
WAIPU COVE RESERVE BOARD
COMMENTS TO FAST TRACK PANEL - BREAM BAY SAND EXTRACTION
PROJECT

Prepared by Evan Cook

22 MAY 2026

1. SUMMARY OF EVIDENCE

- 1.1 This statement of evidence was prepared for Waipu Cove Reserve Board (WCRB) in relation to an application from McCallum Bros Ltd for resource consents (coastal permits) for sand extraction and coastal discharges in Bream Bay.
- 1.2 The application provides for the extraction of up to 250m³ of sand per annum over 35years. The sand extraction area is 15.4km² and is located 4.7km off the Bream Bay Coast.
- 1.3 Waipu Cove Reserve Board have been invited by the panel to comment on the application under section 53(3) of the Fast Track Approvals Act.
- 1.4 In this statement of evidence, I address the following:
 - Context and background to the application, including the values of Waipu Cove
 - The potential effects of the proposal on Camp Waipu Cove, Bream Bay, and the Northland Region
 - The applications consistency with the relevant policy statements and plans
 - The proposals consistency with the purpose and principles of the Resource Management Act
- 1.5 After carefully considering the information I have been provided, and assessing this material against the relevant statutory documents, I have concluded that:
 - The proposal has the potential to result in significant and irreversible adverse effects on the coastal environment and the ongoing operations at Camp Waipu Cove.
 - The proposal has the potential to result in adverse effects on the Northland economy
 - the proposal is not consistent with relevant planning documents as set out in s104(1)(b).

- the application is inconsistent with the purpose of the Resource Management Act 1991 (The Act).

1.6 For the reasons outlined in this evidence, WCRB recommends that the application be declined.

2. INTRODUCTION

- 2.1 My full name is Evan James Cook. I am a Director of Whangarei Planning Limited, a position I have held since September 2021. I am a qualified planner, holding a Bachelor of Tourism and a Master of Planning from the University of Otago. I have been a full member of the New Zealand Planning Institute since September 2016 and have been a member of the Institute since 2008.
- 2.2 I have worked as a planner in the Northland region since November 2007, across both the private and public sectors. My experience includes roles as a Policy Planner (Coastal), and later Senior Planner, with the Whangārei District Council, positions I held between 2008 and 2021.
- 2.3 In my role as Senior Policy Planner, I was involved in the development of structure plans and plan changes to implement the Whangarei Coastal Management Strategy which guides development in the coastal settlement of Whangarei District. My responsibilities included preparing submissions on proposed legislation and regional and national policy documents, liaising with the public, Council departments, and external agencies on resource management and coastal matters, and participating in Environment Court mediation and hearings.
- 2.4 I was directly involved in rural and coastal plan changes to the Whangarei District Plan, including the preparation of planning provisions and section 32 evaluation reports for the Coastal Environment and High and Outstanding Natural Character Area provisions. I reported on submissions at plan change hearings and was subsequently involved in Environment Court mediation on a range of topics, including provisions relating to the Coastal Area. I also contributed to the Urban and Services Plan Change, including reporting on submissions relating to the District Growth and Development and Urban Growth and Development chapters, and acting as an expert planning witness to the environment court on rules managing Kauri dieback disease.
- 2.5 I am a long time resident of the Waipu Cove area and have been a board member of the Waipu Cove Reserve Board since 2015. I have prepared these comments on behalf of the Board.

Scope of Evidence

- 2.6 My evidence will address the following topics:
- a) the values that would or might be affected by the project, in relation to Camp Waipu Cove.
 - b) the actual and potential effects on the environment that might arise in the event of grant of the approvals sought, and;
 - c) the nature and scale of the project's regional and / or national benefits.

3. ISSUES FOR PANEL

- 3.1 The application seeks consent to mine a total of around 8.5million cubic meters of marine sand over 35 years. The sand mining area is proposed to be located approximately 5km from the shore of Bream Bay. In my opinion the issues for Panel are:
- (a) Risk to the coastal sediment system, the integrity of Bream Bays coastal dune system, and the property they provide protection for.
 - (b) The significant uncertainty in relation to the potential adverse effects of the proposal
 - (c) Whether the potential effects can realistically be monitored, managed or reversed through consent conditions .
 - (d) The economic benefits/costs to New Zealand, and the Northland region.

