Opua Marine Servicing and Oyster Landing Facility

Economic Impacts

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Economic Impacts

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1 Introduction

Opua Marina and the associated land side activities are the marine service area in the Far North. Currently the facility services the needs of recreational boaters as well forming the base for the Commercial Marine Service businesses engaged in maritime construction and servicing of commercial fleets and it serves as the key oyster barge unloading and servicing centre. Growth in the three key activities have led to constraints and will potentially lead to conflict in terms of incompatible land uses attempting to use the same space and water access.

In addition, Opua Marina is undergoing a major expansion that will see the number of marina berths increase significantly and the amount of recreational marine focused land space increase significantly as well. This means that it is no longer tenable for the Maritime construction and servicing sector or the Aquaculture sector to utilise the same area for their activities. Issues associated with Work Space Health and Safety and the lack of control over public areas mean that an alternative location is required to ensure that these activities can continue to operate in Northland efficiently and effectively.

Due to the geography of the Bay of Islands and existing uses, the number of alternative locations for the maritime servicing and oyster farm servicing industries to locate are limited. The need for all tide access, a hard sea edge, wave protection, a flat lay down area, turning space for trucks and road access are the characteristics required. Since 2009 the area adjacent to the proposed Vintage Railway station approximately 500m south of the Opua Marina, accessed by Beaufort St, has been identified as the most appropriate location to develop a purpose built boat ramp, berthing and laydown area for the Marine Servicing sector.

The purpose of this report is to identify the likely direct and potential flow on effects of consenting this development compared with the alternative. This report will first identify the sectors that will benefit from the proposed development, then identify the role they play in the Northland economy. The effects of not consenting the proposed development are then identified and the difference between the 2 positions treated as the impact of the proposal.

1.1 Background

Economic impacts and likely effects on the Northland Regional economy as reported in this paper are based on a series of interviews carried out with Ben Warren of B.T. Warren Oysters and Tim Yeates and Jess Cherrington of Total Marine Group. This has been supplemented with background information on the scale and structure of the Northland economy contained in Market Economics proprietary Input-Output economic models.

1.2 Author Experience

Greg Akehurst has a B.Com. in Economics and a B.A. in Geography from University of Auckland. He is a founding Director of Market Economics, a leading independent economic consultancy based in Auckland. Greg has over 20 years' experience in assessing economic effects of industries and growth and has carried out impact studies across New Zealand. He has been responsible for overseeing the largest economic

impact studies carried out in New Zealand (Rugby World Cup 2011, The America's Cup 2003, 2007, 2011). He has also worked closely with New Zealand's Marine sector preparing a number of Industry wide reports on the Scale and scope of the Industry for New Zealand Marine (previously Boating Industry Association).

Greg specialises in assessing growth and change in markets and the effects of industrial growth and change on regional and national economies. He has prepared evidence for Council hearings, the Environment Court, and for the High Court. He is currently authoring Guidance documents for Ministry of Business, Innovation and Employment to assist Councils to assess the sufficiency of their business land. Greg was heavily involved in providing evidence for Auckland Council and others to the Independent Hearings Panel on the Auckland Unitary Plan and prepared a study into Auckland's Business Land specifically for the IHP.

Greg has worked specifically in assessing skill shortages and requirements to achieve regional growth goals. He worked directly advising Central Government and CERA on the labour requirements to complete the Christchurch Earthquake rebuild. In more recent times, he and the rest of the Market Economics team have assessed the economic impacts of the Kaikoura Earthquakes for Central Government. Greg has developed the National Construction Sector Occupations Model (NCOM) for MBIE. This model provides all of government with estimates of the type and nature of skills and occupations required to meet the needs of New Zealand's construction sector. This work is ongoing and is into its 3rd annual update.

Greg leads between 20 -30 projects annually and co-manages Market Economics staff of 16 professionals.

1.3 Report Structure

Section 2 of this report outlines the levels of current activity in both the Oyster Farming Sector and within the TMG and the role these industries and businesses play in the regional economy. Section 3 focuses on the scale and nature of activity should consent for the proposed development be granted. While section 4 translates these effects into likely economic impacts at the regional level, before aligning the scale of the impacts with the requirements under the Coastal Policy Statement to determine whether they are regionally significant or not.

