

Table L1: Assessment of Project South against the relevant provisions of the New Zealand Coastal Policy Statement 2010.

Provision	Assessment
<p>Objective 1</p> <p>To safeguard the integrity, form, functioning and resilience of the coastal environment and sustain its ecosystems, including marine and intertidal areas, estuaries, dunes and land, by:</p> <ul style="list-style-type: none"> maintaining or enhancing natural biological and physical processes in the coastal environment and recognising their dynamic, complex and interdependent nature; protecting representative or significant natural ecosystems and sites of biological importance and maintaining the diversity of New Zealand’s indigenous coastal flora and fauna; and maintaining coastal water quality, and enhancing it where it has deteriorated from what would otherwise be its natural condition, with significant adverse effects on ecology and habitat, because of discharges associated with human activity. 	<p>Section 6 and 7 of the AEE outline why Project South will safeguard the coastal environment.</p> <p>The first two matters are comfortably achieved by Project South. Water quality in this location is in its natural state and the ecological assessment has identified that Project South will not have any adverse effect of biological significance on the water column or coastal processes.</p> <p>With respect to the third matter, Section 2 of the AEE described the site selection process for Project South which reduced its potential effects on biodiversity values. The area chosen for Project South avoids, and provides a buffer from, coastal protection areas, marine reserves, and other known areas of significant value. This includes the Catlins Coast Marine Mammal Sanctuary and the Northern Titi Islands. The Five Farming Areas have also been selected in order to locate farming over areas having no important benthic diversity and / or valued benthic habitat.</p> <p>As described in Section 5 of the AEE a number of important marine mammal and seabird species visit the area in which the Five Farming Areas would be located. Those species will be protected in accordance with Policy 11 set out below.</p>
<p>Objective 2</p> <p>To preserve the natural character of the coastal environment and protect natural features and landscape values through:</p> <ul style="list-style-type: none"> recognising the characteristics and qualities that contribute to natural character, natural features and landscape values and their location and distribution; identifying those areas where various forms of subdivision, use, and development would be inappropriate and protecting them from such activities; and encouraging restoration of the coastal environment. 	<p>The landscape and natural character assessment completed for Project South by Frank Boffa:</p> <ul style="list-style-type: none"> recognised the characteristics and qualities that contribute to natural character, natural features and landscape values in this environment; and concluded Project South is appropriate use and development considering those values. <p>The location and design of the Five Farming Areas means natural character effects are likely to be in the moderate to low category and effects will be managed in accordance with Policy 13 below.</p>
<p>Objective 3</p> <p>To take account of the principles of the Treaty of Waitangi, recognise the role of tangata whenua as kaitiaki and provide for tangata whenua involvement in management of the coastal environment by:</p> <ul style="list-style-type: none"> recognising the ongoing and enduring relationship of tangata whenua over their lands, rohe and resources; promoting meaningful relationships and interactions between tangata whenua and persons exercising functions and powers under the Act; incorporating mātauranga Māori into sustainable management practices; and recognising and protecting characteristics of the coastal environment that are of special value to tangata whenua. 	<p>Section 6.8 of the AEE sets out how Sanford intends to address these matters. It includes undertaking a comprehensive engagement and consultation programme with tangata whenua. Sanford will ensure that engagement is fulsome and that there is sufficient time for this to occur. In this way, Sanford anticipates that the outcomes set out in this objective will be achieved.</p>
<p>Objective 4</p> <p>To maintain and enhance the public open space qualities and recreation opportunities of the coastal environment by:</p> <ul style="list-style-type: none"> 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 	<p>This objective informed the design of Project South and its Five Farming Areas. The design and clustered layout of the structures at each the Five Farming Areas minimises the area where free public movement would be excluded, while acknowledging the functional requirements of offshore salmon farming and the dynamic coastal environment in which the structures would be located. As identified in the AEE, there is very little recreational use of the Project South area aside from recreational fishing and yachting, and the Project South activities are not incompatible with the continued use of the area for those purposes. Allowing use of the area for Project South will not hinder the maintenance or enhancement of public open space qualities or recreational opportunities in the coastal environment.</p>

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<ul style="list-style-type: none"> 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. 	
<p>Objective 5</p> <p>To ensure that coastal hazard risks taking account of climate change, are managed by:</p> <ul style="list-style-type: none"> locating new development away from areas prone to such risks; considering responses, including managed retreat, for existing development in this situation; and protecting or restoring natural defences to coastal hazards. 	<p>Not relevant to the activity.</p>
<p>Objective 6</p> <p>To enable people and communities to provide for their social, economic, and cultural wellbeing and their health and safety, through subdivision, use, and development, recognising that:</p> <ul style="list-style-type: none"> the protection of the values of the coastal environment does not preclude use and development in appropriate places and forms, and within appropriate limits; some uses and developments which depend upon the use of natural and physical resources in the coastal environment are important to the social, economic and cultural wellbeing of people and communities; functionally some uses and developments can only be located on the coast or in the coastal marine area; the coastal environment contains renewable energy resources of significant value; the protection of habitats of living marine resources contributes to the social, economic and cultural wellbeing of people and communities; the potential to protect, use, and develop natural and physical resources in the coastal marine area should not be compromised by activities on land; the proportion of the coastal marine area under any formal protection is small and therefore management under the Act is an important means by which the natural resources of the coastal marine area can be protected; and historic heritage in the coastal environment is extensive but not fully known, and vulnerable to loss or damage from inappropriate subdivision, use, and development. 	<p>Establishing and operating Project South and its Five Farming Areas will assist in achieving this objective.</p> <p>As outlined in Section 6.2, Project South will make a significant contribution to the social and economic wellbeing of people and communities through its provision of a sustainable food resource, export revenue, and the employment and wages it will inject into the economy. Project South will also do this without having any significant adverse effect on the ability of other coastal activities to do the same. Its remote location means the only other existing activity that could be impacted is commercial fishing. As a major quota owner in this area, Sanford are satisfied that the Project South proposal will have minimal effect on fishing activities in this area.</p> <p>The Regional Coastal Plan pre-dates the NZCPS and has not been amended to give effect to its direction to provide for aquaculture in appropriate places. However, it does provide a framework for managing aquaculture in the region and for the reasons outlined in the Coastal Plan Table below, Project South sits comfortable with that framework.</p> <p>It is further considered that the proposed salmon farming at the Five Farming Areas constitutes development in an 'appropriate place and form, and within appropriate limits' in the context of Objective 6 for the following reasons:</p> <ul style="list-style-type: none"> The Five Farming Areas have a functional need to be located in the coastal marine area; Water quality at the Five Farming Areas is well suited to effective and efficient farming of king salmon; The Five Farming Areas are well located relative to the land based infrastructure required to support the activity; and Salmon farming at the Five Farming Areas will avoid, remedy or mitigate its adverse effect on the environment in a manner which is consistent with the expectations of the NZCPS, including its directive provisions which address protection of landscape, natural character and biodiversity.
<p>Objective 7</p> <p>To ensure that management of the coastal environment recognises and provides for New Zealand's international obligations regarding the coastal environment, including the coastal marine area.</p>	<p>The installation of appropriate Aids to Navigation at the Five Farming Areas will provide for New Zealand's obligations regarding safe navigation of the coastal marine area.</p>
<p>Policy 1 Extent and characteristics of the coastal environment</p> <p>(1) Recognise that the extent and characteristics of the coastal environment vary from region to region and locality to locality; and the issues that arise may have different effects in different localities.</p> <p>(2) Recognise that the coastal environment includes:</p> <ol style="list-style-type: none"> the coastal marine area; islands within the coastal marine area; 	<p>When identifying the existing environment for Project South, and when assessing the effects of Project South on that environment, all matters listed in Policy 1 were considered.</p>

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<ul style="list-style-type: none"> (c) areas where coastal processes, influences or qualities are significant, including coastal lakes, lagoons, tidal estuaries, saltmarshes, coastal wetlands, and the margins of these; (d) areas at risk from coastal hazards; (e) coastal vegetation and the habitat of indigenous coastal species including migratory birds; (f) elements and features that contribute to the natural character, landscape, visual qualities or amenity values; (g) items of cultural and historic heritage in the coastal marine area or on the coast; (h) inter-related coastal marine and terrestrial systems, including the intertidal zone; and (i) physical resources and built facilities, including infrastructure, that have modified the coastal environment. 	
<p>Policy 2 The Treaty of Waitangi, tangata whenua and Māori Heritage</p> <p>In taking account of the principles of the Treaty of Waitangi (Te Tiriti o Waitangi), and kaitiakitanga, in relation to the coastal environment:</p> <ul style="list-style-type: none"> (a) recognise that tangata whenua have traditional and continuing cultural relationships with areas of the coastal environment, including places where they have lived and fished for generations; (b) involve iwi authorities or hapū on behalf of tangata whenua in the preparation of regional policy statements, and plans, by undertaking effective consultation with tangata whenua; with such consultation to be early, meaningful, and as far as practicable in accordance with tikanga Māori; (c) with the consent of tangata whenua and as far as practicable in accordance with tikanga Māori, incorporate mātauranga Māori in regional policy statements, in plans, and in the consideration of applications for resource consents, notices of requirement for designation and private plan changes; (d) provide opportunities in appropriate circumstances for Māori involvement in decision making, for example when a consent application or notice of requirement is dealing with cultural localities or issues of cultural significance, and Māori experts, including pūkenga², may have knowledge not otherwise available; (e) take into account any relevant iwi resource management plan and any other relevant planning document recognised by the appropriate iwi authority or hapū and lodged with the council, to the extent that its content has a bearing on resource management issues in the region or district; and (i) where appropriate incorporate references to, or material from, iwi resource management plans in regional policy statements and in plans; and (ii) consider providing practical assistance to iwi or hapū who have indicated a wish to develop iwi resource management plans; (f) provide for opportunities for tangata whenua to exercise kaitiakitanga over waters, forests, lands, and fisheries in the coastal environment through such measures as: <ul style="list-style-type: none"> (i) bringing cultural understanding to monitoring of natural resources; (ii) providing appropriate methods for the management, maintenance and protection of the taonga of tangata whenua; (iii) having regard to regulations, rules or bylaws relating to ensuring sustainability of fisheries resources such as taiāpure, mahinga mātaimai or other non commercial Māori customary fishing; and 	<p>Section 6.8 of the AEE sets out how Sanford intends to address these matters. It includes undertaking a comprehensive engagement and consultation programme with tangata whenua. Sanford will ensure that engagement is fulsome and that there is sufficient time for this to occur. In this way, Sanford anticipates that the outcomes set out in this provision will be achieved.</p>

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<p>(g) in consultation and collaboration with tangata whenua, working as far as practicable in accordance with tikanga Māori, and recognising that tangata whenua have the right to choose not to identify places or values of historic, cultural or spiritual significance or special value:</p> <ul style="list-style-type: none"> (i) recognise the importance of Māori cultural and heritage values through such methods as historic heritage, landscape and cultural impact assessments; and (ii) provide for the identification, assessment, protection and management of areas or sites of significance or special value to Māori, including by historic analysis and archaeological survey and the development of methods such as alert layers and predictive methodologies for identifying areas of high potential for undiscovered Māori heritage, for example coastal pā or fishing villages. 	
<p>Policy 3 Precautionary approach</p> <p>(1) Adopt a precautionary approach towards proposed activities whose effects on the coastal environment are uncertain, unknown, or little understood, but potentially significantly adverse.</p> <p>(2) In particular, adopt a precautionary approach to use and management of coastal resources potentially vulnerable to effects from climate change, so that:</p> <ul style="list-style-type: none"> (a) avoidable social and economic loss and harm to communities does not occur; (b) natural adjustments for coastal processes, natural defences, ecosystems, habitat and species are allowed to occur; and (c) the natural character, public access, amenity and other values of the coastal environment meet the needs of future generations. 	<p>All new marine farming activities involve some degree of uncertainty in respect of their effects on the environment, irrespective of the extent of predevelopment assessment work undertaken.</p> <p>For larger scale projects in new areas, it is generally expected that development would occur in stages and an adaptive management approach will be adopted. That represents a precautionary approach and will be followed by Sanford with Project South. Details of this approach are proposed in Section 3.8 and Section 7.2.1 of the AEE.</p>
<p>Policy 4 Integration</p> <p>Provide for the integrated management of natural and physical resources in the coastal environment, and activities that affect the coastal environment. This requires:</p> <ul style="list-style-type: none"> (a) co-ordinated management or control of activities within the coastal environment, and which could cross administrative boundaries, particularly: <ul style="list-style-type: none"> (i) the local authority boundary between the coastal marine area and land; (ii) local authority boundaries within the coastal environment, both within the coastal marine area and on land; and (iii) where hapū or iwi boundaries or rohe cross local authority boundaries; (b) working collaboratively with other bodies and agencies with responsibilities and functions relevant to resource management, such as where land or waters are held or managed for conservation purposes; and (c) particular consideration of situations where: <ul style="list-style-type: none"> (i) subdivision, use, or development and its effects above or below the line of mean high water springs will require, or is likely to result in, associated use or development that crosses the line of mean high water springs; or (ii) public use and enjoyment of public space in the coastal environment is affected, or is likely to be affected; or (iii) development or land management practices may be affected by physical changes to the coastal environment or potential inundation from coastal hazards, including as a result of climate change; or 	<p>In accordance with Policy 4 the assessment of effects of Project South has considered the environment in an integrated manner.</p>

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<p>(iv) land use activities affect, or are likely to affect, water quality in the coastal environment and marine ecosystems through increasing sedimentation; or</p> <p>(v) significant adverse cumulative effects are occurring, or can be anticipated.</p>	
<p>Policy 5 Land and waters managed or held under other Acts</p> <p>(1) Consider effects on land or waters in the coastal environment held or managed under:</p> <p>(a) the Conservation Act 1987 and any Act listed in the 1st Schedule to that Act; or</p> <p>(b) other Acts for conservation or protection purposes; and, having regard to the purposes for which the land or waters are held or managed:</p> <p>(c) avoid adverse effects of activities that are significant in relation to those purposes; and</p> <p>(d) otherwise avoid, remedy or mitigate adverse effects of activities in relation to those purposes.</p> <p>(2) Have regard to publicly notified proposals for statutory protection of land or waters in the coastal environment and the adverse effects of activities on the purposes of that proposed statutory protection.</p>	<p>Project South is not located in waters or above seabed which are managed or held under other Acts</p>
<p>Policy 6 Activities in the coastal environment</p> <p>(1) In relation to the coastal environment:</p> <p>(a) recognise that the provision of infrastructure, the supply and transport of energy including the generation and transmission of electricity, and the extraction of minerals are activities important to the social, economic and cultural well-being of people and communities;</p> <p>(b) consider the rate at which built development and the associated public infrastructure should be enabled to provide for the reasonably foreseeable needs of population growth without compromising the other values of the coastal environment;</p> <p>(c) encourage the consolidation of existing coastal settlements and urban areas where this will contribute to the avoidance or mitigation of sprawling or sporadic patterns of settlement and urban growth;</p> <p>(d) recognise tangata whenua needs for papakāinga, marae and associated developments and make appropriate provision for them;</p> <p>(e) consider where and how built development on land should be controlled so that it does not compromise activities of national or regional importance that have a functional need to locate and operate in the coastal marine area;</p> <p>(f) consider where development that maintains the character of the existing built environment should be encouraged, and where development resulting in a change in character would be acceptable;</p> <p>(g) take into account the potential of renewable resources in the coastal environment, such as energy from wind, waves, currents and tides, to meet the reasonably foreseeable needs of future generations;</p> <p>(h) consider how adverse visual impacts of development can be avoided in areas sensitive to such effects, such as headlands and prominent ridgelines, and as far as practicable and reasonable apply controls or conditions to avoid those effects;</p> <p>(i) set back development from the coastal marine area and other water bodies, where practicable and reasonable, to protect the natural character, open space, public access and amenity values of the coastal environment; and</p> <p>(j) where appropriate, buffer areas and sites of significant indigenous biological diversity, or historic heritage value.</p> <p>(2) Additionally, in relation to the coastal marine area:</p>	<p>Establishing and operating Project South and its Five Farming Areas will assist in implementing this policy direction.</p> <p>As outlined in Section 6.2 of the AEE, Project South will make a significant contribution to the social and economic wellbeing of people and communities through its provision of a sustainable food resource, export revenue, and the employment and wages it will inject into the economy. It will also do this without having any significant adverse effect on the ability of other coastal activities to do the same. Project South's remote location means the only other existing activity that could be impacted is commercial fishing. As a major quota owner in this area, Sanford are satisfied that the Project South proposal will have minimal effect on fishing activities in this area.</p> <p>It is also considered that the proposed salmon farming at the Five Farming Areas constitutes development in an 'appropriate place and form, and within appropriate limits' for the following reasons:</p> <ul style="list-style-type: none"> • The Five Farming Areas have a functional need to be located in the coastal marine area; • Water quality at the Five Farming Areas is well suited to effective and efficient farming of king salmon; • The Five Farming Areas are well located relative to the land based infrastructure required to support the activity; • The Five Farming Areas will not adversely impact public access to open space or recreational and amenity values; and • Salmon farming at the Five Farming Areas will avoid, remedy or mitigate its adverse effect on the environment in a manner which is consistent with the expectations of the NZCPS, including its directive provisions which address protection of landscape, natural character and biodiversity. <p>With respect to clause 2(b) and (e) while staged development of the Five Farming Areas is required in order to be suitably precautionary when managing effects, the project plan is expedient and aligns with the policy direction that the Five Farming Areas should be developed without unreasonable delay. The design and layout of structures at the Five Farming Areas is also considered to be an appropriate response to the policy direction that occupied space is to be used efficiently while acknowledging the functional requirements of offshore salmon farming and the dynamic coastal environment in which the structures would be located.</p> <p>The Regional Coastal Plan pre-dates the NZCPS and has not been amended to give effect to its direction to provide for aquaculture in appropriate places. However, it does provide a framework for managing aquaculture in the region and for the reasons outlined in the Coastal Plan table below Project South sits comfortable with that framework.</p>

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<p>(a) recognise potential contributions to the social, economic and cultural wellbeing of people and communities from use and development of the coastal marine area, including the potential for renewable marine energy to contribute to meeting the energy needs of future generations;</p> <p>(b) recognise the need to maintain and enhance the public open space and recreation qualities and values of the coastal marine area;</p> <p>(c) recognise that there are activities that have a functional need to be located in the coastal marine area, and provide for those activities in appropriate places;</p> <p>(d) recognise that activities that do not have a functional need for location in the coastal marine area generally should not be located there; and</p> <p>(e) promote the efficient use of occupied space, including by:</p> <ul style="list-style-type: none"> (i) requiring that structures be made available for public or multiple use wherever reasonable and practicable; (ii) requiring the removal of any abandoned or redundant structure that has no heritage, amenity or reuse value; and (iii) considering whether consent conditions should be applied to ensure that space occupied for an activity is used for that purpose effectively and without unreasonable delay. 	
<p>Policy 7 Strategy planning</p> <p>(1) In preparing regional policy statements, and plans:</p> <ul style="list-style-type: none"> (a) consider where, how and when to provide for future residential, rural residential, settlement, urban development and other activities in the coastal environment at a regional and district level, and: (b) identify areas of the coastal environment where particular activities and forms of subdivision, use and development: <ul style="list-style-type: none"> (i) are inappropriate; and (ii) may be inappropriate without the consideration of effects through a resource consent application, notice of requirement for designation or Schedule 1 of the Act process; and provide protection from inappropriate subdivision, use, and development in these areas through objectives, policies and rules. <p>(2) Identify in regional policy statements, and plans, coastal processes, resources or values that are under threat or at significant risk from adverse cumulative effects. Include provisions in plans to manage these effects. Where practicable, in plans, set thresholds (including zones, standards or targets), or specify acceptable limits to change, to assist in determining when activities causing adverse cumulative effects are to be avoided.</p>	<p>Policy 7 applies to plan development and is not directly relevant.</p>
<p>Policy 8 Aquaculture</p> <p>Recognise the significant existing and potential contribution of aquaculture to the social, economic and cultural well-being of people and communities by:</p> <ul style="list-style-type: none"> (a) including in regional policy statements and regional coastal plans provision for aquaculture activities in appropriate places in the coastal environment, recognising that relevant considerations may include: <ul style="list-style-type: none"> (i) the need for high water quality for aquaculture activities; and (ii) the need for land-based facilities associated with marine farming; (b) taking account of the social and economic benefits of aquaculture, including any available assessments of national and regional economic benefits; and 	<p>Policy 8 is highly relevant to Project South. The significant potential and existing contribution of aquaculture to the well-being of people and communities is unequivocally recognised. Sanford’s aquaculture already generates substantial social and economic benefits at both a national and regional scale.</p> <p>Although the Regional Coastal Plan pre-dates the NZCPS and has not been amended to give effect to its direction, it does provide a framework for managing aquaculture in the region and for the reasons outlined in Section 9.4 below Project South sits comfortable with that framework.</p> <p>The proposed salmon farming at the Five Farming Areas constitutes development in an ‘appropriate place and form, and within appropriate limits’ in the context of the NZCPS provisions for the following reasons:</p> <ul style="list-style-type: none"> • The Five Farming Areas have a functional need to be located in the coastal marine area; • Water quality at the Five Farming Areas is well suited to effective and efficient farming of king salmon;

