

2 March 2020

Mark Arbuthnot  
E-mail: marbuthnot@bentley.co.nz  
Job No: 12004.8

**Auckland Council  
Private Bag 92300  
Victoria Street West  
Auckland 1142**

Attention: Sarah Wong

Dear Sarah,

**RE: Request for further information under section 92 of the Resource Management Act 1991**

Further to your letter dated 11<sup>th</sup> February 2020, the following further information is provided in respect of the application by Ports of Auckland Limited ('**POAL**') to undertake capital and ongoing maintenance dredging activities within the Waitematā Navigation Channel Precinct and the Port Precinct (application reference BUN60348750).

**Volume of dredging**

*Please confirm the total figures for the volume of dredged materials under both the capital dredging and maintenance dredging works, and whether these will be the same as the volume approved under EEZ400011. If the figures differ from that approved under EEZ400011, please confirm that any [excess] dredge will be dealt with under a separate permit.*

The proposal seeks to authorise the dredging of:

- (a) an equivalent accumulated amount of up to 75,000m<sup>3</sup> of material from maintenance dredging over any five-year period; and
- (b) up to 2.5 million cubic metres of material from capital dredging over the term of the consent.

Permit EEZ400011 authorises the dumping of:

- (a) up to 50,000m<sup>3</sup> of dredged material from maintenance dredging in any consecutive 12-month period;
- (b) up to 400,000m<sup>3</sup> of dredged material from capital dredging in any consecutive 12-month period; and
- (c) up to 2 million cubic metres of dredged material from capital dredging over the term of the consent.

The 2.5 million cubic metres of capital dredging that is proposed represents the “worst case” in terms of the maximum channel depths that are required to accommodate the larger vessels that are likely to call at the Port of Auckland into the future.

There are many factors that contribute to the maximum design depth of shipping channels, which include requirements to provide suitable clearances beneath the keels of vessels. POAL are in the process of developing a dynamic under keel clearance management system which will enable under keel clearances to be managed in real time based on actual sea and weather conditions. This under keel system has been successful in reducing dredging requirements at other Ports around the world (e.g. Brisbane, Australia), and if successful at the Port of Auckland, may also reduce the proposed design depths (thereby reducing the overall volume of capital works dredging to be undertaken and the overall cost of the works).

Further, and in line with best practice, the capital dredging volume includes a 300mm “over dredge” allowance (and equates to approximately 640,000m<sup>3</sup> of material) as a conservative measure to ensure that the proposed design depths can be achieved. The extent to which all of this over dredge allowance is required is dependent on a number of factors, including the contours of the seabed and the tolerance of the dredging equipment.

As noted in the application documents, while capital dredging permit 24730 enabled the removal of 1,000,000 cubic metres of material to a depth of 13 metres below Chart Datum, the outcome of further post-consent analysis enabled the actual volume of capital dredging to be reduced to approximately 600,000 cubic metres and to a depth of 12.7 metres to 12.8 metres below Chart Datum. This illustrates the conservative nature of dredging volume calculations.

Any dredged material in excess of the 2 million cubic metres that is approved under Permit EEZ400011 will either be:

- (a) utilised to complete the Fergusson reclamation (there is a small amount of reclamation to be completed);
- (b) provided to third parties who may require small volumes of material;
- (c) disposed of at an alternative disposal facility; or
- (d) subject to a variation to Permit EEZ400011.

### **Biosecurity**

*Section 8.9 of the Environmental Assessment prepared by Kennedy Environmental Limited states that “Controls will be included to minimise the potential for the transfer of unwanted terrestrial pests to Rangitoto Island while working within the Rangitoto Channel”. Please provide detailed information on what these controls will be, in order to assess whether the controls are suitable to manage the biosecurity risk associated with the proposed activities.*

During the dredging, the vessels involved (barge and tug) will work within the Waitemata Navigation Channel Precinct. As such the key environment (for transfer of terrestrial pests) is Rangitoto Island.