2 Current Activity

This assessment of current activity is split between Activity associated with the maritime construction and servicing works carried out by the Total Marine Group's (TMG) 4 integrated subsidiary companies[1], and the activity of the oyster farms. These are the sectors and businesses that will directly benefit from the proposed development. Note that Total Marine Group is often referred to as Total Marine Services (TMS) as it is the Services component that coordinates and integrates the other arms of TMG to complete contracts.

2.1 Total Marine Group

Total Marine Group (TMG) are engaged in the building and maintaining of wharf and floating marine infrastructure. They are based in Opua and Auckland and are responsible for the development and maintenance of the majority of marina and wharf structures in the Bay of Islands and at many other locations across Northland and the rest of New Zealand. The Opua facility houses Total Engineering Services who are the fabrication arm of TMG. In this role they carry out all the fabrication for Total Floating Services and maintain and repair all plant for TMG. Product made in Opua is shipped all over New Zealand and also used internationally. They are also engaged in commercial fleet refits and maintenance as well as new boat construction (commercial boats).

TMG play a role as a corporate citizen in the Opua community. They sponsor education through local schools as well as being sponsors of the local Swordfish Club, Westpac Helicopter, community halls and other community clubs. They also employ local young people and actively engage them in higher education.

Total Marine Services

Total Marine Services are the construction arm of TMG. They build all types of wharf structures, jetties, walkways and other pieces of infrastructure. They build and maintain marinas and have a large fleet of floating plant and machinery to allow them to carry out these contracts. In total the group have 6 barges and 6 tugs that are dispatched nationally to carry out construction tasks. They are based on Opua so need to maintain, refit and service the boats at Opua.

A key part of the process of building and maintaining marine structures is the need to lay down often large structures (floating concrete pontoons, very large timber piles, floating bridges and timber). This requires an amount of controlled space away from the public. The business is growing strongly and can no longer accommodate their activities at the Opua Marina and hardstand.

TMS have a national footprint and are the largest marine construction operator in New Zealand.

[1] Total Marine Group consists of Total Marine Services Ltd., Total Floating Systems Ltd., Total Engineering Ltd., and Total Dredging Ltd.

Total Dredging

Total Dredging carry out any and all dredging associated with marina contracts won by the wider group. However they also have a wide range of long term contracts to keep channels clear in a number of locations; Whangarei District Council (for the Hatea Channel, and the harbour and Town Basin), Portland Cement (to allow the Aotea Chief access to the cement works) and at Marsden Point (to ensure NZ Refining can bring oil tankers into the refinery).

In addition to a wide range of sea based dredging, Total Dredging also are engaged in pond clearing for AFCO Meat Works. Total Dredging also carry out Hydrographic Survey work in Northland and are developing a range of technologies to assist in precision dredging including the use of 3D mapping.

They are based in Opua and have a core of technicians and dredge operators. They are able to service dredging across New Zealand from the Opua base, they run 2 dredge barges and 2 tugs plus shore machinery.

Total Engineering

Total Engineering, as described above, fabricate all componentry for marina and wharf development for TMG. They also provide haul-out, refit and refurbishment services for workboats and the Bay of Island Commercial fleet. A key benefit is that they offer after hours servicing meaning that commercial boat down time is minimised.

Total Engineering have a focus on technological development and aim to bring highest levels of technology to the work the group do. Product innovation occurs in the manufacturing facility in Opua and is shipped to the rest of the country.

Total Floating

Manufacture pre-cast concrete floating platforms and pontoons. Total Floating manufacture in Auckland and have a sales office presence in Opua only. They carry out storage and sales in Opua and have a significant share of the market due to the wider group being able to service and maintain the pontoons. Total Floating is the smallest aspect of the TMG in Opua.

2.1.1 Business Size

At present TMG employ more than 35 full time staff and have a turnover of approximately $10m.