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<p>(c) ensuring that development in the coastal environment does not make water quality unfit for aquaculture activities in areas approved for that purpose.</p>	<ul style="list-style-type: none"> The Five Farming Areas are well located relative to the land based infrastructure required to support the activity; and Salmon farming at the Five Farming Areas will avoid, remedy or mitigate its adverse effect on the environment in a manner which is consistent with the expectations of the NZCPS, including its directive provisions which address protection of landscape, natural character and biodiversity. <p>There is no risk that salmon farming in the Project South area will make water quality unfit for aquaculture activities in other areas.</p>
<p>Policy 9 Ports</p> <p>Recognise that a sustainable national transport system requires an efficient national network of safe ports, servicing national and international shipping, with efficient connections with other transport modes, including by:</p> <p>(a) ensuring that development in the coastal environment does not adversely affect the efficient and safe operation of these ports, or their connections with other transport modes; and</p> <p>(b) considering where, how and when to provide in regional policy statements and in plans for the efficient and safe operation of these ports, the development of their capacity for shipping, and their connections with other transport modes.</p>	<p>Not relevant to the activity</p>
<p>Policy 10 Reclamation and de-reclamation</p> <p>(1) Avoid reclamation of land in the coastal marine area, unless:</p> <p>(a) land outside the coastal marine area is not available for the proposed activity;</p> <p>(b) the activity which requires reclamation can only occur in or adjacent to the coastal marine area;</p> <p>(c) there are no practicable alternative methods of providing the activity; and</p> <p>(d) the reclamation will provide significant regional or national benefit.</p> <p>(2) Where a reclamation is considered to be a suitable use of the coastal marine area, in considering its form and design have particular regard to:</p> <p>(a) the potential effects on the site of climate change, including sea level rise, over no less than 100 years;</p> <p>(b) the shape of the reclamation, and, where appropriate, whether the materials used are visually and aesthetically compatible with the adjoining coast;</p> <p>(c) the use of materials in the reclamation, including avoiding the use of contaminated materials that could significantly adversely affect water quality, aquatic ecosystems and indigenous biodiversity in the coastal marine area;</p> <p>(d) providing public access, including providing access to and along the coastal marine area at high tide where practicable, unless a restriction on public access is appropriate as provided for in policy 19;</p> <p>(e) the ability to remedy or mitigate adverse effects on the coastal environment;</p> <p>(f) whether the proposed activity will affect cultural landscapes and sites of significance to tangata whenua; and</p> <p>(g) the ability to avoid consequential erosion and accretion, and other natural hazards.</p> <p>(3) In considering proposed reclamations, have particular regard to the extent to which the reclamation and intended purpose would provide for the efficient operation of infrastructure, including ports, airports, coastal roads, pipelines, electricity transmission, railways and ferry terminals, and of marinas and electricity generation.</p> <p>(4) De-reclamation of redundant reclaimed land is encouraged where it would:</p>	<p>Not relevant to the activity.</p>

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<p>(a) restore the natural character and resources of the coastal marine area; and</p> <p>(b) provide for more public open space.</p>	
<p>Policy 11 Indigenous biological diversity (biodiversity)</p> <p>To protect indigenous biological diversity in the coastal environment:</p> <p>(a) avoid adverse effects of activities on:</p> <p>(i) indigenous taxa⁴ that are listed as threatened⁵ or at risk in the New Zealand Threat Classification System lists;</p> <p>(ii) taxa that are listed by the International Union for Conservation of Nature and Natural Resources as threatened;</p> <p>(iii) indigenous ecosystems and vegetation types that are threatened in the coastal environment, or are naturally rare⁶;</p> <p>(iv) habitats of indigenous species where the species are at the limit of their natural range, or are naturally rare;</p> <p>(v) areas containing nationally significant examples of indigenous community types; and</p> <p>(vi) areas set aside for full or partial protection of indigenous biological diversity under other legislation; and</p> <p>(b) avoid significant adverse effects and avoid, remedy or mitigate other adverse effects of activities on:</p> <p>(i) areas of predominantly indigenous vegetation in the coastal environment;</p> <p>(ii) habitats in the coastal environment that are important during the vulnerable life stages of indigenous species;</p> <p>(iii) indigenous ecosystems and habitats that are only found in the coastal environment and are particularly vulnerable to modification, including estuaries, lagoons, coastal wetlands, dunelands, intertidal zones, rocky reef systems, eelgrass and saltmarsh;</p> <p>(iv) habitats of indigenous species in the coastal environment that are important for recreational, commercial, traditional or cultural purposes;</p> <p>(v) habitats, including areas and routes, important to migratory species; and</p> <p>(vi) ecological corridors, and areas important for linking or maintaining biological values identified under this policy.</p>	<p>As described in Section 5 of the AEE several important marine mammal and seabird species visit the area in which the Five Farming Areas would be located. Policy 11(a) contains explicit direction on the protection of those values. The key direction is to avoid adverse effects on species which are:</p> <ul style="list-style-type: none"> indigenous taxa that are listed as threatened or at risk in the New Zealand Threat Classification System lists; and taxa that are listed by the International Union for Conservation of Nature and Natural Resources as threatened. <p>Also of relevance here is Policy 11(b)(iv) and (v) which contains policy to avoid significant adverse effects and avoid, remedy or mitigate other adverse effects of activities on:</p> <ul style="list-style-type: none"> habitats of indigenous species in the coastal environment that are important for recreational, commercial, traditional or cultural purposes; and habitats, including areas and routes, important to migratory species.. <p>Each is addressed below.</p> <p>Avoiding Adverse Effects on Seabird Species</p> <p>A list of the seabird species which meet the Policy 11(a) criteria, and which are known to inhabit the waters in which Project South would be located is provided in Table 4 (see Section 5.8 of the AEE). Several measures have or will be taken to address potential effects on these species, including:</p> <ul style="list-style-type: none"> Locating the Five Farming Areas many kilometres offshore and away from significant roosting sites. Minimising the area occupied by farm structures at each of the Five Farming Areas and in turn effects on habitat exclusion. Implementing best available management practices for net design (including avoiding the use of traditional bird netting). That a Seabird Management Plan be developed by an experienced marine seabird expert after consultation with the Department of Conservation and tangata whenua prior to commencing operations to ensure the most appropriate protection measures are in place. Staging development of the Five Farming Areas and incorporating monitoring and adaptive management as described in Section 8. <p>The combination of these measures will mean the Policy 11(a) test is achieved.</p> <p>Avoiding Adverse Effects on Marine Mammal Species</p> <p>A list of the marine mammal species which meet the Policy 11(a) criteria for requiring avoidance of effects, and which are known to inhabit the waters in which Project South would be located is provided in Table 3 (see Section 5.7 of the AEE). With respect to Policy 11(b)(v) the area may also be important for migrating whale species.</p> <p>A number of measures have or will be taken to address potential effects on these species, including:</p> <ul style="list-style-type: none"> Minimising potential habitat exclusion by minimising the area occupied by farm structures at each of the Five Farming Areas. Staging development of the Five Farming Areas and incorporating monitoring and adaptive management.

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- A Marine Mammal Management Plan will be developed by an experienced marine mammal expert after consultation with the Department of Conservation and tangata whenua prior to commencing operations to ensure the most appropriate protection measures are in place.
- Monitoring to improve knowledge of how marine mammals will perceive offshore farm structures visually and acoustically, and importantly, to confirm their reactions to farms and whether they use the application site.

The combination of these measures will mean the Policy 11(a) and Policy 11(b)(v) test is achieved.

Habitats of indigenous species in the coastal environment that are important for recreational, commercial, traditional or cultural purposes

Policy 11(b)(iv) contains policy direction to avoid significant adverse effects and avoid, remedy or mitigate other adverse effects of activities on habitats of indigenous species in the coastal environment that are important for recreational, commercial, traditional or cultural purposes.

Project South has been located and designed to sit comfortably with this policy direction, with key matters being:

- A location has been chosen for the Five Farming Areas which is not an important or unique fishing area.
- A suitable buffer area has been provided between the Five Farming Areas and the Foveaux Strait oyster beds.
- Project South will be undertaken in a manner which protects tīti, including the nesting and feeding of those birds on nearby islands and in the surrounding marine area.
- Project South will be undertaken in a manner which protects other taonga marine bird species which are known to inhabit this area.¹
- Project South will be undertaken in a manner which protects taonga marine mammal species which are known to inhabit this area.²
- The location and design of the Project South farmed areas means they will not have an adverse effect on taonga shellfish species, nor will it adversely affect any habitat which is of biological significance for any fish species.

Policy 12 Harmful aquatic organisms

- (1) Provide in regional policy statements and in plans, as far as practicable, for the control of activities in or near the coastal marine area that could have adverse effects on the coastal environment by causing harmful aquatic organisms⁷ to be released or otherwise spread, and include conditions in resource consents, where relevant, to assist with managing the risk of such effects occurring.
- (2) Recognise that activities relevant to (1) include:
 - (a) the introduction of structures likely to be contaminated with harmful aquatic organisms;
 - (b) the discharge or disposal of organic material from dredging, or from vessels and structures, whether during maintenance, cleaning or otherwise; and whether in the coastal marine area or on land;
 - (c) the provision and ongoing maintenance of moorings, marina berths, jetties and wharves; and
 - (d) the establishment and relocation of equipment and stock required for or associated with aquaculture.

The key direction in Policy 12 for resource consent applications like this is to include conditions on resource consents to assist with managing the risk harmful aquatic organisms being released or otherwise spread. Several management measures are proposed for Project South and they are described in Section 7 of the AEE. It is expected they will form the basis of consent conditions. This is consistent with Policy 12.

¹ These include: Hoiho (Yellow-eyed penguin), Karoro (Black backed gull), Koau (Black shag, Pied shag, Little shag), Korora (Blue penguin), Tara (Terns), Tawaki (Fiordland crested penguin) and Toroa (Albatrosses and Mollymawks).

² These include: Kekenos (New Zealand fur seals), Paikea (Humpback whales), Paraoa (Sperm whale), Rapoka/Whakahao (New Zealand sea lion/Hooker's sea lion), Tohora Southern right whale.

Provision	Assessment
<p>Policy 13 Preservation of natural character</p> <p>(1) To preserve the natural character of the coastal environment and to protect it from inappropriate subdivision, use, and development:</p> <ul style="list-style-type: none"> (a) avoid adverse effects of activities on natural character in areas of the coastal environment with outstanding natural character; and (b) avoid significant adverse effects and avoid, remedy or mitigate other adverse effects of activities on natural character in all other areas of the coastal environment; including by: (c) assessing the natural character of the coastal environment of the region or district, by mapping or otherwise identifying at least areas of high natural character; and (d) ensuring that regional policy statements, and plans, identify areas where preserving natural character requires objectives, policies and rules, and include those provisions. <p>(2) Recognise that natural character is not the same as natural features and landscapes or amenity values and may include matters such as:</p> <ul style="list-style-type: none"> (a) natural elements, processes and patterns; (b) biophysical, ecological, geological and geomorphological aspects; (c) natural landforms such as headlands, peninsulas, cliffs, dunes, wetlands, reefs, freshwater springs and surf breaks; (d) the natural movement of water and sediment; (e) the natural darkness of the night sky; (f) places or areas that are wild or scenic; (g) a range of natural character from pristine to modified; and (h) experiential attributes, including the sounds and smell of the sea; and their context or setting. 	<p>In accordance with the NZCPS Sanford has avoided adverse effects on any outstanding natural feature or landscape or area of outstanding natural character by avoiding locating the Five Farming Areas in these high value locations.</p> <p>With respect to the landscape and natural character values that are present in this environment the activity sits comfortably with the above policy direction on the basis that the location and design of the Five Farming Areas means:</p> <ul style="list-style-type: none"> • Seascape effects are likely to be low to very low; • Natural character effects are likely to be in the moderate to low category; and • Cumulative effects are likely to be very low to relatively insignificant.
<p>Policy 14 Restoration of natural character</p> <p>Promote restoration or rehabilitation of the natural character of the coastal environment, including by:</p> <ul style="list-style-type: none"> (a) identifying areas and opportunities for restoration or rehabilitation; (b) providing policies, rules and other methods directed at restoration or rehabilitation in regional policy statements, and plans; (c) where practicable, imposing or reviewing restoration or rehabilitation conditions on resource consents and designations, including for the continuation of activities; and recognising that where degraded areas of the coastal environment require restoration or rehabilitation, possible approaches include: <ul style="list-style-type: none"> (i) restoring indigenous habitats and ecosystems, using local genetic stock where practicable; or (ii) encouraging natural regeneration of indigenous species, recognising the need for effective weed and animal pest management; or (iii) creating or enhancing habitat for indigenous species; or (iv) rehabilitating dunes and other natural coastal features or processes, including saline wetlands and intertidal saltmarsh; or (v) restoring and protecting riparian and intertidal margins; or (vi) reducing or eliminating discharges of contaminants; or 	<p>This is not an area where restoration of natural character is necessary or appropriate.</p>

Provision	Assessment
<ul style="list-style-type: none"> (vii) removing redundant structures and materials that have been assessed to have minimal heritage or amenity values and when the removal is authorised by required permits, including an archaeological authority under the Historic Places Act 1993; or (viii) restoring cultural landscape features; or (ix) redesign of structures that interfere with ecosystem processes; or (x) decommissioning or restoring historic landfill and other contaminated sites which are, or have the potential to, leach material into the coastal marine area. 	
<p>Policy 15 Natural features and natural landscapes</p> <p>To protect the natural features and natural landscapes (including seascapes) of the coastal environment from inappropriate subdivision, use, and development:</p> <ul style="list-style-type: none"> (a) avoid adverse effects of activities on outstanding natural features and outstanding natural landscapes in the coastal environment; and (b) avoid significant adverse effects and avoid, remedy, or mitigate other adverse effects of activities on other natural features and natural landscapes in the coastal environment; including by: (c) identifying and assessing the natural features and natural landscapes of the coastal environment of the region or district, at minimum by land typing, soil characterisation and landscape characterisation and having regard to: <ul style="list-style-type: none"> (i) natural science factors, including geological, topographical, ecological and dynamic components; (ii) the presence of water including in seas, lakes, rivers and streams; (iii) legibility or expressiveness—how obviously the feature or landscape demonstrates its formative processes; (iv) aesthetic values including memorability and naturalness; (v) vegetation (native and exotic); (vi) transient values, including presence of wildlife or other values at certain times of the day or year; (vii) whether the values are shared and recognised; (viii) cultural and spiritual values for tangata whenua, identified by working, as far as practicable, in accordance with tikanga Māori; including their expression as cultural landscapes and features; (ix) historical and heritage associations; and (x) wild or scenic values; (d) ensuring that regional policy statements, and plans, map or otherwise identify areas where the protection of natural features and natural landscapes requires objectives, policies and rules; and (e) including the objectives, policies and rules required by (d) in plans. 	<p>The Five Farming Areas have been selected so as to avoid a location within or affecting any outstanding natural feature or landscape.</p>
<p>Policy 16 Surf Breaks of national significance</p> <p>Protect the surf breaks⁸ of national significance for surfing listed in Schedule 1, by:</p> <ul style="list-style-type: none"> (a) ensuring that activities in the coastal environment do not adversely affect the surf breaks; and (b) avoiding adverse effects of other activities on access to, and use and enjoyment of the surf breaks. 	<p>Not applicable</p>
<p>Policy 17 Historic heritage identification and protection</p> <p>Protect historic heritage in the coastal environment from inappropriate subdivision, use, and development by:</p>	<p>The location of the Five Farming Areas means no historic heritage items are recorded or are expected to be present on the seabed.</p>

Provision	Assessment
<ul style="list-style-type: none"> (a) identification, assessment and recording of historic heritage, including archaeological sites; (b) providing for the integrated management of such sites in collaboration with relevant councils, heritage agencies, iwi authorities and kaitiaki; (c) initiating assessment and management of historic heritage in the context of historic landscapes; (d) recognising that heritage to be protected may need conservation; (e) facilitating and integrating management of historic heritage that spans the line of mean high water springs; (f) including policies, rules and other methods relating to (a) to (e) above in regional policy statements, and plans; (g) imposing or reviewing conditions on resource consents and designations, including for the continuation of activities; (h) requiring, where practicable, conservation conditions; and (i) considering provision for methods that would enhance owners' opportunities for conservation of listed heritage structures, such as relief grants or rates relief. 	
<p>Policy 18 Public open Space</p> <p>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:</p> <ul style="list-style-type: none"> (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. 	<p>This policy direction informed the design of Project South and its Five Farming Areas. The design and clustered layout of the structures at each the Five Farming Areas minimises the area where free public movement would be excluded, while acknowledging the functional requirements of offshore salmon farming and the dynamic coastal environment in which the structures would be located. As discussed above, there is a very low level of public use and access to the area at present and so Project South will not result in any effects on public open space that would be contrary to this policy.</p>
<p>Policy 19 Walking access</p> <ul style="list-style-type: none"> (1) Recognise the public expectation of and need for walking access to and along the coast that is practical, free of charge and safe for pedestrian use. (2) Maintain and enhance public walking access to, along and adjacent to the coastal marine area, including by: <ul style="list-style-type: none"> (a) identifying how information on where the public have walking access will be made publicly available; (b) avoiding, remedying or mitigating any loss of public walking access resulting from subdivision, use, or development; and (c) identifying opportunities to enhance or restore public walking access, for example where: <ul style="list-style-type: none"> (i) connections between existing public areas can be provided; or (ii) improving access would promote outdoor recreation; or 	<p>Not applicable.</p>

Provision	Assessment
<ul style="list-style-type: none"> (iii) physical access for people with disabilities is desirable; or (iv) the long-term availability of public access is threatened by erosion or sea level rise; or (v) access to areas or sites of historic or cultural significance is important; or (vi) subdivision, use, or development of land adjacent to the coastal marine area has reduced public access, or has the potential to do so. <p>(3) Only impose a restriction on public walking access to, along or adjacent to the coastal marine area where such a restriction is necessary:</p> <ul style="list-style-type: none"> (a) to protect threatened indigenous species; or (b) to protect dunes, estuaries and other sensitive natural areas or habitats; or (c) to protect sites and activities of cultural value to Māori; or (d) to protect historic heritage; or (e) to protect public health or safety; or (f) to avoid or reduce conflict between public uses of the coastal marine area and its margins; or (g) for temporary activities or special events; or (h) for defence purposes in accordance with the Defence Act 1990; or (i) to ensure a level of security consistent with the purpose of a resource consent; or (j) in other exceptional circumstances sufficient to justify the restriction. <p>(4) Before imposing any restriction under (3), consider and where practicable provide for alternative routes that are available to the public free of charge at all times.</p>	
<p>Policy 20 Vehicle Access</p> <p>(1) Control use of vehicles, apart from emergency vehicles, on beaches, foreshore, seabed and adjacent public land where:</p> <ul style="list-style-type: none"> (a) damage to dune or other geological systems and processes; or (b) harm to ecological systems or to indigenous flora and fauna, for example marine mammal and bird habitats or breeding areas and shellfish beds; or (c) danger to other beach users; or (d) disturbance of the peaceful enjoyment of the beach environment; or (e) damage to historic heritage; or (f) damage to the habitats of fisheries resources of significance to customary, commercial or recreational users; or (g) damage to sites of significance to tangata whenua; might result. <p>(2) Identify the locations where vehicular access is required for boat launching, or as the only practicable means of access to private property or public facilities, or for the operation of existing commercial activities, and make appropriate provision for such access.</p> <p>(3) Identify any areas where and times when recreational vehicular use on beaches, foreshore and seabed may be permitted, with or without restriction as to type of vehicle, without a likelihood of any of (1)(a) to (g) occurring.</p>	<p>Not applicable.</p>

