

KEY ISSUES RAISED IN SUBMISSIONS

The following summary includes specific points and consistent themes/matters raised across submissions received on the applications by Northland Regional Council and Whangārei District Council. It does not provide an exhaustive list of each point raised in each individual submission.

NB: References to support/oppose/neutral refer to the specific submission sub-point, as opposed to the overarching submission.

AIR QUALITY	
SUPPORT (1) Sub #25.4	<ul style="list-style-type: none"> Current Port operations are not considered to have diminished air quality.
OPPOSE (6) Sub #18.2, 104.2, 135.3, 176.4, 184.9, 205.2	<ul style="list-style-type: none"> Residents and businesses are currently impacted by dust clouds from the Port and concerned about potential dust nuisance created by both construction and operation Concerned about increased air pollution The air quality monitoring site is a distance from the port and is upwind.
NEUTRAL (-)	
RELIEF SOUGHT Sub #176.4	<ul style="list-style-type: none"> Engage with businesses on any air quality issues that might arise with granting of the consent.
AVIFAUNA	
SUPPORT (1) Sub #32.4	<ul style="list-style-type: none"> The loss of nesting areas are not considered to be significant as numerous nesting sites locate near the Port.
OPPOSE (11) Subs #89.3, 112.1, 114.3, 118.2, 139.1, 145.7, 158.1, 165.2, 172.4, 174.6, 132.3	<ul style="list-style-type: none"> The Port lighting and noise will have a negative impact on birds (seabirds and those more likely to reside on land) and have high cumulative adverse effects Likely increase in conflict between the variable oystercatchers and human activities (including dog walking) Kiwi breeding programs have been successful at reintroducing Kiwi to Reotahi, which could be threatened by night-time activities at the port. No assessment of the impact on northern New Zealand dotterel, and the effects on red-billed gulls are underemphasised The proposal will not avoid effects on significant indigenous biodiversity as required by the NZCPS (significant loss of sea bird habitat). The AEE contains assumptions regarding avifauna population and movements which are challenged by submitters, including the effects assessment conclusion Proposal will permanently remove indigenous biodiversity habitat (11.7ha in total) and there is no guarantee alternative habitats will mitigate these effects The high tide bird roost is not sufficient in size, small in comparison to the extent of habitat being lost, and requires regular sand top-ups so is not guaranteed to remain The high tide bird roost appears to be located within the Significant Ecological Area (SEA) which already contains foraging habitat for seabirds The new bird roost is perceived as a positive but only at the loss of beach habitat.
NEUTRAL (1) Sub #32.4	<ul style="list-style-type: none"> Changes may be required to the bird roost as it will be 'dry' at low water and subject to predators.
RELIEF SOUGHT Sub #32.4, 112.1, 114.3, 158.1, 184.8	<ul style="list-style-type: none"> Redistribute the sand disposal (bird roost mitigation) to replenish the Marsden Bay foreshore Create a wetland of 20ha+ in the area Fund pest protection and fencing for 30 years Resource tangata whenua to monitor effects Maintain access between the sea and roosting facility Further consideration and compensation for the loss of habitat, with input on conditions from the Director-General of Conversation.
BIOSECURITY	
SUPPORT (1) Sub #25.9	<ul style="list-style-type: none"> Shipping companies have stringent on-board procedures to manage biosecurity risks, which are monitored by MPI.
OPPOSE (3) Subs #12.6, 145.4, 174.3	<ul style="list-style-type: none"> Increased vessel movements increases risk for invasive species to be introduced The proposal to introduce cruise ships risks new viruses spreading in New Zealand.
NEUTRAL (-)	
RELIEF SOUGHT	

CLIMATE CHANGE AND GREENHOUSE GAS EMISSIONS	
SUPPORT (8) Subs #58.5, 86.3, 90.2, 107.4, 177.2, 180.3, 182.3, 216.3	<ul style="list-style-type: none"> The expansion will allow for larger ships with lower carbon emitting technologies to call. The expansion and providing access to a container port facility in Northland will support low carbon transport options and exporter's carbon reduction ambitions. Northport is well-equipped to support renewable energy projects in Northland. Government climate initiatives support growth in forestry, which is a large industry in Northland. The port expansion will provide certainty of export to the forestry sector, enabling further growth. Expansion is critical to meeting the Emissions Reduction Plan, which explicitly calls for greater use of coastal shipping (which produces 12.5% of the emissions per tonne compared with road freight). Moving 2% of NZ's freight onto shipping would reduce transport emissions by 16%. The expansion will enable Northport to capitalise on the proposed transshipping opportunities outlined in the New Zealand Freight and Supply Chain Issues Paper (aimed at decarbonising the New Zealand supply chain) The proposal will reduce emissions and carbon footprints from road transport from shipping cargo being transported from Northland to the ports of Auckland and/or Tauranga. KiwiRail (182) supports the expansion and its proposed integration of rail connections as it is essential that rail freight is taken up (following construction of the rail spur) at high rates to reduce carbon emissions. Expansion will increase maritime supply chain networks which are forecasted to be disrupted by climate change-related weather events. Rougher seas and increased likelihood of tropical storms increases the likelihood of shipping delays and damage to port infrastructure. The development presents an opportunity to mitigate risk should other Ports, i.e. the Port of Tauranga, be unable to operate on a temporary basis.
OPPOSE (7) Sub #92.1, 139.5, 145.3, 171.3, 174.11, 184.5, 205.4	<ul style="list-style-type: none"> The application does not indicate how it will comply with the Emission Reduction Plan, specifically Action 10.3.1 (supporting the decarbonisation of freight). As the rail connection has not been confirmed, the increase in freight will lead to an increase in emissions from trucks. As per Proposed Regional Plan policy D.2.3, the potential effects of climate change on the development should be considered – this should include the impacts on the proposed bird roost and the potential future loss of habitat, as well as the effects on the proposed extension. Development should not be enabled within the coastal area given predicted sea level rise. Insufficient attention has been given to mitigating the effects of sea level rise and climate change - the tidal gauge at Marsden was not used in Applicant's assessments. The proposal fails to adequately or appropriately respond to the risks of climate change, or detail how those effects will be exacerbated by the proposal.
NEUTRAL (-)	
RELIEF SOUGHT Sub #134.4, 169.2, 220.3	<ul style="list-style-type: none"> Confirm an ongoing commitment to reducing environmental effects (including emissions) that arise out of ongoing operational activities, particularly as environmental monitoring and restoration technology improves over time. The Applicant should establish and make public their programme/plan for reaching a net zero or negative carbon footprint (which should not be dependent on pine forests). Use renewable energy in as many areas of the proposal as possible.
COASTAL PROCESSES	
SUPPORT (1) Sub #85.1	<ul style="list-style-type: none"> The expected changes to the harbour will nil to minor as a result of dredging.
OPPOSE (19) Sub #18.1, 32.2, 37.2, 53.2, 74.1, 124.3, 125.3, 141.3, 146.1, 158.2, 164.2, 165.3, 170.1, 171.5, 174.5, 176.2, 183.3, 184.2, 208.2	<ul style="list-style-type: none"> Since the dredging of the original Port, the seabed has changed from sand to mud below the low tide line. Further dredging could cause substrate damage, which could lead to ecosystem collapse or destruction. The requested volume of dredged material could cause sand drift, causing unsightly beaches and shifting banks. There's been limited transparency of previous dredging and there are too many unknowns in the dredging plan – there is no heavy metals sample taken; no modelling of effects on Marsden Cove Marina; and dredge plume modelling doesn't take into account large vessels moving through the plume. Recent enforcement action taken against Channel Infrastructure identified that Per and Polyfluoroalkyl Substances (PFAS) have been discharged to the harbour - the impact of dredging on remobilising these chemicals has not been assessed. The proposed dredging is too close to the Marine Reserve; increased sedimentation will affect filter feeding sponges and visibility for snorkelers. The application contains conflicting statements about sedimentation impacts to the west of Northport. Additional dredging is opposed as sand has eroded from One Tree Point to the dredging point and it will not be returned to the beach. The cumulative effects of ongoing dredging on coastal processes are of significant concern. Marsden Cove Ltd (MCL) holds a resource consent to divert Blacksmiths Creek and is concerned there will be increased sedimentation in the marina access channel. Deposition of dredge spoil at sea will cause beaches to have silt build-up in easterly sea conditions due to mud and clay in the spoil. Sedimentation, accretion, and erosion resulting from the reclamation and dredging may impact the continual safe use of the Channel Infrastructure facilities and may give rise to structural integrity issues in the terminal. The expansion will reduce water flows (currents) within the harbour and reduce water quality. Increased currents will add complications to tidal movements in the area, including back eddies which could affect the safety of swimmers.

