

3 May 2017

Second Minute of the Marlborough Salmon Farm Relocations Advisory Panel:

Requested Bullet Point **Response from Hudson Associates Landscape Architects**

RESPONSE TO EVIDENCE OF STEPHEN BROWN

ASSESSMENT METHODOLOGY

- **Disagree** that there is insufficient correlation between scoring and determination of what constitutes a “more than minor” effect.

The methodology states that where analysis has determined a one-point shift on the NZILA rating scale will result from the inclusion of the salmon farm at a site (from existing baseline to resulting rating), that has been determined as a low and acceptable level of adverse effects (with site sensitivity being taken into account in determining the resultant rating). Of the 17 sites initially proposed by MPI and initially analysed, those which scored a higher degree of change were determined to be unacceptable and removed from consideration.

- **Disagree** that cumulative effects have not been adequately assessed.

Stephen Brown’s evidence references the Hudson Report prior to the Drakeford Williams Review, but does not make specific reference to the Hudson Report post the Drakeford Williams review – which included further analysis of Reach values and cumulative effects.

WAITATA REACH: CUMULATIVE EFFECTS

- **Agree** that the Reach as a whole has Very High Landscape values, and High Natural Character values¹.
- **Agree** that mussel farms in the side-bays of Waitata Reach generally have little real impact on perceptions of the coastal environment and landscape from within the main channel of the Reach.²
- **Agree** that the proposal generally has more potential for greater adverse effects to arise from combinations of farms (i.e. from cumulative effects) than from individual farms.
- **Disagree** that the effects cumulatively of the five proposed farms will be significant on either landscape or natural character values at the Reach scale.

In my opinion sequential effects will be the most elevated of cumulative effects arising from the combination of the proposed farms. However, the proposed farms will be dispersed over a distance greater than 12kms, with a total of 7 salmon farms potentially visible sequentially over that distance, on travelling through the Reach. Given the distance

¹ Evidence of Stephen Brown; Environmental Defence Society (Written Comments 0592) pg 13, para 32.

² Ibid pg 12, para 29.

between the farms on the west and east sides of the channel (roughly 2kms), and that the northern proposed farms will only be passed if the traveller is leaving/entering the Sound, it follows that not all 7 farms will necessarily be seen on a journey through the Reach – or if they are, then a number of them will be probably only be distantly seen on that journey. In my opinion the scale of the Reach is large enough to accommodate the proposed farms.

Further, although the reach is highly natural, values are variable the length of the Reach, with modifications for the productive uses of forestry and farmland often highly visible, which affects perceived naturalness. In my view that context reduces the perceptual impact of the farms – the farms will not seem completely out of context. It is relevant to note that there are sequential effects all the time as boat traffic moves through the Reach, many of which can occur as permitted activities e.g. buildings located in groups or successive pine plantations. In my opinion the experience of the Reach on the journey through it as “natural” in comparison with the more developed Inner Pelorus Sound, will remain.

In terms of the 2012 BOI findings relating to cumulative effects within Waitata Reach, the Board at that time considered five application farms and two existing consented farms all within a cluster approximately 4km by 6km, and found that the cumulative effect would be decisive. It granted two of the application farms, and this gave a total of four farms within the 4km by 6 km cluster inside Waitata Reach (including one in Waihinau Bay), plus one in Forsyth Bay. In terms of the current cumulative effects assessment, there are two existing salmon farms in the Reach (taking into account the removal of Waihinau and Forsyth proposed by King Salmon) when four were accepted by the BOI. The five proposed farms are dispersed over a stretch greater than 12kms, reducing the cluster effect that the BOI needed to consider.

My assessment of cumulative effects in Waitata Reach is dependent on the removal of the existing farms at Waihinau and Forsyth Bays. In my opinion the removal of these farms (and the proposed removal of other farms - particularly that at Ruakaka), and their substitution in proposed locations where adverse effects will be less, is a basic premise behind the whole site-swap proposal. I think it is unfortunate that the beneficial effects of the removal of the existing salmon farms - particularly at Ruakaka, Waihinau and Forsyth Bays (which is close to Forsyth and Bird Islands), have not been addressed by all the experts in relation to the proposed sites.

- **Disagree** that the cumulative effects of Blowhole Point North and South in combination would significantly affect the ONL and Reach values of the gateway area.

It is accepted that the two proposed farms will be visible simultaneously and sequentially but in my opinion the context is large enough, and visually dramatic and complex enough to take that without affecting the perceived naturalness of the gateway to any more than a low degree. The proposals will always be seen within the context of their side-bays, and within the context of existing modifications at Te Akaroa headland – and the accumulated effect of adding the two farms would only be small in my opinion. The open, rugged and expansive natural character of the gateway landforms and inter-face with Cook Strait is so dominant, that I believe it will remain so even with the addition of the two proposed farms.

