

Richard Johnson  
Manager EEZ Applications  
Environmental Protection Authority  
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26 November 2018

Dear Richard

**Request for advice under section 56 of the Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012 regarding the Coastal Resources Limited Application - EEZ100015**

Thank you for your letter of 16 November 2018 requesting advice from Auckland Council regarding the Coastal Resources Limited Application to dump dredged material in the EEZ to the east of Great Barrier Island.

Our response to the questions in your letter is set out below.

*1. Does Auckland Council have any comments on the alternatives for disposal of dredged material either on land or off shore?*

The high-level alternatives for the disposal of dredged material are:

- on land
- in the Hauraki Gulf
- a west coast coastal marine area site (e.g. in the Manukau Harbour, Kaipara Harbour or open coast)
- re-use in reclamation projects, e.g. the Port of Auckland Axis Fergusson reclamation
- in the EEZ.

The Auckland Unitary Plan policies show a clear intent that the disposal of material should be avoided within the Hauraki Gulf Marine Park (AUP F2.3, particularly policy (3)).

In many cases, disposal at West Coast sites would be impractical due to the cost and physical conditions, or would be inconsistent with other AUP policies aimed at protecting surf breaks, navigation channels, or ecological values.

Disposal in reclamation projects has been a useful option in the past. Whether that option is available is dependent on whether reclamation consents have been granted. The need to dispose of dredged material would not in itself justify the creation of a new reclamation.

Whether land-based options are appropriate will depend on site-specific circumstances relating to the source of the dredged material and the characteristics of the potential disposal site. At a strategic level, alternatives on land would be beneficial as having less effect on the marine environment, but would need to be assessed and monitored in terms of the effects at the relevant land site.

Issues around the region with consenting land-fills and clean-fills have shown that some proposals can have significant implications for local ecology, water quality, culturally significant sites or on local traffic. At appropriate sites, such effects can be managed through management controls and monitoring.

Whether disposal in the EEZ is the best alternative will depend on the logistics, costs, and environmental and social effects for each alternative site.

*2. Are there any limitations on increasing the amount of barge traffic in relation to the dumping?*

No. Barges have never been an issue for the Harbourmaster's office.

The Council's only form of limitation on increasing barge traffic is the Navigation Safety Bylaw 2014 which sets some limits on vessel movements, including on vessel speed in some defined areas. The requirements in the Bylaw would need to be met by all vessels.

*3. Does Auckland Council have a preferred route that the barges to CRL's proposed dump site should use?*

No.

Please contact me if you have any further questions.

Yours sincerely,



Kath Coombes  
**Principal Planner**