4. CONTEXT AND BACKGROUND

- 4.1 This section sets out the context and background of the Waipu Cove Reserve Board and Camp Waipu Cove.
- 4.2 These comments are made on behalf of the Waipu Cove Reserve Board, the statutory body responsible for the management and stewardship of the Waipu Cove Recreation Reserve, including the management of Camp Waipu Cove associated public amenities. The board is appointed by the Department of Conservation to manage the reserve under the provisions of the Reserves Act. The board is currently comprised of 8 members, and includes appointed representatives from Patuharakeke and Te Parawhau Hapu.

- 4.3 The Board’s primary responsibility is to protect and enhance the long-term environmental, recreational, and economic values of the reserve for the benefit of the public. The health, stability, and amenity of the beach and dune system are fundamental to fulfilling that role, being the main attraction to guests staying in the campground.
- 4.4 The operations at Camp Waipu Cove make a significant economic contribution to the local and regional economy. In 2025 Camp Waipu Cove had a total operating revenue of 2.199m, employing 10 FTEs, and paying out over \$800k in staff wages. At its peak the camp provides accommodation for approximately 1000 guests. In the last financial year, the campground provided accommodation across 81,840 visitor nights. These visitors provide a significant boost to the local economy, particularly over the summer months but also throughout the year.
- 4.5 Environmental care remains central to our operations. Dune restoration and weed control efforts are carried out in partnership with Northland Regional Council Coastal Care, with planting days involving volunteers from the community. Additional planting and protective fencing are planned for winter 2026. Guests also continue to be offered the option of contributing to dune care through donations at the time of booking which has been well supported. The camp holds active resource consents to allow for beach scraping for dune protection and restoration, the maintenance of stream channels, and the removal of algae from the beach.
- 4.6 The Waipu Cove Campground and Recreation Reserve provide significant social, recreational, cultural and economic values to both residents and visitors. For generations, the campground has been an iconic Kiwi summer holiday destination, hosting families from throughout New Zealand who return year after year to experience the unique coastal environment of Waipu Cove.
- 4.7 The campground and adjacent beach provide opportunities for a wide range of recreational activities including swimming, surfing, fishing, walking, kayaking, boating, and general beach recreation. These activities are fundamentally dependent on the quality, safety, amenity, and natural character of the beach and dune environment. The campground also provides an important connection for many families and visitors to the coast, contributing to community wellbeing, social cohesion, and the traditional New Zealand beach holiday experience. WCRB is concerned that any degradation of the coastal environment, beach width, dune stability, water quality, surf conditions, or recreational amenity resulting from

the proposal would place these longstanding values at risk and adversely affect the ongoing use and enjoyment of Waipu Cove by current and future generations.

- 4.8 The Board opposes the application. For the reasons outlined below, it is considered that the proposal gives rise to significant uncertainty and risk in relation to the coastal sediment system of Bream Bay, with potentially irreversible adverse effects that cannot be adequately avoided, remedied, or mitigated. Furthermore, the propose does not result in any economic benefit to the Northland region, and may in fact result in significant negative economic effects over the long term due to the potential effects of the proposal. In these circumstances, the application should be declined.

5. ADVERSE EFFECTS OF THE PROPOSAL

Risk to the Coastal Sediment System

- 5.1 The central concern of WCRB is the extraction of up to 250,000 cubic meters of sand per annum over 35 years from a sediment system that is understood to have limited inputs and complex offshore–onshore connectivity. The total sand extraction for which consent is sought is some 8.45 million cubic meters.
- 5.2 The applicant’s assessment relies heavily on modelling that concludes the extraction will not materially affect the shoreline due to depth and distance offshore. However, the Board considers that this conclusion is not sufficiently certain or robust to justify the scale of extraction proposed.
- 5.3 The board disagrees with the applicant’s assessment that the risk to coastal processes is negligible to low, with less than minor to minor effects.
- 5.4 Bream Bay operates as an integrated sediment system. Offshore sand functions as part of the wider sediment budget that supports beach and dune stability over time. Removal of material from that system introduces a real risk of reducing the long-term sediment supply available to maintain the coastline, and the long term viability of the dune system as a buffer against coastal hazards. The WCRB considers that there is potential for significant effects on coastal processes, and that these effects may not become apparent until the damage to the coastal environment is irreversible.