2.2 Waikare Inlet Oyster Farms

Currently the Waikeria Inlet is home to 24 Oyster farms owned by 12 individuals. In total there are 70Ha consented for Oyster farming in the inlet. At present 55Ha are actively farmed leaving 15Ha for future growth. Given that there is no quota for Pacific Oysters, the farms sell as much as they can grow. In recent years, post the closure in 2009, the industry has grown substantially and is likely to be producing over 1,000 tonnes within the next few years. Currently they produce approximately 700 tonnes of shellfish, up from 200 tonnes in the year immediately after the fishery was reopened.

This portion of the industry employs approximately 35 people, and operates by hanging oyster spat covered sticks off top rails between piles mounted into the seabed in relatively shallow tidal bays. The entire structure is covered at high tide, but is exposed at low tide. Harvest occurs at or either side of low tide, meaning that access to landing facility coincides with reasonably low water. This can pose difficulties with respect to the Opua Wharf where at low tide there is around 5-7 metres of difference between sea level and the wharf deck. Harvest runs from approximately April to December following a 14-18 month growth period.

It can take between 45minutes to 1 hour to unload a barge containing approximately 8 tonnes of oysters. Currently, this occurs at the Opua Marina, but with up to 3 barges at a time at the peak harvest times, this limits and constrains recreational marine use of the boat ramps.

2.2.1 Sales Estimates

The oysters currently harvested from Waikare (around 700tonnes) are worth approximately $8.5m[2]. Potential growth to 1,000 tonnes will see this increase to around $12m. However, there is no potential for the existing oyster harvest to continue to be landed at Opua, let alone any additional harvest.

The inability to control the workspace results in a Health and Safety situation that is no longer acceptable.

2.2.2 Flow on Effects

There are a range of flow on effects that are driven by the Oyster farms. As a primary producer, growth in Oyster farming, generates a range of downstream linkages as the shellfish move through the processing sector. The processing plants are located at Kaitaia (Ahipara) and in Auckland (Tuakau). This means that only a portion of the downstream linkage generates employment and household incomes in Northland, reducing the overall economic footprint.

However, an earlier study completed by Enveco (2010) found that the impacts of Oyster Farming alone could be calculated based on multipliers derived from surveys of the farms. Per hectare ratios published in the Enveco 2010 study have been applied to the 55 currently productive hectares to generate the direct impacts listed in Figure 2.1, below.

Ultimately the vast majority of the shellfish are exported. Approximately 75% of New Zealand's oyster production is frozen in the half shell and exported to Australia. The majority of the balance is consumed locally.

[2] Ben Warren Consent Hearing Evidence (29/03/2017)

Figure 2.1: Direct and Flow on Impacts of Waikare Oyster Farming, currently and into the future

		Waikare Inlet	
	Per Ha	Current (55ha)	Future (70Ha)
Direct Impacts			
Regional Output	$ 53,000	$ 2,915,000	$ 3,710,000
Employment	0.67	37	47
Household Income	$ 19,000	$ 1,045,000	$ 1,330,000
Regional Income (Value Added)	$ 33,000	$ 1,815,000	$ 2,310,000
Multipliers			
Regional Output	1.76	1.76	1.76
Employment	1.38	1.38	1.38
Household Income	1.6	1.6	1.6
Regional Income (Value Added)	1.62	1.62	1.62
Total Impacts			
Regional Output	$ 93,280	$ 5,130,400	$ 6,529,600
Employment	0.92	51	65
Household Income	$ 30,400	$ 1,672,000	$ 2,128,000
Regional Income (Value Added)	$ 53,460	$ 2,940,300	$ 3,742,200

