
**PRE-CAUCUSING STATEMENT BY STEPHEN KENNETH BROWN FOR ENVIRONMENTAL DEFENCE
SOCIETY INC IN RESPECT OF SUBMISSION ON MINISTRY OF PRIMARY INDUSTRIES POTENTIAL
RELOCATION OF KING SALMON LTD SALMON FARMS IN THE MARLBOROUGH SOUNDS
(LANDSCAPE)**

5 MAY 2017

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Introduction

1. My name is Stephen Kenneth Brown. I prepared a statement of evidence for the Environmental Defence Society Inc analysing landscape and natural character effects of the Ministry for Primary Industries' salmon farm relocation proposal filed with the Panel on 27 March 2017.
2. This supplementary statement is filed in response to the Panel's 2nd Minute dated 20 April 2017. The Panel has directed caucusing of landscape architects on 9 May 2017. In preparation for caucusing it has also directed that experts prepare a supplementary statement summarising:
 - Points of agreement with opposing expert opinions.
 - Points of disagreement with opposing expert opinions.
 - Why the panel should prefer my expert opinion/that of experts sharing my opinion.
3. As identified by the Panel¹, I have read and considered the evidence of:
 - John Hudson: MPI's expert.
 - Julia Williams: MPI's peer reviewer.
 - Dr Michael Steven: Friends of Nelson Haven et ors.

Matters of agreement

4. My reading of the evidence indicates the following matters are agreed between all experts:
 - While Natural Character values are often viewed as being very site specific, there can be no doubt that perceptions of naturalness and natural character value, and the physical reality associated with such values, often stretch well beyond the site level. As such I agree with Dr Steven in relation to Boffa Miskell's 5 scales of

¹ Panel's 2nd Minute at [9].

Natural Character assessment and John Hudson's analysis where he takes this adequately into account. It appears thAT Julia Williams also agrees with this approach to natural character assessment.

5. The following matters are agreed between myself, John Hudson and Julia Williams:

- The location and extent of the Outstanding Natural Landscape (ONLs) within and next to Pelorus Sound as identified by Boffa Miskell for Marlborough District Council in 2015.
- The location and extent of areas of Outstanding Natural Character and High Natural Character (ONC and HNC areas) within and next to Pelorus Sound as identified by Boffa Miskell for Marlborough District Council in 2014.
- That both Boffa Miskell studies appropriately and accurately reflect the landscape and natural character values found within Pelorus Sound, although they do so in a way that reflects the range of values found at an individual 'site level'. Neither study addresses wider 'reach scale' values that take into account the cumulative experience or experiences of moving through the Sounds and appreciating them in a more dynamic fashion.

6. The following matters are agreed between myself and Dr Steven:

- That landscapes have important spatial and sea components. This leads me to conclude that the Marlborough Sounds have a second layer of important landscapes that are defined at the 'reach level'. After all, the Marlborough Sounds comprises a broad landscape of sunken valleys. In my opinion, these do not necessarily need to be identified for the purposes of the sort of landscape study already undertaken by Boffa Miskell for Marlborough District Council, although this would be desirable. However, they do need to be recognised when considering development proposals that might affect the core qualities of individual or multiple 'reach level' landscapes. This has a direct bearing on assessment of the effects that the 6 proposed salmon farms would have on the Waitata Reach and part of the Tawhitinui Reach near Maud Island.

- That Mr Hudson appears to have assessed natural character values and effects at little more than the scale of individual salmon farm sites and this does not recognise the wider context or wider scales that are also important when it comes to interpreting such values and effects within the continuum of a reach and its sea surface.
- I agree with many of Dr Steven's comments regarding the values attributable to the Waitata Reach and Marlborough Sounds at his paragraph 79 (79.1 to 79.7). I also agree that it not a 'working landscape', even though I am less convinced that all of the Waitata Reach is an ONL (moreso, on the eastern side).
- That it is significant that the NZ King Salmon decision addressed the issue of cumulative effects at some length and, in part for that reason, declined consent for the sites at Kaitira, Tapiipi and White Horse Rock.