As set out in the Auckland Regional Pest Management Strategy, terrestrial pest species include, but are not limited to, Argentine ants, rodents (e.g., rats, mice), mustelids (e.g., stoats), mammals (cats), plague skinks and weeds (seed, plant material).

In order to minimise the potential for the transfer of unwanted terrestrial pests to Rangitoto Island, POAL proposes to implement a Biosecurity Management Plan ('BMP') which will identify the controls that are necessary to manage terrestrial biosecurity risks. The proposed controls will include:

- Information regarding the vessels to be used for dredging operations.
- Briefing of the contractor(s) about terrestrial biosecurity risks.
- A requirement that no pets are to be brought on board any vessel.
- The maintenance of rodent and ant traps on board tow vessels and barges.
- Inspections of vessels on a weekly basis for indication of insect infestation, rodent droppings or visible evidence of any other terrestrial pest species.
- Procedures for notifying Auckland Council Biosecurity Team officers if terrestrial pest species are observed.
- Allowance for Auckland Council biosecurity dog checks for specific pests as and when requested by Council.
- No dredging vessel operating within the Waitemata Navigation Channel Precinct will anchor outside the Precinct unless within the Port Precinct or in an emergency.

Refer to **Attachment 1** to this letter for an updated set of proposed conditions (which replaces Attachment 11 to the AEE).

### **Suggested Changes/Recommendations – not pursuant to section 92 of the Resource Management Act 1991**

The following responses are provided to the comments received from Council's Biosecurity Team.

- *Conditions 25-30 (Ecological Monitoring) – these will be monitored by both Council's Monitoring Team in conjunction with Council's Biosecurity Team.*

*Biosecurity also request that a condition requiring the applicant should notify them of any non-indigenous marine species if found during works be included, with summary reports (as required by Condition 29) and any footage to be provided upon request.*

The applicant agrees that Conditions 25-30 (Ecological Monitoring) can be monitored by Council's Monitoring Team in conjunction with Council's Biosecurity Team.

The applicant also agrees to provide to the Biosecurity Team the summary of the observations of the video surveys required by Condition 29 of the application, if new non-indigenous marine species are found as a consequence of the ecological monitoring required by Conditions 25 to 30 of the application.

- *Condition 32 (Terrestrial Rodent Management) – This condition needs more information included, i.e. the condition should manage Argentine ants, plague skinks, as well as the rodents and mustelids, and include a clause about keeping records and notifying Biosecurity if anything is observed.*

The applicant agrees that Condition 32 should relate to a wider range of terrestrial pest species. The BMP discussed above includes a requirement to keep records of all inspections of vessels for identification of insect infestation, rodent droppings or visible evidence of any other terrestrial pest species, and to notify Auckland Council Biosecurity Team officers if terrestrial pest species are observed.

The attached conditions have been updated to reflect this.

- *A finalised Biosecurity Management Plan (BMP) will need to be submitted to Council's Biosecurity Team for written certification – this can be provided with as a condition of consent.*

Agreed, refer to attached conditions.

- *There is no information as to what vessels will be used for the dredging operations, nor their home port in the application. Please include this information in the BMP.*

Agreed, refer to attached conditions.

- *The applicant will need to notify Biosecurity prior to any vessel movements occurring – this can be done through the attached template. A condition of consent requiring this notification will also be recommended.*

This suggestion appears to be based on a condition that has been imposed on the AC36 resource consent. The Vessel Movement notification requirements under that resource consent was developed as that project required vessels to visit other port facilities outside the Waitemata Harbour.

The vessel movements that are proposed to occur under POAL's application will be repetitive and will be of a limited geographic range. If the AC36 approach was to be used, it would require the Biosecurity Team to be notified at least 300 times a year.

The vessels associated with the proposal will make the same or similar trips each day within and around the project area. A vessel movement notification form is not considered to be necessary for this work. In relation to vessel movements outside the project area (associated with the disposal of the material), condition 16 of EEZ400011 requires POAL to provide a written record of the individual loads disposed of at the CDS each month to the EPA; a copy of which can be provided to Council if required.