Source: Enveco Multipliers applied to current productive farm space

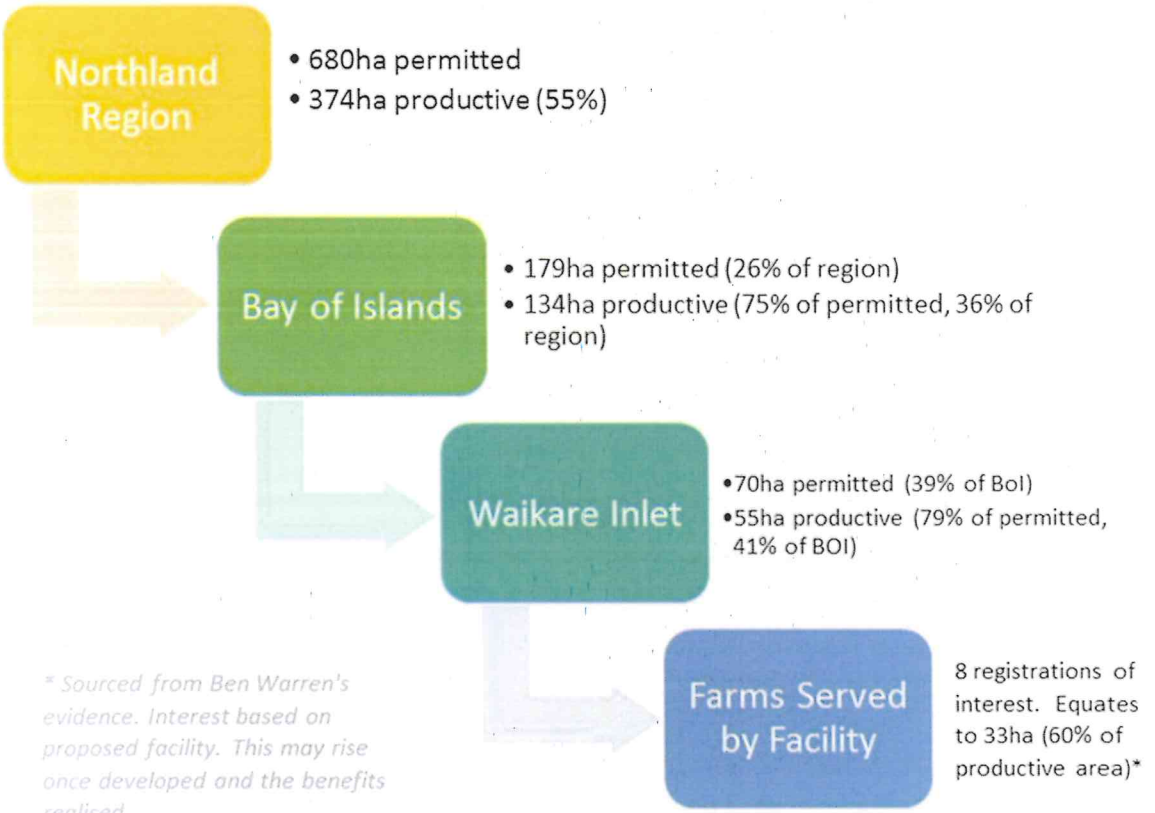
Once the flow on effects are taken into account, regional output grows from $2.9m to $5.1m annually. These figures may be a little low, given price change over the past 7 years, but for the purposes of this assessment, provide an indication of the degree that the oyster farms generate flow on effects that benefit other businesses in the region.

Future development of latent consented capacity sees direct regional output climb to $3.7m and once flow on effects are included, grow to $6.5m.

2.3 Aquaculture Industry – Far North District

It is important to place the activity currently occurring in the Waikare Inlet into a wider Regional context. Northland leads the country in terms of the Pacific Oyster farming industry. With approximately 680ha of permitted oyster farm area spread across the region's many sheltered harbours, Northland accounts for nearly 60% of permitted farm area nationally. The Bay of Islands coastal marine area contains approximately 36% of the regions productively farmed area (134ha) and the Waikare Inlet – the area primarily served by the proposed development – contains approximately 41% of the productively farmed area in the Bay of Islands or 15% of the area farmed in the region.

Figure 2.2: Role of Landing Facility in Northland Aquacultural Context.



There is little up to date information on the contribution of oyster farming to the Northland or Far North District economy. As referenced by Mr Warren, the 2010 Enveco report is the last comprehensive study carried out. This Economic Impact Assessment calculated the contribution of both oyster farming and oyster processing activity in 2009. The region's oyster industry was estimated to contribute $17m of total value added from farming activity (sustaining 292 FTEs) and $13m from oyster processing activity based (173 FTEs) on the assumption of 50% of processing occurring within the region. This was a combined $30m of total value added to the regional economy in 2009, sustaining 465 full time equivalent jobs.