- **Disagree** that the cumulative effects of the proposed farms at Richmond South and Horseshoe Bay will affect ONFs in Waitata Reach and significantly affect Reach values.

In this area views of the ONFs on the western side of the reach, Maud Island and (proposed) ONF at Tapapa Point are gained from a mixed-use landscape with variable characteristics and values including productive uses. The addition of a salmon farm will not alter that. I disagree that the addition of a salmon farm would act as a “tipping point” to push the adverse effects of development here to an unacceptable level which will impact on the perceptual ability to appreciate the ONFs. In my opinion the context is large-scale enough to accommodate the combination of the two proposed farms from a landscape perspective.

WAITATA REACH: LOCALISED EFFECTS

Blowhole Point North/Blowhole Point South

(Stephen Brown assesses these individual proposals identically. I have commented on cumulative effects from the combination of the two sites under the Cumulative Effects section above.)

- **Disagree** that either of these proposals will (individually) adversely affect the ONL key values (which have been assessed in the proposed Marlborough Environment Plan at a regional/district-scale), or have High/Very High adverse effects at the localised and Reach-scale.

In my opinion the context here is large-scale enough and the configuration of landforms surrounding the “gateway” complex enough to absorb the proposal without affecting the “high-level” ONL associative or perceptual values of this end of the Reach by any more than a low amount. While clearly this end of the Reach where the Sound meets Cook Strait is rugged, elemental and highly natural, Reach-scale values are compromised to an extent by clearly evident modifications in the form of pasture and discordant forestry blocks on Te Akaroa headland and west of Harris Bay. I consider that even with the addition of a salmon farm at the Blowhole sites, the existing landform, pasture and dark-green, rectilinear forestry block on Te Akaroa headland will remain the dominant visual elements for most views towards the sites as the “gateway” is approached. In my opinion the key values relating to the ONL – namely associative ones and values relating to the rugged, dominant landforms creating the “gateway” will remain intact.

Mid Channel Waitata

- **Disagree** that the proposal will affect appreciation of ONFs of the Waitata Reach due to the site being part of the platform (the central waters of the reach) for public views to outstanding landscapes.

It is my view that the proposal will not affect the ability to appreciate the key values of ONFs within the Reach. The ONFs have been defined as a number of separate areas mainly along the western side of the Reach, and at Kaitira, and lie within a context (the Reach as a whole) of variable characteristics and values, including existing modifications and productive uses which are also visible from the central channel (farming/forestry, road tracking, distant buildings, and some marine farming). The ONFs are always viewed/experienced from within, and as part of, this wider mixed context.

- **Disagree** with the assessment as Outstanding Natural Landscape/Seascape.

I note that Stephen Brown assesses the Reach as a whole as having Very High landscape/seascape value³, and so I am taking from this part of his evidence that he is assessing this part of the Reach – the context of this site – separately, as Outstanding.

In my opinion the context here has High Landscape/Seascape values. While the site clearly has a high degree of “naturalness” in that it has no structures, in my opinion the surrounding context here does not attain the same level of landscape value as some other parts of the Sounds such as Port Gore or parts of Queen Charlotte Sound. It is rugged and elemental here, but it is also an area of clear modification and ongoing productive uses – uses which are impacting in terms of landscape character and effects on natural character. This is relevant to the level of “naturalness” compared to these other “Outstanding” parts of the Sounds (at Port Gore and Queen Charlotte Sound). In my opinion this site is beyond the “gateway” experience between Te Akaroa and Kaitira, and so has lower associative values also. In my view to describe this part of Waitata Reach as being surrounded by “landforms largely covered by native forest”⁴ is overstating the current values.

- **Disagree** that adverse effects on landscape and natural character at the local and Reach scale will be High.

I think the context is large enough and of an existing character which can accept the proposal from a landscape/seascape perspective, and its in-water characteristics will allow effects on natural science values to be at an acceptable level, assuming appropriate management.

Richmond South and Horseshoe Bay

(Stephen Brown assesses these individual proposals identically. I have commented on cumulative effects from the combination of the two sites under the Cumulative Effects section above.)

- **Agree** that adverse effects on natural character at both localised and Reach scales will be low for both these proposals.
- **Disagree** that adverse effects on landscape values will be Moderate/High at both the localised and Reach scale for both these proposals.

The existing landscape character (which has mixed vegetation patterns and productive uses both on land and in the water) and the scale of the context mean that the proposal is acceptable within the existing landscape.

- **Disagree** that the proposals will have adverse effects on the ability to appreciate the ONFs of Maud Island, Mt Shewell and the proposed ONF at Tapapa Point.

³ Ibid pg 13, para 32.

⁴ Ibid pg 32, para 78.

