaculture Project* (Tipa & Associates, 2020–2025)
[14] Cultural Impact Assessment –Ngāi Tahu Seafood: *Hananui Aquaculture Project* (Tipa & Associates, 2020–2025)
[15] *Ngā Hua o Āpiti Hono Tātai Hono: Hananui Aquaculture Application* (Te Ao Mārama Inc, 2025).

by 12% of New Zealand adults in 2023, making it a less common activity compared to fishing, but still notable among active recreation pursuits. Sailing and Yachting ranked 26th with 2.6% participation[16].

Data describing and quantifying recreation values of Rakiura/Stewart Island is provided by the 2020/2021 survey: Departure Card Visitor Survey Rakiura/ Stewart Island (Southland Regional Development Agency). The survey indicated that Stewart Island is considered a nationally important "Bucket List" destination for cultural and recreational reasons, although since the COVID-19 pandemic, this may have changed.

The survey found that the top reason for travel to the Island was as a "Bucket List" destination (27% of visitors), followed by seeing a kiwi/wildlife (19% of visitors) and tramping/walking/hunting (15%). Only 10% of visitors listed their motivation as being related to COVID-19 and associated impacts (e.g., the closure of the international borders, lack of international tourists, domestic marketing campaigns). The majority of

	Home Region:	Auckland	Wellington	Canterbury	Otago	Southland	All
	Number of visitors:[a]	1,219	581	1,035	622	170	**6,538**
Motive for Travel	Bucket List	31%	28%	25%	19%	17%	**27%**
	Walking / Tramping	16%	19%	16%	18%	21%	**15%**
	Nature / Scenery	4%	6%	4%	5%	5%	**5%**
	Seeing a Kiwi / Wildlife	16%	14%	16%	26%	23%	**19%**
	Can't travel overseas, COVID19	8%	12%	13%	6%	15%	**10%**
	Part of a bigger trip	9%	5%	7%	0%	0%	**7%**
	Recommendation	9%	13%	14%	18%	14%	**11%**
	Significant Event (Birthday, Honeymoon)	6%	3%	6%	7%	5%	**7%**

[a] Some respondents did not complete the home region question, so they have been excluded from this breakdown. However, their data will be reflected in the 'All' category.
Percentage shown is percentage of visitors from that region who completed both the motive for travel question and home region question. Where a visitor has listed multiple home regions, if any of the regions above has been included, they have been included in this table.

Table 1: Recorded Visitor Activities on Stewart Island in 2020-2021

visitors to the Island engaged in short walks (63%) and bird watching (50%), highlighting the popularity of nature-based activities. Additionally, guided tours were undertaken by 38% of visitors, indicating a strong interest in learning more about the area through structured experiences. In terms of specific destinations, Te Wharawhara Ulva Island was the most visited site, with 66% of respondents reporting they had explored the pest-free sanctuary. The new Rakiura Museum attracted 41% of visitors, while 35% visited Observation Rock, reflecting a range of interests in both natural and cultural attractions. Respondents for the survey were divided into two groups: New Zealanders and those international visitors. Unsurprisingly, 97% of visitors to Rakiura/ Stewart Island indicated they lived in NZ while the remaining 3% were international visitors, the largest portion from the UK. Table 1 shows the activities that motivated people to travel to the island.

[16] Sport NZ Insights Tool 2023, https://sportnz.org.nz/resources/insights-tool/

From a cultural lens, wāhi taonga, including marine mammals, seabirds, sharks, fish, and other species of cultural significance, as well as key marine fauna that support local recreation and tourism, have been identified as potentially at risk from marine farming activity in this area, noting that the effects of aquaculture on all wāhi taonga species are anticipated to be low, as outlined in the relative assessments. Provided that robust mitigation measures and appropriate consent conditions are fully implemented, to ensure optimal protection across species groups, relevant management plans, such as a Marine Mammal Management Plan, Seabird Management Plan, and Shark Management Plan, have been developed and will be implemented prior to operations. These plans should be led by qualified experts and prepared in direct consultation with mana whenua (Ngā Rūnanga) and the Department of Conservation (DOC).

In summary, general marine activity demand on Rakiura/ Stewart Island remains moderate, with most visitors primarily engaging in nature-based activities such as short walks (63%) and bird watching (50%), while guided tours also attract significant interest (38%) (Southland Regional Development Agency, 2021;). Although fishing is the sixth most popular active leisure activity nationally participated in by 10.2% of adults (Sport New Zealand, 2023), the majority of Rakiura/ Stewart Island visitors are motivated by its status as a "bucket list" destination, opportunities to see wildlife, and tramping or hunting, rather than marine recreation specifically. Only a small proportion of visitors report fishing or other marine activities as their main reason for travel, and survey data confirms that the recreational use of marine resources around Rakiura/ Stewart Island is modest compared to its terrestrial attractions[17].

5.4 Fishing (Recreational and for Tourism)

Commercial fishing has long been practiced around Stewart Island as a significant economic activity, with commercial fishing enterprises established as early as the 1900s [18]. The increase in recreational fishing as a tourism endeavour has increased since the early 2000s and is probably the most common form of recreation undertaken in the either in association with other activities or as a single focus on Rakiura/ Stewart Island. Carbines (1998) first undertook a localised diary survey over six years (1993–1998), focusing on recreational fishers in Paterson Inlet. Participants recorded details of their fishing trips, including effort, catch, and locations, with a primary emphasis on scallops and pāua, but also collecting data on blue cod and rock lobster. The study calculated catch per unit effort (CPUE) and retention rates (the proportion of fish kept) for key species [19].

Scallops

Key findings from Carbines (1998) included CPUE fluctuations and stock depletion. Following the 1993 ban on dredging, scallop CPUE increased from 15.5 to 45.5 scallops

[17] Southland Regional Development Agency, 2021

[18] Carl Walrond, 'Stewart Island/Rakiura', Te Ara - the Encyclopedia of New Zealand, http://www.TeAra.govt.nz/en/stewart-islandrakiura (accessed 9 June 2025)

[19] Carbines, Glenn. D. (1998). *Estimation of recreational catch and effort in Paterson Inlet from a diary survey.* (p. 41). Ministry of Fisheries.

per hour between 1993 and 1996, suggesting an initial recovery. However, by 1998, CPUE had dropped sharply to 16.7 scallops per hour, indicating a collapse in the fishery despite ongoing dredging restrictions. Supplementary dive surveys in subsequent years (e.g., 2003) confirmed a dramatic decline in scallop densities, with only 43 scallops found across 17 sites in Paterson Inlet, and just 11 above the legal size. Formerly productive beds around Ulva Island and Sawdust Bay were severely depleted.

Blue Cod Retention and Catch
The retention rate for blue cod in Paterson Inlet was 45%, compared to 76–94% in more remote Rakiura/ Stewart Island areas. This lower retention rate in the inlet suggests higher fishing pressure and a prevalence of smaller fish in more accessible locations. The findings highlighted the need for area-specific management strategies, such as size limits or catch restrictions, to protect blue cod stocks in high-use areas.

Paua and Rock Lobster
Hand-gathering of pāua was common in Paterson Inlet, with stable but relatively low catch rates. Retention rates were high (94%) for rock lobster, though spatial data were limited. James et al. (2003) yearlong study between 2002-2003 built on Carbines initial study of Petersons inlet.

In 2003 James et al. and NIWA conducted an expanded survey encompassing the entire Rakiura/ Stewart Island coastline, employing a combination of diary surveys, aerial surveys, and exit questionnaires. The survey employed a combination of exit questionnaires at ferry and airline terminals, diary logbooks maintained by charter operators and frequent private fishers, and aerial surveys conducted on days of high fishing effort. Their findings corroborated those of Carbines (1998), particularly regarding localised depletion in accessible areas and the relative health of stocks in remote regions [20].

Aspect	Carbines (1998) – Paterson Inlet Focus	James et al. (2003) – Island-wide Survey
Scope	Paterson Inlet, scallops and blue cod	Entire Stewart Island, all major species
Blue Cod Retention	45% in Paterson Inlet, 76–94% in remote areas	Retention increases with remoteness
Scallop Trends	CPUE spike post-dredging ban, then collapse	Continued scallop scarcity, no recovery observed
Methods	Diary surveys, dive sampling	Diaries, aerial surveys, exit questionnaires

Table 2: Summary of Research

The survey found that bottom lining (rod and line fishing) was the most common method, with blue cod fishing overwhelmingly the primary target and catch-comprising 86% of the

[20] James, G. D., Unwin, M. J., & Carbines, G. (2004). *Survey of recreational fishing in Stewart Island* (p. 27). NIWA.

bottom-line catch. Other methods included potting for blue cod and rock lobster, dredging for oysters, set netting for butterfish, moki, and sand flounder, hand gathering of pāua and mussels, and diving for scallops and rock lobster. Most recreational fishing activity was concentrated along the central eastern coast of Stewart Island, particularly in more accessible areas near Halfmoon Bay and Paterson Inlet.

A survey of the Southland Recreation Blue Cod Fishery by Davey & Hartiill (NIWA, 2011) in 2009-2010 found that recreational blue cod fishery around Stewart Island and Foveaux Strait to be highly concentrated in accessible inshore and nearshore zones, particularly near Halfmoon Bay, Port William, and Paterson Inlet. The report recorded that blue cod comprised more than 80 percent of the total recreational harvest across all fishing platforms, with most effort directed at hook-and-line fishing from trailered boats and charter vessels. The average harvest rate (HPUE) from trailer boats was approximately 4 fish per hour, but catch rates varied widely between subareas: Port William recorded the highest at 9.3 fish per hour, while Paterson Inlet had significantly lower yields of around 0.4–0.7 fish per hour. Charter vessel effort was similarly dominated by blue cod, accounting for nearly 90 percent of total targeted fishing time, with a mean HPUE of 2.1 fish per hour.

Fishing effort was heavily localised, with most trips undertaken by residents from Southland or Stewart Island itself. Around the island, effort was focused on northern and northeastern waters, whereas the western and southern coasts were seldom fished due to distance and exposure. Patterns indicated potential for localised depletion, particularly in frequently accessed areas such as Halfmoon Bay and Paterson Inlet. The results also align with earlier Stewart Island surveys (James et al., 2004; Boyd & Reilly, 2005), which identified strong blue cod dominance and declining mean fish size near heavily fished access points. Collectively, these findings show that recreational blue cod harvests are both intense and spatially concentrated near key access areas, albeit away from the proposed site for HAP.

For the northwest coast and the proposed farm area, specifically the stretch from Port William to Christmas Village accessible from the site, the survey found that this area had significantly less recreational fishing activity compared to the central and eastern coasts. The aerial survey and questionnaire data showed that fishing effort was minimal in the more remote northern and northwestern coastal zones, including the area from Port William to Christmas Village. This is likely due to the challenging access, as these locations are primarily reached by multi-day tramping (such as via the Northwest Circuit track) or by water taxi and are not as frequented by day visitors or charter vessels. Anecdotal accounts from trampers confirm that while fishing is possible from the rocky shores and beaches in these areas, the thick kelp and rugged coastline make surfcasting challenging, and fishing activity tends to be opportunistic and low in intensity.

The Ministry of Primary Industries and Fisheries NZ requires all Charter boats and recreational vessels to submit catch records, where, when and what they are pulling from the sea. Figure 8 shows the proposed farm area and the CMA in relation to amateur charter vessel events from 2018-2019 to 2023-2024. As the grid colours show, there were minimal events within the proposed farm area, with the majority of recordings being

between 6-36. In regards the proposed farm area itself, it is within a blue-water setting[21] not one of the more commonly accessed inshore fishing spots, and more of a thoroughfare to access the saddle or Port William, but may still form part of this wider fishing opportunity. However, the data indicate that recreation fishing activity is very sparse in and near the proposed farm area.

5.5 A note for fishing data

Beginning in 2019, all commercial fishing vessels became required to electronically report their catch, including the precise location coordinates of each fishing event. Prior to 2019, reporting practices varied by fishing method and spatial scale: trawling and some set netting were documented by location, at least for the start of the event, whereas methods such as oyster dredging, pāua diving, and rock lobster or cod potting were only reported at the broader level of fisheries statistical areas. [22]

The age of the available recreational fishing data specific to Rakiura/ Stewart Island is dated, and up to date information and studies on fish and fishing patterns for Rakiura/ Stewart Island is unavailable. The most recent MPI reports, the National Panel Survey of Marine Recreational Fishers (2011/2012[23], 2017/2018[24], and 2022/2023[25] Recreational Fishing Harvest Estimates) omit Stewart Island and Great Barrier Island from their surveys. Furthermore, as stated early, many hunting parties who reserve the hunting blocks off of the Northwest circuit closest to the application site commonly undertake fishing and diving activities from the huts around Rakiura/ Stewart island . While there is limited discernible data on recreational fishing effort of these parties, anecdotal evidence supported by stakeholder engagement suggests that recreational fishing activity has increased in both popularity and intensity since the time these reports were prepared on Rakiura/ Stewart Island, similar to other areas in NZ.

[21] Taylor (1993). *Recreation Opportunity Spectrum-Marine Settings* (p.25).

[22] The assessment reviewed a selection of key fishing information documents, studies, and academic papers with relevance to fishing around Rakiura/ Stewart Island. Of the reviewed work listed in the references, many surveys conducted by the National Panel of Marine Recreational Fishers excluded Stewart Island from their survey results, therefore the information was not included in the assessment.

[23] Holdsworth, J. C., Sneyd, E., & Hartill, B. W. (2014). *National panel survey of marine recreational fishers, 2011–12: Harvest estimates* (Fisheries Assessment Report No. 2014/67). Ministry for Primary Industries. https://www.mpi.govt.nz/dmsdocument/4719-FAR-201467-National-Panel-Survey-Of-Marine-Recreational-Fishers-201112-Harvest-Estimates

[24] Wynne-Jones, J., Gray, A., Walton, H., & Hartill, B. (2019). *National panel survey of marine recreational fishers 2017–18: Harvest estimates* (New Zealand Fisheries Assessment Report 2019/24). Fisheries New Zealand, Ministry for Primary Industries. https://www.nzsportfishing.co.nz/wp-content/uploads/2020/06/Recreational-harvest-estimates-2108.pdf

[25] Heinemann, A., & Gray, A. (2024). *National panel survey of marine recreational fishers 2022–2023* (New Zealand Fisheries Assessment Report 2024/51). Fisheries New Zealand, Ministry for Primary Industries. https://www.nzsportfishing.co.nz/wp-content/uploads/2024/10/2024-National-Panel-Survey-of-Marine-Recreational-Fishers-2022-2023.pdf

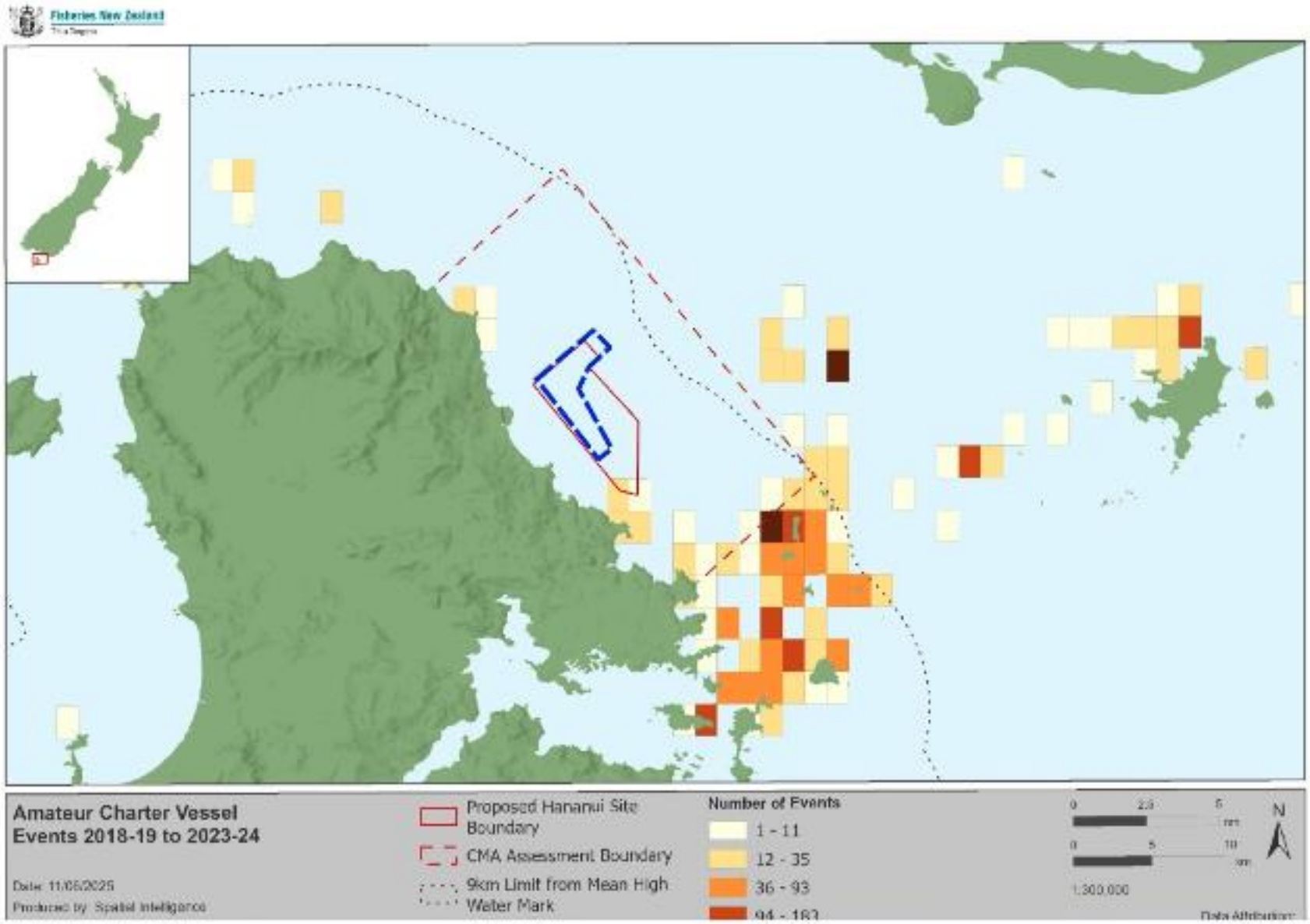


Figure 8: Fisheries New Zealand amateur charter vessel events analysis with Project area overlaid (blue-dashed boundary)

5.6 Boating and Boat Passage

New Zealand boasts several nationally significant recreational boating destinations- such as the Hauraki Gulf, Bay of Islands, Coromandel Peninsula, Abel Tasman, and Marlborough Sounds. Rakiura/ Stewart Island stands apart as a more remote and challenging setting for boating. In the South Island, easy cruising is largely confined to the sheltered waters of Abel Tasman and Marlborough Sounds, which are celebrated for their popularity, multitude of anchorages, and subject to suitable skills, relatively manageable conditions. In contrast, Rakiura/ Stewart Island, along with Banks Peninsula and the Westcoast of the South Island, is recognised for its rugged beauty and unique qualities but presents more demanding conditions for mariners, including exposed coastlines and rapidly changing weather.