Scientific Uncertainty and Limitations of Assessment

- 5.5 A critical issue for the Panel is the level of uncertainty associated with the proposal.
- 5.6 The applicant’s modelling relies on assumptions regarding sediment transport, storm dynamics, long-term coastal behaviour, and system connectivity. These processes are inherently complex and variable, and outcomes are sensitive to modelling assumptions.
- 5.7 There is limited long-term empirical evidence demonstrating that large-scale offshore extraction in comparable systems has no adverse shoreline effects. Effects may only become apparent over extended periods, at which point they cannot be reversed.
- 5.8 The level of uncertainty is such that it cannot be concluded with confidence that adverse effects will be avoided.

Irreversibility of Effects

- 5.9 The proposal involves permanent removal of sediment from a finite system. Extracted material cannot be replaced, and natural replenishment occurs over long or uncertain timescales.
- 5.10 The effects of the sand extraction on the Bream Bay shoreline and dune systems may take many years to manifest. If the applicant's predictions are incorrect, the consequences are effectively permanent. This elevates the threshold for approval.

Local Effects on Waipu Cove

- 5.11 Waipu Cove is a high-value public coastal environment supporting recreation, tourism, and local economic activity. The beach has been widely recognised as one of New Zealand's premier coastal destinations, including being named among the country's best beaches in national rankings¹. This status reflects the quality of the natural environment and its importance as a regional drawcard.
- 5.12 The Waipu Cove Campground plays a significant role in the local and regional economy. It supports sustained tourism activity, particularly over peak holiday periods, and contributes directly to visitor spending across the wider Bream Bay area and Northland region across the accommodation, hospitality, retail, fuel, and recreation sectors. Beach-based holidays are the core attraction, and the continued viability of this activity is directly dependent on maintaining beach quality, width, and amenity.
- 5.13 Potential adverse outcomes associated with sediment depletion include:
- reduction in beach width and amenity
 - increased erosion risk
 - dune instability
 - reduced suitability for swimming, surfing, fishing, and general recreation
- 5.14 These outcomes would directly undermine both the recreational value of the reserve and the economic benefits it generates for the District and wider Northland region. We are already experiencing erosion of our dune and foreshore, and spend significant time and resources maintaining and enhancing our protective dune system. The WCRB are very

¹ NZ Herald – Best Beach 2025 & 2026. Best Camping Beach 2025 & 2026, Best Family Beach 2025

concerned that the removal of sediment from a closed system can only be detrimental to the protection that our beach and dune systems provide for our local area.



Coastal Erosion at Waipu Cove Reserve 12 April 2026

5.15 The application's AEE assesses the effects of the proposal on commercial activities as negligible, concluding that effects would be less than minor. WCRB disagrees with that assessment. If sand removal results in adverse effects on the dune system, including increased coastal erosion risk or reduced dune stability, there is potential for significant adverse effects on commercial activities located landward of the dunes. This includes activities undertaken at Camp Waipu Cove, which relies on the coastal environment as a core component of its operation and visitor experience. Any degradation of the beach and dune environment has the potential to adversely affect the ongoing viability, attractiveness, and operation of such activities, with consequential effects extending to the wider local economy supported by tourism, recreation, and seasonal visitors to the Waipu Cove area.

Algae Blooms

5.16 Waipu Cove and the wider Bream Bay area have experienced recurrent blooms of red algae in recent years, with particularly severe events occurring in 2013, 2016 and 2021. During

the 2016 episode, huge quantities of algae were deposited along the shoreline and washed up the stream at the southern end of the beach, where it decomposed, killing aquatic life, producing strong odours and creating health and safety hazards for swimmers and beach users. The smell made it unpleasant for residents and visitors and had significant negative impacts on the Waipu Cove Campground and local hospitality businesses.