Provision	Assessment
<p>Policy 21 Enhancement of water quality</p> <p>Where the quality of water in the coastal environment has deteriorated so that it is having a significant adverse effect on ecosystems, natural habitats, or water based recreational activities, or is restricting existing uses, such as aquaculture, shellfish gathering, and cultural activities, give priority to improving that quality by:</p> <ul style="list-style-type: none"> (a) identifying such areas of coastal water and water bodies and including them in plans; (b) including provisions in plans to address improving water quality in the areas identified above; (c) where practicable, restoring water quality to at least a state that can support such activities and ecosystems and natural habitats; (d) requiring that stock are excluded from the coastal marine area, adjoining intertidal areas and other water bodies and riparian margins in the coastal environment, within a prescribed time frame; and (e) engaging with tangata whenua to identify areas of coastal waters where they have particular interest, for example in cultural sites, wāhi tapu, other taonga, and values such as mauri, and remedying, or, where remediation is not practicable, mitigating adverse effects on these areas and values. 	<p>Water quality at the Five Farming Areas is in its natural state. The assessment has shown that the activity will not have any adverse effects of biological significance on water quality.</p>
<p>Policy 22 Sedimentation</p> <ul style="list-style-type: none"> (1) Assess and monitor sedimentation levels and impacts on the coastal environment. (2) Require that subdivision, use, or development will not result in a significant increase in sedimentation in the coastal marine area, or other coastal water. (3) Control the impacts of vegetation removal on sedimentation including the impacts of harvesting plantation forestry. (4) Reduce sediment loadings in runoff and in stormwater systems through controls on land use activities. 	<p>Not applicable.</p>
<p>Policy 23 Discharge of contaminants</p> <ul style="list-style-type: none"> (1) In managing discharges to water in the coastal environment, have particular regard to: <ul style="list-style-type: none"> (a) the sensitivity of the receiving environment; (b) the nature of the contaminants to be discharged, the particular concentration of contaminants needed to achieve the required water quality in the receiving environment, and the risks if that concentration of contaminants is exceeded; and (c) the capacity of the receiving environment to assimilate the contaminants; and (d) avoid significant adverse effects on ecosystems and habitats after reasonable mixing; (e) use the smallest mixing zone necessary to achieve the required water quality in the receiving environment; and (f) minimise adverse effects on the life-supporting capacity of water within a mixing zone. (2) In managing discharge of human sewage, do not allow: <ul style="list-style-type: none"> (a) discharge of human sewage directly to water in the coastal environment without treatment; and (b) the discharge of treated human sewage to water in the coastal environment, unless: <ul style="list-style-type: none"> (i) there has been adequate consideration of alternative methods, sites and routes for undertaking the discharge; and (ii) informed by an understanding of tangata whenua values and the effects on them. 	<p>For both types of discharge proposed (feed and medical therapeutants) the discharge mechanism is designed to monitor and minimise loss of the discharged material into the surrounding environment, and in turn no effects on water quality of biological significance are expected.</p>

Provision	Assessment
<p>(3) Objectives, policies and rules in plans which provide for the discharge of treated human sewage into waters of the coastal environment must have been subject to early and meaningful consultation with tangata whenua.</p> <p>(4) In managing discharges of stormwater take steps to avoid adverse effects of stormwater discharge to water in the coastal environment, on a catchment by catchment basis, by:</p> <ul style="list-style-type: none"> (a) avoiding where practicable and otherwise remedying cross contamination of sewage and stormwater systems; (b) reducing contaminant and sediment loadings in stormwater at source, through contaminant treatment and by controls on land use activities; (c) promoting integrated management of catchments and stormwater networks; and (d) promoting design options that reduce flows to stormwater reticulation systems at source. <p>(5) In managing discharges from ports and other marine facilities:</p> <ul style="list-style-type: none"> (a) require operators of ports and other marine facilities to take all practicable steps to avoid contamination of coastal waters, substrate, ecosystems and habitats that is more than minor; (b) require that the disturbance or relocation of contaminated seabed material, other than by the movement of vessels, and the dumping or storage of dredged material does not result in significant adverse effects on water quality or the seabed, substrate, ecosystems or habitats; (c) require operators of ports, marinas and other relevant marine facilities to provide for the collection of sewage and waste from vessels, and for residues from vessel maintenance to be safely contained and disposed of; and (d) consider the need for facilities for the collection of sewage and other wastes for recreational and commercial boating. 	
<p>Policy 24 Identification of coastal hazards</p>	<p>Not applicable.</p>
<p>(1) Identify areas in the coastal environment that are potentially affected by coastal hazards (including tsunami), giving priority to the identification of areas at high risk of being affected. Hazard risks, over at least 100 years, are to be assessed having regard to:</p> <ul style="list-style-type: none"> (a) physical drivers and processes that cause coastal change including sea level rise; (b) short-term and long-term natural dynamic fluctuations of erosion and accretion; (c) geomorphological character; (d) the potential for inundation of the coastal environment, taking into account potential sources, inundation pathways and overland extent; (e) cumulative effects of sea level rise, storm surge and wave height under storm conditions; (f) influences that humans have had or are having on the coast; (g) the extent and permanence of built development; and (h) the effects of climate change on: <ul style="list-style-type: none"> (i) matters (a) to (g) above; (ii) storm frequency, intensity and surges; and (iii) coastal sediment dynamics; taking into account national guidance and the best available information on the likely effects of climate change on the region or district. 	

Provision	Assessment
<p>Policy 25 Subdivision, use, and development in areas of coastal hazard risk</p> <p>In areas potentially affected by coastal hazards over at least the next 100 years:</p> <ul style="list-style-type: none"> (a) avoid increasing the risk¹⁰ of social, environmental and economic harm from coastal hazards; (b) avoid redevelopment, or change in land use, that would increase the risk of adverse effects from coastal hazards; (c) encourage redevelopment, or change in land use, where that would reduce the risk of adverse effects from coastal hazards, including managed retreat by relocation or removal of existing structures or their abandonment in extreme circumstances, and designing for relocatability or recoverability from hazard events; (d) encourage the location of infrastructure away from areas of hazard risk where practicable; (e) discourage hard protection structures and promote the use of alternatives to them, including natural defences; and (f) consider the potential effects of tsunami and how to avoid or mitigate them. 	Not applicable.
<p>Policy 26 Natural defences against coastal hazards</p> <ul style="list-style-type: none"> (1) Provide where appropriate for the protection, restoration or enhancement of natural defences that protect coastal land uses, or sites of significant biodiversity, cultural or historic heritage or geological value, from coastal hazards. (2) Recognise that such natural defences include beaches, estuaries, wetlands, intertidal areas, coastal vegetation, dunes and barrier islands. 	Not applicable.
<p>Policy 27 Strategies for protecting significant existing development from coastal hazard risk</p> <ul style="list-style-type: none"> (1) In areas of significant existing development likely to be affected by coastal hazards, the range of options for reducing coastal hazard risk that should be assessed includes: <ul style="list-style-type: none"> (a) promoting and identifying long-term sustainable risk reduction approaches including the relocation or removal of existing development or structures at risk; (b) identifying the consequences of potential strategic options relative to the option of ‘do-nothing’; (c) recognising that hard protection structures may be the only practical means to protect existing infrastructure of national or regional importance, to sustain the potential of built physical resources to meet the reasonably foreseeable needs of future generations; (d) recognising and considering the environmental and social costs of permitting hard protection structures to protect private property; and (e) identifying and planning for transition mechanisms and timeframes for moving to more sustainable approaches. (2) In evaluating options under (1): <ul style="list-style-type: none"> (a) focus on approaches to risk management that reduce the need for hard protection structures and similar engineering interventions; (b) take into account the nature of the coastal hazard risk and how it might change over at least a 100-year timeframe, including the expected effects of climate change; and (c) evaluate the likely costs and benefits of any proposed coastal hazard risk reduction options. (3) Where hard protection structures are considered to be necessary, ensure that the form and location of any structures are designed to minimise adverse effects on the coastal environment. 	Not applicable.

Provision	Assessment
(4) Hard protection structures, where considered necessary to protect private assets, should not be located on public land if there is no significant public or environmental benefit in doing so.	
<p>Policy 28 Monitoring and reviewing the effectiveness of the NZCPS</p> <p>(1) To monitor and review the effectiveness of the NZCPS in achieving the purpose of the Act, the Minister of Conservation should:</p> <ul style="list-style-type: none"> (a) in collaboration with local authorities collect data for, and, as far as practicable, incorporate district and regional monitoring information into a nationally consistent monitoring and reporting programme; (b) undertake other information gathering or monitoring that assists in providing a national perspective on coastal resource management trends, emerging issues and outcomes; (c) within six years of its gazettal, assess the effect of the NZCPS on regional policy statements, plans, and resource consents, and other decision making; and (d) publish a report and conclusions on matters (a) to (c) above. 	Not applicable.
<p>Policy 29 Restricted Coastal Activities</p> <p>(1) The Minister of Conservation does not require any activity to be specified as a restricted coastal activity in a regional coastal plan.</p> <p>(2) Local authorities are directed under sections 55 and 57 of the Act to amend documents as necessary to give effect to this policy as soon as practicable, without using the process in Schedule 1 of the Act, with the effect that:</p> <ul style="list-style-type: none"> (a) any activity specified as a discretionary activity and a restricted coastal activity becomes a discretionary activity only; (b) any activity specified as a non-complying activity and a restricted coastal activity becomes a non-complying activity only. <p>(3) Any application for a coastal permit for an activity specified as a restricted coastal activity that has been publicly notified before the date the amendments in clause (2) are made shall continue to be treated as an application for a restricted coastal activity for the purposes of section 117 of the Act.</p> <p>(4) Any other application for an activity specified as a restricted coastal activity made before the date of the amendments in clause (2), shall be considered as a discretionary or non-complying activity in accordance with the regional coastal plan or proposed regional coastal plan's classification and section 117 does not apply.</p>	Not applicable.

Table L2: Assessment of Project South against the relevant provisions of the Regional Policy Statement for Southland.

Provision	Assessment
Chapter 3 Tangata Whenua	
<p>Objective TW.1 – Decision-making and partnerships with tangata whenua</p> <p>The principles of the Treaty of Waitangi/Te Tiriti o Waitangi are taken into account in a systematic way through effective partnerships between tangata whenua and local authorities, which provide the capacity for tangata whenua to be fully involved in council decision-making processes.</p>	<p>This objective relates to partnerships between tangata whenua and local authorities.</p>
<p>Objective TW.2 – Provision for iwi management plans</p> <p>All local authority resource management processes and decisions take into account iwi management plans.</p>	<p>The relevant iwi management plan is Te Tangi a Tauria. To the extent it can without input from tangata whenua Sanford has provided an assessment of Project South against the provisions of Te Tangi a Tauria and this is provided in Table L4 below.</p> <p>First and foremost Sanford acknowledges that Te Tangi a Tauria is an important planning document designed to assist tangata whenua in carrying out kaitiaki roles and responsibilities, and that tangata whenua are best placed to assess Project South against its provisions.</p> <p>Sanford expects this to occur as part of the engagement and consultation it proposes.</p>
<p>Objective TW.3 – Tangata whenua spiritual values and customary resources</p> <p>Mauri and wairua are sustained or improved where degraded, and mahinga kai and customary resources are healthy, abundant and accessible to tangata whenua</p>	<p>As outlined in Section 6.8, to the extent it can, without the active input of tangata whenua, Sanford considered the cultural, spiritual, historic, and traditional associations of tangata whenua to this area when planning and assessing the effects of Project South.</p> <p>Beginning in March 2020 Sanford will initiate a comprehensive engagement and consultation programme in respect of Project South with tangata whenua.</p> <p>This will address effects on tangata whenua spiritual values and customary resources.</p>
<p>Objective TW.4 – Sites of cultural significance</p> <p>Wāhi tapu, wāhi taonga and sites of significance are appropriately managed and protected.</p>	<p>As outlined in Section 6.8, to the extent it can, without the active input of Te Rūnanga o Ngāi Tahu and Ngāi Tahu ki Murihiku, Sanford sought to identify Wāhi tapu, wāhi taonga and sites of significance using readily available information. None were identified as being directly affected by the Five Farming Areas.</p> <p>However, Sanford acknowledges that public record of some Wāhi tapu, wāhi taonga and sites of significance may not be kept and that this assessment should occur in consultation with tangata whenua. This will occur as part of the consultation and engagement Sanford will initiate in March 2020 with tangata whenua.</p>
<p>Objective TW.5 – Provision for Māori land and resources</p> <p>Māori are able to develop and use their land and resources and provide for their social, economic and cultural wellbeing, in a manner that is sustainable.</p>	<p>As outlined in Section 6.8, to the extent it can, without the active input of Te Rūnanga o Ngāi Tahu and Ngāi Tahu ki Murihiku, Sanford considered the importance of tangata whenua being able to continue using of the resources in this coastal area when planning and assessing the effects of Project South. Including titi, mahinga kai, and Ngai Tahu’s own proposed salmon farm off the northern coast of Rakiura.</p> <p>However, Sanford acknowledges that this assessment should occur in consultation with tangata whenua. This will occur as part of the consultation and engagement Sanford will initiate in March 2020 with tangata whenua.</p>
<p>Policy TW.1 – Treaty of Waitangi</p> <p>Consult with, and enhance tangata whenua involvement in local authority resource management decision-making processes, in a manner that is consistent with the principles of the Treaty of Waitangi/Te Tiriti o Waitangi.</p>	<p>This policy is about local authorities exercising their powers. It is relevant to Environment Southland’s decision making process for this application, but not to the merits of the application itself.</p>
<p>Policy TW.2 – Partnerships and relationship agreements</p> <p>Actively foster partnerships and relationship agreements between local authorities and tangata whenua.</p>	<p>This policy is about the relationship between Environment Southland and tangata whenua. Not applicants for resource consent applications.</p>

<p>Policy TW.3 – Iwi management plans</p> <p>Take iwi management plans into account within local authority resource management decision making processes.</p>	<p>See assessment of Objective TW.2</p>
<p>Policy TW.4 – Decision making</p> <p>When making resource management decisions, ensure that local authority functions and powers are exercised in a manner that:</p> <p>(a) recognises and provides for:</p> <ul style="list-style-type: none"> (i) traditional Māori uses and practices relating to natural resources (e.g. mātaihai, kaitiakitanga, manaakitanga, matauranga, rāhui, wāhi tapu, taonga raranga); (ii) the ahi kā (manawhenua) relationship of tangata whenua with and their role as kaitiaki of natural resources; (iii) mahinga kai and access to areas of natural resources used for customary purposes; (iv) mauri and wairua of natural resources; (v) places, sites and areas with significant spiritual or cultural historic heritage value to tangata whenua; (vi) Māori environmental health and cultural wellbeing. <p>(b) recognises that only tangata whenua can identify their relationship and that of their culture and traditions with their ancestral lands, water, sites, wāhi tapu and other taonga.</p>	<p>This policy is about Environment Southland’s role as the decision maker on this application.</p>
<p>Policy TW.5 – Māori land and resources</p> <p>Assist and enable the use and development of Māori land and resources, in a manner that is sustainable.</p>	<p>See assessment of Objective TW.5.</p>
<p>Chapter 6: Biodiversity</p>	
<p>Objective BIO.1 – Understand and identify</p> <p>Understand the extent of loss of indigenous ecosystems and habitats across the Southland Region and identify those at risk to further loss and degradation.</p>	<p>Section 5 of the AEE and the associated technical reports identify the indigenous ecosystems and habitats present in the area where Project South would be located.</p>
<p>Objective BIO.2 – Maintain and protect</p> <p>Maintain indigenous biodiversity in Southland and protect areas of significant indigenous vegetation and significant habitats of indigenous fauna for present and future generations.</p>	<p>Section 6 and 7 of the AEE describe how indigenous biodiversity will be maintained by Project South.</p> <p>The south west Foveaux Straight area is habitat of endangered seabird species, including yellow eyed penguin and Foveaux shag, and potentially several marine mammal species. Section 6 and 7 of the AEE describe how the habit of those species will be protected by Project South</p>
<p>Policy BIO.3 – Protect coastal indigenous biodiversity</p> <p>Protect indigenous biodiversity from adverse effects in the coastal environment as set out in Policy 11 of the New Zealand Coastal Policy Statement 2010</p>	<p>For the reasons set out in Table L1 above regarding Policy 11 of the NZCPS, Policy BIO.3 is achieved.</p>
<p>Chapter 7 Coast</p>	
<p>Objective COAST.1 – Direction on activities within the coastal environment</p> <p>Provide clear direction on appropriate and inappropriate subdivision, use and development activities, the cumulative effect of an activity, and precedent effects of a decision, within the region’s coastal environment</p>	<p>This objective is directed at local authorities preparing planning documents.</p>
<p>Objective COAST.2 – Activities in the coastal environment</p>	<p>Of prime importance when determining whether Project South is ‘appropriate aquaculture’ in this context is achieving the outcomes sought in Objective COAST.5, Policy BIO.3 and Policy COAST.3 for how biodiversity, landscape and natural character values are to be protected. Collectively those provisions direct that Project South be located and</p>

Infrastructure, ports, energy projects, aquaculture, mineral extraction activities, subdivision, use and development in the coastal environment are provided for and able to expand, where appropriate, while managing the adverse effects of those activities.

managed to achieve the directive policies contained in the NZCPS for those matters. For the reasons set out in Section 9.2 of the AEE those bottom lines will be achieved by Project South.

Other important aspects of Project South which mean it is appropriate aquaculture in respect of this objective are:

- Effects of Project South on water quality will be avoided remedied or mitigated such that coastal water quality and ecosystems are maintained;
- The offshore location of Project South and the design of its structures means it will not have adverse effects on historic heritage, coastal dune systems or natural hazards, and its adverse impacts on public access, amenity and social values will be minimal; and
- A comprehensive suite of measures is proposed for avoiding, remedying or mitigating the effects of the activity.

Objective COAST.3 – Coastal water quality and ecosystems

Coastal water quality and ecosystems are maintained or enhanced.

The main effects on the water column from finfish farming are the release of total ammonia-N (or TAN), potential enhancement of phytoplankton biomass, and consumption of oxygen. No effects of concern in respect of water quality and ecosystems have been identified for Project South.

Objective COAST.4 – Natural character

The natural character of the coastal environment is restored, rehabilitated or preserved.

This objective will be achieved.

Section 6.6 of the AEE sets out the reasons why the natural character effects of Project South will be moderate to low and natural character will be suitably preserved in this environment. As outlined below natural character will be preserved in accordance with Policy COAST.3.

Objective COAST.5 – Aquaculture

Recognise the contribution of aquaculture to the well-being of people and communities by making provision for aquaculture in appropriate locations while:

- protecting coastal indigenous biodiversity in accordance with Policy BIO.3;
- protecting outstanding natural features, landscapes and natural character in accordance with Policy COAST.3; and
- avoiding, remedying, or mitigating other adverse effect.

This objective is achieved by Project South, noting the following:

- For the reasons set out in Section 2 of the AEE water quality in this location is well suited to effective and efficient farming of king salmon.
- Policy BIO.3 is achieved here for the reasons set out above.
- Effects on natural features and landscape and natural character will achieve Policy COAST.3 for the reasons set out below.
- Other adverse effects will be avoided, remedied or mitigated as described in Sections 6 and 7 of the AEE.