In this area views of these ONFs are always gained from a mixed landscape with variable characteristics and values including productive uses. The addition of a salmon farm will not alter that. I disagree that the addition of a salmon farm would have an adverse effects which alters the ability to appreciate the ONFs either from the site or from further away in the Reach.

With particular regard to Horseshoe Bay – although the Bay looks narrow when viewed on a map in plan-form, the experience at the Bay is of a fairly wide, deep bay, albeit dominated by the scale of the surrounding landforms of Tapapa Point, Kauauroa and Te Kaiangapipi headland. While the addition of a salmon farm will slightly lower landscape values I disagree that that would be unacceptable.

TORY CHANNEL (TIO POINT): CUMULATIVE EFFECTS

- **Agree** that cumulative adverse effects on landscape and natural character in Tory Channel will be at an acceptable level.

TORY CHANNEL (TIO POINT): LOCALISED EFFECTS

- **Agree** that adverse effects on landscape and natural character are at an acceptable level at the localised scale.

RESPONSE TO THE REVIEW BY JULIA WILLIAMS

ASSESSMENT METHODOLOGY

The Drakeford Williams Review has been responded to within the body of the final Hudson Report, and further information incorporated on characterisation at a Reach scale, visibility of salmon farms, cumulative effects, and effects for residents - as was recommended by the Review.

- **Agree** that (as well as larger-scale assessment) site specific/localised-area assessment is appropriate.

WATATA REACH: CUMULATIVE EFFECTS

- **Disagree** that all existing aquaculture (including mussel and salmon farms) should be included in cumulative effects.

In my view the mussel farms – which are for the most part of the side-bays of the Reach, have little impact on perceptions inside the main channel. Benthic experts did not consider cumulative effects at a Reach scale.

- **Disagree** that the cumulative effects resulting from the combination of the two Blowhole sites will be more than low and will therefore affect ONL values.

The two proposed farms will be visible simultaneously but in my opinion the context is large and visually complex enough to accept that without affecting the perceived naturalness of the gateway to any more than a minimal degree. The proposals will always be seen within the context of their side-bays, and within the context of existing modifications at Te Akaroa headland – and the accumulated effect of adding the two farms would only be small in my opinion. The open, rugged and expansive natural character of the gateway landforms and inter-face with Cook Strait is so dominant, that I believe it will remain so even with the addition of the two proposed farms.

- **Disagree** that the cumulative effects of the combination of the two sites at Richmond South and Horseshoe Bay will be more than low and will adversely affect ONF and ONC values of Maud Island.

In this area views of Maud Island are gained from a mixed-use landscape with variable characteristics and values including productive uses. The addition of a salmon farm will not alter that. I disagree that the addition of a salmon farm would push the adverse effects of development here to an unacceptable level which will impact on the perceptual ability to appreciate ONFs. In my opinion the context is large-scale enough to accommodate the combination of the two proposed farms from a landscape perspective. In my opinion the site is too distant from Maud Island for impacts on natural science values to be any more than low, although it is accepted that benthic experts did not comment on that.

- **Disagree** that the effects cumulatively of the five proposed farms will be significant on either landscape or natural character values at the Reach scale.
Refer to response to Stephen Brown above.

WAITATA REACH: LOCALISED EFFECTS

Blowhole North

- **Agree** on effects on landscape and natural character for the individual site.

Blowhole South

- **Agree** on effects on landscape and natural character for the individual site.

Mid-Waitata

- **Agree** that the site is not Outstanding Landscape or Natural Character.
- **Disagree** on level of adverse effects on landscape and natural character.

I rate the level of adverse effects as lower than Julia Williams. In assessing perceptual effects I appear to take more account of the productive context provided by surrounding landforms than Julia Williams does. I also think the context is large-scale enough to take the proposal from a landscape/seascape perspective, and consider that its in-water characteristics (depth and high-flow) will allow effects on natural science values to be at an acceptable level, assuming appropriate management (based on advice from the benthic experts).

Richmond South

- **Agree** on level of adverse effects on landscape and natural character for the individual site.

Horseshoe Bay

- **Agree** on level of adverse effects on landscape and natural character for the individual site.

Waihinu Bay: Proposed Removal

- **Agree** that there will be a beneficial effect from the removal of the existing farm.

I consider that the effect of removal here will be highly beneficial for landscape values.

Forsyth Bay: Proposed Removal

- **Agree** that there will be a beneficial effect from the removal of the existing farm.

Crail Bay: Proposed Removal x 2

- **Agree** that there will be a beneficial effect from the removal of the two existing farms.

Ruakaka Bay: Proposed Removal

- **Agree** that there will be a beneficial effect from the removal of the existing farm.

I consider that there will be a very high beneficial effect on landscape values of removal of this farm.

Otanerau Bay: Proposed Removal

- **Agree** that there will be a beneficial effect from the removal of the existing farm.