	<ul style="list-style-type: none"> • Cumulative effects of proposed reclamation and capital and maintenance dredging on sediment distribution within the marine reserve. • The AEE has not addressed the potential tidal flow effects on Mair Bank. The proposed reclamation will have adverse effects on tidal flows and subsequently, the continual loss of shellfish (pipi) on Mair Bank. Shellfish provide 'armouring' to the Bank against further erosion and critical to the Banks integrity – the Bank protects the nearby sandy Marsden Point from erosion. • The shoreline west of the port (Blacksmiths Creek) has steadily eroded since construction of the Port. Dredge spoil from the '90s, dumped 30m back from the shoreline is now exposed. If left to continue this will cause a failure of the beach. The proposed bird roost will be subject to the same erosive forces and will eventually fail. • The reduction of Blacksmiths Creek spit needs consideration independent of the bird roost and as a part of a cumulative effects assessment.
NEUTRAL (3) Sub #32.2, 141.3, 179.3	<ul style="list-style-type: none"> • Utilising dredge spoil to replenish the Blacksmiths Creek beachfront instead of the proposed bird roost enhances and protects an existing significant ecological habitat from coastal processes without affecting navigation. • There is no analysis of whether the works will mobilise sediment within the Harbour channel, and result in more frequent channel dredging. • Reporting does not address main concerns around the rate of deposition and the potential for mobilised sediment to block the Marsden Cove access channel more frequently. • There is no assessment of the effect of the bird roost reclamation on currents.
RELIEF SOUGHT Sub #32.3, 74.1, 85.1, 124.3, 125.3, 126.3, 141.3, 165.3, 170.1, 176.2, 179.3, 184.2	<ul style="list-style-type: none"> • Northport to take full liability for impacts to the harbour, and full responsibility to mitigate and repair these changes. • Reduce the reclamation area. • Impose conditions of consent to require monitoring and mitigation of the effects related to dredging and sedimentation. Also, Whangārei require mitigation (re-sanding, beach stabilisation) if coastal erosion is greater than expected. • Monitoring of long-term change from dredging should be expanded to include shorelines from the Port and the sand bank between One Tree Point and Snake Bank, and the shoreline between the port and Mair Road/Mair Bank. • Require monitoring be the responsibility of NRC, and not self-reported by the Port, to increase transparency. • In place of establishing the proposed bird roost, focus on the replenishment of the eroded foreshore to the West of the Port (including the beaches of One Tree Point) to return it to its pre-Port state. • Commission independent analysis to determine the impact of the requested dredging, specifically Darch Point as the beach surface level has dropped. • MCCML seeks to ensure that ongoing and existing maintenance dredging of the access channel is not adversely affected, including potential monitoring conditions for the access channel. • MCL seeks assurances that the proposal will not affect their ability to own resource consent requirements, including their ability to maintain the marina access channel, and request responses to the technical matters in their submission (165) before any hearing. • Channel Infrastructure (sub #176) seeks further information responding to their technical concerns and mitigation of any adverse impacts on their operations. Independent monitoring of erosion and sedimentation of the foreshore is requested prior to and annually after the proposal is implemented to determine impacts on the terminal.
CULTURAL	
SUPPORT (2) Sub #15.3, 147	<ul style="list-style-type: none"> • Northport has undertaken consultation since the introduction of expansion plans in 2017 and has made material changes in response to input provided. • Northport has undertaken genuine engagement with community and iwi.
OPPOSE (13) Sub #1.1, 2.1, 89.2, 114.1, 117.1, 131.3, 140.2, 145.2, 152, 158.3, 164.1, 166, 175	<ul style="list-style-type: none"> • Tangata whenua (Te Parawhau) do not have confidence that tikanga and mātauranga values will be protected. • Northport have not acknowledged the Kaitiakitanga Ropu group set up as a condition of the original consent. • The proposal does not provide for the relationship of mana whenua with whenua toto, wahi tapu, waitai, wai Māori. • The proposal restricts Te Parawhau Hapū from acting as kaitiaki for the harbour and directly conflicts with Te Parawhau Hapū cultural values relating to; Atua, Wai, Whenua, Ao Tūroa and Tāngata. • The current proposal is wholly inadequate in and provides no detail on how cultural effects or concerns raised within the Patuharekeke Trust Board (PTB) Cultural Values Assessment (CVA) and Cultural Effects Assessment (CEA) will be addressed • The proposal has had a tokenistic and inadequate cultural engagement process, which has led to resignations from the Northport Vision for Growth Tangata Whenua Group. • Engagement with mana whenua has not been in in the spirit of Te Tiriti o Waitangi. • Te Parawhau never ceded sovereignty and consider the proposal to impact their Māori cultural rights and customary marine title. • Rangatiratanga was usurped by confiscation of Poupouwhenua; all concerns for Te Parawhau relate to ongoing cultural issues. • The AEE does not recognise the site of significance at Poupouwhenua which is identified in the Regional Plan. • Patuharekeke has a Treaty of Waitangi claim on the area, which is yet to be settled. The proposal would also conflict with Patuharekeke's application for Customary Marine Title. • Ngati Kahu o Torongare express concern over their ability to continue to carry out traditional practices and the impact on mahinga mataitai. • Nga Hapū o Whangārei oppose the proposal due to the high impact on cultural values, including on kaimoana, and the ancestral connections to Poupouwhenua.
NEUTRAL (-)	
RELIEF SOUGHT Sub #2.1, 112.3, 114.1, 158.4, 164.1, 166, 169.3	<ul style="list-style-type: none"> • Mana whenua concerns regarding the proposal should be resolved before consent is granted • A Community Environmental Endowment Fund of 2% - 5% of the total build cost should be established to fund community programs. • Development of/contribution to the Whangārei Terenga Paraoa Kaitiaki Critical Resource Management Fund. • Genuine engagement and partnership with iwi/hapū in the spirit of te Tiriti o Waitangi.