Pro-rata, the Enveco Report ratios per ha suggest that the productive farm area within the Bay or Islands contributed $13m of total value added (including processing) in 2009 to the regional economy and sustained 199 FTEs in that year. At 55ha of productive farm area (2011), oyster farming in the Waikare Inlet contributed an estimated $2.9m of total value added and 51 FTEs to the region's economy at that time. Allowing for a pro-rata contribution to processing (and based on the Enveco assumptions of 50% carried out within the region), Waikare Inlet farms contribute $2.5m of regional valued added and 30 FTEs. Total farming and processing from this Inlet is therefore estimated at $5.39m of regional value added (including $2.8m in wages and salaries) and 81 FTEs.

Given that the majority of oyster farming within the region falls within the Far North District, the significant share of this economic impact falls to the District.

The oyster farming industry in Northland has faced significant obstacles in recent years. In the past, the oysters have been susceptible to viruses – some of which have had a significant impact on production for

prolonged periods, with flow on effects to farm owners and processors. This has meant that permitted farm area has not materially changed over the last decade (i.e. no demand for new farm area) while the share of productive area has fluctuated – particularly in locations like the Waikare Inlet.

The industry continues to invest on more resistant oyster strains with the aim of making farming more resilient. The industry in Northland today is well on the road to full recovery and productive area is increasing once again – utilising the existing vacant capacity within permitted areas.

The instability of the past is evidenced by Mr Warren's evidence regarding output from Waikare Inlet farms. In 2001, production was at a peak of 1,000 tonnes per annum. At the time of the Enveco Report (i.e. a 2009 survey), production was low at approximately 200 tonnes pa. Today it sits at approximately 700 tonnes and expectations are that 1,000 tonnes can again be reached in the near future. This suggests two things:

- that the economic impacts calculated above from the Enveco Report underestimate the current contribution of the industry to the regional economy.
- If the expectations of Waikare Inlet farmers is representative of producer confidence throughout the region, then the economic impact of the oyster industry on Northland is likely to rise further still.

Data from Infometrics shows that the combined 'Aquaculture and Fishing Sector' in the Far North District grew by 12.6% in terms of GDP contribution in the past year, compared to total economy growth of just 2.4% in the same period. While this sector plays a very small economic role relative to other sectors, it is important in a local context. It accounts for just 0.4% of total District GDP in 2016 (and 0.5% of employment). Despite this, aquaculture is considered an important industry in the Far North District and Northland region overall – it plays a key role in the identity of the area. The activity in Far North District is significant nationally and the aquaculture industry is a key sector for economic growth under central government's strategy. Perhaps more importantly, aquaculture provides employment opportunities in often remote locations and is therefore important for Northland's economic and social wellbeing.

2.3.1 Issues

The Oyster Industry in Waikare Inlet faces a few issues relating to landing access. First, they rely on the presence of TMS to service boats and the farms themselves. Second, they need all tide access to a suitable flat water berthage from which they can land the oyster harvest, directly into transport to the processing plants.

Oyster barges have very little freeboard. This means they are susceptible to wave action and wakes from other craft. This limits their ability to travel around the Bay to other alternative landing locations. The trip across the inlet to Opua is entirely suitable – further travel would require new equipment.

3 Activity with Landing Consented

The key benefit of developing the landing and berthing facility is that it allows TMS and other marine construction contractors to continue their operations in the Bay of Island. It also allows the Waikare Inlet Oyster Farms to carry on operating in an efficient manner.

3.1 Economic Activity - TMG

The largest effect of consenting the development of the proposed wharf and laydown area is that it secures the presence of TMS in Opua. The purpose built layout area ensures that TMS can continue to service Bay of Islands maritime infrastructure and to continue to provide maritime construction services to the rest of New Zealand.

In direct economic terms this ensures a $10m turnover business employing more than 35 people continues to operate. However the effects are broader than simply the direct effects. The high level of connection TMS has with the wider Northland economy and the manner in which employees spend money and engage with local community mean that the effect of retaining TMS is far wider.

The best way of understanding the scale of these linkages is to use multipliers. Multipliers provide a summary view of the total economic footprint TMG have in Northland. Figure 3.1 presents the total economic footprint of TMG on the Northland economy.