TORY CHANNEL (TIO POINT): CUMULATIVE EFFECTS

Note: Assessment of cumulative effects carried out by Julia Williams for Tory Channel was based on the inclusion of additional salmon farms proposed at the time in Tory Channel. These other proposed farms have now been removed from consideration – in part due to cumulative effects.

TORY CHANNEL (TIO POINT): LOCALISED EFFECTS

- **Agree** on level of adverse effects on landscape and natural character for the individual site.

RESPONSE TO THE EVIDENCE OF DR MICHAEL STEVEN

ASSESSMENT METHODOLOGY

- **Disagree** that the Hudson report relies exclusively and incorrectly on earlier Boffa Miskell reports undertaken for Marlborough District Council and that no assessment of characteristics and values has been undertaken as part of this proposal.

The Boffa Miskell reports – which contain analysis of characteristics and values at an over-arching scale, have been appropriately referenced given that they form part of the proposed Marlborough Environment Plan and hold some weight in that regard. In addition the Hudson report clearly contains analysis of key characteristics and values at the Reach scale, and at the localised bay/site scale.

- **Disagree** that analysis below the Reach scale is inappropriate.

Finer-grained analysis would only have been inappropriate if a conclusion had been made early on that the Reach could not appropriately contain any further development. That is not my opinion. Finer grain analysis was required to determine where development might be able to be accommodated.

Dr Steven quotes in his evidence from the NZKS Board of Inquiry final decision on the salmon farm applications in Waitata Reach, that the Board, as well as considering effects at a Reach scale, also considered effects from individual farms “at a more local level”.⁵

- **Disagree** that the NZ Coastal Policy Statement is not taken into account in analysis or referenced in the Hudson report.

The New Zealand Coastal Policy Statement is referenced in the opening parts of the report, and taken into account as an integral component of the assessment of effects carried out, with the results of our work being utilised by the project planner.

- **Disagree** that there have been no measures proposed for mitigation of effects.

Farm design mitigates visual effects. Farm management to accepted standards mitigates in-water/benthic effects. Selection of sites for certain site characteristics can reduce the impact of visual and other effects – a mitigating factor appropriate for inclusion in assessment of effects.

WAITATA REACH: CUMULATIVE EFFECTS

- **Agree** that the Reach does not exhibit Outstanding Natural Character, and that no areas of Outstanding Natural Character are directly impacted by the proposal.⁶

⁵ Evidence of Dr Michael Steven, Written Comment 0598; pg 47, para 144.

⁶ Ibid pg 37, para 109.

- **Disagree** on assessment of the Waitata Reach as Outstanding Natural Landscape.

In my opinion values through the reach are currently too variable for the whole reach to be classed as Outstanding. While the Reach clearly has a high degree of “naturalness” and appears as more “natural” than Inner Pelorus Sound, in my opinion the present fragmented nature of patterns through the reach and the subsequent lowered cohesiveness mean that the reach does not attain the same level of values as some other parts of the Sounds (e.g. parts of Port Gore and Queen Charlotte Sound).

It is noted that Dr Steven considered the Waitata Reach to be ONL prior to the inclusion of the two salmon farms at Waitata and Kopaua⁷, and that he still considers the reach ONL despite the inclusion of those salmon farms⁸.

- **Disagree** that Waitata Reach has already reached the threshold of unacceptable cumulative adverse effects on landscape and natural character, and that cumulative effects arising from the proposed farms through the reach would equate to a significant adverse effect on landscape and natural character.

For reasons outlined above in response to Stephen Brown.

Further, I understand from his evidence that Dr Steven is particularly concerned on effects on the natural science aspect of natural character. Given the size of the proposal area (approx. 12 x 2 - 4kms), together with the water depth and the high water-flow, and the advice from benthic experts that there are no areas of natural science significance at any the sites, in my opinion the combined effect of the proposed farms on marine natural science factors is likely to be low, especially with the management of benthic and in-water effects to accepted standards being met by King Salmon. (Although it is accepted that that conclusion has been reached through what I consider to be a sensible judgement, and that benthic/scientific experts did not comment on cumulative effects at a Reach scale.) Terrestrial natural science values will not be affected.

- **Disagree** that cumulative effects on natural character have not been assessed.

Refer above.

- **Disagree** that mussel farming in bays off the central channel of the reach, along with all other modifications in the reach, should be included in consideration of cumulative effects.

Mussel farms are for the most part removed from the central channel. Benthic information provided did not comment on the effects of mussel farms in the bays on the in-water or benthic environment of the main channel, and the specifics of this are outside the area of expertise of a landscape architect. Mussel farms in the side-bays generally do not have a perceptual impact inside the main channel.

⁷ Ibid; para 77.

⁸ Ibid; para 81.

WAITATA REACH: LOCALISED EFFECTS

Dr Steven makes very few comments on localised effects from proposed farms, as he considers that assessment should be carried out at no smaller than the Reach scale.