Source: Northern Advocate 31 December 2016

- 5.17 In response, the Waipu Cove Reserve Board (WCRB) with the assistance of local contractors and volunteers, removed hundreds of tonnes of algae from the beach which was stockpiled on nearby farmland. WCRB subsequently sought and was granted resource consents to mechanically collect and remove the algae, and open up the mouth of the stream to drain the trapped water. WCRB has also commissioned ongoing monitoring and research into the algae; however, investigations have not yet identified the specific nutrient sources contributing to its growth in Bream Bay.
- 5.18 WCRB is concerned that proposed sand extraction and dredging activities could disturb and mobilise nutrient-rich fine sediments from the seafloor, further stimulating algal growth within Bream Bay, which washes ashore in easterly conditions. The activities proposed may increase the frequency and intensity of blooms, with consequent adverse economic effects on the campground and other local businesses, community wellbeing, and the recreational enjoyment of the beach by residents and visitors, particularly if this occurs over the busy summer period.

Cumulative Effects

- 5.19 The proposal must be assessed at full scale over time. Cumulative sediment removal is significant, particularly in a system with limited replenishment.
- 5.20 It is also noted that other parties (Channel Infrastructure) already hold consents for sand extraction within the Bream Bay system. The current proposal must be considered in light of all existing consents so that the whole system is not subject to incremental degradation of the coastal sediment system. The cumulative effects of all sand extraction consents is a relevant consideration for the panel, particular if a tipping point is reached where adverse effects may be irreversible.

Limitations of Conditions and Adaptive Management

- 5.21 Monitoring detects adverse effects but does not prevent them. There is no practical way to replace removed sediment, and any responses would be reactive. Adaptive management is not an appropriate safeguard where the effects may only become apparent after irreversible damage has occurred.
- 5.22 WCRB is concerned that the conditions of consent will not be able to be effectively monitored (e.g. turbidity in the water column), and that potentially significant adverse effects, in particular over the longer term, cannot be adequately managed through the adaptive management regime proposed by the applicant.
- 5.23 The recommended conditions are largely reliant on monitoring detecting adverse effects after extraction has already occurred, rather than preventing those effects from arising in the first instance. In particular, while the conditions provide for monitoring of extraction volumes, bathymetric and ecological changes, there are limited enforceable trigger points requiring extraction activities to cease, reduce, or relocate before significant adverse effects on shoreline stability, beach width, and dune systems occur.
- 5.24 The proposed financial contribution toward the Council's Bream Bay Beach Profile Survey Programme is similarly passive in nature and does not contain any direct feedback mechanism linking monitoring results to mandatory operational changes.
- 5.25 It is the WCRB's understanding that the applicants previous sand extraction operations in Pakiri were largely unmonitored by consenting authorities, and when monitoring did take place, significant non-compliance with the consent conditions were identified.

- 5.26 The concerns of WCRB are exacerbated given the operator's track record of non-compliance, and because the activity will occur offshore and at night, making real-time monitoring and enforcement inherently difficult.

6. OVERARCHING POLICY FRAMEWORK

6.1 Given that coastal permits are sought under the RMA, it is appropriate that the relevant planning documents are taken into consideration. Within Section 6, I outline the overarching policy framework applying to the area under the RMA.

6.2 In particular, we consider that it is relevant that the Panel take into consideration whether the proposal is consistent with, or contrary to objectives and policies of the national, and regional planning documents that apply. Given that the project is located in the CMA I consider that the relevant documents are:

- (a) The New Zealand Coastal Policy Statement 2010
- (b) The Regional Policy Statement for Northland
- (c) The Northland Regional Plan

New Zealand Coastal Policy Statement 2010 (NZCPS)

6.3 The New Zealand Coastal Policy Statement 2010 provides the primary national direction for managing activities in the coastal environment. The Board considers that the proposal is inconsistent with key NZCPS policies, particularly those relating to precaution, coastal processes, and natural character.

Policy 3 – Precautionary Approach

6.4 Policy 3 requires a precautionary approach where the effects of activities on the coastal environment are uncertain, unknown, or little understood, but potentially significantly adverse or irreversible.