This objective makes it clear that aquaculture is a valued and anticipated activity in the Southland coastal marine area and it is something that the plan seeks to actively promote in appropriate locations.

Policy COAST.1 – Direction on locations for activities

Identify in regional and district plans locations within the coastal environment where particular activities and forms of subdivision, use and development:

- are appropriate;
- are inappropriate; and
- 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.

This policy is directed at local authorities preparing planning documents.

Policy COAST.2 – Management of activities in the coastal environment

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

- protect indigenous biodiversity, historic heritage, natural character, and natural features and landscape values;

All of these matters are addressed in Section 6 and 7 of the AEE. Key points to note are:

- Indigenous biodiversity, natural character, natural features and landscape values will be protected in accordance with the provisions which address those specific matters in the RPS.

- (b) maintain or enhance amenity, social, intrinsic, ecological and cultural values, landscapes of cultural significance to tangata whenua and coastal dune systems;
- (c) maintain or enhance public access; and
- (d) avoid or mitigate the impacts of natural hazards, including predicted sea level rise and climate change.

- The offshore location of Project South and the design of its structures means it will not have adverse effects on historic heritage, coastal dune systems or natural hazards, and its adverse impacts on public access, amenity and social values will be minimal.
- Policy COAST.2 (b) directs that landscapes of cultural significance to tangata whenua be maintained or enhanced. This will be addressed in the comprehensive engagement that will be undertaken with tangata whenua.

Policy COAST.3 – Protection of the coastal environment

Ensure that subdivision, use and development activities:

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

Project South is not located within any outstanding natural feature or landscape or outstanding natural character area.

As outlined in Section 6.6 no significant adverse effects on other values are expected, with the key conclusions being:

- Seascape effects are likely to be low to very low.
- Natural character effects are likely to be in the moderate to low category.
- Cumulative effects are likely to be very low to relatively insignificant.

Policy COAST.4 – Infrastructure, port, aquaculture, mineral extraction and energy projects

Recognise and make provision for ... appropriate ... aquaculture... that must be located within the coastal environment.

Making provision for Project South is consistent with this policy.

Policy COAST.5 – Management of effects on coastal water quality and ecosystems

Avoid, remedy or mitigate adverse effects of land-based and marine activities on coastal water quality and its ecosystems.

See assessment of Objective COAST.3.

Chapter 10: Natural features and landscapes

Objective LNF.1 – Identification and protection of outstanding natural features and landscapes

Southland's outstanding natural features and landscapes are identified and protected from inappropriate subdivision, use and development.

Project South is not located within any outstanding natural feature or landscape.

Objective LNF.2 – Identification and management of locally distinctive and valued natural features and landscapes

Southland's locally distinctive and valued natural features and landscapes are identified, and managed so that subdivision, use and development is consistent with their values

No locally distinctive or valued natural features or landscapes have been identified in the affected area.

Policy LNF.1 – Identify and assess outstanding natural features and landscapes

To identify and assess Southland's outstanding natural features and landscapes using, but not limited to, the following regional factors:

- (a) natural science factors, which specifically includes the geological, topographical, ecological and dynamic components of the landscape;
- (b) aesthetic values, including memorability and naturalness;
- (c) expressiveness (legibility), which is how obviously the landscape demonstrates the formative processes which helped to create it;
- (d) transient values, which specifically includes the occasional presence of wildlife or its values at certain times of the day or of the year;
- (e) whether the values are shared and recognised;

Project South is not located within any outstanding natural feature or landscape

- (f) value to tangata whenua;
- (g) historical and heritage association;
- (h) the presence of water including in seas, lakes, rivers and streams;
- (i) vegetation, particularly native vegetation; and
- (j) wild or scenic values.

Policy LNF.2 – Identify, assess and manage locally distinctive and valued natural features and landscapes

No locally distinctive or valued natural features or landscapes have been identified in the affected area.

To identify and assess Southland’s locally distinctive and valued natural features and landscapes, and manage adverse effects, in particular significant adverse effects, from subdivision, use and development in a manner consistent with the values identified.

Policy LNF.3 – Identify, assess and manage natural features and landscapes of cultural significance to tangata whenua

Sanford is not aware that any such natural feature or landscape of cultural significance has been identified by tangata whenua in the Project South area. However this will be discussed during the comprehensive engagement Sanford intends on commencing with tangata whenua in March 2020.

To identify, assess and manage natural features and landscapes of cultural significance to tangata whenua as either outstanding natural features and landscapes or locally distinctive and valued natural features and landscapes, depending on the values associated with them.

Table L3: Assessment of Project South against the relevant provisions of the Regional Coastal Plan for Southland.

Provision	Analysis
4 Fundamental Principles	
4.1 Protection of Values	
<p>Objective 4.1.1 - Adverse effects</p> <p>To avoid, wherever practicable, remedy or mitigate any adverse effects from the use and development of the natural and physical resources within the coastal environment.</p>	<p>The approach taken to managing the effects of Project South on the environment accords with Objective 4.1.1. The various measures proposed to avoid, remedy or mitigate effects on the environment are summarised in Sections 6 and 7 of the AEE.</p>
<p>Objective 4.1.2 - Significant Conservation Values</p> <p>To identify and protect significant conservation values within the coastal marine area.</p>	<p>Section 5 of the AEE identifies the various conservation values that are attributed to the environment in which Project South would be located. Including the various marine mammal and seabird species which inhabit the area. Section 6 describes how they would be protected.</p>
<p>Policy 4.1.1 - Protection of values</p> <p>Identify the values of the coastal marine area which require protection: the degree of protection of each value to be commensurate with the significance of the value.</p>	<p>The assessment approach taken in the AEE has implemented the approach set out in Policy 4.1.1 when assessing the effects of Project South and identifying appropriate management measures.</p>
<p>Policy 4.1.2 - Protection of natural and physical resources</p> <p>Recognise that the natural and physical resources of the coastal marine area can be protected by the application of policies in this document.</p>	<p>The policies of the Coastal Plan were considered when assessing how the effects of Project South should be managed.</p>
4.2 Functional Need	
<p>Objective 4.2.1 - Need for coastal location</p> <p>To ensure that only those activities and developments that have a functional need to be located in the coastal marine area or for which there is no practicable alternative location outside the coastal marine area are situated there.</p>	<p>Offshore salmon farming requires a location in the coastal marine area.</p>
<p>Policy 4.2.1 - Justifying coastal location</p> <p>Require that proposals for uses and developments in the coastal marine area justify the functional necessity for that location or demonstrate that there is no practicable alternative location outside the coastal marine area.</p>	<p>There is no practicable alternative location for an offshore salmon farm outside of the coastal marine area.</p>
4.3 Timing, Frequency, Duration and Regularity	
<p>Objective 4.3.1 - Temporal characteristics of activities</p> <p>To ensure that the adverse effects of an activity attributable to its timing, frequency, duration and regularity of operation are avoided, remedied or mitigated.</p>	<p>Project South is a year-round activity. The assessment of effects for Project South does not identify any matter which requires specific management during any particular time of the year.</p>
<p>Policy 4.3.1 - Timing of activities</p> <p>Manage the times of day, month, or year of activities where this avoids, remedies or mitigates the adverse effects of those activities on the coastal environment.</p>	<p>See above.</p>
<p>Policy 4.3.2 - Frequency, duration and regularity of activities</p>	<p>See above.</p>

Provision	Analysis
<p>Manage the frequency, duration and regularity of activities where this avoids, remedies or mitigates the adverse effects of those activities on the coastal environment.</p>	
<p>4.4 Multiple Use</p>	
<p>Objective 4.4.1 - Need to justify exclusive or preferential occupation of coastal marine area</p> <p>To ensure that any exclusive or preferential occupation of the coastal marine area is necessary and fully justified.</p>	<p>This objective is achieved here for the following reasons:</p> <ul style="list-style-type: none"> • For reasons described in Sections 2 and 3 of the AEE occupation of the Five Farming Areas over the life of the consent will be required to enable the farming of King salmon in these locations. • As described in Section 3 of the AEE a staged development approach to the Project South farmed areas is proposed. It contemplates allocated space being developed in a methodical way within reasonable time periods. • The staged development approach proposed means the amount of space from which other users will be excluded will be limited to that required for the Project South activities at that point in time. This means during the initial years of development free unimpeded access will be maintained over the farm areas which are not yet in use. • The area in which Project South would be located is lightly used for recreational fishing and yachting, and the Project South activities are not incompatible with the continued use of the area for those purposes. Recreational users will only be excluded from the minimum area necessary for operational purposes, and the area that would be occupied by those farmed structures does not contain any unique recreational value relative to that of the surrounding ocean to which unimpeded access will be maintained. • The area that would be occupied by farmed structures does not contain any unique navigational value relative to that of the surrounding ocean to which unimpeded access will be maintained. With the establishment of the navigational aids outlined in Section 7 of the AEE, commercial vessels (including shipping, cruise liners and fishing vessels) will continue to be able to navigate through this area in a safe and efficient manner. • As a major quota owner in this area, Sanford are satisfied that the Project South proposal will have minimal effect on fishing activities in this area.
<p>Policy 4.4.1 - Need for exclusive occupation</p> <p>Recognise that some activities will require exclusive occupation notwithstanding the fact that the public have a right to use the coastal marine area.</p>	<p>See above.</p>
<p>Policy 4.4.2 - Justify public access restrictions</p> <p>Require activities that restrict the public use of the coastal marine area to justify the necessity for that restriction.</p>	<p>See above.</p>
<p>4.5 Public Value</p>	
<p>Objective 4.5.1 - Value of the coastal marine area to the public</p> <p>To ensure that the value of the coastal marine area to the public is maintained or enhanced</p>	<p>The area the Five Farming Areas would be located in is lightly used by the public, and for reasons set out in Section 6 of the AEE and above the presence of the Project South Farming Areas is not incompatible with the continued use of this general area by the public in this manner. The presence of the Project South Farming Areas in this location will therefore not result in any significant loss of public value.</p>
<p>Policy 4.5.1 - Financial contributions to be obtained</p>	<p>No financial contributions are required or proposed.</p>

Provision	Analysis
Use the provisions of Section 108 of the Act to obtain “financial contributions”.	
4.6 Concentration Versus Sprawl	
<p>Objective 4.6.1 - Concentrating use and development</p> <p>To protect areas free from use and development by seeking, wherever practicable, to concentrate use and development into areas where those activities are already taking place</p>	<p>There is no remaining capacity in Big Glory Bay where salmon farming in Southland is currently located.</p> <p>A new area is therefore required for the project. The isolated offshore location proposed is considered suitable when considering the intent of Objective 4.6.1 and Policy 4.6.1 as it will not impact on the natural character of Southland’s coastline, nor will it impact on the amenity values of coastal areas.</p>
<p>Policy 4.6.1 - Concentrate compatible activities</p> <p>Encourage concentration of compatible activities in areas of existing uses and developments, where adverse effects can be avoided, remedied or mitigated, in preference to using undeveloped areas in the coastal marine area.</p>	See above.
4.7 Cumulative Effects	
<p>Objective 4.7.1 - Avoid, remedy or mitigate cumulative adverse effects</p> <p>To avoid, remedy or mitigate cumulative adverse effects.</p>	As directed by the Coastal Plan, Project South will avoid, remedy or mitigate cumulative adverse effects and it reflects a level of use which is appropriate in this coastal marine area
<p>Objective 4.7.2 - Obtain an appropriate level of use in the coastal marine area</p> <p>To obtain a level of use which is appropriate in the coastal marine area, particularly in areas where remoteness, wilderness and tranquillity are significant components of the environment</p>	See above.
<p>Policy 4.7.1 - Avoid, remedy or mitigate adverse cumulative effects</p> <p>To avoid, remedy or mitigate adverse cumulative effects of activities in the coastal marine area.</p>	See above.
4.8 Commercial/Non-Commercial Surface Water Activities in the Coastal Marine Area	
<p>Objective 4.8.1 - Distinguish between commercial and non-commercial surface water activities</p> <p>To manage surface water activities in the coastal marine area by making a distinction between commercial and non-commercial activities where the cumulative effects of either type of activity will significantly outweigh the other.</p>	Project South is a commercial activity.
<p>Policy 4.8.1 - Commercial activities in the coastal marine area</p> <p>To distinguish, where appropriate, commercial activities in the coastal marine area from non-commercial activities.</p>	See above.
4.9 Consultation and Information Sharing	
<p>Objective 4.9.1 - Consultation with territorial authorities iwi and government agencies</p> <p>To ensure that territorial authorities are consulted where resource consent applications are in areas of the coastal marine area that either adjoin or are within territorial authority boundaries, iwi or government agency boundaries.</p>	<p>For reasons relating to the commercial sensitivity of this project, and the manner in which coastal space is allocated, Sanford regrets it has not been able to undertake any consultation on the Project South activities before lodging resource consent applications.</p> <p>Sanford will commence a full, thorough and open dialogue as soon as possible following lodgement of this application.</p>

Provision	Analysis
	<p>This includes undertaking a comprehensive engagement and consultation programme with tangata whenua. Sanford will ensure there is full and sufficient time for this to occur and will take guidance on how best to complete this engagement process.</p> <p>To allow fulsome public input into this consent process Sanford has also requested full public notification of the applications.</p> <p>This will ensure decisions on these applications are informed in the manner sought by these provisions.</p>
<p>Objective 4.9.2 - Consultation with the community</p> <p>To ensure that consultation takes place with affected adjacent landowners and the community in general.</p>	<p>See above.</p>
<p>Policy 4.9.1 - Consultation with adjoining territorial authorities</p> <p>Consult with adjoining territorial authorities, including Community Boards, in very case where consent is sought to undertake activities in the coastal marine area adjoining or within their boundaries.</p>	<p>See above.</p>
<p>Policy 4.9.2 - Sharing of information</p> <p>Share information and knowledge gained about the coastal environment with adjoining territorial authorities iwi and government agencies, particularly where it relates to coastal processes and/or to activities with previously unknown or little known effects.</p>	<p>See above.</p>
<p>5 General Matters</p>	
<p>5.1 Natural Character</p>	
<p>Objective 5.1.1- Preserve natural character</p> <p>To preserve the natural character of the coastal marine area.</p>	<p>Natural character in the area the Five Farming Areas would be located is high, and for the reasons set out in Table L1 and M2 above it will be preserved in accordance with the expectations of the NZCPS and RPS. This accords with the direction in Policy 5.1.1 of the Coastal Plan below.</p>
<p>Policy 5.1.1 – Adopt New Zealand Coastal Policy Statement policies</p> <p>To adopt the policies contained in Chapter 1 of the New Zealand Coastal Policy Statement in so far as they apply to the coastal marine area.</p>	<p>For the reasons set out in Table L1 above Project South sits comfortably with the NZCPS natural character provisions.</p>
<p>Policy 5.1.2 – Protection from unnatural noise</p> <p>Protect areas from noise intrusion where the absence of unnatural noise is a significant component of the natural character of the area.</p>	<p>The offshore locations where the Five Farming Areas are located is not one of these areas.</p>
<p>5.2 Natural Features and Landscapes</p>	
<p>Objective 5.2.1 - Protecting outstanding natural features and landscapes</p> <p>To protect outstanding natural features and landscapes in the region's coastal marine area from the adverse effects of use, development, and subdivision.</p>	<p>The Five Farming Areas are not located within any outstanding natural feature or landscape.</p>
<p>Policy 5.2.1 - Outstanding natural features and landscapes</p>	<p>The Five Farming Areas are not located within any outstanding natural feature or landscape.</p>

Provision	Analysis
Identify and protect outstanding natural features and landscapes within the coastal marine area.	
<p>Policy 5.2.3 - Importance of landscape and natural features to the tangata whenua</p> <p>Consult with the tangata whenua and take into account tangata whenua cultural, traditional and spiritual values in relation to issues affecting landscapes and natural features.</p>	This will be a key point of discussion during Sanford’s engagement with tangata whenua.
5.3 Amenity Values	
<p>Objective 5.3.1 -Protection of amenity values</p> <p>To ensure that the use and development of the resources of the coastal marine area will not have significant adverse effects on amenity values, nor on the safety of the public, nor on the enjoyment of the coast by the public.</p>	<p>Because of the remote offshore location of the Five Farming Areas, public use of those areas will be limited to infrequent visitation by recreational fishers, yachts and working commercial vessels, and Project South is expected to sit comfortably with the amenity values attributed to the area by these users. Other than the noise of service vessels the only other notable noise source at the Five Farming Areas will be compressors. Due to the location of the Farming Areas away from people this noise will not have any adverse amenity effects.</p> <p>The marine farming structures are also all relatively low in height, which will maintain the broader sense of open space that dominates offshore areas like this. Vessels will also continue to be able to pass through this area safely for the reasons outlined in Section 6.4 of the AEE.</p> <p>Due to the sparse public access to the Project South area and the steps that Sanford will take to manage any navigational effects of the Farming Areas, there will not be any effects on the safety of the public.</p>
<p>Objective 5.3.3 - Open space</p> <p>To recognise, maintain and enhance the contribution that open space makes to the amenity values in the coastal environment.</p>	See above.
<p>Objective 5.3.6 - Safe environment</p> <p>To maintain a safe environment for all people using of the coastal marine area.</p>	As described in Section 6 and 7 appropriate management measures will be in place to protect the safety of all people using the coastal marine area.
<p>Objective 5.3.7 -Noise levels</p> <p>To ensure that the effects of noise in the coastal marine area do not adversely affect people's health and well-being, natural character and amenity values.</p>	Other than the noise of service vessels (which is expected in this area) the only other notable noise source at the Five Farming Areas will be compressors. In this remote location this noise will not have an adverse effect on people's health and well-being, natural character and amenity values.
<p>Policy 5.3.1 - Amenity values</p> <p>Protect amenity values of the coastal marine area.</p>	See response to Objective 5.3.1 above.
<p>Policy 5.3.2 - Open space values</p> <p>Maintain and enhance open space values of the coastal marine area.</p>	See above.
<p>Policy 5.3.4 – Lighting</p> <p>Ensure that all lighting associated with any structure and any area of occupation associated with the structure will be shielded or directed away from:</p>	The only surface lighting proposed is that required to illuminate navigational markers. It will not have any of the effects Policy 5.3.4 directs be avoided.