Allen et al (2010) identifies the location of boating clubs as a proxy for identifying likely boating grounds. Caution needs to be applied to this approach as some clubs focus on small dinghy sailing, some have good numbers, and others quite small memberships. Allen et al (2010) also omits many clubs from their review.

While AIS transmitters have only begun to be fitted to recreational boats, the tracks that are recorded offer a useful indication of the recreational activity and tracking of the better equipped boats - particularly those prepared to venture out to sea. An AIS is an Automatic Identification System mounted on a vessel which receives AIS positional and identity signals transmitted by other craft and, for more capable units, also transmits a similar signal. This may include things such as name, size and type – as well as its speed and heading, via VHF radio signal and, when capable, by satellite. It also receives the same data from other vessels via VHF and can track their courses and in some cases can warn of collisions. Some navigation buoys or hazards also transmit an AIS signal (or it is transmitted virtually from another location) and appear live on digital charts where they interface with an AIS receiver.

Shore-based VHF receiving stations can automatically transfer VHF AIS data (a well-recognised one being Marine Traffic[26]). There is one coastal receiver on Rakiura/ Stewart Island, in Oban, and so any local vessel with a VHF or satellite AIS transmission system in Rakiura may be recorded and made available by AIS tracking companies. While AIS is required to be fitted and working on medium and large commercial vessels, there are no available data about the uptake of AIS systems by pleasure craft in New Zealand. The AIS data therefore provides a full picture of commercial boating traffic, and a sample of recreational boating activity, much in the same manner as a sample applied in a social survey. AIS essentially gives an indication of where recreational boating activity occurs and the relative level of that activity where and how they recreate. Its greatest strength is therefore in showing the relative value of settings for different forms of boating recreation.

[26] www.marinetraffic.com

Certain rules apply to the compulsory use of AIS on commercial vessels, but as noted they are voluntary for pleasure craft (see also Mackenzie 2021). Online AIS data can be filtered by vessel type, such as commercial fishing, pleasure craft, tanker, cargo and passenger vessels, and by vessel size. As noted in the Navigation Assessment (Navigatus, 2025), small, powered craft everywhere typically take the most direct route between two points, unless seeking shelter or adjusting for wave conditions. Figure 9 illustrates the AIS heatmap for vessels classified as "Pleasure". The data illustrates the typical transits of recreational craft in the area of the proposed farm that most pleasure boats use the most direct route. The proposed farm area has minimal pleasure craft transits routes as show in the yellow rectangle, confirming the areas low visitation from recreational vessels.

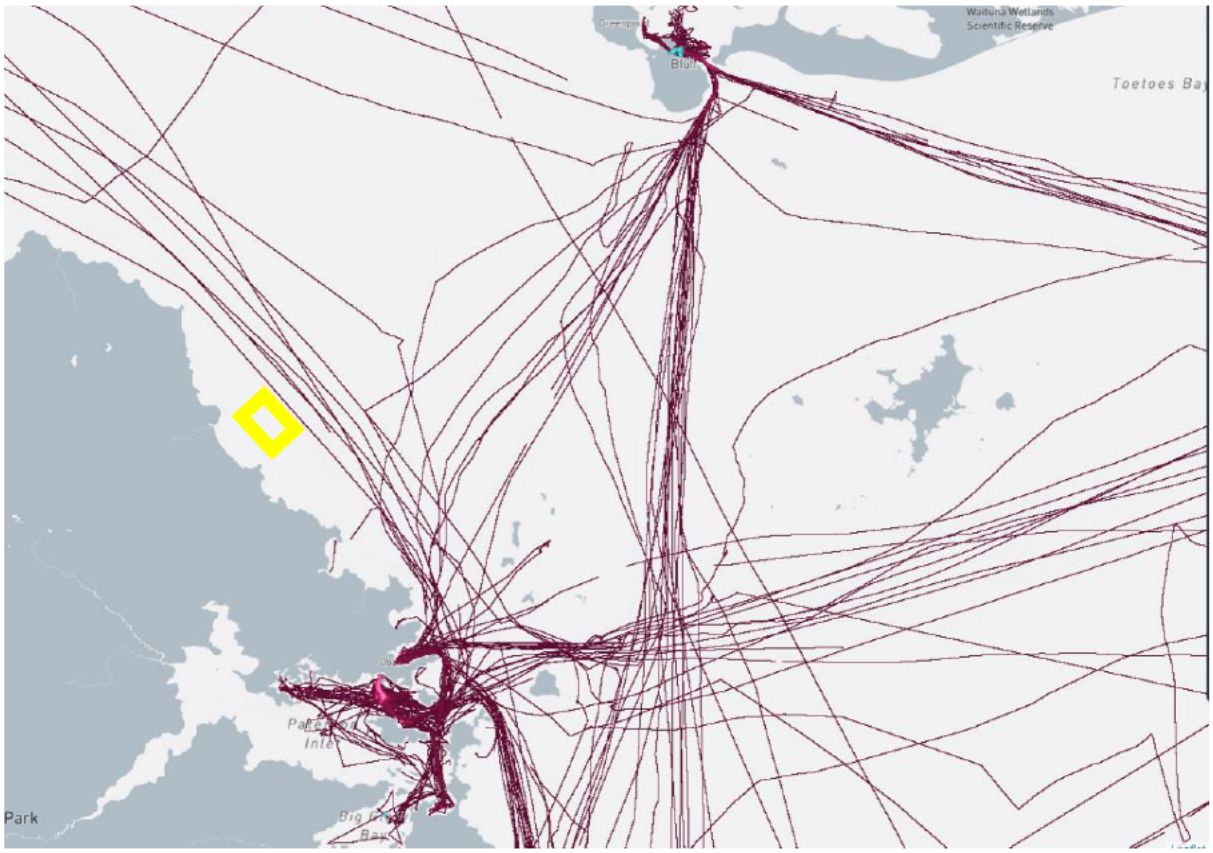


Figure 9: AIS Heat map for "Pleasure" vessels with yellow box for proposed farm location (2025)

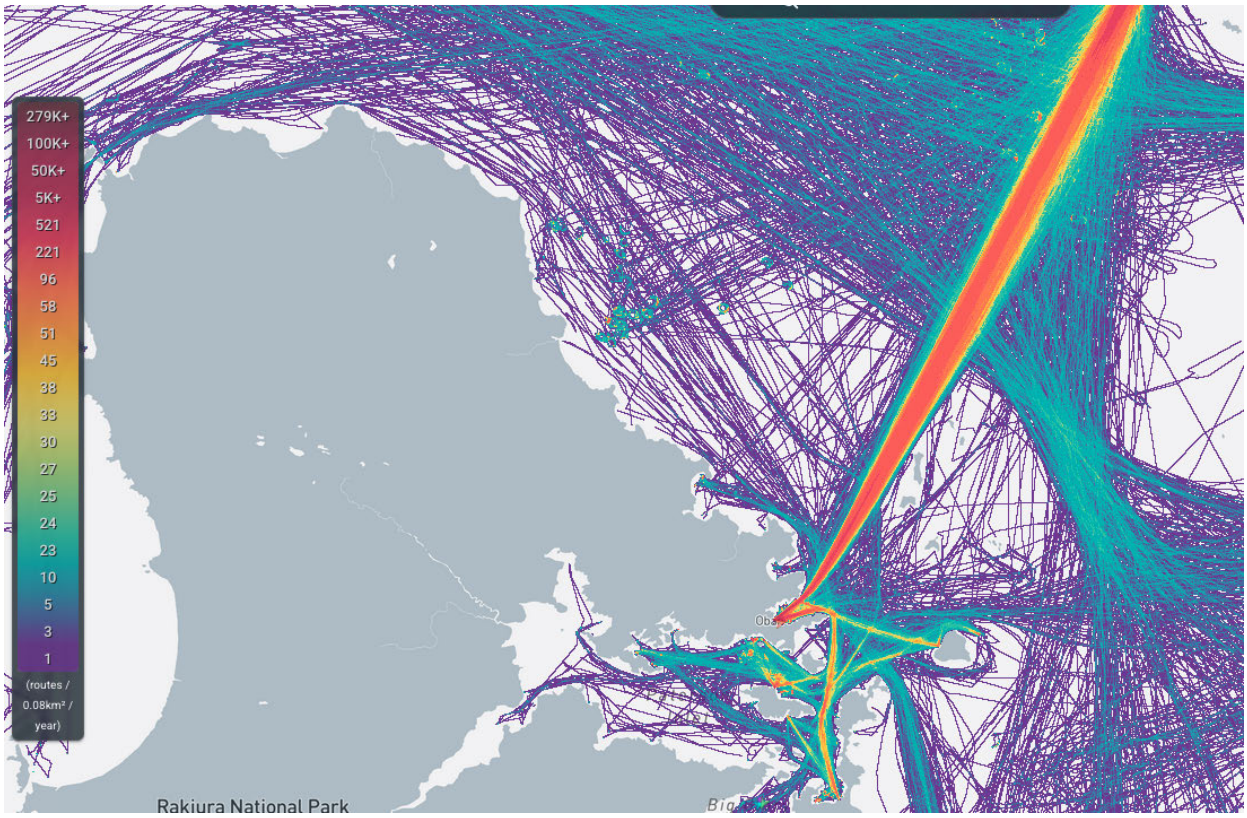


Figure 10: AIS Heat map for all vessel types

This AIS data indicate that the proposed farm area is outside the main transit routes as illustrated in Figure 10 (mostly between Bluff and Oban/Halfmoon Bay and Patersons Inlet), but within routes taken around the island. For specific vessel data points "at anchor" near the proposed farming area (2024) and AIS datapoints for vessels captured at <1 knot in and near proposed marine farming area (2017-2019) see figure 6.2 and figure 6.3 in the Navigation Assessment (Navigatus, 2025).As illustrated in Figure 11, on our site visit you could clearly see the large cargo vessels sitting near the proposed farm area. Bluff Hill and the wind farm were also visible from this area. Most recreation vessels transiting near Murray's Beach will avoid the proposed farm area, but those moving between the southern end of the farm near Newtons Rock/Gull Point are likely to require some additional attention to navigation to avoid the sea pens, natural features and attending barges.

For boating and vessel passage, this means Rakiura/ Stewart Island attracts a smaller, more experienced group of recreational boaters who are drawn by its distinctive, less-travelled waters rather than ease of access or abundance of sheltered anchorages. This further limits the number of boats in the water. Paired with the seascape and conditions, the proposed farm area is not a 'destination', but rather a thoroughfare for recreationists to access other coastal areas, or as outlined in the Navigatus report, a waiting bay for larger cargo vessels who are waiting to port in Bluff (Navigatus, 2025).

Sailboats, however, follow less predictable paths as they seek consistent wind and may tack (zigzag) when heading upwind. Across New Zealand, recreational boating skills and local knowledge vary widely, but around Rakiura/ Stewart Island, the isolation and challenging conditions mean recreational users are generally more skilled and knowledgeable about local weather and sea state than elsewhere. This higher

Figure 11: View from Murrays Beach out to the proposed farm area

competency is especially important given the region's exposed waters and rapidly changing weather, as highlighted in local cruising guides and management plans. Navigatus (2025), the navigation safety assessment, provides AIS data for all craft for the immediate surrounds of the proposal area which shows the same activity as presented here.

In 2016, Land Information New Zealand (LINZ) undertook a hydrographic risk assessment of the South Island, identifying the Southland region as experiencing moderate levels of vessel traffic over a 12-month period. This activity includes a wide range of vessel types, with notable peaks during the summer months due to increased cruise ship transits. Additionally, the region supports regular movements by commercial fishing vessels, which contribute to the consistent maritime presence throughout the year. Figure 12 shows the traffic and types of vessel present during the study. The thick green on the map indicates "recreational" vessels. This illustrates that the main route recreational vessels use is transiting from Bluff to Oban, which correlates with the very popular ferry route connecting the mainland to Rakiura/ Stewart Island.

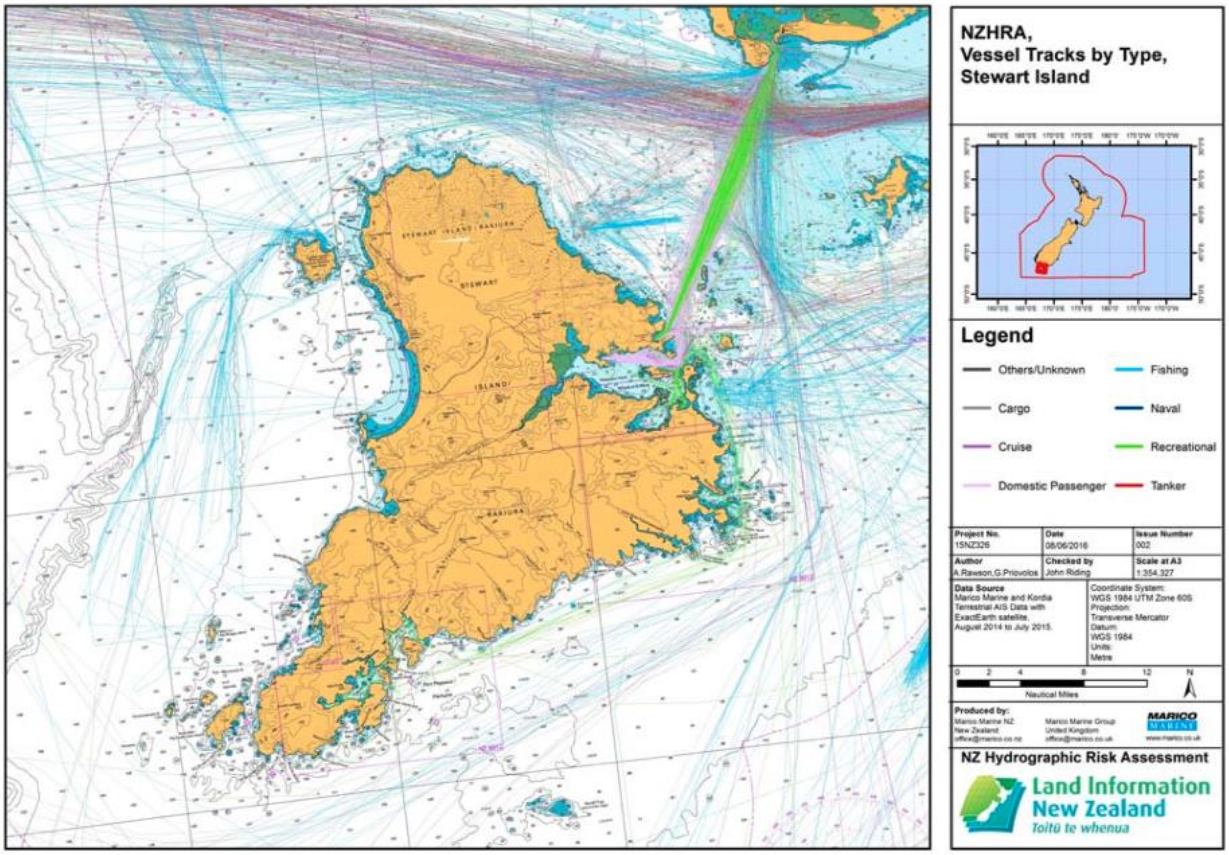


Figure 12: NZHRA Vessel Tracks, All Vessel Types (2016)