**BENTLEY & Co**

Please do not hesitate to contact me on tel. (09) 309 5367 should you wish to discuss any of the matters raised further.

Yours faithfully,  
**BENTLEY & CO. LTD**

A handwritten signature in black ink, appearing to read 'Mark Arbuthnot', with a stylized flourish at the end.

**Mark Arbuthnot**  
**Director**

Cc Alistair Kirk (Ports of Auckland Limited)

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## Capital Works Dredging conditions

- The capital works dredging activity shall be carried out in general accordance with the documents and drawings and all supporting additional information submitted with the application, detailed below, and all referenced by the council as resource consent number(s) [insert]

- Application Form and Assessment of Environmental Effects titled '*Application for resource consent and Assessment of Environmental Effects to undertake capital dredging and on-going maintenance dredging activities within the Waitematā Navigation Channel Precinct and Port Precinct, Auckland*' prepared by Bentley & Co, dated October 2019

Report title and reference	Author	Rev	Dated
Coastal Processes Assessment Report, Rangitoto Channel Shipping Lane Deepening	Beca	5	25 October 2019
Rangitoto Channel Capital Works Dredging Environmental Assessment	Kennedy Environmental Limited	4	25 October 2019
Ports of Auckland Dredging Campaign, Navigational Risk Assessment	Navigatus Consulting	0.3	17 September 2019
Waitematā Navigation Channel Dredging Noise Assessment	Marshall Day Acoustics	-	24 October 2019

Drawing title and reference	Author	Rev	Dated
Figure A.3 Proposed Shipping Lane Layout	Beca	-	-
Figure A.4 Proposed Shipping Lane – Channel Cross Sections	Beca	-	-
Figure A.5 Pre and Post Dredging Cross Section	Beca	-	-

Other additional information	Author	Rev	Dated
[insert]			

- Under section 125 of the RMA, this consent lapses five years after the date it is granted unless:
  - The consent is given effect to; or
  - The council extends the period after which the consent lapses.

### Duration

- The coastal permit for capital works dredging (reference) shall expire on [15 years from approval], unless it has lapsed, been surrendered or been cancelled at an earlier date pursuant to the RMA.

### Dredge Depths

- The subject area shall not be dredged deeper than the maximum depths specified in Table 1 below:

**Table 1.**

<b>Location</b>	<b>Final Design Depth</b>
Shipping lane - bends	-14.2m CD
- straights	-14.0m CD
- tapers	-14.0m CD
Fergusson approaches	-13.5m CD
Fergusson North Berth	-15.2m CD

### **Dredging Volume**

5. The volume of dredged material shall not exceed an in-situ volume of 2,500,000 m<sup>3</sup>.

### **Accidental Discovery Protocol**

6. In the event of discovery of sensitive material the standards and procedures of Rule F2.21.4.1 of the Auckland Unitary Plan (Operative in part) (as amended by the decisions on Proposed Plan Change 15) shall apply.

### **Dredging Management Plan**

7. At least forty (40) working days prior to the start of Stage 1 of the capital dredging works within the coastal marine area, the consent holder shall submit a Dredging Management Plan (DMP) to the Council (Team Leader- Coastal) for certification. The DMP shall be prepared by an appropriately qualified specialist and must contain the following:
- i. confirmation of the dredging programme for the calendar year
  - ii. a schedule for reporting to the Team Leader – Coastal on the total volume of removed material associated with dredging for the calendar year
  - iii. a schedule for notifying the Harbourmaster’s office about dredging operations
  - iv. details of how dredging operations will be managed
  - v. operating procedures for dredging operations for interfacing with other harbour users including piloted ships, ferries and Royal New Zealand Navy vessels
  - vi. procedures to ensure priority is provided to commercial transport ships over dredging vessels
  - vii. details of the dredging methodology (e.g. mechanical excavator)
  - viii. methods to minimise the release of sediment and methods during dredging operations, including visual monitoring of the sediment plume under Condition 24
  - ix. contingency measures to be implemented where required under Condition 23
  - x. confirmation of the disposal site for the dredged material, noting what resource consent or other permit approves the disposal.
8. The DMP required by Condition 7 may be submitted in parts or in stages to address changes to the detail of the DMP or to reflect the staged implementation of the capital works dredging, and



when provided in part or for a stage shall be submitted at least twenty (20) working days for certification prior to commencement of that stage of the works.