Provision	Analysis
<p>a. adjacent activities; b. streets; and c. navigation channels; to avoid the spill of light or glare that is: i. detrimental to the amenity of residential or other users; ii. a hazard to traffic on streets outside of the coastal marine area; and iii. a hazard to navigation within the coastal marine area; unless the purpose of the light is to illuminate or mark a street or navigation channel.</p>	<p>Subsurface lighting will be used for maturation of fish. This will be directed downwards and will present as a faint glow on the surface above the pens. It will not cause light spill.</p>
<p>Policy 5.3.6 - Activities and structures</p> <p>Limit activities and structures in the coastal marine area to those that:</p> <p>a. have a functional need for that location; or b. contribute to the amenities of that area; c. are a necessary and functional part of activities also undertaken on adjoining land.</p>	<p>The Project South structures have a functional need to be located in the coastal marine area.</p>
<p>Policy 5.3.12 - Safety of the public</p> <p>Ensure that activities that take place in the coastal marine area do not endanger public safety.</p>	<p>As described in Section 6 and 7 appropriate management measures will be in place to protect the safety of all people using the coastal marine area.</p>
<p>Policy 5.3.15 - Amenity values</p> <p>Protect amenity values of the coastal environment from the adverse effects of artificial noise in the coastal marine area.</p>	<p>Other than the noise of service vessels the only other notable noise source at the Five Farming Areas will be compressors. In this remote location this level of noise will not have an adverse effect on people's health and well-being, natural character and amenity values.</p>
<p>Policy 5.3.16 - Health and well-being of people</p> <p>Protect the health and well-being of the public from the adverse effects of noise in the coastal marine area.</p>	<p>See above.</p>
<p>Policy 5.3.18 - Noise from ships in motion</p> <p>Avoid noise from ships in motion that adversely affects the health and well-being of people or degrades amenity values.</p>	<p>The Project South Farming Areas are remote. Noise from vessels servicing the farms will not have an adverse effect on the health and well-being of people or degrade amenity values.</p>
<p>Policy 5.3.20 - Manage construction noises in the coastal marine area</p> <p>Manage construction noise in the coastal marine area.</p>	<p>The Project South Farming Areas are remote. Noise from the construction of the Five Farming Areas will not have an adverse effect on the health and well-being of people or degrade amenity values.</p>
<p>5.4 Vegetation and Fauna</p>	
<p>Objective 5.4.1.1 - Protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna</p> <p>To protect areas of significant indigenous vegetation and significant habitats of indigenous fauna within the coastal marine area.</p>	<p>The south west Foveaux Straight area is a habitat of endangered seabird species, including yellow eyed penguin and Foveaux shag, and potentially several marine mammal species.</p> <p>Section 6 and 7 of the AEE describe how the habitat of those species will be protected by Project South.</p>
<p>Objective 5.4.1.2 - Protect intrinsic values of ecosystems</p>	<p>Section 6 and 7 of the AEE describes how the intrinsic values of the ecosystems will be protected.</p>

Provision	Analysis
To protect the intrinsic values of ecosystems in the coastal marine area.	
<p>Policy 5.4.1.1 - Disturbance of areas of significant indigenous vegetation and significant habitats of indigenous fauna</p> <p>Avoid significant adverse effects of disturbance to areas of significant indigenous vegetation or significant habitats of indigenous fauna.</p>	<p>Section 6 and 7 of the AEE describe how significant adverse effects on the habitat of endangered seabird species, including yellow eyed penguin and Foveaux shag, and marine mammal species will be avoided.</p>
<p>Policy 5.4.1.2 - Protection of habitats of important species</p> <p>Protect the habitats of species in the coastal marine area which are important for commercial, recreational, traditional or cultural purposes</p>	<p>Key points of relevance to this policy are:</p> <ul style="list-style-type: none"> • The Five Farming Areas are not of significant importance for commercial or recreational fishing. The effects on the benthic community and food resources from the proposed farm will also be very localised and will not be detectable away from the Farming Areas thus flow-on effects for the wild fish populations which are more valued for fishing are not expected. • A significant buffer has been provided between the Five Farming Ares and the nationally important oyster fishery. • The Project South Farming Areas are known habitat of several species of marine mammals and seabirds which are important to tangata whenua. Section 6 of the AEE describes the potential effects on these species and how they will be protected.
<p>Policy 5.4.1.3 - Preserving habitats of distinctive communities</p> <p>To preserve the habitat of distinctive communities.</p>	<p>No habitat of distinctive communities will be affected by the Project South activities.</p>
<p>Policy 5.4.1.4 – Promoting understanding of ecosystem interactions</p> <p>Promote an understanding of the interactions between the various parts of ecosystems to ensure the life-supporting capacity of ecosystems is safeguarded.</p>	<p>The AEE undertaken for Project South has considered the environment in an integrated manner and concludes that the life supporting capacity of the ecosystem will be safeguarded. That is consistent with this policy.</p>
5.4.3 Exotic Fauna Introduction	
<p>Objective 5.4.3.1 - Introduction of exotic fauna</p> <p>To avoid the introduction of fauna into the coastal marine area in circumstances that could result in adverse environmental effects.</p>	<p>For the reasons outlined in respect of Policy 5.4.3.1 below, the presence of the king salmon at the Five Farming Areas is not expected to have any adverse effects on the environment of concern.</p>
<p>Policy 5.4.3.1 - Introduction of exotic fauna</p> <p>Prevent the introduction of exotic species of fauna where information relating to that species indicates that its introduction is likely to adversely affect:</p> <ol style="list-style-type: none"> indigenous vegetation; or indigenous fauna; or alter coastal processes; or natural character; or life-supporting capacity of ecosystems. 	<p>This policy direction is relevant here as Project South involves the introduction of King salmon, an exotic fauna species, into the coastal marine area.</p> <p>An assessment of the matters listed in this policy is provided in Section 6 of the AEE. The main potential effects of king salmon being introduced at the Five Farming Areas relate to impacts of the fish on the water column, benthic deposition and disease risk. For the reasons outlined in Section 6, effects on the water column and benthic environment are not expected to be of any biological significance. Likewise, Project South has been designed with suitable separation distances between the Five Farming Areas themselves, and between the Five Farming Areas and natural habitats of significance as well as wild Bluff oyster beds, to suitably manage disease risk.</p>
5.6 Tangata Whenua O Murihiku	

Provision	Analysis
<p>Objective 5.6.1 - Recognise values of Ngai Tahu</p> <p>To recognise and provide for cultural, spiritual and traditional values and uses of Ngai Tahu in the coastal marine area.</p>	<p>Section 6.8 of the AEE sets out how Sanford intends these Project South address this objective. Central to that is a comprehensive engagement and consultation programme in respect of Project South with tangata whenua. This will begin in March 2020 and Sanford will ensure there is full and sufficient time for this to occur. By following that process Sanford anticipates that the outcomes set out in this objective will be achieved by Project South.</p>
<p>Objective 5.6.2 - Consultation with tangata whenua</p> <p>To ensure that consultation takes place with tangata whenua in appropriate circumstances.</p>	<p>See above.</p>
<p>Policy 5.6.1 – Kaitiakitaka</p> <p>Have particular regard to the concept of kaitiakitaka in relation to managing the use, development and protection of natural and physical resources in the coastal marine area.</p>	<p>Section 6.8 of the AEE sets out how Sanford intends these Project South address this matter. Central to that is a comprehensive engagement and consultation programme in respect of Project South with tangata whenua. By following that process Sanford anticipates that the outcomes set out in this policy will be achieved by Project South.</p>
<p>Policy 5.6.2 - Consultation where an activity may impact on a site of cultural significance</p> <p>Have regard to and ensure consultation where an activity, use or development occurs within the vicinity of those sites of cultural significance identified on the maps in Appendix 3 and/or in the tables in Appendix 8.</p>	<p>See above.</p>
<p>Policy 5.6.3 - Grounds for consultation</p> <p>The tangata whenua shall be meaningfully consulted by the Council and/or applicants for resource consents when:</p> <ol style="list-style-type: none"> a. an activity could physically disturb a site identified in this Plan as being of significance to tangata whenua; b. an activity could have adverse effects on values of tangata whenua. 	<p>See above.</p>
<p>Policy 5.6.4 - Characteristics of special value to the tangata whenua</p> <p>Identify and protect the characteristics of the coastal marine area of special value to tangata whenua.</p>	<p>See above.</p>
<p>Policy 5.6.5 - Protection of characteristics of significance to Maori</p> <p>It is a national priority to protect:</p> <ol style="list-style-type: none"> a. characteristics of traditional spiritual, historical or cultural significance to Maori identified in accordance with tikaka Maori; and b. significant places or areas of historic or cultural significance; which in themselves or in combination, are essential or important elements of the natural character of the coastal marine area. 	<p>See above.</p>
<p>5.7 Heritage</p>	
<p>Objective 5.7.1 - Protection of heritage values</p> <p>To recognise and have regard for the need to protect heritage values of sites, buildings, places or areas within the coastal environment.</p>	<p>Sanford is not aware of any heritage values attributed to the seabed where the Five Farming Areas would be located, or of any circumstances (notable shipwreck for example) which suggests any heritage values could be present.</p>
<p>Objective 5.7.2 - Heritage value of landscape features</p> <p>To avoid, remedy or mitigate adverse effects on landscape features of high heritage value in the coastal marine area.</p>	<p>See above.</p>

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<p>Policy 5.7.2 - Other sites with important heritage values</p> <p>Protect the heritage values of sites, areas, natural and physical features not listed in Policy 5.7.1, but otherwise recognised as having some heritage value.</p>	<p>See above.</p>
<p>Policy 5.7.2 - Other sites with important heritage values</p> <p>Protect the heritage values of sites, areas, natural and physical features not listed in Policy 5.7.1, but otherwise recognised as having some heritage value.</p>	<p>See above.</p>
<p>5.8 Efficient Use of Natural and Physical Resources</p>	
<p>Objective 5.8.1 - Efficient use and development of natural and physical resources</p> <p>To provide for efficient use and development of natural and physical resources in the coastal marine area where adverse effects are avoided, remedied or mitigated.</p>	<p>For the reasons set out in respect of Policy 5.8.1 Project South represents efficient use and development of the natural and physical resources in this location. Consistent with Objective 5.8.1 a range of measures are proposed to avoid, remedy or mitigate the effects of the activity. These are summarised in Section 7 of the AEE.</p>
<p>Policy 5.8.1 - Efficient use and development of natural and physical resources</p> <p>To recognise and have regard for the efficient use and development of natural and physical resources in the coastal marine area, while having regard to the finite character of some natural and physical resources.</p>	<p>Project South is an efficient use and development of the natural and physical resources in this area for the following reasons:</p> <ul style="list-style-type: none"> • The offshore location of the Five Farming Areas has been identified as being well suited to offshore salmon farming. • The offshore location of the Five Farming Areas is not subject to any significant level of use for other purposes. • The area is lightly used for commercial fishing, recreational fishing and yachting, and it is an informal transit route for various commercial vessels. However, the Project South activities are not incompatible with the continued use of the area for those purposes. • The design of the Five Farming Areas, and the staged development approach, means the amount of space required for the Project South activities, will be kept to the minimum necessary. • The assimilative capacity of the water column to accommodate the impacts of marine farming on dissolved oxygen and nutrient levels which is sometimes relevant for inshore farms is of no consequence here.
<p>5.10 Social, Economic and Cultural Issues</p>	
<p>Objective 5.10.1 - Social, cultural and economic reliance on the coastal marine area</p> <p>To recognise the need for social and economic utilisation of the coastal marine area in a manner that enables people and communities to provide for their social, cultural and economic well-being and for their health and safety.</p>	<p>As described in Section 2, use of the coastal marine area by Project South will contribute to local people and communities providing for their social and economic wellbeing. It will also do so without imposing significant constraints on other use of the area for this purpose, noting in particular that the area is lightly used for commercial fishing, and the Project South activities are not incompatible with the continued use of the area for those purposes.</p> <p>Sanford has not identified any reason why Project South would impact on the ability of tangata whenua to provide for their cultural wellbeing. However, this will be a matter of discussion during the consultation programme with tangata whenua.</p>
<p>Policy 5.10.1 - Recognising the social, cultural and economic reliance on the coastal marine area</p> <p>Recognise the importance of the coastal marine area for social, cultural and economic activities.</p>	<p>See above.</p>

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7. Coastal Water	
7.2 Water Quality	
7.2.2 Classification of Water	
<p>Objective 7.2.2.1 - Maintenance of coastal water quality</p> <p>To maintain the quality of coastal waters in those areas where ambient water quality is suitable for:</p> <ul style="list-style-type: none"> a. contact recreation; b. the growth of shellfish, the human consumption of which is not limited by pathogenic or chemical contamination; c. the health and vitality of aquatic ecosystems; and d. a fishery, including aquaculture, the produce of which is not limited for human consumption by pathogenic or chemical contamination: <p>and except for the area described in Objective 7.2.2.3, to enhance the quality of coastal waters in areas where ambient water quality has been degraded, to a level which is suitable for:</p> <ul style="list-style-type: none"> a. contact recreation; b. the growth of shellfish, the human consumption of which is not limited by pathogenic or chemical contamination; c. the health and vitality of aquatic ecosystems; and d. a fishery including aquaculture, the produce of which is not limited for human consumption by pathogenic or chemical contamination by the year 2020. 	<p>The main effects on the water column from finfish farming are the release of total ammonia-N (or TAN), potential enhancement of phytoplankton biomass, and consumption of oxygen. No effects of concern in respect of the values listed in Objective 7.2.2.1 have been identified for Project South.</p>
<p>Objective 7.2.2.2 - Protect the natural state of some coastal waters</p> <p>To protect the natural state of coastal waters wherever it is considered that they can be fairly described as being in their natural state.</p>	<p>See above.</p>
<p>Policy 7.2.2.2 - Natural state (NS) waters</p> <p>Manage areas of water in the coastal marine area as Class NS Water (being water managed in its natural state) where:</p> <ul style="list-style-type: none"> a. water in these areas has been identified as being, for the most part, unaffected by land use practices and b. is considered to be in its natural state (NS). 	<p>See above.</p>
<p>Policy 7.2.3.15 - Size of Zone of Reasonable Mixing</p> <p>Minimise the size of the area where the relevant water classification standards are breached.</p>	<p>Not applicable.</p>
<p>Policy 7.2.3.2 - Determining the size of zones of reasonable mixing</p> <p>The area of any zone of reasonable mixing from any outfall or discharge activity shall be determined on a case by case basis.</p>	<p>Not applicable.</p>

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7.3 Discharges	
7.3.2 Discharges (Excluding Stormwater) from Land-Based Activities and Ships	
<p>Objective 7.3.2.1 - Effects on the amenity of the coastal marine area</p> <p>To avoid adverse effects on the amenity of the coastal marine area caused by inappropriate discharge of waste products of marine species from ships in the coastal marine area</p>	<p>While the barge at each of the Five Farming Areas will have ablution facilities for use by staff, all grey and black water will be collected and transferred back to Bluff for disposal. This also applies to the Sanford service vessels.</p>
<p>Policy 7.3.2.1 - Adverse effects of the discharge of contaminants</p> <p>Avoid, remedy or mitigate the adverse effects of the discharge of contaminants into the coastal marine area of Southland.</p>	<p>The only discharge of contaminants will be feed and possibly therapeutants (although this will be rare). Section 3.6.3 of the AEE describes how the effects of these discharges will be avoided, remedied or mitigated.</p>
<p>Policy 7.3.2.2 - Alternatives to discharges</p> <p>Require alternatives to discharging to the coastal marine area to be considered.</p>	<p>There are no alternative methods for discharging feed and if necessary therapeutants, which are better than those proposed in Section 3.6.3. The proposed methods are best practice.</p>
<p>Policy 7.3.2.6 - Contamination from materials used in the coastal marine area</p> <p>Avoid, remedy or mitigate the contamination of air, land and water from material stored, transported, handled or conveyed on, over or adjacent to the coastal marine area.</p>	<p>While the barge at each of the Five Farming Areas will have ablution facilities for use by staff onsite, all grey and black water from those barges will be collected and transferred back to Bluff for disposal. This also applies to the Sanford service vessels.</p>
<p>Policy 7.3.2.12 - Discharges of human sewage and ballast water into coastal waters from ships</p> <p>Strongly discourage discharges of human sewage and ballast water into coastal waters from ships.</p>	<p>See above.</p>
<p>Policy 7.3.2.13 - Encourage the use of onboard sewage collection and treatment</p> <p>Encourage the use of systems onboard ships for the collection, storage, treatment and transfer of human sewage to avoid, wherever practicable, mitigate or remedy the adverse effects of discharging sewage into the coastal marine area.</p>	<p>See above.</p>
<p>Policy 7.3.2.14 - Effect of waste products of marine species on amenity</p> <p>Prevent the amenity value of the coastal marine area around wharves and along the foreshore from being affected by the accumulation of waste products of marine species discharged from ships in the coastal marine area.</p>	<p>Not applicable.</p>
7.3.5 Hazardous Substances and Hazardous Waste	
<p>Objective 7.3.5.1 - Storage, use, discharge and transportation of hazardous substances and hazardous waste</p> <p>To avoid, where practicable, any adverse effects resulting from the storage, use, discharge and transportation of any hazardous substances and hazardous waste within the coastal marine area.</p>	<p>Section 3.6.4 of the AEE describes how the use and storage of these substances at the Five Farming Areas will be managed in accordance with the strict controls contained in the various legislation administered by Maritime New Zealand, including The Health and Safety at Work (Hazardous Substances) Regulations 2017, and the maritime and marine protection rules which are statutory instruments (or secondary legislation) made by the Minister of Transport under the Maritime Transport Act 1994. This includes the strict requirements relating to planning and response to spills.</p>

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	This is an appropriate response to this objective, and no effects are expected.
<p>Objective 7.3.5.2 - Accidental or deliberate release of hazardous substances</p> <p>To ensure that there are appropriate documented procedures and equipment available to remedy or mitigate the adverse effects of any accidental or deliberate release of hazardous substances within or to the coastal marine area.</p>	See above.
<p>Policy 7.3.5.1 - Avoiding adverse effects</p> <p>Avoid, where practicable, adverse effects of the storage, use, discharge and transportation of hazardous substances and/or hazardous waste within the coastal marine area.</p>	<p>Section 3.6.4 of the AEE describes how the use and storage of these substances at the Five Farming Areas will be managed in accordance with the strict controls contained in the various legislation administered by Maritime New Zealand, including The Health and Safety at Work (Hazardous Substances) Regulations 2017, and the maritime and marine protection rules which are statutory instruments (or secondary legislation) made by the Minister of Transport under the Maritime Transport Act 1994. This includes the strict requirements relating to planning and response to spills.</p> <p>This is an appropriate response to this policy and no effects are expected.</p>
<p>Policy 7.3.5.2 - Coastal Permits</p> <p>Consider the effects of the storage, use, discharge and transport of hazardous substances and hazardous waste as part of any resource consent to:</p> <ul style="list-style-type: none"> • occupy the coastal marine area; and/or • erect or use a structure; and/or • discharge contaminants into the coastal marine area. 	See above.
<p>Policy 7.3.5.3 - Contingency and emergency response planning</p> <p>Encourage persons engaged in activities associated with hazardous substances in the coastal marine area to have contingency or emergency response plans.</p>	See above.
<p>7.3.8.1 Marine Farming Discharges</p>	
<p>Policy 7.3.8.1.1 - Feeding of farmed species</p> <p>Encourage the efficient application of nutrients discharged to the coastal marine area as a food source.</p>	Project South will utilise state of the art underwater feeding technology to ensure the efficient application of feed (and the associated nutrients) and therapeutants. The offshore location of Project South also means nutrification of the water body is not an effect of concern here, and modelling has shown any effects of that nature will be of no biological significance.
<p>Policy 7.3.8.1.2 - Health product usage of farmed species</p> <p>Encourage the efficient application of fauna health products (such as antibiotics and vitamins), for the target farmed species in the coastal marine area</p>	Section 3.6.3 describes how fauna health products will be applied, if necessary at the Five Farming Areas.
<p>7.3.8.2 Structure and Ship Cleaning, Maintenance and Repainting</p>	
<p>Objective 7.3.8.2.1 - Appropriate cleaning and maintenance of structures and ships</p> <p>To provide for the appropriate cleaning and maintenance of structures and ships in the coastal marine area.</p>	All hull cleaning of ships used to service Project South will occur in facilities which have been separately authorised for that purpose.