	<ul style="list-style-type: none"> • Recognition, by Northport, of the Kaitiakitanga Rōpū. • Align conditions of consent with the conditions raised in the CVA and that have been determined by hapū.
ECONOMICS	
<p>SUPPORT (93) Sub #3.1, 4.1, 8.1, 10.1, 15.1, 16.1, 17.1, 19.1, 21.1, 25.1, 26.1, 32.1, 33.1, 34.1, 35.1, 36.1, 41.1, 45.1, 46.1, 47.1, 48.1, 49.1, 50.1, 51.1, 52.1, 54.1, 55.1, 57.1, 58.1, 63.1, 69.1, 75.1, 76.1, 77.1, 78.1, 79.1, 81.1, 83.1, 84.1, 86.1, 87.1, 88.1, 90.1, 91.1, 93, 94.1, 95.1, 96.1, 97.1, 98.1, 99, 100.1, 101.1, 102, 106.1, 107.1, 108, 109, 112.6, 113.1, 116.1, 123, 127.1, 133.1, 137.1, 138, 142.1, 143, 144, 147.1, 148, 151, 155, 159.2, 161.1, 162, 163, 169.1, 177.1, 179.4, 180.1, 184.7, 190, 191.1, 195.1, 198, 212, 216.1, 219, 221.1, 224.1, 226, 227.1</p>	<ul style="list-style-type: none"> • The expansion will bring sustainable and significant employment and economic benefits to the region, particularly if Northport is successful in securing a greater share of out-of-region freight. • Flow on economic benefits for wider industry, including primary production (Seeka and Zespri) and manufacturing • The proposal will result in short- and long-term employment associated with the construction of the port and increased freight capacity and stimulate businesses on land surrounding the port. • The development of Northport will enable exporters to be more cost effective and competitive (reduces export/transport costs for Northland businesses around 25%) and reduce carbon footprints (growing importance in international markets) from needing to ship from Ports of Auckland. • Will lead to essential transport infrastructure development which will service local economic growth. • Large availability (700ha) of appropriately zoned land nearby will support economic growth catalysed by the expansion. • Port jobs are typically ‘ongoing’ in nature and will rise with freight volume. They include jobs/trades with transferrable skills. The proposed expansion will enable employers to offer more regular and consistent shifts. • Employment at the port will create an impetus for housing development and in becoming a larger employment hub, risks of underemployment will reduce. • Investment would be positive in a likely global economic downturn and the proposed expansion may also offset the lost jobs/economic cost of the refinery closure. • Northport has a track record of supporting local businesses and the proposal will further help local businesses and therefore local prosperity. • The expansion will enable several small businesses to grow to a more sustainable size, ensuring essential service businesses don’t close. • Whangārei is identified as a ‘High Growth’ area by MBIE, and the expansion aligns with multiple strategic economic action plans. • The expanding economy/population in the immediate area will lead to more amenities (supermarkets etc) for existing local residents. • The expansion will enable greater access for bigger ships, attracting new shipping customers, diversifying the customer base and mitigating commercial risk. The proposal will provide for new business and economic diversification, as the region is heavily dependent upon agriculture, forestry, fishing, and tourism. • The expansion will enable Northport to keep up with global shipping trends and adapt to freight needs. Additional berthage and diversification will also reduce Northport’s exposure to a single export sector risk. • Granting the expansion consents will give confidence to Northport’s Board, stakeholders, and investors looking to invest in Northland – consents are essential parts of de-risking potential future business plans. • Additional berthing that could accommodate cruise ships would enhance Whangārei’s attractiveness as a destination as passengers could be transferred directly from ship to shore without the need for tenders. • One constraint currently preventing Whangārei from becoming a mainstream cruise destination is the length of Northport’s linear berth – 570m is not long enough to accommodate a larger cruise ship (~300m) while also allowing the port to maintain regular commercial freight and cargo operations. The disruption caused by regular cruise calls of vessels this size would be unsustainable. • The capability to berth cruise ships is essential to realising the economic potential of Whangārei as a tourism destination. • Significantly cheaper and more cost-effective than Auckland building a new Port. The proposal capitalises on existing infrastructure/assets, making it cost effective to ratepayers. • Coastal shipping infrastructure will soon be inadequate to meet demand without this expansion, constraining economic growth. The proposal will relieve shipping congestion and the large cost of ships sitting anchored at sea. • Provides certainty to existing port users over level of service, allowing them to plan their own businesses with more certainty. • Increased access of Northland to other markets and other shipping companies. The proposal will facilitate a return to domestic coastal shipping, leading to far-reaching economic benefits.
<p>OPPOSE (3) Sub #135.5, 167.4, 196.2</p>	<ul style="list-style-type: none"> • Will increase the cost of residential buildings (Port noise and light spill). • Lack of faith that the new jobs created will go to locals. • The flow on effect of more business is disproven, and automation will replace manual labour jobs within a decade. • Adverse environmental effects (including water quality) need to be managed to avoid adverse economic effects on businesses dependent upon it.
NEUTRAL (-)	
<p>RELIEF SOUGHT Sub #112.6, 128.4, 159.2, 167.4, 169.1,</p>	<ul style="list-style-type: none"> • With significant asset value increases, a fund for mitigating against the adverse environmental effects should be established - a Community Environmental Endowment Fund could be established and used to finance, in perpetuity, programmes of environmental and community value in the area affected by the project. • A commitment to train locals for all types of jobs, with (e.g.) 75% of the workforce coming from Northland. • Preference for local industry to deliver most of the infrastructure. • Tourism is key to the local economy, and any impacts to Te Araroa Trail must be mitigated so tourists are not stranded during construction. • More detailed plans and conditions of consent included to ensure safe and positive visitor experiences for the people coming to Whangārei District and for the supporters of Whangārei’s tourism sector.
ECONOMICS – SUPPLY CHAIN	
<p>SUPPORT (43)</p>	<ul style="list-style-type: none"> • Northport plays a critical role in maintaining a robust supply chain for local and regional businesses.

<p>Sub #15.4, 16.2, 25.6, 26.2, 33.2, 35.2, 40.1, 45.2, 46.2, 47.2, 48.2, 49.2, 50.6, 51.2, 52.2, 54.2, 57.2, 58.2, 75.2, 76.2, 77.2, 81.2, 82.1, 84.2, 86.2, 91.2, 94.2, 95.2, 97.2, 101.2, 106.2, 107.2, 113.2, 127.2, 137.2, 142.2, 147.2, 149.1, 180.2, 182.2, 216.2, 221.2, 224.2</p>	<ul style="list-style-type: none"> • Expansion of the port will strengthen the North Island supply chain, particularly for critical materials. • The expansion is needed to deal with larger freight volumes in Northland and will reduce congestion of ships waiting to berth at Northport. • The expansion will enable Northport to capitalise on the proposed transshipping opportunities outlined in the New Zealand Freight and Supply Chain Issues Paper (aimed at decarbonising the New Zealand supply chain) • Will be needed to address the capacity constraints in NZ ports, particularly at Ports of Auckland – could meet much of the demand for North Auckland. • The expansion has the potential to free up space for other uses at Ports of Auckland. • Provides resilience in instances where other ports and the state highways are constrained – has already proved in practice that it can ‘step up’ when needed. • A ‘three-port’ strategy including an expanded Northport will be much cheaper and more practical than building a new ‘super-port’ to replace Ports of Auckland, even assuming a location could be found. • Port congestion due to lack of berths around the country is currently costing NZ substantially (delays to receiving/exporting goods, demurrage, etc). • In the face of increasing constraints and costs across the freight industry, new strategically located and connected infrastructure is critical for cargo movements – provides important links to international markets that businesses throughout the region rely on. • The rail spur will increase operational efficiency of companies and reduce transport costs. • 54% of the population live in the upper North Island with key growth areas located North of the Waitemata, Northport is in the most logical location to cater to this growth. • Will reduce the costs and inefficiencies associated with trucking through cities or multiple regions. • Close access to shipping makes marginal businesses viable, where the cost of trucking would’ve been too high. This includes being able to sell what would otherwise be waste materials. • Mitigates the risk for Northland exporters who rely on trucking exports to other ports. • The expansion would facilitate a resurgence coastal shipping, reducing reliance on road and rail, reducing costs, increasing resilience, and better connecting NZ. • Increases the number of shipping companies that call into Northport. • Expanding to allow bigger ships is critical to ensure NZ maintains key freight links with the world. • It is the best placed port in the Upper North Island to expand – there is available nearby land, it is deep and requires minimal dredging, and it is the closest port to international markets. • The expanded port strengthens the case for improved transport links between Whangārei and Auckland. • The improvements to the supply chain will lead to a reduction in carbon emissions as shipping replaces distance trucking. • KiwiRail (182) supports integration of rail freight following the construction of the Marsden Point spur, as it will reduce carbon emissions and congestion and will improve road safety. • KiwiRail has already improved tracks and purchased land for the rail link with the expectation of high freight volumes coming from an expanded Northport. • Currently containers are transported past Northland to Auckland or Tauranga. Increasing container options will increase the number of shipping lines that utilise Northport (positive impact for local exporters). • Northland businesses rely on Northport’s ability to service export shipping programme and provide ancillary services (such as coolstore facilities) • The key benefits of an improved/more resilient supply chain can only be fully realised if KiwiRail provide the proposed rail connection. • Ports must be laid out efficiently – the expansion is necessary for processing container freight even if there is a reduction in log movements.
<p>OPPOSE (2) Sub #92.5, 203.2</p>	<ul style="list-style-type: none"> • Auckland should build a new port in the Auckland region. • Insufficient roading infrastructure for Northport to take more freight. • More trucks required to move containers without a confirmed rail connection which will impact supply chain emissions.
<p>NEUTRAL (-)</p>	
<p>RELIEF SOUGHT Sub #95.2, 101.2</p>	<ul style="list-style-type: none"> • Recognise Northport’s ability to expand is of national importance. • Ensure that North Island supply chain issues have been resolved prior to expanding the port.
LAND TRANSPORT	
<p>SUPPORT (21) Sub #15.2, 26.3, 35.4, 41.2, 48.3, 49.3, 50.5, 51.3, 58.3, 64.1, 77.4, 81.4, 82, 95.3, 106.3, 116.2, 127.4, 153.1, 182.4, 207.1, 227.2</p>	<ul style="list-style-type: none"> • Investment in supporting infrastructure is key to reducing road freight and congestion • The expansion will strengthen the case for further essential transport infrastructure upgrades (such as SH1, SH15 upgrades and the rail spur) which will improve amenity, efficiency, and safety. • Northport has built the KiwiRail link into its plans and is working with Waka Kotahi on an integrated transport assessment tying into work already undertaken by Waka Kotahi and Whangārei District Council. • KiwiRail supports the integration of rail freight with the Marsden Point spur. • The rail spur will improve operational efficiency and significantly reduce truck movements, transport costs, and environmental footprint. • Shipping directly from Northland removes the need to truck freight to Auckland or Tauranga – reducing congestion and pressure on existing failing roads and increasing supply chain capacity. • Growth in container traffic between Northland and Auckland shows the need for a port capable of processing containers at Northport. • National Road Carriers supports an efficient and integrated supply chain which includes land, sea, and air transport. • An expanded Northport will provide more choices and create new opportunities for the trucking industry.