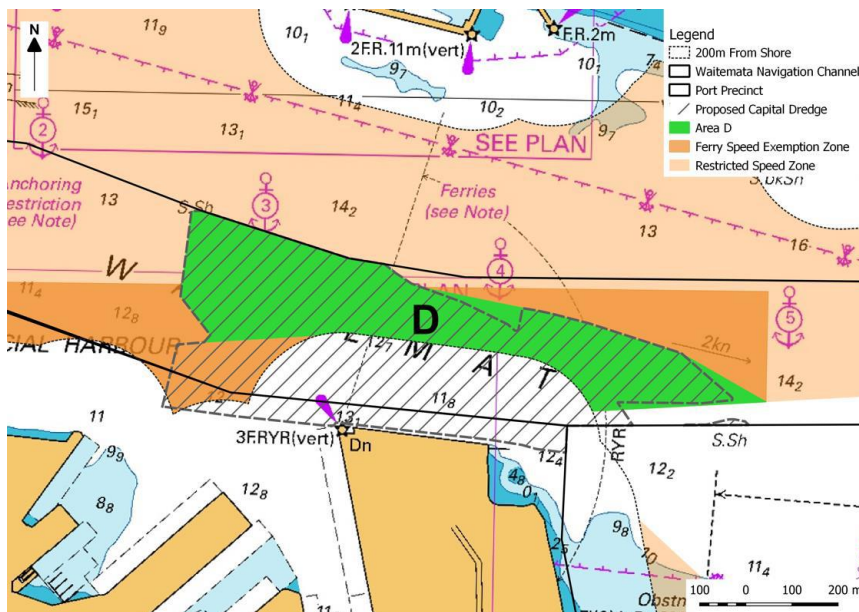
9. All works shall comply with the approved DMP at all times. The Consent Holder shall ensure that:
  - i. A copy of this consent is held at all times on any self-propelled barge, or any tug towing a barge, that the Consent Holder has authorised to undertake dredging operations; and
  - ii. Personnel directly involved in the exercise of this consent are informed of their obligations and responsibilities in exercising this consent.

### Dredging Methodology

10. The capital dredging works shall be carried out using a mechanical excavator.

### Navigation and Safety

11. No dredging works shall occur in any part of the subject area during:
  - i. Any Prada Cup and America's Cup racing events under the 36<sup>th</sup> America's Cup;
  - ii. Public holidays; and
  - iii. Auckland Anniversary Weekend.
12. No capital works dredging within Area D in Figure 1 below shall occur during the Summer peak period (defined as the period between 1 December and Easter Monday inclusive) between the hours of 7am and 10am on weekdays;



13. The consent holder shall request that the Harbourmaster issue:
  - i. A single generic temporary Notice to Mariners advising mariners of the overall dredging campaign, and barge and tow operations to, from and at the dump ground or alternate disposal site.

- ii. Local Notices to Mariners as the campaign stops and starts to notify local mariners of where the dredge will be operating, within the overall campaign and any special precautions that mariners should take.