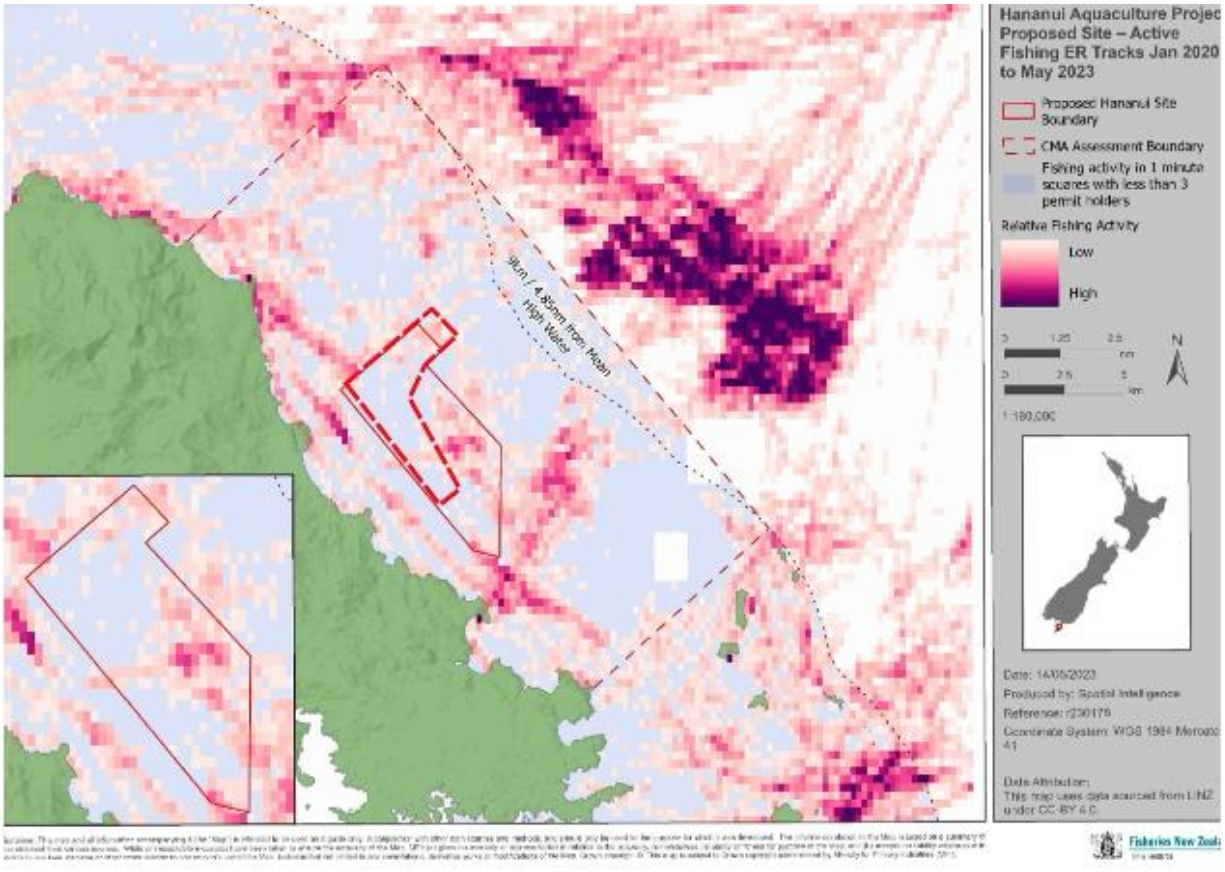


Figure 13: Fisheries New Zealand heatmap for Jan 2020 – May 2023 with proposed farming area outlined in thick, red, dashed line.

Fisheries New Zealand provided NTS with a heatmap of commercial fishing activity in and around the proposed farming area over the period January 2020 through to May 2023. Figure 13 is a heatmap which includes the boundary for a previously proposed marine farming area. This image has been georeferenced to also include the farming area proposed for this Project. Full details of the commercial fishing activity reference Nici Gibbs, Fathom Consulting Ltd (2025).

The island experiences significant domestic passenger movement, primarily due to the regular ferry service. Paterson Inlet is a hub for recreational and tourism activity, with domestic excursion boats frequently operating in the area, as reflected in traffic plots. The inlet also serves as a popular anchorage for cruise ships. Cruise ship activity is concentrated on the east coast of Rakiura/ Stewart Island, with six vessels recorded anchoring in Half Moon Bay (Oban), 15 in Paterson Inlet, and three north of Chew Tobacco Point. We rely on the Navigatus navigation assessment for more detailed cruise ship movements.

In addition to tourism-related traffic, approximately 20 cargo vessels, mainly bulk carriers, anchored off the island's north-east coast at Murray Beach and Saddle Beach, typically while awaiting a berth or cargo assignment in Bluff.

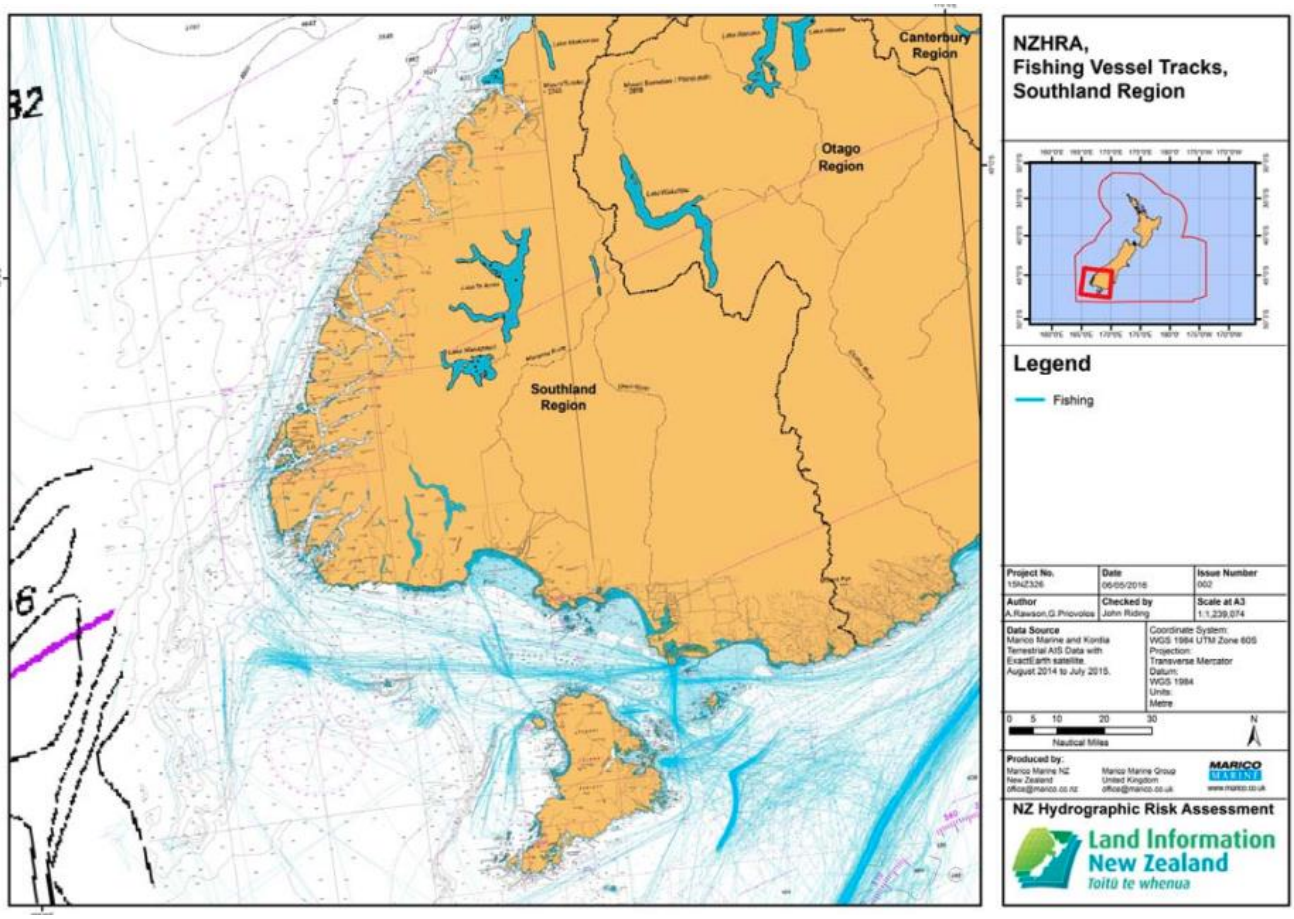


Figure 14: NZHRA Recreational Fishing Vessel Tracks (non-commercial)[27]

[27] Land Information New Zealand (LINZ)- New Zealand hydrographic risk assessment - South Island, pg. 118

Figure 14 shows specifically fishing vessels present throughout the study. Recreational fishing activity in the region primarily involves small trailer boats, with most activity concentrated along the south coast. On fine weather days, up to 12 small vessels may launch from the boat ramp at Bluff Harbour.[28] However, the area's frequently harsh weather conditions are not conducive to high volumes of recreational boating. Fishing and diving are most popular during periods of settled weather. Estimates suggest that 70 to 100 recreational vessels harvested just under half a million Bluff oysters, while the customary catch was approximately a quarter of a million oysters.[29] Recreational and customary pāua fisheries collectively contribute around 10% of the total regional catch, reflecting their ongoing cultural and recreational importance in Southland.

5.7 Diving

The marine environment off the northern coast of Rakiura/ Stewart Island, particularly around the proposed Hananui Aquaculture Project, is characterised by strong tidal flows, sandy and gravel substrates, and depths of 20–40 meters. While the area supports some recreational diving, this is infrequent in the immediate vicinity of the proposed farm sites. The proposed farm area is not a recommended dive site and the strong local currents would make it a difficult setting for this activity. The nearest recommended dive areas Codfish Island (Whenua Hou), Bishop and Clerk Islets, Pegasus area, Lord River area (Allen et al., (2010). Allen et. al (2010) also notes that there is scallop and shellfish gathering along that northwest coastline. Hananui would have no impact on these sites.

Shark cage diving is a popular tourist attraction, an occurs around Edward Island. We rely on NIWA's (2025) detailed Shark Assessment.

5.8 Tourism

Rakiura/ Stewart Island stands as a premier tourism destination, attracting both domestic and international visitors drawn to its unique landscapes and rich natural heritage. The following section of this report provides a focused assessment of tourism activity within or adjacent to the proposed farm area, highlighting key features and the potential impacts.

Northwest Circuit and Adjacent Hunting Blocks/Huts

The primary tourism opportunities closest to the proposed farm area on Rakiura/ Stewart Island are centred around the Northwest Circuit, a challenging 125 km tramping route that loops from Oban around the coast to Mason Bay before returning inland via Freshwater Landing. This multi-day circuit (typically 9–11 days) provides access to a

[28] Land Information New Zealand (LINZ)- New Zealand hydrographic risk assessment - South Island, pg. 118 (8.2.7)
[29] Land Information New Zealand (LINZ)- New Zealand hydrographic risk assessment - South Island, pg. 117 (8.2.6)

series of Department of Conservation (DOC) and Rakiura Hunters Camp Trust (RHCT) huts, which also serve as accommodation for those utilising the adjacent hunting blocks and fishing along the coastline. While the Northwest Circuit and hunting blocks represent the closest land-based tourism activities, water-based tourism is a major component of the Rakiura/ Stewart Island experience. Access to the Northwest Circuit and adjacent hunting blocks is typically via Oban, with routes and activities highly dependent on weather conditions, particularly for water-based tourism. The remoteness and low visitor density of these areas contribute to the appeal, offering a wilderness experience distinct from more developed tourist tracks and attractions elsewhere in New Zealand.

Charter fishing boats offer unique fishing trips departing from Halfmoon Bay, allowing visitors to participate in traditional blue cod fishing, oyster dredging and cray pots. Boat tours and water taxi services are also well-established providing scheduled and custom trips around the island with popular destinations to Paterson Inlet, Ulva Island, Freshwater River. These tours often focus on wildlife viewing, birding, and exploring the island's rugged coastline, offering a perspective of Rakiura/ Stewart Island that is only accessible by water.
The proposed farm area sits offshore from some popular hunting drop off points at Murray's Beach, Christmas Village and Bungaree Hut.

These tourism operations rely to a large extent on the ability to offer a remote experience differentiated from the Great Walk on Rakiura/ Stewart Island.

Areas preferred by fishing charters (often a tourism activity) in Section 5.4.

Stewart Island Flights provides scheduled and custom scenic flights between Invercargill and Rakiura/ Stewart Island, as well as tailored aerial tours over the island's wild landscapes. These flights can be organised to showcase specific areas of interest, including the remote reaches of the Northwest Circuit, and are suitable for those wishing to experience the island's remoteness from above.

5.9 Summary

The Hananui Aquaculture Project proposed farm area is located approximately 3 kilometres north-west of sites frequented by fishing charters and north of the main navigational route boats transiting between Oban and Bluff, but within a less frequently used route between Port William and the Saddle. The proposed farm area forms part of the wider recreation setting offshore from Rakiura/Stewart Island, being a transit site and part of a wide offshore recreation setting which can be used for a variety of low intensity activities, such as fishing and sailing, but the proposed farm area itself does not have any site-specific recreation values. Therefore, the effects on overall recreation and tourism will be low.

6 Consultation Outcomes

Recreation and tourism stakeholders were identified via the literature review and direct contact with known users of the study area. In person and Teams sessions were held with representatives of anglers, including Charter Boat operators, the Department of Conservation, Great South, Yacht Clubs including the Bluff and Otago Yacht Club, Dive South (Diving Club) and other tourism operators. The following stakeholders were interviewed:

- Private/Commercial Fishing and Hunting Charters
    - Bravo Adventure Cruises
    - Loredo Charters
    - Tequila Fishing and Bird Watching
    - Mairiua Fishing Charters
    - Stewart Island Charters
    - Mana Charters
- Diving
    - DiveSouth Fishing and Diving Club
    - Shark Experience
- Sailing and Sea Scouts
    - Bluff Yacht Club
    - Otago Yacht Club
- Water Taxi Services
    - Rakiura Adventure Ltd.
- Bluff Sea Scouts
- Great South
- Department of Conservation
- Terrestrial Recreationists (e.g., hunters and trampers)

Through consultation, the Department of Conservation (DOC) acknowledged the need for the assessment to consider potential effects of the Hananui Aquaculture Project on public recreation, amenity values, and visitor experience, which are outlined through this report. While the Department was not in a position to provide a detailed assessment at this stage, it supplied publicly available data to support the evaluation, including updated track counter information from Sawyers Beach (between Port William and Bungaree Hut). The Department confirmed it does not currently hold information on water-based recreation or boating activities in the vicinity.

The following summaries are taken from information provided by interviewees. All key issues raised and points of agreement and disagreement were as follows. For all detailed summaries from consultation see Appendix 3. The key issues and values identified by stakeholders were:

Private/Commercial Fishing and Hunting Charters

Engagement with local fishing charter and transport operators indicated minimal concern regarding the proposed aquaculture development, provided that current access and operational routes remain unaffected. Interviewees expressed that the primary consideration for their business and clients is continued access to key areas such as Murray's Beach, The Northwest hunters blocks, Murray River, Bungaree and Christmas Village. The proposed farm location is not a primary recreational destination. The area is considered a thoroughfare used to access the coastal hunting blocks, occasionally for transit and there is some blue cod fishing and oyster dredging. It was noted that large cargo vessels often use this area as a main waiting bay for Bluff, and charter companies prefer to take clients around to the Saddle or near Port William.

Some stakeholders had reservations about the visual appearance of the farms, and how they may detract from the "remoteness" of the area for themselves and their clientele. From a landscape and visual perspective, as summarised by Mr. Brad Coombs Landscape and Natural Character assessment, the farm would be barely visible from shore due to its offshore distance, the curvature of the earth, and given the viewing distance and low viewing elevation, the finer and more recessive elements are visible but are visually absorbed by the surrounding environment, either within the wider expansive views of the open strait or against the dark backdrop of Rakiura[30]. There is no anticipated exclusion zone beyond a basic safety buffer, and navigation lighting will be installed to mitigate risks. Overall, both hunters and fisherman agreed that if access was not altered, they did not anticipate any adverse effects to recreation or tourism.

Diving

Dive South, regularly operates at locations such as Codfish Island (Whenua Hou), Bishop and Clerk Islets, and the Pegasus area, but not near the proposed farm area. As the proposed farm development area is situated in a coastal bight, the current dive boat transit routes pass through the area where the farm pens are proposed. However, this area is not a dive destination itself for operators like Dive South. The seafloor at the proposed farm area, as confirmed in the Cawthron assessments, lacks sensitive habitats such as light corals, or areas to dive for pāua and other shellfish, further reducing their appeal for recreational diving.