	<ul style="list-style-type: none"> • Northport could service North Auckland, reducing truck movements through the congested Auckland isthmus. • The proposal aligns with GPS on land transport and the strategic intention of SH15. • Waka Kotahi agrees with the assessment of changes needed to key intersections and that Northport will contribute to this, and supports the suggestion that Northport uses telemetry traffic data to determine triggers for roading upgrades. • The proposal will increase safety on roads.
OPPOSE (8) Sub #12.3, 74.2, 92.3, 112.8, 160.3, 186.3, 197, 203.1	<ul style="list-style-type: none"> • The expansion will increase truck/road traffic and exacerbate congestion. • As the rail spur has not been confirmed it will lead to an increase in truck movements. • Opposes the potential use of the rail spur due to it connecting to old lines and being noisy for residents. • Not enough roading infrastructure to accommodate the increase in freight movements from Auckland to Northland. • Additional heavy trucks on the road will increase maintenance costs and health and safety risks. • The Traffic Impact Assessment relies on the rail spur and Waka Kotahi to build embankments, but this is uneconomical or has not been confirmed.
NEUTRAL (5) Sub #51.3, 81.4, 153.1, 159.3, 202.1	<ul style="list-style-type: none"> • The expansion will need to align with planned rail upgrades to remove freight from roads. • Potential rail spur may only see sufficient demand if the expansion of the Port is allowed. • Port infrastructure should be developed alongside continued investment in road, rail, and coastal shipping capabilities to enable full integration of Northport into the upper North Island freight logistics network. • More detail about the final location of the rail line is needed to assess whether it will impact the future local road and proposed park. • As the development of port facilities can take decades, it's important it is approved now, and land transport infrastructure can then support it. Sceptical of traffic data considering there is large population growth expected in Ruakākā. • Climate change should necessitate a commitment to rail, minimising the need to expand roads.
RELIEF SOUGHT Sub #28.2, 31.1, 74.2, 92.3, 128.3, 134.5, 153.1, 159.3, 184.3, 195.2, 197, 202.1, 207.1	<ul style="list-style-type: none"> • Include a safe (family-friendly) cycleway in parallel to the Marsden Point Highway. • Include safe cycling facilities which would connect to the cycleway being developed from One Tree Point to Ruakākā, future routes identified in WDC strategy documents, and the area between the Port and Mair Road. • Agree and implement a plan for the North Island's supply chain which addresses land transport, and which meets the Emissions Reduction Plan before expanding the Port. • Construction of the spur rail line should commence prior to commencement of consented activities. • Provide endorsement for the rail spur in whatever capacity available - the development of the rail spur should allow for electrification and double tracking. • Instead of the triggers proposed in the application, utilise the telemetry traffic data collected continuously on SH15 by Waka Kotahi, to determine when triggers are reached. • Northport to provide an annual monitoring report to Waka Kotahi relating to traffic volumes, safety, and necessary intersection improvements. • Provide alternative routes for Te Araroa walking trail during construction. • Work to begin immediately on mitigating safety concerns on the existing McCathie Road/ One Tree Point Road intersection. • As majority of shipped goods will travel south, upgrade main roading networks through to Auckland. • A portion of reserve consent funds used to develop alternative travel routes throughout the Ruakākā/One Tree Point area.
LANDSCAPE AND VISUAL AMENITY	
SUPPORT (2) Sub #25.5, 50.2	<ul style="list-style-type: none"> • The existing Port has not had a visual impact so far. • Northport has worked to resolve visual impact issues for some residents, reviewing layouts and location of structures, including reducing total crane numbers from 8 to 4. • Expanded public access is supported.
OPPOSE (13) Sub #18.3, 112.5, 114.6, 132.2, 135.4, 139.3, 141.2, 145.9, 167.2, 172.2, 174.8, 196.1, 203.3	<ul style="list-style-type: none"> • Previous dredging has turned sand areas to mud. • Contests the statement that aesthetic impacts will be minor and considers that the reclamation will have more than minor impact on landscape and natural character. • The Assessment of Landscape, Natural Character, and Amenity Effects has failed to incorporate the significant impact to Darch Point residents. • The removal of the chimneys at the refinery will improve the visual amenity only for container cranes to 'blot' the landscape. • Residents were originally told structures would be kept low, but they are now already much higher than agreed upon. • High machinery (including cranes) is very visually imposing in a low-lying area of natural beauty. • The harbour should be restored, and the Port put in 'an uglier spot'. • The increase in night activity will cause an increase in light pollution affecting both sides of the harbour. • Impacts on landform will degrade/diminish mauri and create a sense of loss (of belonging) related to diminished aesthetic wellbeing.
NEUTRAL (3) Sub #160.2, 201.1, 207.2	<ul style="list-style-type: none"> • Important that the area is well maintained. • Not a large visual impact on some properties unless it expands to the west.