### **Water Quality Monitoring**

14. The consent holder shall undertake water quality monitoring once per week for the first six months whilst dredging is underway. Water quality samples shall be collected:
  - i. On an ebb-tide;
  - ii. At an up-drift control site located at least 500m beyond the operations; and
  - iii. At a dilution gradient site 50 m down-drift of the operations aligned approximately along the axis of the channel in line with the dredging activity in the subject area; and
  - iv. At a compliance site 200 m down-drift of the operations aligned along axis of the channel in line with the dredging activity in the subject area.
15. Water samples collected in accordance with Condition 14 shall be individual samples collected from the surface (approximately 0.5 m below the water surface) and above the seabed (approximately 0.5 m above the seabed) at each site.
16. Water samples shall be collected on a day that dredging is occurring.
17. Dilution gradient and compliance site samples shall be representative of the plume generated by the operations (i.e. not collected before the plume has had a chance to develop upon the start of the operations and not after the plume has had a chance to dissipate upon completion of the operations).
18. Water quality sampling shall be undertaken anytime within the period 1.5 hours after low or high tide and 1.5 hours before low or high tide (a period of three hours).
19. A photographic record shall be collected during the six month water sampling to document the sea state and conditions of the day along with any visible discoloration of water arising from dredging activity. A written record shall be maintained of environmental conditions at the time of sampling along with any observations of dredging activity occurring at the time.
20. Samples for water quality monitoring of dredging shall be analysed for turbidity and total suspended solid (TSS) concentration.
21. The proposed trigger level for total suspended solids shall be 25 g/m<sup>3</sup> above TSS at the control site.
22. Within five (5) working days of the completion of this water quality sampling, the results will be summarised and provided to the Team Leader Compliance Monitoring for certification along with information concerning:
  - i. The relationship between TSS and turbidity in the samples collected.
  - ii. The relationship between up-stream and downstream data.

- iii. Recommendations for on-going monitoring and reporting for the balance of the duration of the consent.
23. In the event of an exceedance of the TSS trigger level under Condition 21 above, the consent holder shall implement the contingency measures identified in the DMP. These shall include further monitoring measures in the first instance or a site specific effects assessment, and practical modifications to the relevant activities where further monitoring identifies repeated exceedances. Such modifications may include suspending or altering the dredging approach, or reducing production rates. Details of any contingency measures implemented in accordance with this condition shall be provided to the Team Leader Compliance Monitoring - Central no later than five (5) working days after the exceedance occurs.

### **Visual Suspended Sediment Monitoring**

24. The consent holder shall take and maintain a photographic record of the dredging operations. The photographs shall:
- i. be taken at various stages of the tidal cycle, in different wind and wave conditions, and on days that dredging is in progress;
  - ii. be taken from an elevated vantage point;
  - iii. show the extent of any visible plume or water discoloration;
  - iv. verify that the expected range of the sediment plume is localised and of short duration; and
  - v. be accompanied by brief notes which indicate when they were taken and what they show.

In the event that a noticeable sediment plume outside of the consent area that is not localised and is not of a short duration is observed, all dredging activity shall cease, and the consent holder shall immediately notify and consult with the Council (Team Leader – Coastal) to determine an appropriate course of action to minimise further discharges and any adverse effects associated with the plume.

Within twenty (20) working days of completion of the dredging of that Calendar year the consent holder shall provide a copy of the photographic record to the Council (Team Leader – Coastal).

### **Ecological Monitoring**

25. Video transects shall be collected from four (4) geo-referenced locations within the channel as follows:
- i. within the south-bend (6,500 metres distance identified on Figure A.2 of the Consent);
  - ii. within the central fairway (8,000 metres distance identified on Figure A.2 of the Consent);
  - iii. within the north bend (9,500 metres distance identified on Figure A.2 of the Consent); and
  - iv. within the northern fairway (13,500 distance identified on Figure A.2 of the Consent).
26. The videos shall be recorded at three 100 metre ~~wide-long~~ transects at each of the locations identified in Condition 25.
27. The videos required by Conditions 25 and 26 shall be collected at the following periods:

- i. Prior to the commencement of any capital dredging works;
  - ii. Following the completion of dredging from Stage 1;
  - iii. Prior to the commencement of dredging works for Stage 2;
  - iv. Following the completion of the capital dredging for Stage 2;
  - v. Two (2) years following the completion of the capital dredging under Stage 2; and
  - vi. Five (5) years following the completion of the capital dredging under Stage 2.
28. The recorded video and images shall be examined to identify key epifauna and shell cover at 5 metre intervals along each transect, with 20 observations per transect.
29. Within five (5) working days of the completion of each of the video surveys required by Condition 27(i) to 27(iii), the consent holder shall provide a summary of the observations of the video surveys to the Team Leader Compliance Monitoring – Central for certification. Should any new non-indigenous marine species be found, the consent holder shall notify the Council's Biosecurity Team and shall provide the summary of the observations and associated video surveys on request.
30. Within ten (10) working days of the completion of the video surveys required by Condition 27(iv) to 27(vi), the consent holder shall provide a report describing the ecological changes that have occurred following dredging including recommendations as to whether a further survey is required to the Team Leader Compliance Monitoring – Central for certification.