Tourism shark cage diving is a unique and established activity in the Rakiura/
Stewart Island region, with operations exclusively based at Edwards Island/Motunui. These sites are chosen for their proximity to natural white shark aggregations, largely driven by local pinniped colonies (see shark assessment). The proposed farm area is not used for shark cage diving, nor are they considered suitable destinations for such activity. However, the broader Foveaux Strait area is an important migratory route for sharks, and concerns have been raised by shark cage diving operators about potential negative interactions with sharks due to farm construction or operation. Such impacts could include disturbance or behavioural changes in sharks, which may in turn affect the reliability and sustainability of the shark cage diving tourism business. Specialist shark assessments are relied on.

[30] Landscape and Natural Character Assessment, Isthmus, 2025.

Dive South and other local operators anticipate minimal to minor effects on their activities from the Hananui Aquaculture Project. The proposed farm locations do not overlap with key dive or fishing sites, and transit routes can be managed through navigational planning. For shark cage diving, the key concern is the potential for negative interactions between sharks and farm operations, which could affect shark behaviour and, consequently, the viability of the tourism business. The area is a thoroughfare for sharks, and while the farms are not located at shark diving sites, any disturbance in the strait could have broader ecological and business implications.

Summary

Fishing & Charter Boats
Key Concerns:

- Navigational Hazards: Obstruction of traditional and convenient transit routes, particularly between Bluff and Port William, with increased safety risks in poor weather or low visibility.
- Visual/Amenity Impact: The proposed farm is seen as an "eyesore" that could detract from the wild, pristine seascape and the sense of remoteness valued by recreational and commercial users.
- Access Restrictions: Worries about reduced or complicated access to important fishing and cruising grounds, especially if the farm's infrastructure or service vessels restrict movement.
- Crowding: Increased vessel traffic around the farm site, potentially leading to crowding and diminished experience for recreational sailors.
- Cumulative Effects: Concerns about the precedent set by the development and the potential for further industrialisation of the area, which could degrade its unique character over time.
-

Key Mitigations:

- Maintain Navigational Access: Ensure that the farm design does not impede safe passage for fishing and charter vessels with the proposed AtoN.
- Minimal Lighting: Use of low-impact navigational lighting to preserve the area's natural darkness and sense of remoteness.
- Site Selection: The proposed farm is not located on main fishing or cruising routes, except during rare circumnavigations, thus minimising direct impact on most users.
- Strong Currents: The site's strong tidal flows are expected to help disperse any farm-related waste and reduce environmental impacts.

Diving & Shark Diving
Key Concerns:

- Access and Safety: Need for continued open and safe transit access for dive charters, though the farm site is not a primary dive location.
- Environmental Impacts: Some concern about pollution, but confidence that strong currents will mitigate these effects.
- Shark Behaviour: For shark cage diving, while the farm is not in their operational area, there are concerns about broader ecological impacts, negative interactions with sharks elsewhere in the strait could cause them to avoid the region, affecting tourism.

- Visual Impact: Minimal concern for dive charters, as the farm is not a key dive site and is not expected to be highly visible from popular dive locations.

Key Mitigations:

- Maintain Transit Routes: Ensure that dive charters can continue to transit past the farm site without restriction.
- Environmental Management: Leverage strong currents to disperse waste and minimise pollution risks.
- Partnership and Stewardship: Collaborate with aquaculture operators and conservation groups to ensure sustainable management and shark protection.
- Site Selection: The farm's location avoids key dive and shark cage diving sites, reducing direct operational impacts.

Overall

Key Concerns:

- Visual and Amenity Impact: The farm's visibility from shore and water, especially at night with lighting, could diminish the area's sense of remoteness and natural beauty.
- Access and Navigation: Maintaining unrestricted access to the coastline and anchorages is a priority for all user groups.
- Cumulative Industrialisation: There is a general wariness about the gradual industrialisation of the area and the precedent it may set for future developments.
- Environmental and Ecological Effects: Some stakeholders are concerned about potential pollution and impacts on marine life, though others see the site's strong currents as a mitigating factor.
- Economic and Social Benefits: Some stakeholders, especially local business owners and iwi representatives, see economic and social benefits from the project, provided it is managed responsibly.

Key Mitigations:

- Site Selection: The farm is sited away from main recreational, fishing, and diving areas, minimising direct impacts.
- Design and Lighting: Use of low-impact infrastructure and lighting to preserve the area's natural character.
- Environmental Management: Strong currents at the site help disperse waste and reduce pollution risks.
- Community and Stakeholder Engagement: Ongoing dialogue and partnership with local businesses, iwi, and conservation groups to ensure the project aligns with community values and sustainability goals.
- Access Assurance: Commitment to maintaining access for all users, including hunters, fishers, and tourism operators.

7 The Recreation Opportunity Spectrum

This section considers how 'remote' the study area is as a recreation setting by reference to the internationally accepted recreation planning tool Recreation Opportunity Spectrum (ROS).

7.1 Defining the Recreation Setting

The Recreation Opportunity Spectrum (ROS) is a widely adopted framework in New Zealand recreation planning, originally developed by the US Forest Service. It classifies recreation settings based on physical, social, and managerial attributes to guide the provision of diverse experiences, from urban environments to natural backcountry. In New Zealand, the ROS informs resource management and policy by helping balance recreation access, environmental protection, and user needs. The Department of Conservation uses the ROS and recreation settings in all their National Park Management Plans to help align recreation and visitor management objectives and policies, ensuring that recreation activities are managed sustainably and in a way that protects the natural and cultural values of national parks[31].

The Department of Conservation completed a ROS assessment for Rakiura/Stewart Island to support policy development and overall reserve management in the dual Rakiura/Stewart Island Conservation Management Strategy and Rakiura National Park Management Plan 2011-2021 (CMS/NPMP). This remains the operative CMS/NPMP for the area, and a review of the CMS/NPMP is described by the Department as 'not yet scheduled'.

The ROS uses specific terminology to define the experiences a visitor might expect in different settings: The Department of Conservation ROS for Rakiura/Stewart Island consists of 4 categories:

- *Front country - Where the majority of visitation occurs. Typically small areas, scattered within or on the periphery of large relatively natural areas. Often focused on a particular attraction.*
- *Backcountry- Natural settings generally accessed first through front country. Includes popular walks and tramps set within the body of a large-scale natural setting, and/ or that accesses other settings.*
- *Remote- Large-scale natural settings that are generally well beyond the front- country zones and relatively inaccessible with basic low-use tracks, marked routes and huts.*
- *Wilderness- Extremely remote and pristine areas with no visible human modification, requiring high outdoor skills and self-reliance, offering deep solitude and a sense of discovery.*
    - *Gazetted wilderness; or*
    - *Large natural areas with no facilities; and*
    - *Generally surrounded by remote zones but can be coastal.*

[31] US Forestry Service, https://www.fs.usda.gov/detail/tonto/landmanagement/planning/?cid=stelprdb5412121

Currently, the ROS system is most closely applied by the Department of Conservation, with territorial authorities often adopting a more varied terminology. Appendix 2 presents the recreation setting and experience definitions originally developed by the Department of Conservation for land and marine settings (Taylor, 1993). The 1993 definition is the most explicit and detailed available.

A key challenge arises in reconciling statutory definitions with Recreation Opportunity Spectrum (ROS) classifications. At the time of publication, the Rakiura/Stewart Island NPMP indicated a milestone for gazetting the Southern Wilderness Area in 2015, however, as of the most recent available information, the New Zealand Conservation Authority has instructed the Minister of Conservation to ensure this wilderness area is gazetted, indicating that while the intent and planning are advanced, the formal gazetting process is not yet complete. The Southern Wilderness Area (formerly known as the Pegasus Wilderness Area) is a significant, large, and largely unmodified area in the southern part of Rakiura/ Stewart Island. It has been identified as a priority for wilderness protection in multiple management plans, including the Rakiura National Park Management Plan[32].

The Rakiura/Stewart Island Management Plan 2010 categorises extensive park areas as "remote experience areas" rather than statutory wilderness zones. This distinction reflects legal requirements under Section 14 of the National Parks Act 1980, which reserves "wilderness area" designations for gazetted locations meeting specific preservation criteria.

While visitors often perceive Rakiura's landscapes as wilderness, DOC strictly applies the term only to legislatively recognised areas. The management plan clarifies (p.63) that "wilderness qualities" provide wilderness-like settings through natural character and limited development, but lack the legal protections mandating perpetual non-modification inherent to formal wilderness status

This terminological precision creates comparative challenges:

- "Remote" classifications vary between conservation strategies and park plans
- Visitor expectations of "wilderness experiences" may not align with management frameworks
- Cross-jurisdictional consistency in ROS application becomes complex without standardised legislative anchors.

The majority of Rakiura/ Stewart Island is managed as "Remote Experience Areas" under the ROS, with minimal infrastructure and a strong emphasis on self-reliant recreation. This is particularly evident on the Northwest Circuit, a 125-kilometre tramping route that circumnavigates much of the island's western and northern coastline. The Northwest Circuit is a prime example of a remote recreation setting:

- it is physically demanding, with muddy tracks, challenging weather, and basic Department of Conservation huts spaced along the route.

[32] Department of Conservation, (2010). *Rakiura/Stewart Island Joint CMS and NPMP*. Pg 86, 113.

- There are no booking systems for huts (unless using for hunting blocks), reinforcing the expectation of self-sufficiency and solitude.
- Visitor management on the Circuit is closely aligned with ROS principles, including monitoring of track capacity to prevent crowding, strategies to minimise conflict between trampers and users of air or water taxis, and restrictions on nighttime access to protect sensitive kiwi habitat.

The ROS framework categorises recreation settings from "urban" to "wilderness," ensuring management practices match visitor expectations and area capabilities. For Rakiura/ Stewart Island:

- Wilderness and Remote Zones: Over 85% of the island falls within Rakiura National Park, managed under the NPMP to preserve "remote" and "primitive" ROS settings. These areas, such as the Freshwater River wetlands and granite highlands, offer self-reliant recreation with minimal infrastructure, prioritising ecological integrity and cultural values (e.g., Tītī Islands managed alongside Rakiura Māori)
- Backcountry and Front country Zones: Near Oban township and accessible tracks (e.g., Rakiura Great Walk), facilities like huts and maintained trails cater to moderate-use recreation while retaining natural character. The CMS explicitly avoids overdevelopment in these zones to prevent undermining the island's "exceptionally strong sense of place".

Balancing Statutory Requirements and Visitor Perceptions

While much of Rakiura/ Stewart Island is perceived by visitors as wilderness, the CMS and NPMP apply ROS classifications with statutory precision. For example:

- Legal Wilderness: Areas like Codfish Island/Whenua Hou are strictly managed under the Reserves Act 1977 and National Parks Act 1980 to limit human impact, aligning with ROS's "primitive" category
- Cultural Landscapes: Partnerships with Rakiura Māori ensure ROS designations respect mahinga kai (customary food gathering) and wāhi tapu (sacred sites), blending recreation with kaitiakitanga (guardianship).

The perception and reality of remoteness on Rakiura/ Stewart Island are also shaped by its separation from the South Island by Foveaux Strait. The strait's often rough conditions-characterised by frequent gales and high swells-naturally limit visitor numbers and reinforce the island's low-use, remote status under the ROS. For many visitors, the journey across Foveaux Strait is an integral part of the remote experience, with the island's undeveloped coastline coming into view as a symbol of its isolation. The northern marine areas, visible from the strait, are recognised for their high ecological values, including important seabird and marine habitats, further supporting the ROS goal of maintaining undisturbed settings. In contrast, as experienced on our site visit, areas of perceived remote along the northwest coastline are often diminished by the abundance of cargo vessels, and on a clear calm day, the visibility of Bluff Hill and the wind farm.

The ROS considers several characteristics of a recreation setting, including: experiences, physical setting, level of management input, social setting and activities undertaken. For HAP, the two most relevant characteristics are the physical characteristics of the setting (the degree of naturalness, scale and access) and the

experiences that visitors are likely to have. Visitor experiences are dependent on the quality of the setting, but are subjective in nature and include what are described as "encounter rates" (the number of other people or parties met during a recreation experience) and the degree of independence of participants (or conversely, the ease of access to external assistance). These considerations can readily be translated into a consideration of:

> *"those natural or physical qualities and characteristics of an area that contribute to people's appreciation of its pleasantness, aesthetic coherence, and cultural and recreational attributes",*

- which is the RMA definition for 'amenity values'.

The extent to which a marine farm is perceived as a dominant or simply a noticeable alteration to the landscape depends on how recreational visitors experience the site. Based on the author's observations, marine farms that do not obstruct navigation, are not located near popular recreational anchorages, or do not block scenic views tend to be seen as only a minor element, just another part of the seascape. In contrast, where marine farms are clustered together, as seen in areas like Paterson's Inlet, they become a defining feature of the coastal environment.

Marine farms therefore have the potential to change the physical characteristics of a recreation setting and adversely affect the potential to experience, for example, a remote or wilderness recreation opportunity.

As regards the proposed farm area itself, Appendix 4 shows a detail from the ROS map attached to the CMS/NPMP. The Proposed farm area (in red) is defined as "Remote Blue Water". This puts it beyond the "coastal waters" recreation setting. This supports a conclusion that the proposed farm area is predominantly a location for transit or passage making where a relatively high level of maritime skill is required (a conclusion which is supported by the data presented in Section 7). The consequence of this is that boating encounters with HAP will therefore be infrequent and largely transitory, meaning that the salmon farm will be an apparent feature of the marine environment rather than a dominant one. As a result, effects on recreation opportunities in the study area are likely to be minor or less, and this is discussed further in the following report section.

7.2 Limits of Acceptable Change (LAC Framework)

The LAC framework focuses on defining acceptable wilderness conditions and prescriptive management actions. Four major components include the specification of achievable resource conditions, analysis of existing conditions, identification of necessary management actions, and a monitoring program for evaluation (Stankey et al., 1985). Essentially, LAC is designed to achieve a sustainable balance between environmental and social needs (Diedrich et al., 2011). The LAC process provides a structured framework for wilderness management, emphasising clear objective settings and addressing resource and social condition diversity through three opportunity classes.

When assessing the LAC for recreation for the proposed site, the opportunity setting as outlined in Section 8 are wilderness and remote areas from a terrestrial perspective and remote waters from a water perspective. The expectation is that within the settings recreationists would experience large scale natural areas that are relatively inaccessible, with minimal infrastructure, and potentially no visible human modification. The inclusion of the aquaculture farm does not change the experience from both perspectives. As noted in Mr. Coombs assessment, the ability to see the farm from land would be difficult on a calm day, and where when high winds and ocean seas are large, it would be nearly impossible. Due to the earth's curvature and the shape of the sea's surface, the visible extent of the water surface from sea level is generally limited to around five kilometres when viewed from an average standing eye height of about 1.55 metres above water level. When viewed from higher ground, a greater portion of the sea becomes visible, although fine surface detail diminishes over distance due to atmospheric haze commonly present in coastal environments.

From publicly accessible vantage points on Rakiura's northern coastline, particularly from Big Bungaree Beach through to Christmas Village, sections of the sea surface in the vicinity of the proposed Hananui Aquaculture Project area would be detectable. These viewpoints are already mottled with large cruise ships and cargo vessels, and other recreational shipping vessels. However, visibility of fine detail would remain constrained by distance and prevailing light conditions[33].

From a water-based perspective, the area as illustrated in section X-Boat and Boat Passage, is already visited by fishing vessels, large commercial cargo ships waiting to port, and the occasional recreation vessel. As a result, effects on the acceptable level of change for recreation opportunities in the proposed farm area are likely to be minor or less.

[33] Landscape and Natural Character Assessment, 2025. Isthmus.

8 Findings on effects

This section assesses the effects of the Hananui Aquaculture Project on recreation amenity and access to the marine environment. The proposed farm area is a remote blue-water recreation setting beyond the coastal setting of Rakiura/Stewart Island where the vast majority of marine recreation occurs.

The proposed farm area is not itself a recreation destination (unlike Port Pegasus which is a remote recreation setting, or Patersons Inlet which is a front country recreation setting). However, it occupies a navigational route between Port William and the northern coastline Rakiura/ Stewart Island known as the Saddle. This is an exposed and potentially challenging boating area, and a relatively high degree of competency is expected of skippers, as well as good vessel seaworthiness. The proposed farm is also north-west of Newtons Rock and Bungaree Beach which are fishing destinations, for charter vessels and casual recreational fishing (see stakeholder interviews), and South of Christmas Village. Once again, accessing this location requires a high level of skipper skill.

Therefore, effects are limited to navigation safety, changes to natural character and amenity, and effects on fishing.

8.1 Natural character and amenity

Changes to natural character and amenity from a landscape perspective will affect people navigating and fishing near and within the proposed farm area. Amenity effects (from a landscape perspective) on boats making passage are likely to be minor or less (considering the landscape assessment by Coombs (2025)), as the area is remote and difficult to access, and the introduction of a marine farm does not change this. Much like passing by the mussel farms in the Marlborough Sounds, the boating experience will remain coastal cruising, and for most existing users of the area, any interaction with the new development will be brief and transient. With the pens in place, boats are likely to be attracted to the site for fishing (discussed below) and the landscape of the pens will be part of the experience, as opposed to an effect on it.