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<p>Objective 7.3.8.2.2 - Minimise risk of bioinvasion</p> <p>Minimise the risk from hull cleaning, structure cleaning, and the introduction of invasive organisms from ships, structures, and equipment from outside this region</p>	<p>A comprehensive Biosecurity Management Plan will be implemented which addresses these matters.</p>
<p>Policy 7.3.8.2.1 Use of antifouling chemicals</p> <p>Avoid, wherever practicable, remedy or mitigate the adverse effects of the use of antifouling chemicals on marine farming structures (including ropes, nets and cages)</p>	<p>No antifouling chemicals will be applied to the marine farming structures (including the ropes, nets and pens).</p> <p>The resident feed storage barge on each farm will be antifouled to the manufacture's instructions. This work is overseen by marine engineers and is documented in the internal Sanford 'Work Mate' and asset management software programme. Whole of life work programmes are determined prior to the acquiring any new asset (vessel or new nets etc) and scheduled in, audited for compliance. All of Sanford engineering and vessel repair and maintenance is out-sourced and carried out by approved contractors.</p> <p>No anti-fouling chemicals will be stored on the barge.</p>
<p>Policy 7.3.8.2.2- Contaminants from areas used for the cleaning, maintenance and painting of structures and ships</p> <p>Avoid, wherever practicable, remedy or mitigate the adverse effects of discharges of contaminants from areas used for the cleaning, maintenance and painting of structures and ships.</p>	<p>All hull cleaning of ships used to service Project South will occur in facilities which have been separately authorised for that purpose. With respect to the effects of cleaning the marine farm structures at the Five Farming Areas, a comprehensive biosecurity risk assessment has been completed for Project South which addresses this issue. It recommends various management measures that will be implemented by Sanford to ensure the surrounding environment is protected from biosecurity risks.</p>
<p>Policy 7.3.8.2.3 - Hull cleaning of ships in the coastal marine area</p> <p>Provide for hull cleaning of ships in circumstances where materials containing bioaccumulative, toxic, or noxious substances or viable unwanted or pest organisms, do not enter or are not released into the coastal marine area.</p>	<p>All hull cleaning of ships used to service Project South will occur in facilities which have been separately authorised for that purpose.</p>
<p>9. Occupation</p>	
<p>Objective 9.1.1 - Public recreation</p> <p>Maintain or enhance the availability of the coastal marine area for public recreation and other uses not requiring any form of preferential occupation.</p>	<p>This planning direction was an important consideration when shaping Project South and in turn Project South sits comfortably with it. Key points to note include:</p> <ul style="list-style-type: none"> • For reasons described in Sections 2 and 3 of the AEE occupation of the Five Farming Areas over the life of the consent will be required to enable the farming of King salmon in these locations. • As described in Section 3 of the AEE a staged development approach to the Project South farmed areas is proposed. It contemplates allocated space being developed in a methodical way within reasonable time periods. • The staged development approach proposed means the amount of space from which other users will be excluded will be limited to that required for the Project South activities at that point in time. This means during the initial years of development free unimpeded access will be maintained over the farm areas which are not yet in use. • The area in which Project South would be located is lightly used for recreational fishing and yachting, and the Project South activities are not incompatible with the continued use of the area for those purposes. Recreational users will only be excluded from the minimum area necessary for operational purposes, and the area that would be occupied by those farmed structures does not contain any unique recreational value relative to that of the surrounding ocean to which unimpeded access will be maintained. • The area that would be occupied by farmed structures does not contain any unique navigational value relative to that of the surrounding ocean to which unimpeded access will be maintained. With the establishment of the

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	<p>navigational aids outlined in Section 7 of the AEE, commercial vessels (including shipping, cruise liners and fishing vessels) will continue to be able to navigate through this area in a safe and efficient manner.</p> <ul style="list-style-type: none"> As a major quota owner in this area, Sanford are satisfied that the Project South proposal will have minimal effect on fishing activities in this area.
<p>Objective 9.1.2 – Occupation</p> <p>To ensure that any exclusive or preferential occupation of the coastal marine area is justified.</p>	<ul style="list-style-type: none"> See above
<p>Policy 9.1.1 - Public right of use</p> <p>Where there is a need for any exclusive occupation of space, the interests of the recreational users and other lawful users not requiring any form of preferential occupation shall be protected.</p>	<ul style="list-style-type: none"> See above.
<p>Policy 9.1.2 - Granting of preferential occupation rather than exclusive occupation</p> <p>Where occupation is required and deemed necessary, the Council favours preferential occupation over exclusive occupation.</p>	<p>In accordance with the expressed preference of Council in this policy, the area of exclusive use has been minimised to the extent practicable. Small craft for example, will continue to be able to navigate waters above mooring lines.</p> <p>The staged development approach proposed here also accords with this policy direction. It means the amount of space from which other users will be excluded will be limited to that required for the Project South activities at that point in time. This means during the initial years of development free unimpeded access, will be maintained over the farm areas which are not yet in use.</p>
<p>Policy 9.1.3 - Use it or lose it</p> <p>Where any right of exclusive occupation is granted, and not fully exercised within a reasonable period, the unoccupied allocation may be subject to review.</p>	<p>As described in Section 3 of the AEE a staged development approach to the Project South Farming Areas is proposed. It contemplates allocated space being developed in a methodical way within reasonable time periods.</p>
<p>Policy 9.1.4 - Minimise areas of exclusive occupation</p> <p>Limit the area of exclusive occupation to that necessary to undertake the activity for which the right to occupy is needed.</p>	<p>See Policy 9.1.2.</p>
<p>Policy 9.1.5 - Effects on other users</p> <p>Avoid the use of lawful occupation to provide buffer zones for the purpose of avoiding, remedying or mitigating adverse effects.</p>	<p>In accordance with the expressed preference of Council in this policy, the area of exclusive use has been minimised to the extent practicable. Small craft for example, will continue to be able to navigate waters above mooring lines.</p>
<p>Policy 9.1.6 - Duration of rights to occupy</p> <p>Limit occupation rights to a period that will satisfy the immediate foreseeable needs of the activity.</p>	<p>Section 2 and 3 of the AEE describe the expected development programme for Project South, and why the occupation of the Five Farming Areas is necessary to satisfy the immediate foreseeable needs of the activity.</p>
<p>Policy 9.1.9 - Coastal occupation charging regime</p> <p>Apply a coastal occupation charging regime to persons who occupy Crown land, to the full or partial exclusion of others, in the coastal marine area of Southland.</p>	<p>Sanford expects the standard coastal occupation charging regime will apply to its activities.</p>

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9.2 Ships Used as a Base/Accommodation Facility	
<p>Policy 9.2.18 - Ships used as a base/accommodation facility</p> <p>Discourage the anchoring or mooring of ships for use as a base or accommodation facility.</p>	<p>Sanford does not propose to permanently anchor or moor ships at the Five Farming Areas for use as a base or accommodation facilities. A barge does need to be moored at each of the Farming Areas for operational reasons, however, it will not be permanently occupied.</p>
10. Seabed and Foreshore	
10.1 Dredging, Excavation, Drilling, Tunnelling, and Drainage Works	
<p>Objective 10.1.1 - Disturbance to the seabed or foreshore</p> <p>To avoid, remedy, or mitigate the adverse effects of disturbance to the seabed or foreshore.</p>	<p>Project South will require disturbance of the seabed when installing screw anchors for the mooring lines. This disturbance is temporary, will occur in areas with no notable benthic features, is very localised in terms of the area disturbed, and is undertaken frequently in New Zealand for the installation of marine farming structures.</p>
<p>Policy 10.1.3 - Drilling, tunnelling, excavation, dredging and drainage activities</p> <p>Avoid, remedy or mitigate the impact of drilling, tunnelling, excavation, dredging and drainage activities on the environment in which they are undertaken.</p>	<p>See above.</p>
10.2 Deposition	
<p>Objective 10.2.1 - Minimise deposition</p> <p>To minimise deposition that results from human activities in the coastal marine area.</p>	<p>The main sources of deposition from a fin fish farm are faeces and residual feed. Deposition from the Five Farming Areas will be minimised in accordance with this objective by:</p> <ul style="list-style-type: none"> • Locating the Five Farming Areas in dynamic offshore locations with strong currents; and • Using best practice technology to deliver feed and minimise associated deposition. This includes underwater feeding and use of underwater cameras and related sensors allow constant monitoring of the fish's environment including feeding behaviour.
<p>Policy 10.2.1 - Avoid deposition wherever practicable</p> <p>Avoid, wherever practicable, remedy or mitigate the adverse effects of human induced deposition of substances and material (natural or otherwise) into the coastal marine area, where that deposition will significantly increase the natural volume of material being deposited as the result of coastal processes on the seabed or foreshore</p>	<p>Deposition from the Five Farming Areas will be avoided to the extent practicable by:</p> <ul style="list-style-type: none"> • Locating the Five Farming Areas in dynamic offshore locations with strong currents; and • Using best practice technology to deliver feed and minimise associated deposition. This includes underwater feeding and use of underwater cameras and related sensors allow constant monitoring of the fish's environment including feeding behaviour. <p>When undertaken in this manner it has been assessed that the effect of deposition will not be of any ecological significance (see Section 6.3.4 of the AEE).</p>
<p>Policy 10.2.3 - Avoid, remedy or mitigate the disposal of contaminants in the coastal marine area</p> <p>Avoid, wherever practicable, remedy or mitigate the adverse effects of the disposal or deposition of contaminants and materials containing contaminants in the coastal marine area.</p>	<p>See above.</p>
<p>Policy 10.2.5 - Navigable water</p> <p>Avoid the adverse effects of deposition on navigable water.</p>	<p>The potential for deposition to reduce the navigable depths of the area is not of concern here.</p>

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<p>Policy 10.2.7 - Deposition of organic material</p> <p>Avoid, wherever practicable, remedy or mitigate the adverse effects of the deposition of organic material from activities occurring in the coastal marine area, on the seabed or foreshore</p>	<p>The deposition of faecal material and residual food can impact on organic matter.</p> <p>It will be managed in accordance with the process set out above in respect of Policy 10.2.1 and will achieve this policy.</p>
<p>Policy 10.2.9 - Natural State Water</p> <p>Avoid the adverse effects of deposition on areas with Natural State (NS) waters as identified in Figure 7.2.2.1.</p>	<p>The Five Farming Areas are located in an area with Natural State waters.</p> <p>The Coastal Plan directs that adverse effect of deposition on areas with Natural State waters (such as the Five Farming Areas) be avoided. The associated explanation for this policy notes that deposition on the bed of these natural state waters could have consequences for the biota that it supports, without having any effect on water quality itself. However, that outcome of concern is not expected here. The absence of sensitive reefs or biogenic communities around the Farming Areas, generally low abundance and richness of infauna, the small area actually occupied, the disturbance from strong currents and previous dredging and fishing, and localised nature of deposition mean that effects on the seabed from the Project South proposal will not be ecologically significant. This also means any effects on the benthic community would not have any measurable effect on higher levels in the food web such as birds and fish or inshore area.</p>
<p>11. Structures</p>	
<p>Objective 11.2.1 - Location of structures</p> <p>To ensure that structures are located in the most appropriate site so as to avoid, remedy or mitigate adverse effects of their presence.</p>	<p>In accordance with these provisions the Five Farming Areas were identified as suitable and appropriate for the establishment of farm structures considering the operational requirements for offshore marine farming of king salmon (including the aquatic habitat, sea conditions and proximity to shore based infrastructure), the potential effects of the activity on the environment, and the need to avoid, remedy or mitigate those adverse effects. This is discussed further in Section 2 of the AEE.</p>
<p>Objective 11.2.2 - Social, economic and safety benefits</p> <p>To recognise the social, economic, cultural and safety benefits of structures in the coastal marine area.</p>	<p>Section 2 describes the social and economic benefits that the Project South structures will facilitate by enabling the farming of salmon in the Five Farming Areas.</p>
<p>Objective 11.2.3 - Exterior of permanent structures/ buildings</p> <p>To ensure, where appropriate, that any permanent structure/building is of a form and is finished in materials and of colours which blend into the natural character of the area.</p>	<p>As described in Section 3.4.1 the barge at each of the Five Farming Areas will be painted in an anti-reflective colour. Likely 'Sanford Blue' (also known as Ocean Blue E992), as is the case for all existing Sanford aquaculture vessels.</p>
<p>Objective 11.2.4 - Lighting and glare</p> <p>To ensure that lighting and glare do not adversely affect the natural character, amenity and navigation safety of the coastal marine area, nor residential amenity and traffic safety on land.</p>	<p>The only surface lighting associated with the Five Farming Areas will be that required for navigational safety.</p>
<p>Policy 11.2.1 - New structures and extensions to existing structures</p> <p>Avoid, wherever practicable, remedy or mitigate any adverse effects associated with the presence and construction of new structures, and extensions to existing structures, in the coastal marine area.</p>	<p>Section 2, 3 and 7 of the AEE describes the various measures proposed to avoid, wherever practicable, remedy or mitigate the adverse effects associated with the presence of structures at the Five Farming Areas. This includes selection of the offshore and remote location in which the Five Farming Areas would be located, and the installation of appropriate aids to navigation.</p>
<p>Policy 11.2.2 - Temporary rather than permanent structures</p> <p>Encourage temporary structures in the coastal marine area where permanent structures are not necessary.</p>	<p>Permanent structures are necessary for the Five Farming Areas.</p>

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<p>Policy 11.2.3 - Public benefit</p> <p>In considering the use and development of the coastal marine area, preference will be given to structures that provide public benefit.</p>	<p>Operational requirements mean public access to the Project South structures will not be possible. However, the structures will contribute to indirect benefits which contribute to the Southland community's social or economic well-being, by facilitating offshore salmon farming in this location.</p>
<p>Policy 11.2.4 - Reduction or waiver of financial contributions</p> <p>Where use and development of the coastal marine area is appropriate, and public benefit arises, financial contributions for the use and occupation of the coastal marine area can be reduced or waived.</p>	<p>Not applicable.</p>
<p>Policy 11.2.5 - Structures to be marked</p> <p>Structures that could cause an impediment to safe navigation and are not readily visible shall be marked and/or lit in a manner that indicates the extent of the structure.</p>	<p>Section 6 and 7 describe the proposed marking of structures at the Five Farming Areas any why that marking will result in the structures not causing an impediment to safe navigation.</p>
<p>Policy 11.2.6 - Consultation with the Maritime Safety Authority and Harbourmasters</p> <p>Consult with the Maritime Safety Authority (MSA) and Harbourmaster/s to assess the potential effects of structures and reclamations on navigation safety.</p>	<p>Sanford has a good working relationship with Maritime Safety Authority (MSA) and Southland Harbourmaster, however, for reasons relating to the commercial sensitivity of this project, Sanford has not been able to seek input from either on the Project South activities before lodging resource consent applications.</p> <p>Beginning in March 2020 Sanford intends on undertaking a comprehensive engagement programme with Maritime Safety Authority (MSA) and Southland Harbourmaster in respect of Project South. Sanford will ensure there is plenty of time for this to occur</p>
<p>Policy 11.2.10 - Soundness and safety</p> <p>Any structure in the coastal marine area is to be designed, constructed, and maintained in a manner which ensures that its soundness and safety is not compromised by its use, corrosion, the action of marine organisms, or fluvial or coastal processes.</p>	<p>Section 3 of the AEE describes how the Project South structures will achieve this policy. The structures that will be used are specifically designed by leading international experts in aquaculture technology and manufacturing to operate in this dynamic offshore environment.</p>
<p>Policy 11.2.16 - Natural character, amenity, landscape, seascape and open space values</p> <p>Avoid, remedy or mitigate the adverse effects of structures on the natural character, amenity, landscape, seascape and open space values of the coastal marine area.</p>	<p>Section 6.6 of the AEE describes how the offshore location of the Farming Areas and the design of structures at the Farming Areas combine to avoid, remedy or mitigate adverse effects on these matters.</p>
<p>Policy 11.2.17 - Structures and activities to be compatible with their surrounding environment</p> <p>Encourage structures and activities, including reclamations, to be located, finished, and be of a form, profile, extent and alignment that is not incompatible with the visual amenity, natural character and physical landscape of the area in which it is located.</p>	<p>See above.</p>
<p>11.7.7 Anchorages and Moorings</p>	
<p>Objective 11.7.7.4 - Safe navigation of Southland's coast</p> <p>To ensure that safe navigation of coastal waters is not unnecessarily put at risk by inappropriate use and development within the coastal marine area.</p>	<p>Section 6 and 7 describe the proposed marking of structures at the Five Farming Areas any why that marking will result in the structures not causing an impediment to safe navigation.</p>

Provision	Analysis
<p>Policy 11.7.7.2 - Consultation with Fishermen's Associations</p> <p>Consult with Fishermen's Associations as a matter of course in respect of resource consent applications in areas that are either frequently fished or navigated.</p>	<p>Sanford has a good working relationship with Fishermen's Associations and is a major quota owner in this area. However, for reasons relating to the commercial sensitivity of this project, Sanford regrets it has not been able to seek their input on the Project South activities before lodging resource consent applications.</p> <p>Beginning in March 2020 Sanford intends on undertaking a comprehensive engagement programme with commercial fishers in respect of Project South. Sanford will ensure there is plenty of time for this to occur.</p>
<p>11.8 Navigation Safety</p>	
<p>Objective 11.8.1 - Safe and efficient navigation</p> <p>To ensure there is safe and efficient navigation in the coastal marine area.</p>	<p>Section 6 and 7 describe the proposed marking of structures at the Five Farming Areas any why that marking will result in the structures not causing an impediment to safe and efficient navigation.</p>
<p>Policy 11.8.1 - Existing navigation routes</p> <p>Preserve existing navigation routes:</p> <ul style="list-style-type: none"> • around the coast of the region; and • to and from launching places, ports and anchorages. 	<p>Section 6 and 7 describe the proposed marking of structures at the Five Farming Areas any why that marking will result in the structures not causing an impediment to safe and efficient navigation around the coast of the region, or to and from launching places, ports and anchorages.</p>
<p>Policy 11.8.2 - Avoid adverse effects on navigation safety</p> <p>Avoid any adverse effects from structures and activities on navigation safety.</p>	<p>Section 6 and 7 describe the proposed marking of structures at the Five Farming Areas any why that marking will result in the structures not causing an impediment to safe and efficient navigation.</p>
<p>12. Coastal Processes and Protection Works</p>	
<p>Objective 12.1.2 - Avoid, remedy or mitigate interference with coastal processes</p> <p>To avoid, remedy or mitigate the interference of coastal processes by coastal use and development where such interference could cause adverse effects.</p>	<p>This objective is achieved. The location of Project South and the design of the pens avoids remedies or mitigates effects on coastal processes such that:</p> <ul style="list-style-type: none"> • effects on hydrodynamics are expected to be very small and localised; and • in the open ocean environment of and around the application area, the ecological consequences of potential alterations to the hydrodynamic regime as a result of the proposal are expected to be negligible.
<p>Policy 12.1.5 - Effects of structures and activities on coastal processes and vice versa</p> <p>Take into account the effects of structures and activities on coastal processes and vice versa.</p>	<p>The effects of structures and activities to be taken into account are summarised above in respect of Objective 12.1.2.</p>
<p>13 Cruise Ships and Other Ships in Internal Waters</p>	
<p>Objective 13.1 - Maintain essential characteristics</p> <p>To maintain the essential characteristics of the pristine coastal marine area environment adjoining the internal waters of the Fiordland National Park and Stewart Island that contribute to a range of high quality experiences in a natural coastal environment</p>	<p>Service vessels may travel to the Five Farming Areas from Big Glory Bay which is within the internal waters of Stewart Island. The passage of service vessels to and from Big Glory Bay via these internal waters is commonplace due to the existing marine farming in the area. That those vessels occasionally travel to the Five Farming Areas rather than other locations in the coastal marine area will not have an adverse effect on the characteristics of these internal waters, or their remoteness and wilderness values.</p>
<p>Objective 13.2 - Preserve remoteness and wilderness values</p>	<p>See above.</p>

Provision	Analysis
To preserve the remoteness and wilderness values of the internal waters of Fiordland and Stewart Island.	
<p>Policy 13.2 - Use of internal waters by ships other than cruise ships</p> <p>Avoid the adverse effects arising from the use of internal waters by ships over 1,000 gross registered tons that are not cruise ships.</p>	See above.
15. Marine Farming	
<p>Objective 15.1.1 - Avoid, remedy or mitigate any adverse effects</p> <p>Avoid, remedy or mitigate any adverse effects of marine farming operations.</p>	In accordance with Objective 15.1.1 a number of measures to avoid, remedy or mitigate the adverse effects of the Project South activities are proposed. These are summarised in Section 2, 3 and 7 of the AEE.
<p>Policy 15.1.1 - Resource consents required</p> <p>Require resource consents for the establishment and operation of marine farming developments.</p>	Resource consent is required and has been sought for the Project South activities.
<p>Policy 15.1.3 - Avoid adverse effects of marine farms in specific areas</p> <p>Avoid the adverse effects from the establishment of marine farms in Marine Reserves, Fiordland's internal waters, Lords River, Port Pegasus, Paterson Inlet (except Big Glory Bay and the Salmon Farming Refuge Zone), and Port William on Stewart Island, and that part of Awarua Bay that lies to the east of the Tiwai Causeway</p>	Project South and its Five Farming Areas are located outside these identified areas.
<p>Policy 15.1.4 - Monitoring the effects of marine farming</p> <p>To require monitoring of individual marine farm sites</p>	In accordance with this policy a comprehensive environmental monitoring plan is proposed for Project South. It is described further in Section 7.
17. Financial Contributions and Bonds	
<p>Objective 17.1 - Financial contributions</p> <p>To secure financial contributions, in appropriate circumstances, for the purpose of offsetting the significant unavoidable adverse effects of certain activities on the coastal marine area</p>	No financial contributions to offset adverse effects are required or proposed as part of Project South.
<p>Objective 17.2 Remedy unlawful adverse effects</p> <p>To be in a position to remedy (without financial cost to the public) the unlawful adverse effects of activities, carried out in breach of the Coastal Plan or the conditions of any applicable resource consents.</p>	The details of any bond required for Project South will be discussed with the Council following lodgement.