#### **Dredging Noise**

31. Except for capital works dredging activities at Fergusson North berth, capital works dredging shall not be undertaken west of a line between North Head and Bastion Point during the night-time period (2200 – 0700).

#### **Biosecurity Management Plan**

32. ~~All dredging barges shall be installed with bait trap stations to manage rodents.~~
- At least forty (40) working days prior to the start of Stage 1 of the capital dredging works within the coastal marine area, the consent holder shall submit a Biosecurity Management Plan (BMP) to the Council (Team Leader- Coastal, in consultation with Biosecurity Team) for certification. The BMP shall include:
- i. Information regarding the vessels to be used for dredging operations.
  - ii. Briefing of the contractor(s) about terrestrial biosecurity risks.
  - iii. A requirement that no pets are to be brought on board any vessel.
  - iv. The installation and maintenance of rodent and ant traps on board tow vessels and barges.
  - v. Inspections of vessels on a weekly basis for indication of insect infestation, rodent droppings or visible evidence of any other terrestrial pest species.

- vi. Procedures for notifying Auckland Council Biosecurity Team officers if terrestrial pest species are observed.
- vii. Allowance for Auckland Council biosecurity dog checks for specific pests as and when requested by Council.
- viii. No dredging vessel operating within the Waitemata Navigation Channel Precinct will anchor outside the Precinct unless within the Port Precinct or in an emergency.

32A. All works shall comply with the approved BMP at all times.

#### **Public Access**

33. Public access to and along the coastal marine area shall be maintained while the dredging activity is undertaken, except where it is necessary to exclude the public for health and safety reasons.

#### **Completion of Capital Dredging Works**

34. The extent of the changes to the seabed over the area(s) subject to the capital dredging authorised by this consent, comprising the volume of material removed from the coastal marine area and the resultant depths below chart datum, shall be recorded. This information shall be provided to the Council (can be emailed to [monitoring@aucklandcouncil.govt.nz](mailto:monitoring@aucklandcouncil.govt.nz) and cc'd to [coastal.monitoring@aucklandcouncil.govt.nz](mailto:coastal.monitoring@aucklandcouncil.govt.nz) ) upon completion of each dredging event or at the request of the Council (Team Leader – Coastal).

#### **Notification to the Hydrographic Authority**

35. Within twenty (20) working days of the completion of any capital dredging operation, the consent holder shall provide information on the extent of the changes to the seabed over the area(s) subject to the capital dredging authorised by this consent, comprising the volume of material removed from the coastal marine area and the resultant depths below chart datum, to the New Zealand Hydrographic Authority (Land Information New Zealand, Private Box 5501, Wellington 6011 or [customersupport@linz.govt.nz](mailto:customersupport@linz.govt.nz)) and to Council ([monitoring@aucklandcouncil.govt.nz](mailto:monitoring@aucklandcouncil.govt.nz) and cc'd to [coastal.monitoring@aucklandcouncil.govt.nz](mailto:coastal.monitoring@aucklandcouncil.govt.nz)).

11 February 2020

**Attention:** Anthony Blomfield, Bentley & Co Limited  
[ablomfield@bentley.co.nz](mailto:ablomfield@bentley.co.nz)

Dear Anthony,

## Request for further information under section 92 of the Resource Management Act 1991

<b>Application numbers:</b>	BUN60348750 (Council reference number) CST60348302 (coastal permit for capital works dredging works) CST60348751 (coastal permit for maintenance dredging works)
<b>Applicant:</b>	Ports of Auckland Limited
<b>Address:</b>	Coastal Marine Area adjacent to 1-19 Quay Street, Auckland Central
<b>Proposed activity:</b>	To undertake capital dredging and on-going maintenance dredging activities within the Waitematā Navigation Channel Precinct and Port Precinct.