For those on fishing charters heading across the Murrays Beach stretch connecting Bungaree to Christmas Village, or anglers heading to Newtons Rock, the experience could be affected by the presence of a marine farm near their destination, an area that was once completely free of structures. Many individuals may have previously enjoyed a sense of venturing into remote and adventurous waters after departing Honeymoon Bay, an atmosphere that could be diminished by visible infrastructure.

However, in this specific case, such an effect is unlikely to be significant. The proposed marine farm site is located more than 3 kilometres from Murrays Beach. Fishing spots will continue to offer a sense of remoteness, thanks to their distance from shore and the exposed, blue water environment. As a result, any negative impacts will be a less than minor effect on navigation (specific to recreation and tourism), access, and amenity,

provided that access to key coastal sites is maintained and navigational safety measures are implemented.

8.2 Fishing

Recreational fishing near the proposed farm site is currently limited, with most activity concentrated in sheltered areas such as Paterson Inlet and the eastern bays of Rakiura/ Stewart Island (Carbines, 1998; James et al., 2004). The Stewart Island/Rakiura Conservation Management Strategy (DOC, 2012) confirms that the high-energy, exposed coastline along the Foveaux Strait-where the farm is proposed-supports only a small proportion of the island's overall recreational fishing effort. James et al., 2004 further indicate that less than 1% of recreational fishing trips occur in the vicinity of Murrays Beach, underscoring the low baseline use of this area by fishers.

A key consideration is whether the introduction of salmon farming infrastructure might attract or displace wild fish, thereby changing fishing opportunities. Research has shown that salmon farms can aggregate wild fish species, sometimes creating new fishing hotspots (Taylor & Dempster, 2021). However, the effect is highly context-dependent, varying with local species composition and environmental conditions. For example, in the Hauraki Gulf, mussel farms have increased the abundance of target species such as snapper, supporting a vibrant charter fishing industry (Sport New Zealand, 2015.). For Rakiura/ Stewart Island, both the Wild Fish Assessment (Taylor & Dempster, 2021) and the Wild Fisheries and Oyster Assessment (Fathom, 2025) suggest that while the proposed salmon farm may attract some species such as trumpeter and blue cod, the overall impact on recreational fishing is likely to be neutral or positive, given the current low level of effort in the area (for more detail on fish assessment see Wild Fish Assessment).

Environmental monitoring and modelling further support the conclusion that the farm will not negatively affect recreational fishing resources. As detailed in the Cawthron assessment on seabed effects, depositional modelling and seabed assessments indicate that organic waste outside the farms primary footprints may disperse up to at least 17km from the proposal boundary area, with minimal risk of benthic degradation beyond this footprint[34]. Water column assessments and hydrodynamic modelling (SLR, 2025) also predict that strong tidal currents in the Foveaux Strait will disperse nutrients rapidly, maintaining water quality suitable for both farmed and wild fish[35].

To ensure that any new fishing opportunities created by the farm do not lead to conflicts or safety risks, technical reports recommend the implementation of specific cardinal markers, navigational aids and lighting around farm and the dissemination of navigational safety information to recreational fishers (Navigatus, 2025).

In summary, according to the findings of Carbines (1998) & James et al., (2004), the available evidence suggests that the proposal is not expected to negatively impact

[34] Seabed Assessment. Cawthron Institute, 2025, pg.8.
[35] Water Column Assessment. SLR, 2025, pg.36.

existing recreational fishing resources and may, in fact, create new opportunities for fishing activity. The offshore remote location, combined with the area's low present fishing effort and robust environmental management measures, means that any changes are likely to be minimal or even beneficial, potentially creating new opportunities for local fishers without displacing established activities (Carbines, 1998; James et al., 2004; DOC, 2012; Cawthron Institute, 2025; Stantec, 2025). However, managing this new activity will require careful attention to navigation safety for recreational vessels operating near the farm pens and mooring cables. Recommended measures include providing targeted education for recreational fishers and promoting safety information through widely used print and online fishing media.

8.3 Navigational study

The prime consideration for recreation is one of navigational safety. This has been assessed by Navigatus (2025) who found that the navigation risks are able to be adequately managed, and the proposed salmon farm may offer clear benefits to mariners navigating the area. The proposed aids to navigation (AtoN) for the Hananui farm development, will follow established practice and regulations and will be recognisable to any competent mariner - in doing so they can be expected to ensure safe navigation.

Recreational Boating and Navigation

Navigatus highlights the importance of properly marking the marine farming area to ensure safe navigation for recreational skippers. With an irregular shape of the development area, careful placement of AtoN is crucial to prevent confusion by mariners. Correct marking and lighting that follow regulatory requirements and established guidance will facilitate safe passage, allowing recreational boaters to navigate without unintended hazards. Because the farm will be situated at a fixed, well-known location and marked with both physical and virtual navigational aids, it will be easily identifiable to vessels in the vicinity. If the boundaries of the farm are appropriately marked, providing a reliable reference point that enhances situational awareness, this will assist to reduce the risk of navigational incidents. Additionally, the farm's location presents an opportunity to install an automatic weather station, the output of which could be broadcast and so deliver real-time, localised weather information to all mariners, including commercial fishers, recreational boaters, and other vessels operating nearby. This improved access to up-to-date meteorological data would further support safe navigation, particularly in an area known for rapidly changing weather conditions.

Fishing Access and Navigation

For recreational fishing, effective AtoN will mark the boundaries around the farming area and indicate the navigational hazard. Notably, the southern cardinal mark is proposed to be positioned so as not to inadvertently funnel boats over Newtons Rock which is important given the nearby Gull Rock is a popular fishing and diving destination. The southern cardinal mark will aid in navigation in and around Gull Rock, a popular fishing

and diving destination. The proper marking of the development area is vital to ensure that fishing boats can access preferred fishing spots without inadvertently encroaching into hazardous areas, thus supporting both safe navigation and continued fishing activities in adjacent waters. The primary and formal mechanism for communicating the location of the farms will be through Notices to Mariners while updates are proliferated via LINZ and associated digital charting platforms. As a supplementary measure, information may also be shared directly with Southland and Otago boating clubs through appropriate online or published media to enhance initial awareness during the update period.

Education In addition to the channels required by regulation, education about the operation of the salmon farm, such as expected workboat movements, staffing arrangements and VHF working channels, will also contribute to safety, and can be carried out at the same time. Such advice will support anglers who are likely to be attracted to fishing near the pens. With these controls and education services in place, effects on navigation as it relates to recreation will be minor or less. Considering the requirement for skippers of recreational and charter craft to have advanced maritime experience and skill if operating in the unique offshore environment, and considering the requirement for skippers of charter craft to be qualified (and that recreational skippers will need to be reasonably experienced to be operating in the area of the of the proposed farm area), their ability to navigate around the pens, in the same manner as for any other marine hazard such as other vessels, must be relied on.

Visual Impact from Shore

As noted in the landscape and natural character report (Isthmus, 2025), the visibility of AtoN from the shore will be minimal, albeit still visible. The lighting characteristics, notably, the northern cardinal mark will feature the most prominent light, visible up to 6 nautical miles, making it particularly conspicuous at night both on the water and from the shoreline. Other cardinal and special mark lights may also be visible from the coast during clear weather. While these navigation aids are essential for safe boat passage and to delineate the farm boundaries for recreational boaters and fishers, their visibility from land means that they could alter the nocturnal coastal landscape, potentially affecting terrestrial recreation and the experience for those enjoying natural nightscapes. Overall, the focused nature of the navigational safety lighting will not adversely affect the night sky and star watching activities at Rakiura.

Navigatus further details that lighting for navigational purposes is good and translates to safe passage. Further, large vessels at anchor, awaiting entrance to Bluff will, as is currently the case, show many more lights and emit considerably greater levels of light than the farm AtoN. Additionally, the lighting of the farms will only be that required by maritime regulation and no additional lighting will be fitted. Overall while some visual impact from lighting will occur, it will be no more than that required to ensure navigational safety. Overall, while some visual impact from lighting will occur, mainly during clear nights, it is intended to be as limited as possible without compromising maritime safety.

9 Conclusion

The Hananui Aquaculture Project is situated in a coastal area that experiences relatively low levels of recreational activity, thereby avoiding significant impacts on recreation values, specifically those related to access to and movement along the coast, as emphasised in key planning documents such as the New Zealand Coastal Policy Statement (NZCPS), Regional Policy Statement (RPS), Environment Southland Regional Coastal Plan (ESRCP), and relevant CMS/National Park Management Plan. There are no established recreation destinations within the proposed farm area itself; the main uses are navigation and passage-making between Port William, Murrays Beach/Christmas Village, and the northern reaches of the Saddle, including routes connecting Bay and Codfish Island. Localised fishing activities, notably for blue cod, occur near rocky reefs such as Newtons Rock.

Navigation through the proposed farm area takes place in a sometimes-exposed coastal area that presents certain challenges for mariners. Skippers are expected to have a high level of competency, and vessels must be seaworthy to safely traverse the region. The proposed salmon farm will introduce an additional navigational feature; however, with careful siting and the use of appropriate aids to navigation, the associated risk is not expected to exceed that of other recognised marine hazards. In fact, the installation of navigational aids may contribute to safety for vessels passing through the area, as confirmed by recent assessments (Navigatus, 2025).

From a landscape and amenity perspective, the presence of the salmon farm is unlikely to significantly alter the remote and open-water character of the area for passing boats or remote experience for terrestrial recreationists such as hikers and hunters. The boating experience will remain largely unchanged, with any interaction with the farm being brief and transient. The tramping experience will also remain largely unchanged, with the potential to see minimally visible farm infrastructure like a feeding barge or pens. Regarding recreational fishing, while the area is sometimes favoured by charter operators targeting blue cod, the farm will be located more than 3 km from Newtons Rock and over 4 km from Christmas Village. This separation helps avoid adverse effects on existing fishing opportunities and may, in fact, create new attractions for anglers.

Environmental assessments (Cawthron, 2025) indicate that the benthic environment within the proposed farm area will not be adversely affected. Additionally, research by Taylor & Dempster (2021) suggests that adult fish may be drawn to the vicinity of the salmon pens, potentially enhancing local fishing prospects. Taken together, and considering the findings of other specialist reviews, the effects of the Hananui Aquaculture Project on recreation and tourism are expected to be no more than minor.

10 References

Allen, W., Elmetri, I., Clarke, S., Gibbons, J., Clark, K., Jiang, W., & Taylor, M. (2009). *Mapping the Values of New Zealand's Coastal Waters. 3. Social Values.* (p. 45). MAF. https://www.google.com/url?sa=t&source=web&rct=j&opi=89978449&url=https://webstatic.niwa.co.nz/library/BNZtp2008-16.pdf&ved=2ahUKEwjY7bHBo-ONAxWfdPUHHaEcD6AQFnoECCUQAQ&usg=AOvVaw2yqCe1VBtj6OTTjOhdMlNg

Bennett, H. et., al. 2025. *Assessment of seabed effects associated with farming salmon offshore of northern Stewart Island / Rakiura*. Cawthron Institute

Bentley, J., & Pfluger, Y. (2019). *Stewart Island/Rakiura Landscape and Coastal Natural Character Study* (p. 79). Environment Southland.

Bermingham. G., (2025). Supplementary Navigational Risk Review Report for Proposed Stewart Island Fish Farm: Prepared for Ngāi Tahu Seafood Ltd by Navigatus Consulting, Auckland, New Zealand

Boyd, R., & Reilly, P. (2005). *National marine recreational fishing survey: Results from the South Island*. Ministry of Fisheries.

Blair, S.-R., & Cain, A. M. (2021). *Ngā Hua o Āpiti Hono Tātai Hono and Stage 1 Āpiti Hono Tātai Hono report*.

Carbines, Glenn. D. (1998). *Estimation of recreational catch and effort in Paterson Inlet from a diary survey.* (p. 41). Ministry of Fisheries.

Coombs, B., (2025). Natural Character, Landscape and Visual Amenity Assessment Effects for Proposed 'Hananui Aquaculture Project' Salmon Farm. Isthmus client report prepared for Ngāi Tahu Seafood Limited.

Davey, N. K. & Hartill, B. (2011). *Survey of the Southland recreational blue cod fishery during the 2009–2010 fishing year.* New Zealand Fisheries Assessment Report 2011/57. Ministry of Fisheries, Wellington.

Diedrich, A., Balaguer Huguet, P., & Tintoré Subirana, J. (2011). Methodology for applying the Limits of Acceptable Change process to the management of recreational boating in the Balearic Islands, Spain (Western Mediterranean). *Ocean & Coastal Management*, *54*(4), 341–351. https://doi.org/10.1016/j.ocecoaman.2010.12.009

DOC. (2012). *Stewart Island/Rakiura Conservation Management Strategy and Rakiura National Park Management Plan* (p. 316) [Management Plan]. Southland Conservancy.

Edwards, J. M. R. (1988). *The impact of sea cage salmon farming on the benthic environment of Big Glory Bay, Stewart Island*. University of Otago. https://ourarchive.otago.ac.nz/esploro/outputs/graduate/The-impact-of-sea-cage-salmon/9926479298901891

Finnucci, B., (2025). *Shark assessment for the proposed fish farm off northern Stweart Island/Rakiura*. NIWA.

Graham, D. (1998, October 16). Ngai Tahu Settlement [Government]. *The Beehive*. https://www.beehive.govt.nz/feature/ngai-tahu-settlement-232

James, G. D., Unwin, M. J., & Carbines, G. (2004). *Survey of recreational fishing in Stewart Island* (p. 27). NIWA.

James, G., Wing, S., & Brown, S. (2004). *Survey of recreational fishing at Stewart Island, 2002–2003*. Ministry of Fisheries.

Marine Industry of New Zealand. 2007. Marine Industry of New Zealand Annual Report for period to 31 December 2007. MIA, Auckland.

Maritime New Zealand. 2007. Boating Safety Strategy - 2007 Review of the New Zealand Pleasure Boat Safety Strategy. MNZ, Auckland.

Macara, G. R. (2010). *The Climate and Weather of Southland.* (p. 44). NIWA.

Michael, K (2020). *Hananui Aquaculture Project: the potential effects of salmon aquaculture on wild oysters (Ostrea chilensis) in Foveaux Strait*. NIWA.

Ministry of Fisheries. (2010). *Fisheries Assessment Plenary: Blue cod (BCO 5)*. Ministry of Fisheries.

Morrisey, D. J., Gibbs, M. M., Pickmere, S. E., & Cole, R. G. (2000). Predicting impacts and recovery of marine-farm sites in Stewart Island, New Zealand, from the Findlay–Watling model. *Aquaculture*, *185*(3), 257–271. https://doi.org/10.1016/S0044-8486(99)00360-9

Rakiura National Park | Stewart Island—Rakiura, New Zealand. (n.d.). Retrieved May 5, 2025, from https://www.newzealand.com/nz/feature/national-parks-rakiura/

Reis, A. C. (2008). An empirical study of visitor conflicts in New Zealand's Southland Conservancy: The case of hunters and trampers on Stewart Island. *University of Otago*. https://researchportal.scu.edu.au/esploro/outputs/report/An-empirical-study-of-visitor-conflicts/991012821998802368

Riding, J., Priovolos, G., & Roberts, J. (2016). *LAND INFORMATION NEW ZEALAND NEW ZEALAND HYDROGRAPHIC RISK ASSESSMENT - SOUTH ISLAND* (p. 162). LINZ. https://www.google.com/url?sa=t&source=web&rct=j&opi=89978449&url=https://www.linz.govt.nz/sites/default/files/doc/hydro_15nz326-c-nzhra-south-island-issue-1.pdf&ved=2ahUKEwiG5fmL052PAxWLEjQIHaGAJXEQFnoECBcQAQ&usg=AOvVaw15OEWbFowXKr0HWLbsCVdb

Ruggedy Range. (n.d.). *Ulva Island, Stewart Island New Zealand » Ruggedy Range™*. Retrieved May 5, 2025, from https://www.ruggedyrange.com/ulva-island/

Simmons, G., & Morgan, G. (2014). *Predator-Free Rakiura: An Economic Appraisal* (p. 52). Morgan Foundation.

Sport New Zealand. (2015). *Sport and Active Recreation Profile: Fishing – Findings from the 2013/14 Active New Zealand Survey* (p. 20). Sport NZ.

Stankey, G. H., Cole, D. N., Lucas, R. C., Peterson, M. E., & Frissell, S. S. (1985). *The Limits of Acceptable Change (LAC) System for Wilderness Planning* (Technical Report INT-176; p. 44). United States Depart of Agriculture and Forestry Service.

Tipa & Associates. (2020). Cultural Impact Assessment for Hananui Aquaculture Project. Prepared on behalf of Te Runanga o Awarau, Te Runanga o Oraka Aparima, Te Runanga o Waihopi and Te Runanga o Hohonui

Taylor, PC. 1993. The New Zealand recreation opportunity spectrum. Guidelines for users. Department of Conservation

Taylor & Dempster., (2021). *A discussion on the effects of salmon farming on the wild fish fauna of an area in Foveaux Strait and management options for avoiding, remedying, and mitigating any adverse effects including proposed methods for monitoring and investigating the impact of deploying a sea pen salmon farm in the area*. Statfishtics. Melbourne University, Australia.