6.5 The proposed extraction involves the removal of substantial volumes of sediment from a closed, complex and dynamic coastal system. The long-term effects on sediment transport, coastal stability, and shoreline behaviour are inherently uncertain. If the applicant's predictions are incorrect, the resulting effects -particularly shoreline erosion -would be effectively irreversible.

- 6.6 In these circumstances, Policy 3 directs that a precautionary approach be adopted. This weighs strongly against granting consent where uncertainty remains and the potential consequences are permanent.

Policies 24–27 – Coastal Processes

- 6.7 Policies 24 to 27 require identification and understanding of coastal processes, including sediment transport systems and budgets, and the adoption of a long-term perspective that accounts for climate change and sea level rise.
- 6.8 The Board considers that the current level of understanding of the Bream Bay sediment system is insufficient to confidently conclude that large-scale, long-term extraction will not adversely affect coastal processes. The removal of sediment from an interconnected system introduces a clear risk of altering sediment supply to beaches and dunes over time.
- 6.9 Policy 25 further requires that activities avoid increasing the risk of social, environmental and economic harm from coastal hazards. Any reduction in sediment supply has the potential to exacerbate erosion and increase vulnerability to storm events and sea level rise. That risk is not adequately resolved by the application.

Policy 13 – Preservation of Natural Character

- 6.10 Policy 13 requires the preservation of the natural character of the coastal environment, including avoiding significant adverse effects.
- 6.11 Seabed extraction at the scale proposed constitutes a substantial modification of the natural coastal system. The potential for downstream effects on beach morphology and dune systems, effects on benthic habitat and fauna, as well as the visual effects of industrial activity represents a significant adverse effect on natural character that is not appropriately avoided.

Policy 6 – Activities in the Coastal Environment

- 6.12 Policy 6 recognises the importance of enabling economic use and development in the coastal environment. However, this is expressly subject to avoiding significant adverse effects and managing other effects.

6.13 While the proposal has economic benefits to the operator, these benefits may be outweighed by adverse effects on existing commercial activities in the Northland Region. In addition, any economic benefits do not override the requirement to avoid significant adverse effects or to address uncertainty regarding environmental outcomes. In this case, the scale of extraction and the uncertainty of effects mean that the environmental thresholds set by the NZCPS are not met.

6.14 In summary, the proposal:

- involves material uncertainty regarding coastal processes
- presents a risk of irreversible adverse effects on the coastal environment
- cannot be confidently managed to avoid increasing coastal hazard risk

Accordingly, the application is inconsistent with Policies 3 and 24–27 of the NZCPS and does not satisfy the requirements of Policies 13 and 6.

6.15 In the absence of sufficient certainty that adverse effects will be avoided, the NZCPS framework supports a precautionary approach, and this should be taken into account in the panels decision.

Northland Regional Policy Statement

6.16 In my opinion the relevant regional policy statement is the Northland Regional Policy Statement (“RPS”).

6.17 The proposal is inconsistent with the operative Regional Policy Statement for Northland, particularly the provisions relating to indigenous biodiversity, natural character, outstanding landscapes, and coastal processes.

Policy 4.4.1 – Maintaining and Protecting Significant Ecological Areas and Habitats

6.18 Policy 4.4.1 requires that, within the coastal environment, adverse effects on significant indigenous habitats and vulnerable ecosystems be avoided, and that significant adverse effects on other indigenous ecosystems and habitats also be avoided.

- 6.19 The policy specifically recognises dunelands, estuaries, coastal wetlands, spawning and nursery areas, and margins of the coastal marine area as ecosystems particularly vulnerable to modification.
- 6.20 The dune systems of Bream Bay are identified within the Regional Policy Statement mapping as Outstanding Natural Landscapes and contain areas of High and Outstanding Natural Character. These landforms are dependent on the continued functioning of coastal sediment processes to maintain the values that contribute to their natural character.
- 6.21 The current proposal involves the removal of substantial volumes of marine sediment from an interconnected coastal system. While the precise magnitude of effects remains uncertain, the proposal creates a real risk of disrupting the long-term sediment supply that supports the dune systems and coastal margins of Bream Bay.
- 6.22 Given the recognised vulnerability of these environments, and the policy direction to avoid adverse effects within the coastal environment, the proposal is inconsistent with Policy 4.4.1.