Provision	Analysis
<p>Policy 17.1 - Financial contributions not necessarily required</p> <p>Recognise that there are circumstances where adverse effects on the environment must be avoided, and that in such circumstances a financial contribution cannot be used to offset these effects.</p>	<p>No financial contributions to offset adverse effects are required or proposed as part of Project South.</p>
<p>Policy 17.2 - Use of financial contributions as a secondary measure</p> <p>Only use financial contributions to offset the adverse effects of notified controlled, discretionary or non-complying activities after all means of avoiding, mitigating or remedying adverse effects have been addressed.</p>	<p>No financial contributions to offset adverse effects are required or proposed as part of Project South.</p>
<p>Policy 17.3 - Financial contributions to be considered on a case-by-case basis</p> <p>Determine the requirement for, and assess the actual quantum of, financial contributions on a case-by-case basis in the manner set out in Method 17.1.</p>	<p>No financial contributions to offset adverse effects are required or proposed as part of Project South.</p>
<p>Policy 17.4 - Priorities for the application of financial contributions</p> <p>In applying the provisions of Sections 108(2) and 108(10) where financial contributions are required, the Council shall have the following priorities:</p> <ul style="list-style-type: none"> I land including esplanade reserves or strips; iii money; iii a combination of money and land. 	<p>No financial contributions to offset adverse effects are required or proposed as part of Project South.</p>
<p>Policy 17.5 - Use of financial contributions</p> <p>Use financial contributions for the purposes set out in Method 17.1 with the aim of offsetting adverse effects arising as a consequence of, or in association with, the activity for which consent is granted.</p>	<p>No financial contributions to offset adverse effects are required or proposed as part of Project South.</p>
<p>Policy 17.6 - Benefits for the affected community</p> <p>Where practicable, to ensure that the benefits of any financial contribution are used to replace the value lost and applied as close as possible to the site where the adverse effects occur; and where this is not practicable, to identify people or communities most directly affected by the adverse effects and to try to ensure that they benefit from the positive environmental effects that result from the financial contribution.</p>	<p>No financial contributions to offset adverse effects are required or proposed as part of Project South.</p>
<p>Policy 17.7 - Bonds as insurance</p> <p>In appropriate circumstances, require resource consent holders to lodge bonds as insurance against the failure to remedy or mitigate adverse environmental effects and/or failure to remove equipment and structures</p>	<p>The details of any bond required for Project South will be discussed with the Council following lodgement.</p>
<p>Policy 17.8 - Need for and value of bonds</p> <p>Determine the requirement for and assess the actual value of the bonds on a case-by-case basis in the manner set out in Method 17.2.</p>	<p>The details of any bond required for Project South will be discussed with the Council following lodgement.</p>

Table L4: Assessment of Project South against the relevant provisions of Te Tangi a Tauria.

Provision	Assessment
3.6.1 General Policy for Southland's Coastal Environment	
1. Ensure the land, water and biodiversity at the interface of Southland's coastal environment are managed in an integrated way through careful planning and policy instruments which avoid compartmentalising the natural environment.	The AEE has considered the environment in an integrated manner.
2. Recognise that the degree of connection between the coastal and inland environments is inherent when developing robust systems to address areas of degradation and mitigate for future and potential environmental effects.	The AEE has considered the environment in an integrated manner. The Project South area is a significant distance offshore and this avoids interactions with inland environments.
3. Promote communication and collaboration between groups with an interest in or have links with the coastal environment and its management.	Sanford intends on undertaking extensive communication and collaboration with Te Rūnanga o Ngāi Tahu and Ngai Tahu Seafood Resources, Awarua, Hokonui, Ōraka Aparima and Waihopai rūnanga, Rakiura whānau, Rakiura Tītī Islands Committee, the Rakiura Tītī Islands Administration Body, Te Whaka a Te Wera Mātaitai Committee and Rakiura Maori Lands Trustees in respect of these applications once they have been lodged and formally accepted by Environment Southland. Sanford will ensure there is sufficient and full time for this to occur. Engagement with other groups with an interest in the Project South environment and its values including the local communities of Rakiura and Bluff will also occur at this time.
4. Understand that the impacts of mismanagement, such as poor urban development, land use intensification and diversion of water affect the cultural health of the coastal environment.	Based on the information available, and the assessment of effects on biological and physical values Sanford does not consider that approving Project South would constitute 'mismanagement' or that Project South would exacerbate existing 'mismanagement'. However, this will be discussed further in consultation with tangata whenua once applications have been lodged.
5. Understand that the mixing of waters may have adverse effects on river mouth environments as a result in changes of flow, amount and type. Therefore the quality and quantity of freshwater entering lowland catchments of the coastal environment may affect current and future generations from exercising customary rights. The impacts of such activities should be avoided.	Not applicable to this activity.
6. Respect, protect and enhance coastal areas of importance where possible	The physical effects of Project South on the coastal environment are described in Section 6. The activity will be undertaken in a manner which protects the physical environment. The impact on the cultural landscape in this area will be discussed further with tangata whenua once applications have been lodged.
7. Protect and enhance kaimoana and kaimataitai for future generations.	The biological effects of Project South on kaimoana and kaimātaï resources are described in Section 6. The activity will be undertaken in a manner which protects those resources. This will be discussed further with tangata whenua once applications have been lodged.
8. Support continued research into coastal erosion processes.	Not applicable.
3.6.3 Structures in the Coastal Marine Area	
1. Any activity within, adjacent to or that may potentially impact on Statutory Acknowledgment areas, including Te Mimi o Tū Te Rakiwhānoa (Fiordland Coastal Marine Area) and Rakiura/ Te Ara a Kiwa (Stewart Island/	Project South is located within the Rakiura/ Te Ara a Kiwa Statutory Acknowledgement Area. Sanford will consult with Te Rūnanga o Ngāi Tahu, Ngāi Tahu ki Murihiku and Tangata Tiaki in respect of these applications once they have been lodged. Sanford will ensure there is plenty of time for this to occur.

Provision	Assessment
<p>Foveaux Strait Coastal Marine Area), will require consultation with both Te Rūnanga o Ngāi Tahu, Ngāi Tahu ki Murihiku and Tangata Tiaki gazetted under the South Island Customary Fishing Regulations.</p>	
<p>2. Promote awareness among coastal users that the coastal marine area is a finite resource and the number of suitable sites for some structures is limited, therefore the utilisation of coastal space must be efficient and sustainable.</p>	<p>The rationale for the size and location of Project South structures is provided in Section 2 and 3. As described in those sections, the importance of Project South's use of space being both efficient and sustainable was incorporated into the project design. This includes the proposed staged development approach described in Section 3 of the AEE.</p>
<p>3. Promote a precautionary approach toward new proposals. Where the activities and the effects of new proposals are not known or understood. Further information will be required to determine how such activities may affect, or be affected by coastal processes</p>	<p>An assessment how Project South may be affected by, or affect, coastal processes, is provided in Section 6 and in the various technical reports attached to the AEE. Those effects are expected to be minimal.</p> <p>However, notwithstanding this a precautionary approach is proposed for Project South. It is described in Section 3 of the AEE and involves staged development of the Five Farming Areas alongside a robust monitoring and adaptive management plan. This provides suitable mechanisms for ensuring effects are managed within acceptable limits.</p>
<p>4. Avoid the placement of structures in the coastal marine environment that will have significant affects on the foreshore and seabed, coastal water quality, mahinga kai, kaimoana, and will not be compatible with the coastal environment of adjacent lands.</p>	<p>An assessment of the physical and biological effects of Project South on the foreshore and seabed, coastal water quality, mahinga kai and kaimoana is provided in Section 6 of the AEE. No significant effects are predicted. Staged development of Project South alongside a robust monitoring and adaptive management plan provides a suitable mechanism for ensuring this outcome is achieved.</p>
<p>5. Ensure that structures in the coastal environment are soundly constructed, are compatible with the natural character of the surrounding coastal environment and adjacent lands and do not have adverse effects on other people using the coast area. This includes appropriate placement of moorings and anchorages.</p>	<p>Section 3 describes how the Project South structures will be soundly constructed.</p> <p>Section 6 describes how the development is compatible with the natural character of the area.</p> <p>Adverse effects on other users are addressed in Section 6. These are avoided through the offshore location of the farms, farm design, and the various navigational aids that will be installed. However, this will be discussed further with tangata whenua once applications have been lodged.</p>
<p>6. Ensure that structures located in the coastal marine area justify the functional necessity for that location and do not impact on the coastal environment when an alternative location may be more readily suited for that type of development.</p>	<p>The rationale for the location of Project South and its structures are provided in Sections 2 and 3 of the AEE.</p>
<p>7. Promote concentration of structures within the existing Port Zones (e.g. Bluff , Aparima/Riverton, Waikaiwa) to minimise the risks caused by dispersal on the surrounding coastal environment. Where possible utilise existing facilities within the zones for ship activities.</p>	<p>Project South will utilise existing port facilities in Bluff. No new port facilities are required to service the activity.</p>
<p>8. Ensure that Ngāi Tahu ki Murihiku are involved in any formation of access ways to facilitate access to coastal areas.</p>	<p>Project South does not involve the formation of new access ways.</p>
<p>9. Avoid visual intrusion or obstruction of views as a result of built structures. The location of structures and buildings that may protrude above skylines and ridgelines may be inappropriate in some cases.</p>	<p>The location and design of Project South structures will avoid visual intrusion or obstruction of views. Even under optimum viewing conditions, that the main elements of the farmed areas would not be visible from Ruapuke or Bench Islands.</p>

Provision	Assessment
10. Avoid the erection of structures near or on off shore pest free islands to ensure the values of these islands are not compromised.	Project South structures are not located near any off shore pest free islands. A comprehensive biosecurity assessment has also been completed which confirms no adverse effects on any such islands are expected.
11. Ensure that the erection of lights on coastal structures does not adversely affect the natural character, amenity and navigation safety of the coastal marine area, nor restrict amenity and traffic safety on land adjacent.	Surface lights on the Project South farmed areas will be limited to those required for navigational safety. They will not be visible from land and sit comfortably with the natural character of the area. Subsurface lights used for salmon maturation will not cause light spill.
12. Encourage techniques to eliminate the effects of light pollution. Techniques should be introduced during the planning phase of development and when assessing harbour and port procedures.	Surface lights on the Project South farmed areas will be limited to those required for navigational safety. Subsurface lights used for salmon maturation will not cause light spill.
13. Ensure that protocol are established between stakeholders and developers to recognise for the accidental discoveries of cultural sites and material within the coastal environment during development	The Project South farmed areas are located several kilometres offshore in 50 – 80m of water and any direct physical impacts on the seabed will be limited to the farmed areas. Accidental discovery of cultural sites and material is therefore not expected. However, once applications have been lodged and formally accepted by Environment Southland, Sanford will discuss suitable protocols with tangata whenua.
14. Avoid development on known tauranga waka, cultural, archaeological and mahinga kai sites.	The Project South farmed areas are located several kilometres offshore in 50 – 85m of water. Sanford is not aware of any tauranga waka, cultural, archaeological and mahinga kai sites at any of the five farmed areas. However, once applications have been lodged and formally accepted by Environment Southland consultation on this matter will be undertaken with tangata whenua.
15. Ensure any coastal structure development does not impact on public health and safety.	The only potential impacts on public health and safety relate to navigational use of the area. Section 6 describes why effects on these users will be acceptable.
16. Encourage owners and other stakeholders to maintain existing coastal structures in a reasonable and safe condition.	Section 3 describes the proposed structures, and how they will be kept in a reasonable and safe condition.
17. Maintain close working relationships with Maritime New Zealand and the Harbourmasters, and be actively engaged in assessments undertaken with respect to the development of new structures that may have an impact on aspects of navigation and public safety. This is particularly important when discussing the provision and maintenance of safe anchorages for extreme weather events in areas remote from ports.	The potential impacts on public safety and navigation are discussed in Section 6. Consultation on these matters with the harbour master and tangata whenua will occur once the applications have been lodged.
18. Support the placement of warning signs with respect to navigation safety or hazard mitigation in areas where such placement does not overly detract from natural character and landscape values	Section 6 of the AEE describes how those navigational aids sit comfortably with the natural character in this area. Consultation on these matters with tangata whenua will occur once the applications have been lodged and formally accepted by Environment Southland acknowledging that landscape has cultural elements.
3.6.7 Coastal Water Quality	
1. Ensure that it is clearly understood by all land and coastal users that upstream activities and the impacts these have on water quality have a cumulative downstream effect. Given this, provisions 3.5.10-3.5.14 as outlined in Section 3.5 – Te Rā a Takitimu, Southland Plains of this Plan, should be read in conjunction with the following policies	Not applicable to this application.

Provision	Assessment
2. Ensure that commercial and recreational vessels recognise for impacts of discharge on coastal water quality. Policies 1-4 under provision 3.6.7 above should also be recognised by all coastal water commercial and recreational vessel users within Southland.	All Sanford vessels have fully contained grey water and sewerage systems which are collected and disposed on land.
3. Encourage protection and enhancement of the mauri of coastal waters, to ensure the ability to support cultural and customary usage	The key biological effects when considering the impact of Project South on water quality relate to increased nitrogen inputs and changes in dissolved oxygen. Section 6 of the AEE describes why Project South is not expected to have any ecologically meaningful effect on those parameters. Consultation on these matters with tangata whenua will occur once the applications have been lodged and formally accepted by Environment Southland.
4. Avoid impacts on coastal waters as a result of inappropriate discharge from activities occurring upstream and in areas adjacent to coastal waters.	Not applicable.
5. Avoid the use of upstream waters as a receiving environment for point source discharge of contaminants	Not applicable.
6. Promote the establishment and restoration of coastal wetland and riparian areas to help address non-point source pollution in coastal areas.	Not applicable.
7. Avoid the use of coastal waters and the ocean as a receiving environment for the direct discharge of contaminants.	All Sanford vessels have fully contained grey water and sewerage systems which are collected and disposed on land. Project South will involve increased nitrogen inputs. Section 6 of the AEE describes why Project South is not expected to have any ecologically meaningful effect on those parameters
8. Ensure Ngāi Tahu ki Murihiku have an active role in promoting the relationship recognised between land use activities in the upper catchment and the health of coastal ecosystems.	Project South does not involve land use activities.
9. Ensure the quality of water in all waterways is improved to support biodiversity in estuarine and coastal waters	Effects on water quality are described in Section 6. Water quality at the Project South farmed areas is in a natural state and suitable to support biodiversity. Project South will not have an adverse impact on its suitability to support biodiversity.
10. Ensure that all fish species have uninhibited access between inland and coastal waters.	This matter will not be impacted by Project South.
11. Ensure that there is no sewage or grey water discharged directly into our oceans from coastal activities or vessels/ structures. Any removal of sewage or grey water should be undertaken where appropriate discharges facilities are located to avoid any unwarranted discharge into coastal waters	All Sanford vessels have fully contained grey water and sewerage systems which are collected and disposed on land. This will also be the case for the barge located at each of the Five Farming Areas.
12. Educate coastal water users about the effects of hull cleaning and the impacts that toxic and noxious substances may have on the sustainability of resources located within Taiāpure, Mātaitai, Tauranga Ika and Marine Reserve areas.	Project South does not involve hull cleaning. Any hull cleaning of service vessels will be carried out at existing specialised facilities.
13. Advocate for the development of collection facilities to be installed in all port areas for the collection of shipboard sewage.	All Sanford vessels have fully contained grey water and sewerage systems which are collected and disposed on land to these facilities. This will also be the case for the barge located at each of the Five Farming Areas.

Provision	Assessment
<p>14. Avoid the use, disposal and transportation of hazardous substances. In cases where transportation does occur, provision of secondary containment systems to reduce the risk of spillage is supported.</p>	<p>Section 3.6.4 of the AEE describes how the use and storage of these substances at the Five Farming Areas will be managed in accordance with the strict controls contained in the various legislation administered by Maritime New Zealand, including The Health and Safety at Work (Hazardous Substances) Regulations 2017, and the maritime and marine protection rules which are statutory instruments (or secondary legislation) made by the Minister of Transport under the Maritime Transport Act 1994. This includes the strict requirements relating to planning and response to spills.</p> <p>This is an appropriate response to this provision and adverse effects are not expected.</p>
<p>15. Advocate for the adoption of improved treatment systems for the discharge of water and contaminants to reduce the likelihood of effects on the coastal environment from both upstream and coastal water activities. This includes investigations and improvements to existing coastal sewage infrastructure and management and treatment of ballast water.</p>	<p>All Sanford vessels have fully contained grey water and sewerage systems which are collected and disposed on land to approved facilities. This will also be the case for the barge located at each of the Five Farming Areas.</p>
<p>16. Become actively involved and support development and review of contingency plans to respond to marine emergencies such as oil or diesel spills. This includes active involvement in remediation and risk assessment following a spillage or discharge into coastal waters.</p>	<p>Section 3.6.4 of the AEE describes how the use and storage of these substances at the Five Farming Areas will be managed in accordance with the strict controls contained in the various legislation administered by Maritime New Zealand, including The Health and Safety at Work (Hazardous Substances) Regulations 2017, and the maritime and marine protection rules which are statutory instruments (or secondary legislation) made by the Minister of Transport under the Maritime Transport Act 1994. This includes the strict requirements relating to planning and response to spills.</p> <p>Consultation on these matters with tangata whenua will occur once the applications have been lodged and formally accepted by Environment Southland.</p>
<p>17. Actively support programmes which educate coastal users in respect to the coastal environment's vulnerability, especially in respect to disposal of rubbish in coastal waters and from vessels. Such dumping of rubbish has a negative effect on water quality and ecosystem health.</p>	<p>All non-biodegradable waste will be collected, retained and disposed of at an approved solid waste facility onshore. This includes domestic waste on vessels, as well as materials associated with farming structures, feeding, and all other activities. Sanford has been awarded Best Aquaculture Practice four star rating for its farming practices and has environmental certification from the New Zealand Marine Farming Association. Both demonstrate the company's adherence to industry Standard Operating Procedures and Codes of Practices associated with environmental management</p>
<p>18. Avoid inappropriate location and design of infrastructure e.g. outfalls and pipelines which may pose a threat to water quality. Encourage agencies and developers to adopt best practice when undertaking coastal protection so as to avoid any unnecessary discharge to coastal waters</p>	<p>Not applicable.</p>