Figure 3.1: TMG Economic Footprint – Northland Region

	TMG
Employment	35
Turnover ($m)	$ 10.0
Direct Impacts	
Household Income ($m)	$ 3.5
Contribution to VA ($m)	$ 4.9
Total Regional Impacts	
Total Output ($m)	$ 20.1
Total Household Income ($m)	$ 5.8
Total Value Added ($m)	$ 10.2
Total Employment	73

Assuming that TMG turnover approximately $10m and directly employs approximately 35 in Opua, then the business as an entity contributes approximately $4.9m to regional GDP. However the linkages back into the Northland economy double this impact. In total, Value Added increases to over $10m sustaining the employment equivalent of 73 full time jobs across the region. Household incomes supported by TMG, its suppliers and the retail sector providing goods and services to workers increase to $5.8m annually.

3.2 Economic Activity – Oyster Farms

The presence of a specific commercial landing area is beneficial for the Oyster farms as it means they have an all tide landing facility. In economic terms it simply means that their costs are minimised as the alternatives are all more costly to the industry. The presence of the facility will not lead directly to additional production however the most likely scenario should it not be consented is as follows;

- Farms are no longer able to use the Opua Marina area and as the use of beaches across the bay is not a legal option, they must find another landing facility in the Bay of Islands
- To access any other location, larger barge craft are needed. This is likely to be a joint venture between a number of farms with all paying a portion of the cost.
- Costs to repair and maintain barges will also increase as TMG will no longer be resident in Opua, meaning that capacity to maintain commercial boats is reduced driving prices higher.
- Some farmers will choose not to continue operating, as the additional cost may make them uneconomic. This will lead to selling and consolidation of the industry.
- The fewer larger farms are likely to continue to operate albeit with a higher cost structure. This is likely to lead to a reduction in overall employment numbers in the oyster farm sector as economies of scale increase. This may offset to an extent overall transport cost increases.
- Increased investment in plant may reduce capital invested in expanding capacity in the short to medium term, but ultimately to gain returns on investing in the larger craft, the industry will expand.

In the short space of time available to complete this report, it is not possible to quantify these effects. However, the outcome is likely to be slower growth in the short term, higher costs overall, and lower levels of employment should the facility not be consented.

3.3 Other Effects

TMG also provide afterhours servicing of commercial vessels in Opua. This means that the very heavily water based tourism sector in Paihia can operate efficiently with minimal disruption due to repairs and refits. This work will able to continue with TMG remaining in Opua. Should they relocate, capacity reduces significantly which is likely to impact on the wider tourism fleet across the Bay of Islands.

4 Overall Economic Effects

The overall economic effects can be assessed as the difference between the situation likely to occur should the consent be granted and the new landing area and barge dock is developed, and if it is declined.

In addition to the operational benefits of an operational landing, there is a construction effect associated with the building the wharf and associated layout area, roading and crane installation. These effects have not been considered in this analysis, but are additional.

4.1 Total Marine Group Relocation

The most significant effect from a local and regional economic perspective is the relocation of Total Marine Group to another location – most likely a consolidation with the balance of their operation in Auckland. Figure 4.1, below highlights the relative scale of TMG in the context of overall marine related industry in Opua, Far North District and the Northland Region. Should TMG relocate to Auckland approximately 46% of the total marine sector capacity in Opua is potentially lost.

Figure 4.1: TMS Share of Total Boatbuilding, repairs, component and metal fabrication sectors

Area	Marine Related Emp. 2016	TMS Share
Opua	76	45.8%
Far North District	138	25.3%
Northland	576	6.1%

This is likely to have a range of direct and flow on effects across the economy and for the marine sector overall. Given TMG's role in maintaining and building marine infrastructure in Northland Region, a Northland presence is important. The potential relocation will add approximately $26,000 in establishment fees (to bring a barge to Opua from Auckland and return it after the contract is complete). These are costs that will ultimately be borne by Northland rate payers as a significant portion of the work TMG do is for the various Northland District Councils. Currently Far North District have a budget of between $400,000 and $500,000 to fix and maintain marine holdings. An additional $26,000 simply to bring the facilities back to Opua every time that maintenance needs to be carried out, is a sizable portion of the annual budget.