	<ul style="list-style-type: none"> Care needs to be taken for lighting and light spill on north side of the harbour.
RELIEF SOUGHT Sub #112.5, 141.2, 167.2, 185.3, 196.1, 201.1	<ul style="list-style-type: none"> The project perimeter and all road and rail corridors to include planted and raised buffer mounds, 10m wide. Mobile cranes should be used rather than large container cranes. A maximum height limit, including for containers and cranes (30m suggested). Ensure landscaping maintenance endures over the long-term. The Port should be relocated.
MARINE ECOLOGY	
SUPPORT (3) Sub #25.3, 127.5, 209.1	<ul style="list-style-type: none"> The harbour is cleaner now than 20 years ago, with orca, dolphins, and sea-grass flourishing. Although that is due to work by WDC/NRC, it shows Northport is not polluting the harbour. The seabed is already compromised by shellfish stripping by locals. Environmental effects have been well mitigated.
OPPOSE (21) Sub #12.2, 32.3, 37.1, 74.3, 103.2, 114.2, 124.2, 125.2, 126.2, 135.1, 139.2, 146.2, 158.2, 164.3, 167.3, 171.1, 174.4, 183.5, 184.1, 186.2, 220.2	<ul style="list-style-type: none"> Increased risk of pollution and invasive species. Proposed activities in the CMA means irreversible destruction of ecosystems. Insufficient information in application regarding impacts and mitigation measures. The AEE has not addressed the potential tidal flow effects on Mair Bank. The proposed reclamation will have adverse effects on tidal flows and subsequently, the continual loss of shellfish (pipi) on Mair Bank. The changes in tidal flows will continue loss of shellfish biomass. The proposal will result in the direct loss of healthy intertidal habitats within the proposed reclamation and the proposed sandbank island. These habitats contribute to the broader diversity and ecological values of the harbour. The proposal will also result in the loss of species and habitat in the subtidal area of the reclamation and dredged area. The dredging will also have effects on surrounding subtidal habitats. Listing loss of OHEZ as 3% does not accurately represent the extent of habitat loss as the area is not uniform. No mitigation, offset or compensation is proposed or suggested for most of the cumulative loss of generally healthy habitat in Whangārei Harbour. The proposed dredging site is too close to the Marine Reserve; increased sedimentation will affect filter feeding sponges. Potential impacts on the marine reserve life during construction and on seabed habitat. Loss of seagrass habitat. Seashell substrate damage has potential for ecosystem collapse. Shellfish population has already been declining, yet they are critical to the bank's integrity. Loss of benthic species. Degradation of marine reserves should not be permitted. Details of the new bird roost do not address what habitat would be lost – the ideal location would not have populations of shellfish and wading birds. Concern the application underemphasises the effects on marine ecology. Concerns about the impact of noise on the marine environment. Concerns about degradation of wildlife habitat. Since the dredging of the original Port, the seabed has changed from sand to mud below the low tide line. Further dredging and substrate damage could lead to ecosystem collapse or destruction.
NEUTRAL (7) Sub #32.3, 78.3, 110.2, 134.1, 139.2, 158.2, 184.1, 229	<ul style="list-style-type: none"> The Blacksmiths Creek and Takahiwai Stream are outstanding coastal wildlife habitats and have already been considerably modified by human activity. Erosion can be mitigated by replenishing sand at these areas to enhance and protect them. Monitoring should be undertaken prior to any consented activities to better understand and assist compliance. The assessment of effects on pipi only assesses effects based on harvestability, not in general on the species. The proposed new bird roost could affect sedimentation patterns and therefore also benthic biota. There is no mention of the impact on Motukiore Island, an area of significant environmental importance, which will be less than 600 metres from the proposed extension. Monitoring should include the impact on this area. Mitigation has largely been left to be addressed in various Management Plans, making it difficult to gauge the likely effectiveness of those measures. Effects on fishing areas for cockles and pipis are not adequately addressed in the Appendix 11 assessment. Careful attention should be paid to potential effects on water quality and marine ecosystems as a number of NIWA research and marine activities operate within Bream Bay, including within the Whangārei Harbour inlet and the Ruakākā Aquaculture Centre – all of which rely on the availability of good quality sea water to operate. Strict conditions must be set as a precaution. Mitigation for effects on the environment should be addressed through a project cost levy, including for research on the marine environment. Assessment of marine effects did not adequately discuss distinct fishing areas for cockles and pipi.

<p>RELIEF SOUGHT Sub #32.3, 78.3, 110.2, 124.2, 125.2, 126.2, 134.1, 167.3, 184.1, 220. 2, 229</p>	<ul style="list-style-type: none"> • Potential adverse effects on water quality and marine species must be monitored closely with strict consent conditions relating to discharges. • Changes to proposed sandbank as per submission 32 to protect ecological habitat and address predator issues. • The project commits funding to scientific research of the ecology of the harbour and marine mammals • The applicant will provide funding for research, monitoring and planning of the harbour for ecological restoration, managed by the community under a co-governance framework. • Northport to take full liability for negative impacts on biodiversity and have responsibility to mitigate it. • The proposed monitoring framework should take place within a larger marine management context, managed by Government. • The applicant will ensure that users of the port are fully informed of the applicant’s environmental values and are bound by any marine and/or maritime regulations that may be imposed over the harbour and coastal marine area. • Adequate conditions are imposed to avoid, remedy, or mitigate the adverse effects. • Due to potentially significant adverse effects, a precautionary approach is warranted. • Draft Management Plans proposed in the application could be extended to include monitoring of kaimoana shellfish. • 1% levy of the total project costs to be paid upfront to the Northland Charities Commission to allocate, including research into the marine environment. • Limits on timing and amounts for dredging, piling, reclamation and forming turning circles. • Plans to protect shellfish beds should be put in place and need to be made available to the public before construction starts. • Monitoring of the ongoing health of shellfish, fish, marine mammals and flora.
MARINE MAMMALS	
<p>SUPPORT (-)</p>	
<p>OPPOSE (9) Sub #112.7, 114.5, 139.6, 145.8, 158.5, 164.5, 172.5, 174.12, 213.1</p>	<ul style="list-style-type: none"> • Insufficient assessment of the risk on marine mammals from shipping traffic and ship strike. • Protection of the habitat of Tohorā is necessary as a taonga of the Whangārei Harbour. • Inadequate assessment of taonga species (including marine mammals) and the relationship of tangata whenua with those species. • The proposal will have a negative impact on marine mammals from the loss of habitat and limited entrance to the harbour. • Underwater noise can cause effects on marine mammal behaviour, acoustics/changes in communication and physiological injury – particular concerns raised regarding impacts on seals.
<p>NEUTRAL (-)</p>	
<p>RELIEF SOUGHT Sub # 112.7, 114.5, 172.5</p>	<ul style="list-style-type: none"> • Project commits \$2 million to marine mammal research by a New Zealand institution. • Fund a Kaitiaki Critical Resource Management Fund. • Continuous monitoring of underwater noise.
NAVIGATION / PORT OPERATIONS / ENGINEERING DESIGN	
<p>SUPPORT (3) Sub #45.3, 51.4, 54.3</p>	<ul style="list-style-type: none"> • Additional berthage allows for non-forestry vessels, reducing risks of being limited to a single export sector. • Existing bulk port design is unsuitable for container-handling. • The additional berth will reduce waiting times for access when a container ship is in port. • The proposal is designed to use dredge spoil on the port.
<p>OPPOSE (8) Sub #12.4, 32.5, 130, 146.3, 168, 176.3, 179.5, 185.4</p>	<ul style="list-style-type: none"> • No independent report on navigation and safety impact on refinery wharves has been provided. • Impact on safe and timely continued operation of Jetty 3 is likely to be significant and yet to be assessed – lack of independent peer-reviewed navigation and safety report.. • Particular concern from Seafuels (130) and BP Oil NZ (168) regarding access to Jetty 3 for the marine fuels barge MT Awanuia (or replacement vessel) • Concerns about large vessels blocking other users in accordance with maritime law. • The proposed reclamation may encroach on access to Jetty 3 and associated impacts on operations, timing and type of shipping that can be accommodated. • Reclamation may impact the hydrodynamics, tidal currents and sedimentation patterns which may reduce water depths and impact on shipping movements. • Increased shipping to Northport may reduce access to the deep-water shipping channel and cause delays to supply chains. • Increased danger to leisure boats as a result of greater ship movements in a narrow harbour. • Increase in marine traffic with the addition of new marina and projected growth of Port Nikau. • The proposal could potentially give rise to material structural integrity issues with Channel Infrastructure’s Import Terminal System resulting from increased forces on moorings and associated scour effects, affect the functionality of Channel Infrastructure’s stormwater spillway and prevents the operation of Channel Infrastructure’s fire pumps which are located on the jetty due to sedimentation of the seafloor in and around the pump intakes. • Dredging could cause movement of sand resulting in shifting banks throughout Bream Bay. • The proposed bird roost may be a navigational hazard as it is in close proximity to the Marsden Cove Canal that is used by small vessels and located within a popular water-skiing area.