I have undertaken a preliminary planning check of the above application. Under [section 92\(1\)](#) of the Resource Management Act 1991 (RMA), I request the following further information to enable an appropriate understanding of the proposal and assessment of its effects:

### Volume of dredging

Submissions have raised concerns that the proposed capital dredging volume associated with the resource consent application exceeds the volume of the dredged material to be disposed of approved under the EPA's marine dumping consent EEZ400011, where the volume is approved as follows:

- No more than 50,000m<sup>3</sup> of dredged material from maintenance dredging, nor more than 400,000 m<sup>3</sup> of dredged material from capital dredging in any consecutive 12-month period.
- No more than a total volume of 2,000,000 m<sup>3</sup> of dredged material from capital dredging over the term of the consent.

The AEE states that the proposal will have a volume of **2,500,000m<sup>3</sup>** of dredged material from the proposed capital dredging works, and **15,000m<sup>3</sup> per annum / 75,000m<sup>3</sup> per five years** from the proposed maintenance dredging works.

Please confirm the total figures for the volume of dredged materials under both the capital dredging and maintenance dredging works, and whether these will be the same as the volume approved under EEZ400011. If the figures differ from that approved under

EEZ400011, please confirm that any access dredge will be dealt with under a separate permit.

### **Biosecurity**

Section 8.9 of the Environmental Assessment prepared by Kennedy Environmental Limited states that “Controls will be included to minimise the potential for the transfer of unwanted terrestrial pests to Rangitoto Island while working within the Rangitoto Channel”. Please provide detailed information on what these controls will be, in order to assess whether the controls are suitable to manage the biosecurity risk associated with the proposed activities.

You must provide this information within 15 working days (before 10 March 2020). If you are unable to provide the information within 15 working days, then please contact me so that an alternative timeframe can be mutually agreed.

**Note:** If you will require more than 15 working days to provide this further information, the Council has an expectation that you will agree to an upfront extension of time under [section 37](#) to enable the Council to have time to undertake the necessary review of the information once provided.

Under [section 88C](#) of the RMA, the processing of your application is suspended until the above matters have been addressed, or the 15 working day time limit has expired.

### **Suggested Changes/Recommendations – not pursuant to section 92 of the Resource Management Act 1991**

Not pursuant to Section 92, Council’s Biosecurity Team has provided the following feedback on the application, in particular – the proffered consent conditions for the applicant to consider:

- Conditions 25-30 (Ecological Monitoring) – these will be monitored by both Council’s Monitoring Team in conjunction with Council’s Biosecurity Team.

Biosecurity also request that a condition requiring the applicant should notify them of any non-indigenous marine species if found during works be included, with summary reports (as required by Condition 29) and any footage to be provided upon request.

- Condition 32 (Terrestrial Rodent Management) – This condition needs more information included, i.e. the condition should manage Argentine ants, plague skinks, as well as the rodents and mustelids, and include a clause about keeping records and notifying Biosecurity if anything is observed.
- A finalised Biosecurity Management Plan (BMP) will need to be submitted to Council’s Biosecurity Team for written certification – this can be provided with as a condition of consent.
- There is no information as to what vessels will be used for the dredging operations, nor their home port in the application. Please include this information in the BMP.

- The applicant will need to notify Biosecurity prior to any vessel movements occurring – this can be done through the attached template. A condition of consent requiring this notification will also be recommended.
- The statement “*most species found in WNCP sediments are already distributed beyond the Waitematā Harbour*” is not a fact.

If you have any queries, please contact me on [sarah.wong@aucklandcouncil.govt.nz](mailto:sarah.wong@aucklandcouncil.govt.nz) and quote the application number above.

Yours sincerely,



**Sarah Wong**  
**Intermediate Planner**  
**City Centre Team**  
**Central Resource Consenting**