Tourism New Zealand. (n.d.). *Rakiura National Park | Stewart Island—Rakiura, New Zealand*. Retrieved May 5, 2025, from https://www.newzealand.com/nz/feature/national-parks-rakiura/

Wilson, P. 2025. *Water Column Assessment.* SLR.

Zeldis, J., Felsing, M., & Wilson, J. (2006). Limits of acceptable change: A framework for managing marine farming. *Water & Atmosphere*, *14*, 16–17.

11 Appendix 1: Qualifications and Experience

Geoff Canham

My name is Geoff Canham, and I am the Director and Principal Parks and Recreation Specialist at Thrive Spaces and Places. I am an Accredited Parks and Recreation Professional with Recreation Aotearoa (*RA*), and a Certified Parks Professional International with the World Urban Parks Association. I was previously an Associate and Parks and Recreation Project Manager at Opus International Consultants (2006-2013). I have held roles in five local authority parks and recreation agencies, four of them in New Zealand. I was a former Manager of Parks and Leisure for Tauranga City Council, holding a senior position for eight years and for two years prior to that as a Parks and Facilities Officer with Tauranga City Council (1995-2005).

My tertiary and other qualifications (including foreign qualifications) are in horticulture and management, including: National Diploma in Horticulture (RNZIH); Diploma in Horticulture (Massey); British National Certificate in Supervisory Management (Telford College); and a Trade Certificate and Horticultural Apprenticeship (NZTCI). I was the Parks Forum New Zealand representative (2013-2014) and continue as Convenor for the New Zealand Parks Leaders Forum (2013-present). I am an RA Fellow, Chair of the RA Accreditation Board and previously served on the Ministerial Panel for Stewardship Land classification.

I have 41 years' experience in parks agency/ local government parks and recreation within New Zealand, and international experience in parks and recreation leadership, planning and project management. I lead my consulting planning company, Thrive Spaces and Places Ltd, primarily working in recreation and statutory planning.

I have provided recreation evidence for Plan Change 94 (Auckland Council), Plan Change 25 (Tauranga City Council) and for Plan Change 92 (Western Bay of Plenty District Council). I have also provided recreation evidence as a witness in the Environment Court, Hearings and in the High Court for judicial review applications.

Samantha Strong

I am a consultant Recreation and Open Spaces Planner at Thrive Spaces and Places since 2022.

I graduated from Conestoga College with a Diploma in Recreation and Leisure Services Programming in 2011. I graduated from Lincoln University in 2022 with a three-year Bachelor's degree in Sport and Recreation Management (with Distinction), and graduated with a Master's in Parks Management from Lincoln University June 2025.

Between 2011 and 2022 I was a Recreation Programmer across both Canada and Australia, developing and implementing a range of local and regional wide recreation programmes, working in outdoor recreation, tourism, and local government.

I am a published academic, creating a tourism classification framework (TAC Framework) to assess nature-based tourism destinations through adaptive management.

Since 2022, I have been a Recreation and Open Spaces Planner at Thrive Spaces and Places and have undertaken recreation and open spaces planning and management assessments. I have provided open space, recreation and open space provision evidence in district plan changes across New Zealand and completed recreation impact assessments for other consent applications (Auckland, Tasman, Tekapo, Westport, and Tauranga).

12 Appendix 2: Recreation Opportunity Spectrum Definitions

Rakiura/Stewart Island CMS and National Park Management Plan (2011)

SETTING	FRONTCOUNTRY	BACKCOUNTRY	REMOTE	WILDERNESS
1. General description	i) Where the majority of visitation occurs. Typically, small areas, scattered within or on the periphery of large relatively natural areas. ii) Often focused on a particular attraction.	i) Natural settings generally accessed first through front country. ii) Includes popular walks and tramps set within the body of a large-scale natural setting, and/ or that accesses other settings.	i) Large-scale natural settings that are generally well beyond the front-country zones and relatively inaccessible with basic low-use tracks, marked routes and huts.	i) Gazette wilderness; or ii) Large natural areas with no facilities; and iii) Generally surrounded by remote zones but can be coastal.
2. Accessibility	i) Readily accessible areas, usually via roads and/or accessible by water taxis. ii) Tour buses and guided parties. iii) Enabled for people of most ages and abilities.	i) People will have travelled some distance to reach these settings.	i) Typically, four or more hours of travel over land from the front- country. ii) Access supported by aircraft and watercraft to some areas.	i) Generally, requires passing through backcountry and/ or remote to reach boundary, however some areas are accessible by the coast.
3. Facility setting	i) Good quality facilities, services and easy access. ii) Sometimes the origin for tramping tracks and routes, with signs and information to make this transition clear. iii) High degree of control via information and direction signs, and barriers.	i) A range of facility standards, including popular walks and tramping tracks. ii) Evidence of control limited to essential directional signs and barriers on Great Walks and where there are significant hazards.	i) Basic huts, bridges, low-use tracks and marked routes. ii) Evidence of control limited to essential direction signs	i) No facilities
4. Desired visitor experience and interactions	i) Varying, from activities with large groups, some time with small groups/ family, some time away from other groups, and solitude in some cases. ii) Expectation of few to many others depending on location/popularity. iii) Small groups typical and larger groups at popular tourist destinations. iv) Day and overnight visitors.	i) Generally, time away from other groups and, in some cases, solitude. ii) Occasional encounters with organised groups. iii) Generally accepting of occasional intrusion of noise. iii) Backcountry seekers.	i) Reasonable expectation of isolation from sights, sounds and activities of other people. ii) Interaction with few other groups. iii) Considerable self-reliance on backcountry skills. iii) Backcountry and remoteness seekers.	i) Complete isolation from sights, sounds and activities of other people. ii) Maximum interaction with only one other group is generally acceptable. ii)Remoteness seekers.

5. Preferred maximum party size	i) 15 (including guides) generally and for guided parties; 30 for periodic tour parties.[1]	i) 15 (including guides).	i) 9 (including guides).	i) 6.
6. Typical visitor interaction levels	Fewer than 30 people seen per visit duration.	i) 15 or fewer people seen per day for Back Country Adventurer tracks (see part five of the attached Rakiura National Park Management Plan for more information on this user group). ii) 40 or less people seen per day for Back Country Comfort tracks (see part five of the attached Rakiura National Park Management Plan for more information on this user group).	10 or fewer people seen per day.	6 or fewer people seen per visit duration.
7. Concessions operations	i) Concessionaire activity may be permitted in front country, backcountry, and remote settings, subject to conditions to avoid, remedy or mitigate adverse effects including compliance with criteria within this table and the outcomes, objectives and policies for Places within the Stewart Island/Rakiura CMS area. Concessions should not be granted for a gazette wilderness area unless the activity is necessary or desirable for the preservation of the area's indigenous resources and is in conformity with this strategy plan and (where applicable) the Rakiura National Park Management Plan. Concessionaire clients and independent visitors should be managed in a similar manner, unless there is a specified reason for different management. The outcomes, objectives, and policies for Places within the Stewart Island/Rakiura CMS area apply.			
8. Concessions effects management	Avoid, remedy, or mitigate effects by setting conditions.	i) Avoid and mitigate effects as far as possible. Apply hut occupancy criteria as outlined in section 1.7.1 - Authorization's.	i) Concessions activity to be indistinguishable from other activities approved within the Stewart Island/ Rakiura CMS area, for example independent recreational users.	i) Concessions activity to be indistinguishable from other recreational activities. Any such concession needs to be able to demonstrate that it contributes to the preservation of the area's indigenous natural resources. Avoid adverse effects.
9. Aircraft management	i) Aircraft access should not be approved other than in accordance with section 1.5.2 Vehicles (including aircraft).			

Marine Opportunities

Experience					
Urban Waters	**Readily Accessible Waters**			**Remote Waters**	**Wilderness Waters**
	Land/Sea Accessible	**Land Accessible**	**Sea Accessible**		
The probability of experiencing interaction with other groups and individuals is extremely high. While challenge and use of skills may be high, risk will often be reduced and avoidable with assistance readily available should the need arise. The experience is dominated by civilisation.	The probability of experiencing interaction with other users is variable, though quite likely. While challenge and use of skills may be quite significant, the risks will generally be lower than if the same activity were undertaken in a more remote location. Escape back to the safety of civilisation is relatively easy.			The probability of experiencing interaction with others is generally low though not unlikely. The level of challenge, the risk, and use of sea or outdoor skills will be significant. Dependence on group resources will be significant. A largely natural experience.	Outside the participating group there is a very high probability of experiencing complete isolation from the sights, sounds, and activities of humans. There is a high probability of no interaction with other recreation user groups. Users generally either totally reliant on their sea or outdoor skills, or totally dependent on the skills of others. There will be high risk associated with activities due to isolation and dependence on group resources. The environment provides a highly natural experience.
Activities					
Sunbathing Fishing Walking Picnicking Rowing Canoeing Swimming Windsurfing Sailing Sightseeing/Cruising Jetskiing Waterskiing	Sunbathing Fishing Walking Picnicking Swimming Water skiing Sailing/cruising Access to the shore is possible from both landward and seaward.	Sunbathing Fishing Walking Picnicking Swimming Water skiing Sailing/cruising Based on land access only. Sea access (it possible) is through hand-launchable vessels.	Sailing Cruising/boating Diving Fishing Sea kayaking Based on water access only, no vehicle access to coast overland.	Sailing Cruising/boating Diving Fishing Sea kayaking	Sailing Eco cruises Diving All activities will contain a high degree of self-sufficiency and require preparation for one or more days at sea.
Setting					
waterways and adjacent land show high modification, generally including shipping facilities, wharves, beacons, etc, urban development, settlement, seawalls, outfalls, pollution, and resource depletion. High management presence often includes rescue resources. Access is very easy, well-defined, and within close sight and sound of urban environment.	The waterways and/or the adjacent land are readily accessible. Water is commonly plied by runabouts, trailer sailers, and other small vessels. Escape to shelter and civilisation is generally readily available. Modification is apparent but not dominant, with access to some services and facilities available, eg, jetties, ramps, navigation aids. Management presence is often noticeable. Access is good with sailing time/ distance generally less than 1 hr at 5 knots (5 nautical miles) from good shore access, services, facilities, and shelter.			The waterways and adjacent land may show signs of modification. Access between ocean and inland will be very limited. No direct land vehicle access to civilisation. Access to land beyond the coast by foot or by vessel. Coastal modification usually limited to isolated locations. Access between 5 and 30 nautical miles from facilities found in accessible waters.	The waterways and adjacent land very pristine. No signs of human modification, natural hazards unmarked. An exception might be a lighthouse, otherwise the land/seascape appears totally natural, and the abundance and diversity of species is generally very natural. Access is very difficult with sailing time/distance 6 hr at 5 knots (30 nautical miles) from services and facilities, and minimum 12 hr (60 nautical miles) side to side.
	Access readily available from both land and water.	No direct access from water to land. Accessible from land only.	No direct access by vehicle overland. Accessible by sea only.		

Land Physical Characteristics

Urban	Urban Fringe	Rural	Backcountry			Remote	Wilderness
			Drive in	4X4 Drive in	Walk in		
The probability of experiencing and interacting with other groups and individuals is very likely. It is also highly likely that sites, facilities, services and opportunities are convenient, accessible and highly influenced by human activity. The challenge, risk and use of outdoor skills will be relatively unimportant. Purpose built sports grounds and complexes, amusement parks and other highly developed, and/or competitive recreation opportunities, along with the general urban environment will form the bulk of the opportunity. **NATURAL REMNANT** Occurring within urban recreation opportunity will be remnants of the natural environment. This open space parkland, and remnant natural environment offers the chance to experience a little bit of nature in the otherwise urban environment.	The probability of experiencing and interacting with other groups and individuals is highly likely as is the likelihood of encountering convenient sites, facilities and opportunities. The challenge risk and use of outdoor skills will not be particularly important. Experiences involving developed sites, facilities and opportunities such as sports grounds and amusement parks will be less prevalent than in the urban opportunity. **NATURAL REMNANT** The opportunities for experiencing open space and remnant natural environments are likely to be more pronounced than in the adjacent urban environment yet the presence of the urban environment with its associated civilisation invariably permeates this opportunity.	Being primary production land there is a variable but generally moderate to high probability of experiencing interaction with other uses or users, groups and individuals. This may be localised and concentrated. The challenge, risk and use of outdoor skills will not be so important though it may be more prevalent in some activities or at some specific sites. **NATURAL REMNANT** Within natural remnants visitors will be offered a moderate degree of natural environment experience, though the experiences might be quite modified. The sights and sounds of the rural or primary production environment generally pervade. Farming, forestry or hydroelectric generation, for example, are readily apparent and would often surround the area. Natural experience in the rural opportunity may be highly significant if the remnants contain unique or sought after scenic, conservation or recreation values.	The experiences in this opportunity have many human elements but there is an equal probability that users will at times experience isolation from the sights and sounds of humans. There will be good opportunities for interaction with nature. Challenge, risk and the use of outdoor skills will vary considerably depending mainly on activity. There may be good opportunity for learning outdoor skills. **DEVELOPED INCLUSION** These areas will offer experiences that are significantly human influenced and give feelings of still being in civilisation while in a natural environment.		The experiences offered will give the visitor close contact with nature. The interaction with civilization and motorised access in particular will not be highly significant. The general sights and sounds of civilisation will be lower than for drive in. The use of outdoor skills may be important although people relatively inexperienced in the outdoors will often still be able to experience the environment in relative safety with the security of good tracks and shelter readily available.	There is a high probability of experiencing isolation from the sights and sounds of humans, and experiencing a closeness to nature. Outdoor skills, challenge and risk are important, though some reliance can still be placed on human modification, tracks and huts in particular.	There is an extremely high probability of experiencing complete isolation from the sights, sounds and activities of humans, with an extremely high probability of no interaction with other user groups (let alone individuals). Users will be totally reliant on their outdoor skills and it is likely that there will be a high degree of closeness to nature, with a sense of discovery, solitude and freedom.
			The experiences in this opportunity will generally be readily accessible to visitors from highways or standard all weather two wheel drive roads on land or from trailed runabouts on water. The convenience of the vehicle with the shelter and security that this affords will be a significant part of the experience.	Experiences based on or that are influenced by off road vehicle access, jet boatable waters or back country airstrips predominate in this opportunity. Though activity may not be based on the use of a motorised vehicle the influence of vehicles, the safety afforded or the disturbance they create may be present and significant.			