<p>NEUTRAL (2) Sub #32.5, 73.1</p>	<ul style="list-style-type: none"> • The proposed sandbank may cause a navigational hazard, as it is close to the Marsden Cove Canal. • The proposed sandbank will occupy the water-skiing area. • Bulk fuel loading/unloading, and container transport and storage should be well separated.
<p>RELIEF SOUGHT Sub #130, 168, 176.3, 185.4</p>	<ul style="list-style-type: none"> • Ensure no adverse effects on continued use of Jetty 3. • Ensure adequate sea room for use of Jetty 3 for all vessels and in all conditions. • Any changes to currents and silt deposition affecting Jetty 3 are mitigated. • Undertake an independent report on navigation which includes further simulations of ship movements. • Ensure marina access is maintained without extra risk. • Fully assess and manage effects on Channel Infrastructure (as detailed in submission 176).
PLANNING	
<p>SUPPORT (26) Sub #15.5, 19.2, 25.10, 26.4, 32.7, 35.3, 41.3, 46.3, 47.3, 49.4, 50.3, 51.5, 55.2, 57.3, 58.4, 77.3, 78.2, 81.3, 90.3, 105, 107.3, 147.3, 153.2, 161.3, 182.1, 184.6</p>	<ul style="list-style-type: none"> • The expansion will promote regional growth and is consistent with key regional economic and growth strategies, including the Whangārei District Growth Strategy, Tai Tokerau Northland Economic Action Plan, and the RPS. • The NRC RPS identifies regionally significant infrastructure in numerous policies and objectives – these align with the proposed expansion. • The proposal aligns with GPS on Land Transport 2021. • Arataki, a Waka Kotahi strategy responding to the GPS, identifies the growth of Northport as a significant opportunity and the proposal aligns with the wider strategic intention of SH15. • The proposal’s plans to integrate rail freight aligns with KiwiRail’s plans to deliver a rail spur to the Port. • MBIE identifies Whangārei as a ‘high growth’ area. • The choice to follow a standard consent process (rather than fast-tracking) is endorsed as it has enabled productive conversations. • The long-term planning of zones in the Marsden Point/Ruakākā/One Tree Point community has been well thought out, and the port development will lead to other essential upgrades and will benefit these communities. • The expansion of this port avoids the adverse environmental outcomes which would occur in other locations if this were not approved. • The expansion plans were publicised in 2017 and the community was actively engaged with. This included changes to the design, including for cranes. • Expansion is critical to meeting the Emissions Reduction Plan, which explicitly calls for greater use of coastal shipping. • Northland has one of the highest ranks of socio-economic deprivation in NZ. The expansion will achieve broader social outcomes and improve the socio-economic wellbeing of the district and wider region by creating jobs, enabling skills/workforce development, and providing opportunities for associated businesses to grow. • Increased employment opportunities will help address poor labour force engagement and associated social issues. • Port developments are long-term investments, taking years to implement. A long-term vision should be implored when considering these consents to make sure Northport is fit for purpose 50 years from now. • Northport has ample scope to expand its operations to adapt to changing demands of communities and economies. • Approximately 700ha of business-zoned land locate between Northport and SH1, enabling the provision of supporting business in close proximity to the Port. • The port is in the most efficient location it can be, and not granting the application means the sacrifices made by the environment to accommodate the port would have been wasted. • The proposal is consistent with the Upper North Island Story.
<p>OPPOSE (21) Sub #1.2, 2.2, 7.1, 29.1, 89.1, 92.2, 103.3, 112.2, 114.4, 131.1, 139.4, 140.1, 141.4, 145.6, 146.6, 158.4, 164.4, 171.2, 174.2, 176.1, 210.2</p>	<ul style="list-style-type: none"> • Tangata whenua feel that the Kaitiaki Roopu has been controlled by NRC and Northport and they do not have confidence their values will be protected. • A precautionary approach is warranted due to the potential for significant adverse effects on the coastal environment ecology and cultural values of the Whangārei Harbour. • The Kaitiaki Ropu organisation was not acknowledged by Northport, despite being formed as a condition of the original consent. • The application does not indicate how the proposal will comply with the Emission Reduction Plan, specifically 10.3.1. • Migration from Auckland has put pressure on Northland’s population and infrastructure, and development of the port will put pressure on wellbeing. • Granting consent would not achieve the purpose of the RMA as it would: not enable tangata whenua to provide for their wellbeing; not recognise the relationship between Hapū and their whenua toto, wahi tapu, waitai, wai Māori; not enable continued practice of Kaitiaki Māori for the harbour; not implement the principles of te Tiriti o Waitangi, including Rangatiratanga; not ensure adverse effects are adequately avoided, remedied or mitigated; not be consistent with the NZCPS, including avoiding effects on significant biodiversity. • The receiving environment is already degraded and compromised by the current Port. This current degradation must not be the starting point for assessment and used to justify further degradation. • The proposal may be inconsistent with the purpose of the RMA as it may prevent operation of businesses that allow communities to provide for their economic, cultural and social wellbeing. • Not enough is done to avoid, remedy, and mitigate the ecological, landscape, and natural character effects, as required by the NZCPS, RPS, and Regional Plan. • Proposal is contrary to NZCPS Objectives 1-5, and Policies 2, 3, 10, 11, 13, 14, 18, 19, 21, 22, 23, 26. • Proposal is contrary to RPS Objectives 3.2, 3.4, 3.13 and 3.14, and Policies 4.2.1, 4.4.1, 4.6.1, 5.3.3, 7.1.6. • Proposal is contrary to the Proposed Northland Regional Plan Policies D.1.1 – D.1.5, D.2.3, D.2.18, D.2.20, D.5.24. • The proposal does not give effect to s6(c) and s7(d) of the RMA.

	<ul style="list-style-type: none"> • Many effects which are deemed by the application to be less than minor are irreversible effects. RPS 4.4.1(4)(b) says non-reversible effects are likely to be more than minor. • RPS 4.4.1(4)(c) says cumulative and transitory effects may be more than minor, 4.4.1(1) says adverse effects on threatened or at-risk indigenous taxa must be avoided, 4.6.1(1) says significant effects on natural character, landscapes, and features must be avoided. • RP D.2.20 requires a precautionary approach to managing effects on significant biodiversity where adverse effects are little understood. • AEE has not properly addressed effects on mahinga kai, cultural and traditional activities of tāngata whenua, tāipure, mataitai or Māori non-commercial fisheries. • Inadequate assessment of alternatives regarding effects on cultural values, ecological and coastal processes, and alternative methods. • AEE has not identified sites of significance to mana whenua, which are mapped in the RP and identified in the CVA, including Poupuwhenua which will be affected by the proposal. • The Assessment of Landscape, Natural Character, and Amenity Effects has failed to incorporate the significant impact to Darch Point residents. • Insufficient community consultation has been undertaken (one meeting in the past year). • Mana whenua have not been engaged in the spirit of te Tiriti o Waitangi. • The proposal overrides Māori customary rights as per the MACA Act. • Application has not adequately responded to the concerns in the Interim CEA (note: an updated CEA was ratified post-lodgement). • The Planning Assessment should consider Hazardous Substances as containers may contain them. • The proposal may adversely affect Channel Infrastructure's Import Terminal and therefore its ability to fulfil its duties as a lifeline utility as recognised under the Civil Defence Emergency Act 2002. • The community is disadvantaged in addressing the application. • Amendments to the NMP are proposed to reduce noise impact to residents. • Dredging plan does not align with UN Global Goal 14.2 "Protect and Restore Ecosystems". • Concerns that granting of this consent will lead to the Dry Dock, which was previously refused consent. • The expansion will result in Whangārei being like Auckland, and it will be difficult to remove the port. • The proposal is aligned with the 'Vision for Growth' project, which does not have monitoring controls, mitigation or adequate community consultation. • The ownership of the coastal area for reclamation is unclear, including the Whanganui Harbour Refuge under the Department of Conservation. • Consent has not been considered under the Wildlife Act and Conservation Act. • Consent has been applied for prior to the Treaty of Waitangi claim being settled for the area. • The proposal may be inconsistent with the Proposed Northland Regional Plan and Whangārei District Plan. • Omissions in the effects assessment (mahinga kai, ability of tangata whenua to carry out cultural and traditional activities, Māori non-commercial fisheries, sites of significance) sufficient to return the application as incomplete under s88.
<p>NEUTRAL (9) Sub #56, 78.2, 112.2, 114.4, 128.2, 134.2, 158.5, 159.5, 184.6</p>	<ul style="list-style-type: none"> • While acknowledging the benefits of the project, the adverse effects must be carefully managed. • Questions regarding whether the principles of the Treaty have been addressed in an RMA context. • Concerned that appeals will cause delays which could have been obviated by including acceptable mitigation measures. • A proposed monitoring framework should take place within a larger marine management context, requiring consideration by Government. • DOC is also the authority responsible for processing applications under the Wildlife Act 1953. Approval under this Act will be required prior to construction commencing. • Stormwater discharges should be reviewed to meet the requirements of the NPS-FM and the principles of Te Mana o te wai. • WDC Infrastructure will work with Northport and all other key stakeholders in non-RMA statutory processes necessary for the expansion. • It is unclear whether the local electricity grid has capacity for shore-to-ship power, or if this has been planned for. • Detailed conditions should be imposed on any consent to manage adverse effects on water quality, marine ecosystems, and high natural values of the coastal environs – similar to those imposed on the NIWA discharge consents • Long term benefits to the recreation, but during construction provision needs to be made for continuity of the trail. • Verification of Northport's communication with the public about their proposal.
<p>RELIEF SOUGHT Sub #78.2, 8.13, 90.3, 112.2, 128.2, 134.2, 139.4, 140.1, 146.6, 164.4, 176.1, 184.6, 202.2, 210.2</p>	<ul style="list-style-type: none"> • Impacts on water quality and marine species to be monitored and mitigated. • Application should be granted contingent on the rail spur line being confirmed. • Application should be returned under s88(3A) as it does not address the CEA in detail. • Designate the port as of National Importance (currently of Regional Importance) to ensure the rail link is built and delays are avoided. • The applicant will provide at least !% of the development cost and ongoing operational net revenue to a community managed fund under a co-governance framework. • The applicant will establish and publish its program for reaching net-zero carbon. • The applicant will establish a mechanism for regular consultation with iwi/hapū. • The applicant will fund spatial planning for the harbour and proximate areas, to be managed under a co-governance regime.