3.6.10 Management Areas

<p>1. Recognise and provide for the relationship of Ngāi Tahu ki Murihiku within Taiāpure, Mātaitai and Tauranga Ika areas, and provide for the exercise of customary fishing rights under the South Island Customary Fishing fishing regulations.</p>	<p>Project South farmed areas are not located within any identified Taiāpure or Mātaitai. Nor is it expected to have an adverse effect on the biological resources contained within any identified Taiāpure or Mātaitai in the surrounding environment.</p> <p>Sanford is also not aware of any Tauranga Ika in the vicinity of the Project South farmed areas and there are no physical resources present which suggest the sites are likely to be valued for this purpose.</p> <p>The Project South area is also only lightly used for commercial and recreational fishing purposes.</p> <p>In turn, Sanford is not aware of any reason why Project South would impact on customary fishing rights under the Fisheries (South Island Customary Fishing) Regulations 1999.</p>
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Provision	Assessment
	Consultation on these matters with tangata whenua will occur once the applications have been lodged and formally accepted by Environment Southland.
2. Support identification of marine areas of significance for customary fishing and other values within Southland's marine environment and be actively involved in the development of Taiāpure and Mātaitai areas to ensure Ngāi Tahu ki Murihiku have an opportunity to manage areas of special significance.	As above Sanford is not aware of any reason why Project South would impact on customary fishing rights under the Fisheries (South Island Customary Fishing) Regulations or any other relevant fisheries legislation. Consultation on these matters with tangata whenua will occur once the applications have been lodged and formally accepted by Environment Southland.
3. Have active involvement in the development of further marine reserves within Southland's marine environment to ensure that such development does not occur in areas of significance for customary fishing, wāhi tapu or where it may inhibit the development of Taiāpure or Mātaitai.	The application does not involve the development of further marine reserves.
4. Prevent further degradation of the mauri of Taiāpure, Mātaitai, Tauranga Ika, Marine Reserves and areas of significance.	Project South farmed areas are not located within any identified Taiāpure or Mātaitai. For reasons set out in Section 6 of the AEE it is also not expected to have an adverse effect on the biological resources contained within any identified Taiāpure or Mātaitai in the surrounding environment. Sanford is not aware of any Tauranga Ika or other area of significance in the vicinity of the Project South farmed areas and there are no physical resources present which suggest the sites are likely to be valued for this purpose. Section 5 of the AEE identifies the closest Marine Reserves to the Project South area. Section 6 describes why effects on those Marine Reserves, and the biological values they hold, are not expected. Consultation on these matters will occur once the applications have been lodged and formally accepted by Environment Southland.
5. Establish working relationships with all agencies (such as Biosecurity New Zealand, Ministry of Fisheries, Fiordland Marine Guardians, Department of Conservation, Environment Southland and environmental groups) that have roles and responsibilities over the management of Taiāpure, Mātaitai and Marine Reserves to support local iwi capacity building and ensure promotion of best practice among public and discourage activities that will have a detrimental effect on the life supporting capacity of these areas.	Not applicable.
6. Ensure that areas that are gazetted as Taiāpure, Mātaitai, Tauranga Ika or Marine Reserves are protected from biosecurity risks through the education of marine users and the provision of adequate resources for surveillance, monitoring and eradication operations.	A comprehensive Biosecurity Management Plan will be implemented by Sanford to ensure the surrounding environment, including any areas gazetted as Taiāpure, Mātaitai, Tauranga Ika or Marine Reserves is protected from biosecurity risks.
7. Promote integrated interagency co operation in the management and protection of coastal areas adjacent to Taiāpure, Mātaitai, Tauranga Ika or Marine Reserves.	Not applicable.
8. Support agencies with a compliance and enforcement role against those committing offences under established legislation and bylaws.	Not applicable.
9. Engage with communities in the protection and purpose of Taiāpure, Mātaitai, Tauranga Ika and Marine Reserve areas through effective education, communications and participation.	Consultation on these matters with tangata whenua will occur once the applications have been lodged and formally accepted by Environment Southland.
10. Support and remain consistent with existing management plans for Taiāpure, Mātaitai and Marine Reserve areas, and the rules and regulations within	For reasons described in Section 6 of the AEE Project South is not expected to have an adverse effect on biological values of any Taiāpure, Mātaitai or Marine Reserve areas. Consultation on these matters with tangata whenua will occur once the applications have been lodged and formally accepted by Environment Southland.

Provision	Assessment
11 Actively engage with and discourage management area users from the deliberate disposal and discharge of waste materials including rubbish from vessels.	All non-biodegradable waste will be collected, retained and disposed of at an approved solid waste facility onshore. This includes domestic waste on vessels, as well as materials associated with farming structures, feeding, and all other activities. Sanford has been awarded Best Aquaculture Practice four star rating for its farming practices and has environmental certification from the New Zealand Marine Farming Association. Both demonstrate the company's adherence to industry Standard Operating Procedures and Codes of Practices associated with environmental management
12. Discourage the discharge of waste products from processed marine species to the waters within Taiāpure, Mātaitai, Tauranga Ika and Marine Reserve areas and especially within spawning and nursery areas.	No discharges from the processing of marine species will occur.
13. Avoid oil and chemical spills within Taiāpure, Mātaitai, Tauranga Ika and Marine Reserve areas and set in place contingency measures with lead agencies should such an event occur.	<p>Section 3.6.4 of the AEE describes how the use and storage of these substances at the Five Farming Areas will be managed in accordance with the strict controls contained in the various legislation administered by Maritime New Zealand, including The Health and Safety at Work (Hazardous Substances) Regulations 2017, and the maritime and marine protection rules which are statutory instruments (or secondary legislation) made by the Minister of Transport under the Maritime Transport Act 1994. This includes the strict requirements relating to planning and response to spills.</p> <p>Consultation on these matters with tangata whenua will occur once the applications have been lodged.</p>
14. Educate coastal water users about the effects of hull cleaning and the impacts that toxic and noxious substances may have on the sustainability of resources located within Taiāpure, Mātaitai, Tauranga Ika and Marine Reserve areas.	<p>Project South does not involve hull cleaning.</p> <p>Any hull cleaning of service vessels will be carried out at existing specialised facilities.</p>
15. Take an active role in any research or monitoring undertaken within Taiāpure, Mātaitai, Tauranga Ika and Marine Reserve areas. Of particular importance are spawning and nursery areas and important mahinga kai sites. Furthermore Ngāi Tahu ki Murihiku wish to be consulted on and receive a copy of any research undertaken (and its results) within these areas and have an ability to object if applicable	Consultation on these matters will occur once the applications have been lodged and formally accepted by Environment Southland.
3.6.11 Aquaculture and Marine Farms	
1. Ensure that aquaculture activities recognise and provide for pre-existing customary rights and commercial fishing rights provided by the Māori Fisheries Settlement in 1992.	<p>As above Sanford is not aware of any reason why Project South would impact on customary fishing and practices, fishing resources or fisheries. No adverse effects on mahinga kai along the coastline of nearby islands is expected. Impacts on commercial fisheries are discussed in Section 6.</p> <p>Consultation on these matters with tangata whenua will occur once the applications have been lodged and formally accepted by Environment Southland.</p>
2. Establish a process with local government agencies to identify suitable areas for aquaculture and the allocation of coastal space to ensure Ngāi Tahu ki Murihiku rights are protected. This includes involvement in the development of programmes that assess the ecological health, carrying capacity and cumulative effects from all coastal users within Southland's coastal waters.	No process of the kind referred to in this policy has been established.
3. Have active involvement in the consent process for aquaculture and marine farming. Operations should include information on waste disposal and provisions for reducing effects on existing local species.	<p>Sanford intends all stakeholders to have active involvement in the consent process for Project South. Detail for how this occurs will be discussed with tangata whenua once the applications have been lodged and formally accepted by Environment Southland.</p> <p>With respect to the second half of this policy, it is noted that:</p> <ul style="list-style-type: none"> All non-biodegradable waste will be collected, retained and disposed of at an approved solid waste facility onshore; and

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	<ul style="list-style-type: none"> As outlined in Section 7 of the AEE, various measures are proposed to reduce effects on existing local species, including birds, mammals and fish.
<p>4. Recognise and be involved in the development of programmes that recognise for protection of ecological, heritage, wāhi tapu and wāhi taonga values. This includes involvement in ongoing management, setting of consent conditions and monitoring and compliance programmes.</p>	<p>Sanford intends all stakeholders to have active involvement in the consent process for Project South. Detail for how this occurs will be discussed with tangata whenua once the applications have been lodged and formally accepted by Environment Southland.</p> <p>Consultation will include the potential involvement of tangata whenua in the ongoing management of the Project South farmed areas, the setting of consent conditions, and monitoring and compliance programmes.</p>
<p>5. Ensure participation into research of the impacts of marine farms on natural character and visual amenities</p>	<p>No further research on the impacts of marine farms on natural character and visual amenities is proposed as part of these applications.</p>
<p>6. Ensure participation into research that investigates increased sediment dispersal, and the effects of such on seabed habitats under and around marine farms.</p>	<p>No further research on increased sediment dispersal, and the effects of this on seabed habitats under and around marine farms is proposed as part of these applications.</p>
<p>7. Ensure that aquaculture does not have adverse effects on customary fishing and practices, fishing resources or fisheries. This includes maintaining access to sources of abundant local kaimoana, kaimātaitai and mahinga kai populations.</p>	<p>As above Sanford is not aware of any reason why Project South would impact on customary fishing and practices, fishing resources or fisheries. Also - no adverse effects on sources of abundant local kaimoana, kaimātaitai and mahinga kai on the coastline of nearby islands are expected.</p> <p>Consultation on these matters with tangata whenua will occur once the applications have been lodged and formally accepted by Environment Southland.</p>
<p>8. To ensure participation into research on the potential changes to nutrient supplies in coastal waters as a result of increased demand and the possible degradation and displacement of existing natural fish and shellfish populations.</p>	<p>No further research is proposed as part of these applications on the potential changes to nutrient supplies in coastal waters as a result of increased demand and the possible degradation and displacement of existing natural fish and shellfish populations.</p>
<p>9. To ensure that the potential introduction of unwanted organisms is monitored to ensure impacts on existing biodiversity is limited.</p>	<p>A comprehensive Biosecurity Management Plan will be implemented for Project South. It will include various management and monitoring measures to ensure the surrounding environment is protected from biosecurity risks.</p>
<p>3.6.13 Coastal Ecosystems</p>	
<p>1. Avoid coastal activities that may disturb, and have a direct or indirect detrimental impact, on areas of significant vegetation and habitats. Direct impacts may be physical damage while indirect impacts may include effects arising from siltation, deposition or displacement over time</p>	<p>The location of Project South means it will not have a direct or indirect detrimental impact on areas of significant vegetation.</p>
<p>2. Advocate protection of species located in the coastal environments that are of cultural importance to ensure continued cultural well-being</p>	<p>A number of species of marine birds and marine mammals which are listed as Taonga species in Appendix 4 of Te Tangi a Tauira inhabit the Project South area. Section 6 of the AEE outlines how those species and other species which inhabit these waters will be protected.</p>
<p>3. Have active involvement in promoting the understanding of ecosystem interactions within the coastal environment and the impacts that changes to water quality and levels of deposition and disturbance may have on each organism and their subsequent role in maintaining ecosystem health.</p>	<p>Not applicable.</p>
<p>4. Promote the uniqueness of estuarine ecosystems through maintenance and enhancement of their productive nature.</p>	<p>Not applicable.</p>
<p>5. Provide and recognise for the strong cultural links with coastal landscapes and biodiversity held by Ngāi Tahu ki Murihiku.</p>	<p>Sanford acknowledge that Ngāi Tahu ki Murihiku have strong cultural links with the coastal landscape and biodiversity in the Ruapuke /Rakiura/Te Ara a Kiwa area where Project South is located. The physical and biological effects of the Project South farmed areas on landscapes and biodiversity in that area are set out in</p>

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	Section 6 of the AEE. Consultation with tangata whenua on how Project South fits within the cultural landscape in this area will occur once the applications have been lodged.
6. Avoid changes to coastal landscapes and biodiversity which have detrimental impacts on Ngāi Tahu ki Murihiku relationships and associations with coastal land, water, wāhi tapu and wāhi taonga areas.	See above.
7. Recognise for the importance of coastal wetland areas as mahinga kai communities and, where appropriate, expand or create new coastal wetland areas.	Not applicable.
8. Advocate and support initiatives for restocking of lagoon and other coastal waterways with indigenous fish species and be actively involved in maintaining these areas as a suitable fishery habitat.	Not applicable.
9. Ensure Ngāi Tahu ki Murihiku participation in the development of new coastal reserves and/or marine protected areas to ensure an assessment is undertaken with respect to effects of such on areas of cultural importance and continued access.	Not applicable.
10. Advocate for protection and methods of enhancement of threatened coastal species, particularly those of cultural significance.	<p>There are a number of threatened coastal bird and marine mammal species which inhabit the waters in and around Project South.</p> <p>Details of how those species will be protected is provided in Section 6 and Section 7 of the AEE.</p> <p>Consultation on these matters with tangata whenua will occur once the applications have been lodged and formally accepted by Environment Southland.</p>
11. Promote the importance of the health of kaimoana in coastal waters.	<p>Sanford acknowledges the importance of kaimoana to Te Rūnanga o Ngāi Tahu and Ngāi Tahu ki Murihiku, and Section 6 and 7 of the AEE describe how kaimoana resources will be protected.</p> <p>Consultation on these matters with tangata whenua will occur once the applications have been lodged and formally accepted by Environment Southland.</p>
12. Ensure continued access to coastal areas for customary use and to promote continued support among local authorities to ensure such access is maintained.	<p>As above Sanford is not aware of any reason why Project South would impact on customary fishing and practices, fishing resources or fisheries. Nor are any adverse effects expected on mahinga kai along the coastline of nearby islands, or on tīti and the customary use of those species.</p> <p>Consultation on these matters with tangata whenua will occur once the applications have been lodged and formally accepted by Environment Southland.</p>
13. Avoid adverse impacts on vulnerable coastal dune environments as a result of subdivision, residential development, forestry, farming, mineral extraction, tourism and general public access.	Not applicable.
14. Encourage and support projects for the re-establishment and restoration of indigenous plants in coastal dune environments.	Not applicable.
15. Discourage use of recreational vehicles or coastal activities whereby dune environments may be damaged and bird nesting areas threatened.	Not applicable.
16. Support and encourage information sharing between agencies with respect to coastal biosecurity risks.	<p>A comprehensive Biosecurity Management Plan will be completed for Project South. It will include various management and monitoring measures that will be implemented by Sanford to ensure the surrounding environment is protected from biosecurity risks.</p> <p>Consultation on these matters with tangata whenua will occur once the applications have been lodged and formally accepted by Environment Southland.</p>

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17. Support effective communication among coastal users with respect to risks posed by entry of unwanted organisms to New Zealand marine environments.	See above.
18. Avoid cleaning of hulls or “lay-ups” whereby indigenous marine biodiversity will be compromised. Agencies should form best practice protocol for such activities and actively implement these among coastal users.	Project South does not involve hull cleaning. Any hull cleaning of service vessels will be carried out at existing specialised facilities.
3.6.14 Marine Birds	
1. Recognise for Ngāi Tahu ki Murihiku cultural, historical and spiritual association with taonga species. Such associations must be provided for within all management planning documents (Taonga Species as listed under the Ngāi Tahu Claims Settlement Act 1998 are found in Appendix 4)	A number of Taonga Species inhabit the Project South area. They include: <ul style="list-style-type: none"> • Hoiho (Yellow-eyed penguin). • Karoro (Black backed gull). • Koau (Black shag, Pied shag, Little shag). • Korora (Blue penguin). • Tara (Terns). • Tawaki (Fiordland crested penguin). • Titi (Sooty shearwater / Muttonbird, Hutton’s shearwater, Common diving petrel, Common diving petrel, Westland petrel, Fairy prion, White-faced storm petrel, Cook’s petrel, Mottled petrel). • Toroa (Albatrosses and Mollymawks). Section 6 of the AEE describes the potential effects on these taonga species and how they will be protected.
2. Protect coastal environments in which marine birds nest and feed, particularly titi populations.	Section 5 and Section 6 of the AEE describe: <ul style="list-style-type: none"> • the coastal environments in which marine birds nest and feed, including titi populations; and • how Project South will be undertaken in a manner which protects those environments from the proposed marine farming activities.
3. Continue working with local authorities to ensure the protection and education of the public of important marine bird populations.	Not applicable.
4. Avoid compromising marine bird habitats as a result of inappropriate coastal land use, subdivision or development.	Section 5 and Section 6 of the AEE describe: <ul style="list-style-type: none"> • the coastal environments in which marine birds nest and feed, including titi populations; and • how Project South will be undertaken in a manner which protects those environments from the proposed marine farming activities
5. Become actively involved in research and investigation programmes that will enhance marine bird populations and habitats.	Project South is not a research or investigation programme. However, further monitoring of marine birds is proposed as part of the application. Potential tangata whenua involvement in that monitoring will be discussed with tangata whenua once the applications have been lodged and formally accepted by Environment Southland.
6. Encourage techniques to eliminate the effects of light pollution from coastal structures on migratory marine birds.	Section 6 of the AEE addresses the effects of lighting on migratory birds. Various management measures are proposed in respect of those effects. Including limiting above surface lighting to that required for navigational marking.

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7. Promote appropriate fishing techniques among fishers to avoid sea bird by-catch.	Not applicable.
3.6.15 Protection of Significant Coastal Sites	
1. Ensure that Ngāi Tahu ki Murihiku are able to effectively exercise their role as kaitiaki over wāhi tapu and wāhi taonga within Southland's coastal environment.	The Project South farmed areas are located several kilometres offshore in approximately 50 – 80m of water. Sanford is not aware of any wāhi tapu or wāhi taonga site in these locations. This will be confirmed through consultation with tangata whenua once the applications have been lodged and formally accepted by Environment Southland.
2. Maintain good working relationships with those agencies involved in the protection of historic and cultural resources within Southland's coastal environment.	Not applicable.
3. That coastal urupā be guaranteed full protection and access by Ngāi Tahu kaitiaki and whānau through working with landowners and the wider community to develop working relationships and an understanding of the importance of these areas.	Not applicable.
4. Ensure protection over, and recognition of, Ngāi Tahu ki Murihiku ancestral relationships with tauranga waka sites within Southland's coastal environment. Any development that may potentially disturb these sites may only occur following formal approval from Ngāi Tahu ki Murihiku.	Not applicable.
5. Maintain good working relationships with those agencies involved in the protection of historic and cultural resources to ensure support for the protection and acknowledgment of Ngāi Tahu ki Murihiku association with these resources.	Not applicable.
6. Avoid compromising unidentified, or unknown, sites of cultural significance as a consequence of ground disturbance associated with coastal land use, subdivisions and development.	The Project South farmed areas are located several kilometres offshore in approximately 50 – 80m of water and any direct physical impacts on the seabed will be limited to the farmed areas. Sanford understands there are no sites of significance in this location that could be compromised by ground disturbance in this area. Consultation on these matters with tangata whenua will occur once the applications have been lodged and formally accepted by Environment Southland.
7. Ensure that coastal archaeological sites of interest to Ngāi Tahu Whānui are protected and that any modification of these sites are approved by Ngāi Tahu ki Murihiku.	The Project South farmed areas are located several kilometres offshore in 50 – 85m of water and any direct physical impacts on the seabed will be limited to the farmed areas. Sanford understands there are no archaeological sites in this location that could be disturbed by the activity. Consultation on these matters with tangata whenua will occur once the applications have been lodged and formally accepted by Environment Southland.
8. Applications for activities in areas of cultural significance where there are no known sites but the likelihood of finding sites is high, may require one or more of the following (at the cost of the applicant): a. site visit; b. archaeological survey (walk over/test pitting), or a full archaeological description, by an archaeologist approved by Ngāi Tahu ki Murihiku; c. archaeological authority; d. cultural impact assessment; e. cultural monitoring; f. accidental discovery protocol agreement.	See above.

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9. Where an archaeological site survey is required to assess the cultural heritage values in an area, the archaeologist must have the mandate of the appropriate kaitiaki rūnanga.	See above.
10. Any site that fulfils the criteria of the Historic Places Act 1993, whether recorded or not (it just has to be suspected) is protected under the Act. This refers to unexpected sites that may be uncovered during development, even after approval of the overall project has been consented by Ngāi Tahu ki Murihiku.	See above.
11. To ensure that resource consent applicants are aware that liaising with iwi on the cultural impacts of a development does not constitute an archaeological assessment.	See above.
12. Any interpretation or portrayal of Ngāi Tahu history or association with wāhi tapu or wāhi taonga is subject to policies for cultural interpretation, as per provision 3.3.9 of this Iwi Management Plan.	Not applicable.