Land Physical Setting: Primary Characteristics

Urban	Urban Fringe	Rural	Backcountry			Remote	Wilderness
			Drive in	4X4 Drive in	Walk in		
MODIFICATION Profoundly modified overall, few elements of the natural environment remain. Environment quality may be impaired. Generally constant noise from human activity. **ACCESSIBILITY** Very accessible to most members of the community. Many alternative means of transport. Public transport gives good access, very accessible by vehicle. Foot access well defined, surfaces hardened, hazards reduced, numerous alternative routes. Water access from land generally very easy with steps, ramps and paths. On water, access variable though often straight forward. **SIZE** No size criteria for defining urban area. As a guide, several hundred residents and several shops or 50 dwellings at a density of 4/ha with facilities, services, shops etc. **BOUNDARIES** The outer limits of the residential or industrial development. All land within or substantially surrounded by the sights and sounds of dwellings, industry and urban transportation network (highways, railways etc).	**MODIFICATION** Predominantly a cultural landscape with mixed urban-rural land uses. Adjacent to and readily accessible from an urban setting. Will only exist around larger urban areas. Sights and sounds of urban environment present. **ACCESSIBILITY** Very accessible from the urban/residential environment to wide cross-section of community. Generally within walking/cycling distance, often within 1 km of urban boundary. Urban/public transport to boundaries and through area. Walking opportunities well signposted, natural hazards reduced. **SIZE** No size criteria but as a guide urban fringe will only be located around larger urban areas. **BOUNDARIES** Identified by cultural features, roads, housing, dams as well as natural features, ridge lines, vegetation.	**MODIFICATION** Predominantly a cultural landscape with mixed land uses, mainly primary production, farming, horticulture and forestry with some tourist/visitor attractions. Will have a network of services and facilities, roads, power lines, buildings, small population centres, rural communities, villages. **ACCESSIBILITY** General network of roads and vehicle access throughout. Easy foot access. **SIZE** No size criteria but generally tens of hectares or larger. **BOUNDARIES** Boundaries are usually culturally defined, fences, road lines, built up areas, cultivation, developed pastures, plantations or extensive native vegetation as along back country or remote boundaries.	**MODIFICATION** A modified environment that is accessible to road vehicles and outboard motorboats, includes sealed roads, gravel roads, lakes and large/deep rivers but one that is generally dominated by natural vegetation and landscapes and is natural looking. Obvious elements of modification include roads, roadside facilities and some primary production, however these would all be isolated or extensive, generally not intensive. It may include small or environment based facilities. **ACCESSIBILITY** Generally within one kilometre of motorised access. Foot travel often facilitated by good standard tracks. If there are no tracks, access to the adjacent roads relatively easy. **SIZE** No size limit, however area must be large and feel like back country, generally 500 ha or more. If the area is adjacent to a back- country walk in or remote opportunity or has topographical isolation then this area may be smaller than 500 ha. As a guide the area may often be large enough to support centre-fire rifle hunting. **BOUNDARIES** The more remote boundary will usually follow ridge lines or natural boundaries. Cultural features, fence lines, cultivation, etc will often form the other.	**MODIFICATION** This is a modified environment but one that is generally dominated by natural vegetation or landscapes and is natural looking. It is all terrain vehicle or jet boat accessible country, that is traversed mainly by unformed or ungravelled roads, 4x4 accesses, motorbike tracks or back- country airstrips. Obvious elements of modification include roads, roadside facilities and small areas of farming or forestry. These would all be quite isolated or extensive and not intensive. It may include small or environment based facilities. **ACCESSIBILITY** Motorised access is along ungravelled or unformed roads that are off road vehicle accessible or shallow or difficult rivers that are jet boat accessible. Generally the area is within 1 km of motorised access. Foot travel often facilitated by walking or tramping tracks though where there are no tracks access back to the vehicle assess is relatively straight forward. **SIZE** No size limit, however area must be large and feel like back country, generally 500 ha or more. If the area is adjoining a back country walk-in, or remote opportunity, or has topographical isolation, this area may be smaller than 500 ha. As a guide the area may often be large enough to support centre-fire rifle hunting. **BOUNDARIES** The more remote boundary will usually follow ridge lines or natural boundaries. Cultural features, fence lines, cultivation, etc will often form the other.	**MODIFICATION** Predominantly natural environment, signs of earlier occupation of the land may exist, old fences, disused roads, etc, however nature now taking over or predominant. Facilities often limited to huts, tracks, bridges, signs. **ACCESSIBILITY** Aerial and motorboat access possible where permitted. Otherwise non-motorised access only. Foot travel facilitated by good tracks, (mostly benched) huts, campsites, bridges. All weather access under most circumstances. Generally further than 1 kilometre from formed roads, ½, to 1 km from all terrain access. Generally within 1 km of, or readily accessible on foot from, good quality or highly used tracks. **SIZE** No minimum size, but generally greater than 1000 ha. **BOUNDARIES** Delineated by topography.	**MODIFICATION** Highly natural landscape. Minimal apparent modification. Few facilities, limited to light tracks, with occasional bridges, huts and signs. **ACCESSIBILITY"** Non-motorised access only. Access facilitated by some light tracks, bridges, etc, but often weather dependent. Minimum distance 1 km or ½ , day travel on foot from motorised access. **SIZE** No minimum size but generally greater than 1000 ha. **BOUNDARIES** Usually follow ridge lines or natural boundaries.	**MODIFICATION** Highly natural landscape. No apparent modification. No huts, tracks, bridges, signs or other facilities **ACCESSIBILITY** Non-motorised access only. ½ -1 day's foot travel from motorised access or 4 km from 4x4, jet boat, airstrip access and 5 km from developed roads and readily accessible inland waterways. Foot access totally dependent upon the environment and resources and skill of the visitor. **SIZE** Minimum size 2000 ha. At least 2 day's foot travel to traverse. **BOUNDARIES** Boundaries clearly defined by topography, usually ridge lines.

13 Appendix 3:Consultation Summaries

These summaries are based on online meetings, in person, and telephone interviews.

Engagement Summary: Participant A – Charter Operator, May 2025

The operator has over 25 years of experience running charter operations in Bluff, Foveaux Strait, and around Rakiura/ Stewart Island. Mana Charters provides a range of services including fishing charters, hunting block transport, diving, and scenic tours, serving both local and visiting clients. Shane and his team have extensive local knowledge and strong connections with the island's outdoor and tourism sectors.

Their perspective on the proposed Hananui aquaculture farm is balanced and nuanced:

- **Neutral Stance**: The operator maintains a balanced stance, indicating no major expected impacts but remains cautious about possible operational changes.
- **Site Suitability**: They agree that the proposed site is ideal for aquaculture, citing the strong currents in Foveaux Strait, which should help flush out sediment and maintain water quality around the farm. They acknowledge the farm's design and location as being well-considered from an operational perspective.

Key Locations and Operations

- **Hunting Block Transport**: They regularly drop hunters off at Christmas Village and Murray River hunters' huts, as these are popular access points for hunting blocks on Stewart Island. Maintaining unimpeded access to these locations is a primary operational concern.
- **Fishing Charter Destinations**: The fishing charters commonly visit areas such as The Saddle and extend as far south as Port William. While the proposed farm site is within his general area of operation, it is not a specific destination for his charters or for most recreational fishing activity.

Main Considerations and Concerns

- **Access**: The most important issue is ensuring that access to hunting blocks and fishing areas remains unchanged. The ability to freely escort hunters and fishers to their destinations is vital for his business and for the broader recreational use of the area.
- **Fishing Impact**: The Charter company does not believe the farm will significantly affect fishing in the region, as the site is not a primary fishing ground for them, or for most local operators.
- **Economic and Environmental Balance**: While they recognise the potential economic benefits of aquaculture for the region, they remain attentive to the need for ongoing monitoring to ensure that the farm does not inadvertently restrict access or negatively impact the marine environment.

Overall, they maintain a pragmatic, cautiously optimistic stance on the Hananui aquaculture proposal. They support the choice of site due to favourable environmental

conditions and does not anticipate direct negative effects on his core charter operations. However, they emphasise that the preservation of access to key hunting and fishing locations is essential, and they will continue to monitor developments to ensure Mana Charters' services and the area's recreational values are protected.

Engagement Summary: Recreational Sailing Club Representative, May 2025

The Otago Yacht Club described typical voyages from Dunedin to Rakiura/ Stewart Island. The club's members generally sail either directly from Bluff to Port William and then south, or into Halfmoon Bay, using these as main access points to Stewart Island's bays and anchorages. The only occasion when club members would encounter the proposed Hananui aquaculture site is during a full circumnavigation of Rakiura/ Stewart Island, which is less common. Their main destinations are the various bays around the island, such as Golden Bay, Oban, Port Adventure, and with a particular aim to reach Pegasus Bay.

Values Associated with Stewart Island

- Remoteness and Nature: Club members value Rakiura/ Stewart Island for its sense of remoteness and strong connection with nature. The island's wild character and relatively untouched environment are central to its appeal for cruising yachts
- Amenity and Experience: The quality of the cruising experience is closely tied to the area's natural beauty and the absence of industrial development.

Key Concerns and Considerations

The club's primary concern is maintaining uninhibited access to the coastline and anchorages, viewing any restriction or complication to traditional routes negatively. Members are apprehensive that the proposed fish farm could reduce the area's amenity value, seeing it as an "eyesore" that detracts from the wild, pristine seascape that attracts yachts to Rakiura/ Stewart Island. While navigational lighting is recognised as necessary for safety, there is worry that excessive or poorly designed lighting could further erode the sense of remoteness and natural darkness valued by cruisers. Additionally, members observed that the northern coast of Rakiura/ Stewart Island, particularly near Murray Beach, already experiences significant vessel presence from large cargo ships, and the introduction of a fish farm and its service vessels could lead to crowding and further diminish the overall experience for recreational sailors.

Frequency and Nature of Visits

The rep reported that the club typically organises 3–5 trips to Rakiura/ Stewart Island each year. The focus is on exploring bays and anchorages, with Golden Bay, Oban, Port Adventure, and Pegasus Bay being favoured destinations. The proposed farm site does not lie on their main routes, except during rare circumnavigation trips.

Aspect	Otago Yacht Club / Peter Kennett Perspective

Typical Routes	Bluff–Port William, Halfmoon Bay, bays around island
Main Destinations	Golden Bay, Oban, Port Adventure, Pegasus Bay
Encounter with Farm Site	Only during full island circumnavigation
Core Values	Remoteness, connection with nature, pristine environment
Key Concerns	Unrestricted access, visual/amenity impacts, navigational lighting, crowding from vessels
Frequency of Visits	3–5 trips per year

Overall, the Otago Yacht Club value Rakiura/ Stewart Island for its remoteness and natural character. While the proposed Hananui farm is not on their main cruising routes, they are concerned about potential reductions in amenity value, the visual impact of the farm, increased vessel presence, and the need to maintain free access to the coastline and anchorages. Their engagement reflects a desire to balance navigational safety with the preservation of Rakiura/ Stewart Island's unique cruising experience.

Engagement Summary: Participant B – Fishing Charter Operator, May 2025

Operating commercially for 12 years this charter company has fished the Gull Rock area for over 20 years. Their charters regularly fish from Gull Rock coming out to Newtons Rock, primarily targeting blue cod. The area is valued for its reliable fish populations and as a sheltered spot for charters.

Key Fishing Areas and Activities

For the charters and personal trips, they stated that regular fishing occurs between Garden Point and The Saddle, with the bottom of the first green pen above Gull Rock being a notable location. They noted that the area consistently provides good fish populations. Occasionally, they have dredged oysters in the lower part of the farm area. The spot is favoured as a nice, sheltered area to visit during charters.

There has been past conflict with previous shark cage diving operations in the area, particularly around Grey Bay, with catches of 15–20 tonnes noted. The area is not only important for fishing but also for its role as a thoroughfare and for the shelter it provides. The charter typically runs 30–40 day trips a year in the area, though this year it may be closer to 5–6 due to varying conditions. The number of trips depends on wind and weather patterns. The area is popular for both charter and recreational fishing, especially because of its proximity to the coast and the presence of marine mammals and birdlife.

Fishing Methods and Species

- Drift fishing is common along the area.
- Key target species include blue cod, trumpeter, greyboys, and tarakihi.
- The area supports both continued recreational and commercial fishing, provided access and values are maintained.

K**ey Concerns and Values**

This company noted that the ongoing ability to access and navigate the area safely is a primary concern. They emphasised the importance of maintaining the area's recreational and commercial fishing values. They noted that as long as these values and access are preserved, fishing can continue successfully. Overall, participant B rely on the areas around the applicant area for consistent, productive charter fishing and value the area's shelter and accessibility. Continued unimpeded access and the preservation of fishing values are essential for the ongoing viability of his operations.

Aspect	**Details**
Experience	20+ years in area, 12 years commercial charters
Key Areas	Gull Rock, Newtons Rock, Garden Point, The Saddle, lower farm area
Activities	Fishing (blue cod, trumpeter, greyboys, tarakihi), occasional oyster dredging
Values	Good fish populations, shelter, proximity to coast, marine life
Concerns	Past conflict with shark cage diving, need for continued access and navigation
Operations	30–40 trips/year (typical), 5–6 this year, weather-dependent
Compliance	Catch returns logged with MPI

Engagement Summary: Yacht Club (Mainland-Based), May 2025

The Club, as an organisation, is not directly affected by the proposed Hananui aquaculture farm. The club's primary activities revolve around dinghy sailing events, which are confined to Bluff Harbour and do not extend to the area near Stewart Island where the farm is proposed. However, while the club itself remains unaffected, some of its members with larger vessels do sail to Rakiura/ Stewart Island and could potentially encounter impacts when passing through or near the proposed site.

The club acknowledges that the proposed farm could impede the most convenient sailing routes between Bluff and Rakiura/ Stewart Island, particularly for members and other recreational sailors. There is concern that navigating around the farm, especially in poor weather or low visibility, could increase safety risks. Additionally, the club values the natural, pristine environment of the area and the unique experience of sailing in a remote and largely unspoiled setting. Members recognise that marine farming is an industrial activity that could detract from this experience, both visually and in terms of the sense of remoteness.

While the club supports the need for industry and commerce, there is a tension between this acceptance and the desire to preserve the natural character of the area for recreation. The club takes a pragmatic view, recognising that commerce is necessary, but remains cautious about the cumulative impacts should similar developments proliferate in the future. In terms of frequency, the club estimates that only a minority of

its members would sail through the affected area, perhaps one to three times a year per person, and notes that it does not run large regattas or events in the vicinity of the proposed farm.

Finally, there is some scepticism among members regarding the choice of location for the farm. While the immediate impact may be manageable, there is concern that further expansion of such activities could eventually degrade the recreational value and unique character of the area.

Individual Member Perspective

The interviewee, a club member for 25 years and treasurer for 20, notes that although they and some others occasionally sail to Rakiura/ Stewart Island, such trips are infrequent. They value the area for its natural beauty and remoteness but is concerned that the proposed farm could impede direct sailing routes and complicate navigation, especially in poor weather and low visibility. While they appreciate the planned navigational markers and lighting on the farm structures, which he believes will enhance safety, they worry that the farm would be an "eyesore" and detract from the wilderness experience. Although not fundamentally opposed to the farm, the interviewee expressed unease about the gradual industrialisation of natural areas and the precedent it may set for future developments. They do not suggest alternative locations but hopes that such projects are limited to prevent cumulative negative impacts on the region's character and recreational opportunities.

Key Values and Locations

Aspect	Club (as a whole)	Member (Anders)
Main Activity Area	Bluff Harbour (not affected)	Occasionally sails to Rakiura/ Stewart Island
Values	Pristine environment, safe navigation, balance between recreation and commerce	Connection with nature, remoteness, wilderness experience
Main Concerns	Navigational impact for members, cumulative industrialization	Navigational complexity, visual impact, safety in poor weather
Attitude to Proposal	Generally supportive of commerce, cautious about cumulative effects	Accepts commerce, but wary of losing natural character
Frequency of Use	Club events not affected; few members affected	Sails through area 1–3 times/year
Location Considerations	No direct alternative suggested, wary of expansion	No specific alternative, general caution

Overall, the Bluff Yacht Club as an organisation is not directly impacted by the Hananui proposal, as its main activities are confined to Bluff Harbour. However, both the club and individual members recognise potential impacts on navigation, safety, and the natural character of the area for those who sail to Rakiura/ Stewart Island. While there is an

acceptance of the need for commerce, there is also a strong desire to maintain the area's pristine, remote qualities and to avoid cumulative negative effects from further industrialisation.

Engagement Summary: Participant C – Dive Operator, May 2025

This operator has extensive experience running dive charters around Rakiura/ Stewart Island and the wider Foveaux Strait. The operators regular dive sites include Codfish Island (Whenua Hou), Bishop and Clerk Islets, the Pegasus area, and Lord River area. The proposed Hananui aquaculture sites, located 2–6 km off the northern coast of Stewart Island, are not common destinations for the operator's activities; their operations typically transit past Murray Beach rather than stop there for diving.

Perceived Impacts

The participant expects minimal to minor effects on their operations. The proposed sites are not significant for diving or fishing, and regular transit routes are unlikely to be disrupted due to navigational planning. The participants main concern is that transit access remains open and safe. They acknowledged some environmental concerns, particularly around pollution, but believes the strong currents at the sites will mitigate these effects.

They recognised the potential economic benefits of the project, including job creation for Southland, and felt these would offset any minor negative impacts on his business or the local marine environment. They also discussed the proximity of "Coastal Marine Area" and "Outstanding Natural Landscape" designations but understood these overlays do not constrain the proposed farm sites.

Aspect	**Dive South / Barry Bethune Perspective**
Main Dive Locations	Codfish Island, Bishop & Clerk Islets, Pegasus, Lord River
Use of Proposed Site	Not a regular dive or fishing destination; transits past Murray Beach
Farm Layout/Design	Staged development, low-impact lighting, strong currents for waste dispersion
Key Concerns	Maintain transit access, minor environmental concerns, visual effects minimal
Economic View	Recognises job creation and economic benefits for Southland
Planning/Zoning	No direct constraint from nearby protected areas

Overall, this operator anticipates only minor operational impacts from the Hananui aquaculture project, as the proposed sites do not overlap with key dive locations or transit routes. While environmental and visual concerns exist, they are reassured by the site's strong currents and the project's design, and he supports the economic opportunities the farm could bring to the region.

Engagement Summary: Participant D – Fishing Charter Operator, May 2025

This operator provides fishing charters around the southeast of Rakiura/ Stewart Island and opposes the development, citing negative visual and amenity impacts.

Concerns

- The project may disrupt the sense of remoteness and wilderness valued by visitors.
- Potential visual intrusions from infrastructure and cumulative impacts are seen as significant.
- Access to coastal areas and integrity of recreational values remain central issues.

This fishing charter regularly fish in the southeast, particularly around Gull Rock Point and Sawyers Beach, as well as between Burwood and Port William, areas highly valued for both fishing and hunting. Both the interviewee and their clients are drawn to these locations for their remoteness and wilderness experience, with the sense of isolation and pristine environment forming a central part of the charter's appeal. Amenity values and the visibility of the landscape are important, as these areas are seen as places to escape and enjoy the natural setting.

They expressed concern that the proposed aquaculture farm would be highly visible and could detract from this wilderness experience, especially since cargo ships are already visible and, in their view, have already impacted the sense of remoteness. The areas in question are significant for both recreational fisheries and commercial charter operations, and while they acknowledged the importance of navigational lighting for safety, they worry about the cumulative effects of increased infrastructure, such as floodlights and noise, even if these do not directly affect the fish. They also stressed the need to preserve access for both fishing and hunting, noting that locations like Port Adventure are important despite the absence of walking tracks, and that the experience in April and May can differ markedly from other times of the year. Additionally, they raised concerns about the booking system for Māori blocks and emphasised the importance of kai moana (seafood) for his clients.