	<ul style="list-style-type: none"> Amend conditions to achieve best practice management of the dredging and reclamation operations and certainty with respect to the level of adverse effects that will be generated, in particular avoiding, remedying or mitigating adverse effects on: Indigenous biodiversity and habitats; and Landscape and natural character. The conditions should contain all the objectives, standards, limits, minimum surveys, and monitoring and exclusion measures, such that Management Plans only deal with 'how' conditions will be met. Develop a Harbour Safety Management Plan for the construction phase. Engage with Channel Infrastructure to identify and mitigate adverse impacts of their ability to operate. Amend NMP, Chapter 4.2 to "require" (not "consider") the acquisition of electric or quieter equipment over noisier equipment. Amend Chapter 5.3 to add two additional CLG members who live in One Tree Point and Whangārei Heads, more than 2km from the Port. PTB request, in line with our Mana Whakahono ā Rohe Agreements with NRC and WDC [refer section 8.2 and 15 of those agreements]4, that one independent Māori Commissioner be appointed from each body to the hearing panel for this consent. PTB seek to either nominate or have input into the selection of the Māori Commissioners. Further, given the significance of cultural effects to the proposal, we request that the hearing be held at Takahiwai Marae. Consent conditions ensuring continuity of Te Araroa Trail during and after construction (including alternative route). Application be declined. Northport needs to continue to undertake long-term planning that will enable the port to meet community and economic needs. Northport's 'Vision for Growth' should be amended to 'A vision for sustainable growth'.
PROPERTY	
SUPPORT (-)	
OPPOSE (2) Subs #29.2, 132.5	<ul style="list-style-type: none"> Will lose 'indoor-outdoor' amenity value. Potential to reduce property values. Development encourages migration and increases costs to local ratepayers who "didn't give permission".
NEUTRAL (1) Subs #145.5	<ul style="list-style-type: none"> Questions the right to build into harbour area not 'owned' by Northport, and which is subject to Treaty claims.
RELIEF SOUGHT	
RECREATION / OPEN SPACE	
SUPPORT (3) Sub #25.7, 50.4, 207.2	<ul style="list-style-type: none"> Support for proposed public access and facilities and considering more green space and facility connections. The Port has not impacted recreational uses in and around the Harbour.
OPPOSE (11) Sub #12.5, 32.6, 112.4, 132.4, 145.1, 146.5, 159.4, 174.9, 183.4, 208.1, 217.1	<ul style="list-style-type: none"> The proposed new wharf is too small for the community to provide for fishing, swimming, and transport operators. Adverse effects on recreation have not been adequately mitigated. Lack of provision of walking and cycling paths is unacceptable. Increases in noise will reduce enjoyment of the marine reserve and public areas. Increases in vessel movements will increase risk to recreational harbour users. The existing beach (Ralph Timmer Drive) access provides the easiest access for swimmers and those with limited mobility. Adverse effects to public access and the recreation values of Marsden Beach have not been adequately mitigated. Opposes reduction in public area from 6949m² to 4395m². Further complicating tidal movements via construction and vessel movements could affect swimmers' safety. Supports Parks and Recreation Department's opposition to using adjoining reserve land. Impacts on snorkelers from underwater noise and sediment has not been mentioned. The proposed dredging site is too close to the Marine Reserve; increased sedimentation will affect visibility for snorkelers. Extension of the port into the harbour entrance will cause disruption and hazards to recreational users. The proposed location of the bird roost will be located in the middle of a popular water skiing area used frequently by the One Tree Point, Marsden Cove, and wider Bream bay community during summer months Lack of confidence that Northport will maintain public access and water quality/safety for swimming at Marsden Beach.
NEUTRAL (6) Sub #32.6, 128.1, 145.1, 159.4, 184.10, 217.1	<ul style="list-style-type: none"> The new wharf will result in little impact on Te Araroa in the long term, but in the short-to-medium term there is uncertainty about the impact on Te Araroa walkers. WDC Parks and Recreation department has not yet accepted the proposals around the esplanade reserve. The wharf structure carpark and toilets were a condition of the original consent. Land acquired by the Port loses its opportunity to be improved by WDC. The proposed sandbank will occupy the water-skiing area.

	<ul style="list-style-type: none"> The proposal is unclear about whether there would be sufficient land reserved for processing cruise ship passengers. The swimmable beach area will be reduced. As the pontoon is very popular it should be relocated and maintained.
RELIEF SOUGHT Sub #28.4, 31.2, 112.4, 128.1, 159.4, 184.10, 185.2, 207.2, 208.1	<ul style="list-style-type: none"> Ensure continuity of Te Araroa Trail during and after construction and the safety of those using it (by alternate route if necessary). Final design is discussed and agreed with Channel Infrastructure. Extend length of wharf by 50%. Add bike paths/shared paths in the transport corridor to connect Ruakaka with the wharf. Increase the park size from the original at an equal ratio to the increase in size of the port and extended to the full eastern side of the port for recreational fisher access. Ensure existing fishing and recreational aspects are maintained. Develop a loop walk surrounding the refinery area. Provide a new walking and cycling link between Marsden Marina and Ruakaka Beach. Contribute fill to a potential One Tree Point boat ramp breakwater. Provide a family-friendly cycle path from Northport to the SH1/Port Marsden Highway. Consider more green space, beach access, boat ramp if possible. Provide more detailed plans to WDC about the visitor experience for the people coming to Whangārei through the port. The swimming pontoon to be relocated and maintained.
STORMWATER AND WATER QUALITY	
SUPPORT (3) Sub #25.8, 28.3, 159.1	<ul style="list-style-type: none"> WDC Infrastructure supports a practicable solution for stormwater management which is fit for the future. Consideration needs to be given to underlying infrastructure issues, including stormwater. Stormwater is managed from the port and ships, and more is discharged in heavy rain events from local roads and subdivisions.
OPPOSE (2) Sub #74.4, 174.7	<ul style="list-style-type: none"> The current pond will not be large enough for the increased flows. The entirety of Marsden Point is susceptible to flooding and is vulnerable to being 'cut-off' from the rest of the country due to heavy rains. The expansion will negatively impact water quality (not specific to SW).
NEUTRAL (2) Sub #78.4, 170.2	<ul style="list-style-type: none"> Stormwater discharge from new subdivision is eroding the beaches of One Tree Point – potential for dredged sand to be used to replenish these beaches. Careful attention should be paid to potential effects on water quality as a number of NIWA research and marine activities operate within Bream Bay, including within the Whangārei Harbour inlet and the Ruakākā Aquaculture Centre - all of which rely on the availability of good quality sea water to operate.
RELIEF SOUGHT Sub #78.4, 159.1	<ul style="list-style-type: none"> Review stormwater discharges to meet the requirements of NPS-FM and meet the principles of Te Mana o Te Wai. Water discharges must be subject to strict quality/filtering/testing parameters. Stormwater discharges are assessed against the NPS-FM and Te Mana o te Wai with appropriate consent conditions to ensure stormwater systems are fit for purpose. Use the dredging to replace sand on One Tree Point.
TERRESTRIAL ECOLOGY	
SUPPORT (-)	
OPPOSE (-)	
NEUTRAL (1) Sub #32.8	<ul style="list-style-type: none"> The current erosion of Marsden Bay is impacting vegetation and ecological habitats on the shore.
RELIEF SOUGHT Sub #32.8, 112.9	<ul style="list-style-type: none"> Change in the location of the proposed sand bank to replenish the Marsden Bay foreshore for protection of vegetation and the Blacksmith Creek Nature Reserve. Development of a wetland up to 20ha. Shorebird protection on other Whangārei Harbour sites, including pest control, fencing and protection planting for at least 30 years.
TERRESTRIAL NOISE	
SUPPORT (5) Sub #6.1, 25.2, 27.1, 191.2, 200.1	<ul style="list-style-type: none"> Noise from the port is less than they receive from the primary school. Noise is dependent on wind direction and double glazing would more than mitigate increases in noise. Supports NZS Port Noise Limits
OPPOSE (38) Sub #9.1, 12.1, 14.1, 18.4, 24.1, 53.1, 80.1, 92.4, 103.1, 104.1, 118.1, 121, 124.1, 125.1, 126.1, 131.2, 132.1, 135.2,	<ul style="list-style-type: none"> Proposed noise increase is too high for residential areas and will cause sleep disturbance, distress, and will degrade health and wellbeing. The current permitted noise levels are already too high for some residents, some have affected sleep quality and report health issues. Many object to the existing Port Noise Standards and do not believe those levels are being adhered to, that there is adequate monitoring of them, or that Northport is responsive to complaints.