7. The following matters are agreed between myself, Julia Williams and Dr Steven:

- That it is relevant to consider cumulative effects that pertain to the 'reach scale' and that the effects of the proposed salmon farms on the Waitata Reach would be of a high order.
- That it is not, therefore, adequate or appropriate to consider the effects of the proposed salmon farms at just the 'localised site level' or mostly at that level, as Mr Hudson appears to have done. This perception is unfortunately accentuated by the rather narrowly focused nature of the photo simulations accompanying his assessment of effects.

Matters of disagreement

8. My reading of the evidence indicates the following matters are not agreed between myself and John Hudson:

- Boffa Miskell's landscape study helps to contextualise each proposed site change by outlining the values associate with various parts of the Waitata Reach and Pelorus Sound. However, I do not agree with Mr Hudson that this is sufficient for the purposes of identifying the effects that each salmon farm proposal would have on ONLs and other landscapes.

- In my opinion, it is critically important to also consider the effects that the individual proposals would have on the wider reach and outer Pelorus Sound in totality, and to have regard to the cumulative effects that multiple salmon farms – such as both Blowhole Point proposals – would have on immediately adjacent parts of the Sound, on the Waitata Reach and, again, the Outer Sound. This also means that such cumulative effects need to be assessed in relation to other existing activities (including other marine farms) and the wider array of ONLs found within and just outside the mouth of Pelorus Sound. I say this because it is clear that few locals and visitors to the Sounds actually view them from static locations; they are more typically viewed and experienced from boats of various kinds, and even when viewed from individual vantage points, it is frequently the accumulation of coastal features and landscapes, including multiple ONLs viewed down the likes of the Waitata Reach, that leave the most lasting of impressions.
- I do not consider that Mr Hudson (especially) has had sufficient regard to the landscape context afforded each site in terms of their landscape and natural character values.
- I do not consider that Mr Hudson has had sufficient regard to cumulative effects associated with either individual or multiple salmon farms within the Waitata Reach in determining that the current proposals are acceptable from a landscape standpoint.
- I do not consider that it would be appropriate to accommodate development within the Waitata Reach that would, in all likelihood, result in a reduction in landscape values from high to moderate or of natural character values from a high level to moderate-low. This would clearly threaten the integrity of ONLs around Port Ligar, Forsyth and Kaitira and even Maud Island. In particular, I do not consider that:
 - i. Such effects could be regarded as minor;
 - ii. Accommodating such development gives effect to Policies 13 and 15 NZCPS; and

- iii. Accommodating such development is consistent with achieving protection and preservation and under s6 RMA.

Panel Preference

9. The Panel should prefer my expert opinion (and that of experts with supporting views) because:

- It more comprehensively addresses the full range of qualities associated with Pelorus Sound, the Waitata Reach and other landscapes / parts of the coastal environment that would be affected by the proposed salmon farm relocation. This is consistent with having regard to the matter of 'context' that is specifically identified in Policy 13 (2) (h) NZCPS. More importantly, it respects the fact that the Marlborough Sounds comprises multiple landscapes of sunken valleys and water bodies that have importance which transcends individual terrestrial areas and the specific site.
- It addresses both direct and cumulative effects in a comprehensive fashion, including both the effects that exposure to salmon farms both simultaneously and sequentially, would have.
- It recognises that the diminution of values – either landscape or natural character – does not happen in isolation within landscapes like the Waitata Reach or even Tory Channel, and that the degradation of such landscapes would inevitably have an effect on both neighbouring ONL/ ONF / HNC / ONC values and the wider array of such landscapes / environments that are exposed to those living and working within or visiting Pelorus Sound.
- My conclusions are consistent with the erosion of such values (with reference to ss6(a) and (b) of the Act, and Policies 13 and 15 of the NZCPS) that I identify. They take into account both the full range of landscape and natural character effects that the proposed farms would have, and the specific attributes / characteristics and values of the landscapes and coastal environments that would be affected by the proposed salmon farms.

Stephen Kenneth Brown