This fact has the potential to lead to a reduction in maintenance as the increased costs may result in fewer repairs. In turn, this leads to lower levels of service and increased risk of accident.

Private households will also face higher costs in developing and maintaining their marine infrastructure as well. TMG note that this represents approximately 50% of their marine business.

TMG employ more than 35 people in Opua. As such they are probably the largest employer in the immediate vicinity and with recent expansion are likely to employ more staff in future. The households that receive wages and salaries from TMG spend money in the community, send kids to local schools and are engaged more widely in the Opua Community.

Wages and salaries spent locally help sustain retail and other household services that may otherwise not be sustainable. These are commonly referred to as the induced effects of activity and are an important flow on effect of direct economic activity. These induced effects and the business they help sustain would be lost to Auckland along with many of the households who provide TMG with its workforce.

TMG are a significant player at the Far North District level such that a relocation represents almost 1/2 of marine service related capacity leaving Opua (and approximately ¼ of the Far North District total – 35 out of 138 workers). In total the group is estimated to generate annual revenues of around $10m. This is economic activity that would accrue directly to the Auckland economy.

Indirectly the effects are widely felt as well. TMG purchase significant volumes of goods and services from other Northland Businesses. Including;

- Poles for marinas piles and wharves – purchased from Crofts Poles in Whangarei
- All framing and decking timber secured from Northland suppliers
- Specific Plastic Pile caps from a manufacturer in Ruawai (PortStar Plastics)
- Engineering services – specialised engineering skills are contracted for specific jobs from local suppliers
- General supplies and services from Northland businesses.

As mentioned in section 2.1 TMG are also a significant supporter of schools and other community infrastructure in Far North District. This adds to their level of engagement and embeddedness in the local economy.

4.2 Oyster Farms Impacts

The impacts on the oyster farm sector if the consent is not granted are in terms of increased cost structures and operational efficiency. Loading and unloading will no longer be possible at the Opua Marina, meaning that the local farms will need to find an alternative to land the shellfish and carry out repairs on their fleet.

4.3 Total Regional Effects

As described in Section 3, the footprint of TMG in Northland is approximately $10.2m in contribution to value added terms and 73 worker equivalents. Retaining this activity is the largest net effect of granting consent. In addition, oyster farm production is facilitated at a minimal cost and Bay of Island commercial fleet is maintained in an efficient and cost effective way.

Finally, the greatest impact is likely to be the ongoing benefits that TMG are able to provide to the Opua and Far North District community in terms of providing a pathway for students to remain in the north and being engaged in high tech and high skilled employment. This retains a core of skilled workers and capabilities that is unlikely to be replicated if TMG need to vacate Opua.

4.4 New Zealand Coastal Policy Statement

The New Zealand Coastal Policy Statement (NZCPS) (2010) in Policy 10 which relates to land reclamation and de-reclamation, states;

1. *Avoid reclamation of land in the coastal marine area, unless;*
    a. ..
    b. ..
    c. *There are no practicable alternative methods of providing the activity, and*
    d. *The reclamation will provide significant regional or national benefit.*

It is clear from my assessment of the scale of potential economic loss to the Northland economy, and from my understanding of the assessment of alternatives, that the proposed site meets the tests laid out in the NZCPS. That is, the reclamation will provide significant regional economic benefits and that there is no other practicable alternative method for providing these activities or for achieving these benefits.

The likely relocation of TMG to the Auckland region represents a significant loss of capability in the Northland economy. The direct loss of a $10m business plus the flow on effects of approximately another $10m is signifcant in a region that is already identified in the Regional Policy Statement as having the second lowest GDP per capita of New Zealand's 16 regions, 35% below the national average[3].

In addition, the role TMG plays in helping maintain the Bay of Island's commercial tourism fleet, means that its presence is significant to the largest income earning sector in the bay.

4.5 Conclusion

For these reasons, I recommend that the consent be granted on the basis that the economic effects of doing so are regionally significant and are important for building economic resilience in the Northland economy.

[3] Regional Policy Statement for Northland, Page 37 of 183.