141.1, 150, 160.1, 164.8, 165.1, 167.1, 171.4, 172.1, 174.1, 179.1, 183.1, 186.1, 203.5, 205.1, 214.1, 215.1, 218.1, 220.1, 222.1, 223.1	<ul style="list-style-type: none"> Concerns that the noise levels are increasing where it is not justified. Some residents moved to the area for its peace and may feel forced to move again. There is no assessment of the noise impacts on people using the marine reserve. Night-time noise can affect nocturnal birds and the successful kiwi breeding programme in the area. Concern that averaging noise levels will make it difficult for residents to determine what the 'real' noise increase will be. The standards applied for prescribe limits in parcels of time greater than 15 minutes and will not adequately capture the impact of regular, high-intensity but short-duration noises, as can be expected from the Port. There is no assessment of noise effects on community, whanau, kaitiaki etc using Marsden Bay and Te Koutu for recreational or customary purposes. Baseline noise effects are based on data from 5 years ago. The existing noise limits should be retained for the proposal. The rail spur will increase noise for residents of Ruakaka and One Tree Point. Double glazing does not provide effective mitigation during hot summer months when windows are opened. NMP relies on reporting by locals, absolving Northport of full responsibility.
NEUTRAL (6) Sub #118.1, 121, 131.2, 150, 215.1, 222.1	<ul style="list-style-type: none"> Modern machinery should be able to operate at reduced noise levels, similar to that generated by current operations. Noise standards are copyrighted and not widely accessible to the public. Little proof that the increased limits are necessary or justified – modelling projects a negligible increase in noise levels. Previous attempts to increase noise allowance have been declined. Location of Berths 4 and 5 being closer to Reotahi must be considered in modelling.
RELIEF SOUGHT Sub #9.1, 14.1, 24.1, 53.1, 80.1, 92.4, 118.1, 124.1, 125.1, 126.1, 141.1, 150, 160.1, 165.1, 167.1, 172.1, 174.1, 179.1, 185.1, 191.2, 200.1, 210.1, 214, 215, 220.1, 222.1, 223.1	<ul style="list-style-type: none"> Permitted noise levels to remain at the existing level (day = 55dB, night = 45dB). Decline implementation of Port Noise Standards and retain current NAV 6.1 levels. Impose lower noise limits than currently apply. Proactively retrofit affected homes with double glazing, insulation, and mechanical ventilation. Apply the Port Noise Standards. Shift the focus from Northport looking at new noise standards to mitigation measures for local residents affected by noise pollution. Construction to be kept to 8am-5pm Mon-Fri. Shore-based power to be used for all ships and containers. All port vehicles and machinery to be electric and/or fitted with noise mitigation devices. Requiring immediate response to noise complaints. Require the Port to be the initiator of noise control measures, rather than responding to community complaints. Require 24/7 monitoring of noise by an independent body, with results published regularly and costs chargeable to Northport. Ensure any increases in noise do not result in noise exceeding 55dBA L_{dn} within the Marsden Cove development area. Amend chapter 4.2 in the NMP to replace "consider" with "require" with regards to selecting quieter equipment, and chapter 5.3 to have a community liaison group to contribute to noise monitoring. Noise levels to not exceed Residential zone limits.
UNDERWATER NOISE	
SUPPORT (-)	
OPPOSE (5) Sub #158.6, 172.3, 174.1, 183.2, 220.4	<ul style="list-style-type: none"> Dredging noise and vibration will adversely affect sensitive shellfish beds, reef fish, and marine ecosystems. Noise assessment fails to consider amenity and environmental effects on the marine reserve. Marine noise can extend far beyond the immediate area and is experienced more loudly; it may disturb fish populations and drive away marine mammals which rely on echolocation. Underwater noise can have impacts on marine mammal behaviour, acoustic/vocalisation, and physiological injury. There is no assessment of the impacts of underwater noise on snorkellers at the marine reserve.
NEUTRAL (-)	
RELIEF SOUGHT Sub #172.3, 220.4	<ul style="list-style-type: none"> Methods to enhance and protect sensitive ecosystems to be put in place pre-construction. Take a precautionary approach in protecting marine creatures from excessive industrial noise. Require scientifically based constraints on underwater noise. Independent 24/7 monitoring of underwater noise levels. Alternative method of piling should be adopted.

	<ul style="list-style-type: none"> Record and publish results of monitoring regularly.
OTHER	
SUPPORT (10) Sub #8.2, 76.3, 96.2, 98.2, 100.2, 127.3, 133.2, 136, 161.2, 221.3	<ul style="list-style-type: none"> Speaks to the integrity of Northport as an organisation and of the application – good communication, staff wellbeing, environmental track record, building relationships with mana whenua, and corporate governance. Submission states that Northport are looking into the future and present a logical vision. It is a good geographic location for a port expansion, particularly in comparison to alternative Auckland sites. Council owes it to New Zealand Inc., to the taxpayers of the upper North Island to enable this infrastructure that is required to support New Zealand’s continued prosperity and capability. Levy on the project value for research into the marine environment, as the proposal cannot proceed without the environment in which it is located.
OPPOSE (1) Sub #184.4	<ul style="list-style-type: none"> Contends that public engagement has been inadequate and public information events have been poorly advertised.
NEUTRAL (3) Sub #110.1, 134.3, 145.10	<ul style="list-style-type: none"> As NRC has a 51% shareholding it has a conflict of interest in processing this application. Requests for a fund for community projects to be set up equal to 1% of project costs. Fuel supply is critical infrastructure and the Refinery should not have been decommissioned.
RELIEF SOUGHT Sub #110.1, 134.3, 145.11, 208.3	<ul style="list-style-type: none"> Appoint independent advisors to process consent. Reduce the reclamation extent (to reduce damaging effects on the harbour). 1% levy of the total project costs to be paid upfront to the Northland Charities Commission to allocate, including research into the marine environment. Consultation with national security advisers on risks of the port.