Overall, the operator does not support the proposal due to expected degradation of the area's wild character. They are not in favour of the aquaculture development, primarily due to its expected negative impact on the wilderness and amenity values of the area, as well as concerns about cumulative visual and operational effects on both recreational and commercial fishing experiences.

Engagement Summary: Participant E – Wildlife Tourism Operator, May 2025

This operator conducts ecological and shark-viewing tours around Foveaux Strait. Their operations are not near the proposed site. The business has operated for over a decade and is committed to sustainability, education, and the protection of Great White Sharks.

Key Considerations

- No direct effect on tours, but concern over broader ecological impacts.
- Altered shark behaviour due to other marine activities could affect tourism viability.
- Advocates for collaboration between aquaculture and tourism to ensure ecosystem health.

She noted that the proposed aquaculture project will not directly impact their tours, as the operations are exclusively centred around Edwards Island, not near the proposed farm sites. Their tours run seasonally from December to June, focusing on shark observation in the wild, with a strong emphasis on respecting the natural behaviour and habitat of the sharks . They noted that the location of the proposed aquaculture site is not a concern for their current tourism activities, as tourism in the region will continue regardless. However, maintaining the natural behaviour and abundance of sharks is critical for the ongoing success of nature-based tourism in the area.

Knock-On and Ecological Concerns

While the immediate area of operation is unaffected, they raised concerns about the broader ecological dynamics of Foveaux Strait. The nature of Great White Sharks in the Strait is likened to a "dog pack", they are social and can learn from repeated negative interactions. She strongly noted that if sharks experience negative interactions (such as being deterred, stressed, or harmed) further up the Strait, there is a risk they may disperse, alter their behaviour, or avoid the region altogether. This could have adverse effects on their overall business, as the presence and behaviour of sharks are central to their tourism offering.

The fragile nature of the Foveaux Strait ecosystem means that changes in shark movement or population could impact not only their business but also the broader marine tourism sector. As an operator they value partnerships with scientists and conservation groups and noted that they would like to work actively with Hananui to ensure that their activities and the wider marine environment are managed sustainably and responsibly.

Aspect	**Operator Perspective**
Main Operation Area	Edwards Island, Foveaux Strait
Direct Impact of Farm	None on daily tours
Knock-On Concerns	Negative shark interactions elsewhere could deter sharks, impacting tourism
Key Values	Shark welfare, ecosystem health, sustainable tourism, education
Amenity/Tourism	Tourism will continue, but depends on healthy shark populations
Species	10 shark species in Foveaux Strait
Partnerships	Strong focus on collaboration and stewardship

Overall, participant E supports aquaculture in principle and does not foresee direct operational impacts from the proposed farm. However, she emphasises the importance of safeguarding the broader Foveaux Strait ecosystem and shark populations, as negative interactions elsewhere could have significant knock-on effects for shark tourism and the region's natural values. Continued partnership and responsible stewardship are seen as essential for the future of both marine tourism and aquaculture in the area.

Engagement Summary: Participant F – Charter Company and Longtime Local Business Owner, April 2025

Participant F is a fifth-generation Stewart Islander (Waitaha, Ngāti Māmoe, Ngāi Tahu), local business owner, with deep ancestral and personal ties to Rakiura/Stewart Island.

Their family has been involved in fishing and maritime activities around Stewart Island since the 19th century. Over his lifetime, they have worked as a commercial fisherman, pāua diver, salmon farm manager, and eco-tour charter operator, and has been a prominent advocate for sustainable marine management on the island. They are instrumental in establishing the Te Whaka a Te Wera Mātaitai Reserve, the largest in New Zealand, and has worked closely with iwi and conservation groups to protect and manage the island's marine resources. They also ran a charter company, offering wildlife and eco-tours, and has collaborated with the Rakiura Māori Land Trust and other local entities to promote conservation and tourism. Their son is currently a commercial pāua diver.

Participant F expressed full support for the Hananui aquaculture project. Key points and considerations included:

- **Economic and Social Benefits:** They emphasised that the Stewart Island coastline has always provided for the island and its people, both historically and in the present. They see the aquaculture project as a continuation of this legacy, offering new economic opportunities and supporting the island's ongoing viability.
- **Site Suitability:** They noted that the proposed site for the Hananui farm is not a destination for recreational fishing or diving to his knowledge. Instead, it is primarily used as a thoroughfare for vessels traveling along the coast, meaning the farm's presence would not displace valued local activities or sites
- **Access and Island Values:** A key consideration is maintaining access to the water and upholding the values of Rakiura/ Stewart Island. They believe the farm's location and operation will not detract from the island's natural character, recreational use, or cultural values. Instead, they see it as a responsible use of the marine environment that aligns with Stewart Island's history of resourcefulness and adaptation
- **Encouraging Sustainable Development:** They highlighted the importance of fostering economic development that benefits the local community. They believe the aquaculture project will create jobs and support local businesses without compromising the island's environmental integrity or cultural heritage
- **Customary Knowledge and Marine Management:** Drawing on their extensive experience and customary knowledge, they are confident that with careful management, marine resources can be sustained for future generations. They have a strong track

record of working with iwi, local authorities, and conservation groups to ensure that marine development is balanced with protection and stewardship of the environment.

Overall, Participant F is in full support of the Hananui aquaculture project. They believe the project is well-sited, will not interfere with key recreational or cultural activities, and will contribute positively to the island's economy and community. Their support is grounded in a lifetime of experience on Rakiura/ Stewart Island's waters, deep connections with local iwi, and a commitment to ensuring that the island continues to provide for its people in a sustainable way

Engagement Summary: Participant G-Transport Operator, April 2025

Participant G provides regular access for hunters and trampers to multiple drop-off points along the northern coast.

Main Viewpoints

- Supportive of the project if access remains open.
- Sees potential for local partnerships and benefits to the Stewart Island community.
- Emphasises respect for mana whenua leadership and community involvement.

They highlighted the potential for positive partnership opportunities, particularly if the venture could create new avenues for locally owned businesses and encourage a tourism focus. Their business provides transport services for hunters and trampers, with regular pick-ups and drop-offs at key locations within the proposed site area, including Christmas Village, Murray River, Murray Beach, and Bungaree Hut.

Access was participant G's primary consideration. They emphasised the importance of maintaining unrestricted access to these drop-off points for his clients. As long as the aquaculture development does not impose new limitations or barriers to these areas, he sees the project as a good and beneficial venture. Their support was strengthened by the backing of mana whenua, recognising that their endorsement and the farm's potential to support the wider Rakiura/ Stewart Island community were significant factors in their positive outlook. In summary, participant G is supportive of the aquaculture farm, provided access for local tourism and transport businesses remains unaffected, and they are optimistic about the broader community and partnership benefits it could bring.

Engagement Summary: Participant H-Recreational User -April 2025

A regular hunter and visitor values the area's remoteness and low visitor density.

- Observations and Outlook
- Proposed site lies offshore and would be barely visible from land.
- Sees little potential interference with fishing or hunting.
- Supports project design that maintains access and environmental integrity.

Their recreational interests in the area span hunting and fishing, with a particular appreciation for the island's remoteness and the rare opportunity it offers for solitude

and wilderness experiences. He noted that the stretch of coastline from Bungaree Hut to Christmas Village, including Murray Beach, is valued for its isolation and low visitor numbers, making it one of the few places in New Zealand where people can enjoy such a remote setting.

Their experience hunting is enhanced remoteness of the area, providing a sense of solitude. They concluded that fishing tends to focus on rocky areas and reefs closer to shore, away from the proposed aquaculture site and that the site, in his experience, is not a destination for recreational fishing or diving.

Regarding the proposed farm's visual and physical effects, they felt that, given its distance from shore (mostly 3-5 km out), the farm and its structures would be barely visible from land and unlikely to intrude on the recreation experience. They noted that existing large cargo ships in the area are already a more prominent visual presence than the proposed aquaculture infrastructure is likely to be. Their main concern was that the farm should not impact access to the coastline or interfere with the ability to enjoy hunting and fishing in the area. They expressed a desire for assurance that the project would not affect these core recreational values.

Participant H also acknowledged the site selection process, noting that the proposed location avoids key recreational fishing and diving spots, and that the strong tidal flows should help disperse any farm-related waste. They appreciated that the farm's design and placement appear intended to minimise impacts on both the environment and recreational users.

In summary, they do not anticipate significant adverse effects on his or others' recreational experiences, provided these key values are protected.

Engagement Summary: Regional Development Agency Representative, May 2025

The regional agency oversees strategy for sustainable aquaculture aligned with local and national goals. As a council-controlled organisation, it can facilitate conversations between local government, private industry, and the community, acting as a bridge that regulators cannot.

Their Southland Aquaculture Strategy is designed to:

- Overcome regulatory hurdles and reduce investment risk for aquaculture projects.
- Future-proof aquaculture by anticipating environmental and societal changes.
- Support integrated development, balancing aquaculture with other uses and values (like recreation and tourism).
- Build relationships, especially with mana whenua (Ngāi Tahu), to ensure development respects cultural values and aspirations.

The Hananui Project is a flagship example of the type of large-scale, sustainable aquaculture development promoted in the Southland Aquaculture Strategy. It is intended to help Southland reach its economic targets and demonstrate best practice in

environmental management and iwi partnership. When creating the strategy, the Regional Development Agency recognised the importance of Ngāi Tahu's role as mana whenua, engaging with them in the project planning and implementation.

Their representative expressed that the Southland Aquaculture Strategy provides the regional framework and stakeholder coordination necessary for projects like Hananui to proceed. The Hananui Project is a practical expression of the strategy's goals: large-scale, sustainable aquaculture that is integrated with other regional values, led in partnership with mana whenua, and designed to deliver significant economic and social benefits for Southland.

Engagement Summary: Participant I – Charter Operator, May 2025

This operator facilitates fishing and hunting charters near main northern access points of Rakiura/ Stewart Island. Their charter primarily runs hunting charters and fishing trips, including blue cod and crayfish excursions, with approximately 40 charters annually. Their main areas of operation include the waters near Christmas Village, Murrays River, and reefs outside Garden Point, extending up toward the northern Saddle.

Participant I expressed that they are not concerned about the proposed project, provided that continued access to these areas is maintained. They noted that the proposed farm area is not a primary destination for their business, although some fishing does occur in the vicinity. Overall, they do not anticipate that the project will affect his business operations or the experience of his tours.

Engagement Summary: Youth Maritime Group Leader, May 2025

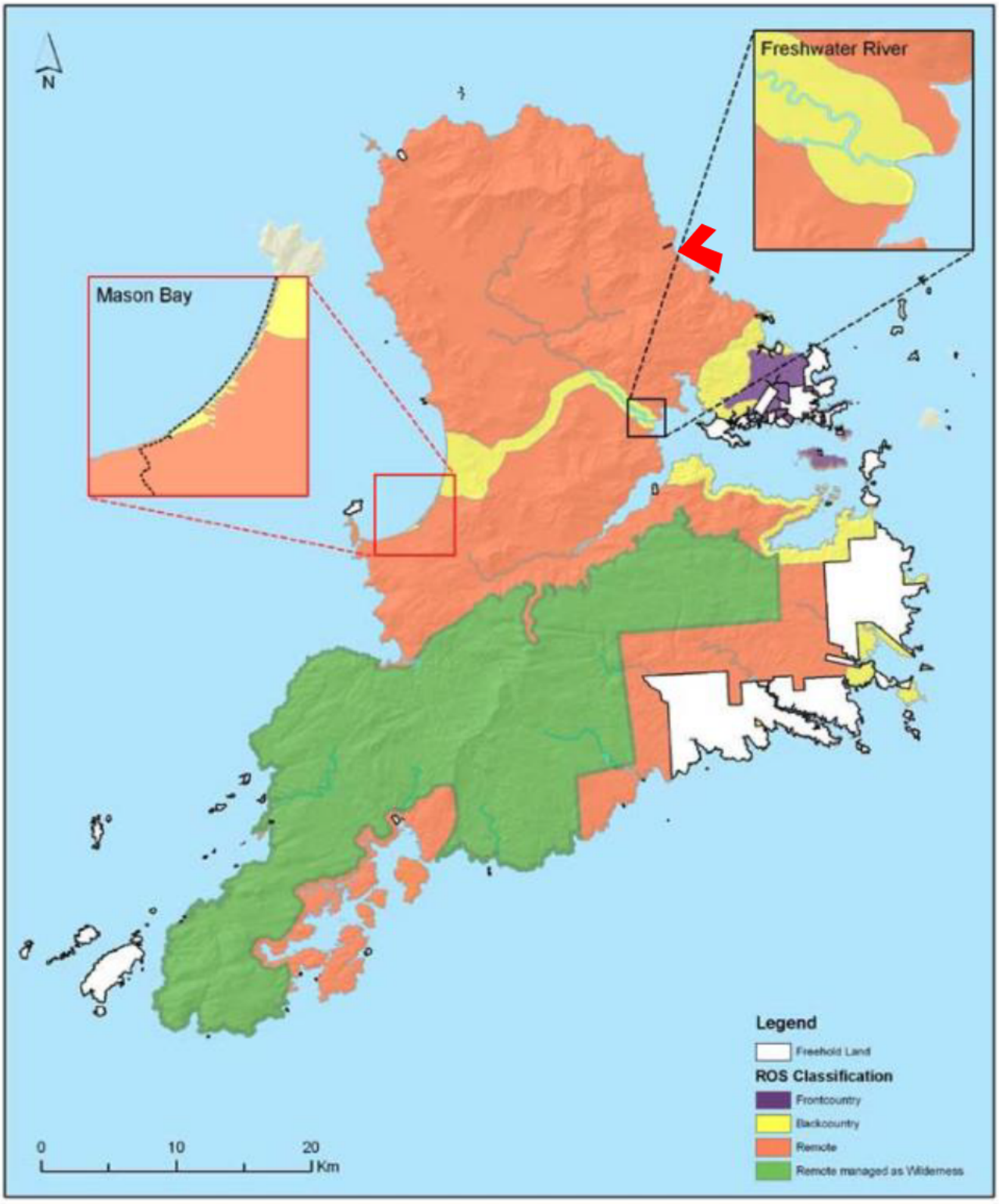
The group conducts nautical training and activities solely within local harbour waters. Activities occur well outside the proposed development area, so no impact is anticipated. They stated that the group would not be affected by the proposed aquaculture project as our activities are carried out in and around the basin/Island Harbour/Bluff Harbour area. They do not undertake activities anywhere near the proposed site near Rakiura.

Engagement Summary: Participant J – Fishing and Wildlife Charter Operator, April 2025

This experienced skipper operates bird-watching and fishing tours around Stewart Island. They confirmed that their charter operations are not conducted within or near the proposed farm area for the project. As a result, they are not concerned about potential impacts on his business. With over 25 years of experience operating in the waters around Rakiura/ Stewart Island, they noted that the proposed development site lies outside the main fishing and sightseeing routes. They anticipate that their charter activities will remain relatively unaffected by the project, and expressed no reservations about its implementation, provided that access to current fishing and bird watching destinations continues unimpeded.

14 Appendix 4: Department of Conservation ROS assessment for Rakiura/Stewart Island (detail) CMS/NPMP (2010) Proposed farm area in red

Map 6 – Recreational opportunity settings for the Stewart Island/Rakiura CMS area



OTAGO YACHT CLUB

25 Magnet Street, Dunedin 03 477 1255
Date 16.05.2025

To:

Samanatha Strong
Thrive Spaces and Places
Recreation and open space planner
[redacted]

Dear Sam,

Re: Ngāi Tahu Seafood Ltd (NTSL) Recreation Impact Assessment in relation to their proposed Hananui aquaculture project off the coast of Stewart Island. Placing a salmon farm 2 km out from Port William

Subject: Concerns Regarding Proposed Farm Placement

I would like to thank you for speaking with Peter Kennett on Thursday, May 15th. The whole committee feels very strongly about the proposed placement of this Farm, for our Members and other users who use this space for cruising and sailing.

Our members frequently travel to Stewart Island, either sailing down the coast from Otago or departing from Bluff. The Port William area is often our first stop on the island and serves as a launching point for our return to Bluff or Otago.

We have several concerns regarding the placement of the farm:

- Navigational hazard to every vessel going up the coast.
- You will be able to see something in the water from the walking tracks, even if it's 2 km from the coast
- Fish farm in a main tourist area, turning an area of natural beauty into an industrial eyesore
- Visibility of the cages in an area of natural beauty in daylight and at night
- There will be some sort of structure on the farm, for feeding, this will be easily visible from the shore or water
- Potential navigation hazards at night and in daylight
- Navigation lights at night disrupt the scenic environment
- Increased traffic in the area.

This location is the first and last place that visitors see when leaving the island. The nets will rise 4 meters above the water and will be clearly visible during the day in such a beautiful area. At night, the presence of lights will further alter the natural landscape.

We are very concerned that this proposal is being fast-tracked, which would prevent us from voicing our opposition to the application. I am sharing this letter with other clubs in the area to give them an opportunity to provide feedback as well.

If you require any additional information, please do not hesitate to contact me at [redacted] or [redacted].

Sincerely,
The Otago Yacht Club Committee and signed by the Commodore of the club

Owen Cambridge
Commodore
Otago Yacht Club