Policy 4.6.1 – Managing Effects on Natural Character, Natural Features and Landscapes

- 6.23 Policy 4.6.1 directs decision-makers to:
- avoid adverse effects on areas of outstanding natural character, outstanding natural features, and outstanding natural landscapes; and*
- avoid significant adverse effects and avoid, remedy, or mitigate other adverse effects elsewhere within the coastal environment.*
- 6.24 Although the offshore extraction area itself is not identified as an area of Outstanding Natural Character, the adjacent dune systems of Bream Bay have been mapped by NRC as Outstanding Natural Landscapes with areas of High and Outstanding Natural Character.
- 6.25 These areas are afforded the highest level of protection under the Regional Policy Statement and NZCPS.
- 6.26 The proposal introduces uncertainty regarding the continued integrity and functioning of the coastal sediment system that sustains these landforms. Any reduction in sediment supply has the potential to exacerbate coastal erosion, destabilise dune systems, and adversely affect the natural character and landscape values of the Bream Bay coastline.

6.27 Importantly, Policy 4.6.1 also recognises that cumulative adverse effects may arise from effects that are individually minor or transitory. This is directly relevant to the proposal, where the long-term cumulative removal of sediment from the coastal system is the central concern.

Policy 5.1.2 – Development in the Coastal Environment

6.28 The Regional Policy Statement provides for appropriate development within the coastal environment under Policy 5.1.2. However, such development must:

- allow for the natural functioning of coastal processes and ecosystems;
- take into account adjoining land and established activities; and
- avoid adverse effects on access to, use, and enjoyment of surf breaks of significance.

6.29 The Board considers the proposal is inconsistent with these directions.

6.30 The removal of sediment from Bream Bay has the potential to interfere with the natural functioning of coastal processes and ecosystems by altering sediment transport dynamics within a constrained coastal system.

6.31 There is also potential for adverse effects on adjoining land through increased coastal erosion risk and degradation of the natural dune buffers that protect development and infrastructure from coastal hazards.

6.32 Waipu Cove is a regionally significant recreational destination and was recently recognised as one of New Zealand’s leading surf beaches, best family beach, and best beaches for camping². The quality of the beach environment, surf conditions, and wider coastal landscape underpin substantial recreational, tourism, and economic benefits for the wider Northland region, including the operation of the Waipu Cove Campground.

6.33 In circumstances where the long-term effects on coastal processes remain uncertain, the proposal cannot be confidently said to maintain the natural functioning of coastal systems as required by the Regional Policy Statement.

² NZ Herald 2025 and 2026

Policy 7.2.1 – Role of Natural Features

- 6.34 Policy 7.2.1 recognises and protects natural systems and features that contribute to reducing the impacts of natural hazard events on the built environment.
- 6.35 The dune systems and beaches of Bream Bay perform a critical natural hazard protection function. These landforms act as natural buffers against coastal erosion, storm surge, wave energy, and coastal inundation. Their effectiveness is directly dependent on the ongoing supply and movement of sediment within the wider coastal system.
- 6.36 The proposed extraction activity introduces uncertainty regarding the long-term sustainability of that sediment supply. Any reduction in available sediment has the potential to weaken the resilience of dune systems and beaches over time, particularly in the context of increasing storm intensity and projected sea level rise.
- 6.37 This is not simply an ecological or landscape issue. The natural character and dune systems of Bream Bay provide an important protective function for public infrastructure, recreational assets, private property, and established development along the coastline, including the Waipu Cove Campground and associated reserve infrastructure.
- 6.38 By potentially undermining the natural coastal buffers that protect the built environment from coastal hazards, the proposal is contrary to the direction of Policy 7.2.1.
- 6.39 In circumstances where the long-term effects on coastal resilience and sediment dynamics remain uncertain, a precautionary approach is required. The proposal cannot be confidently said to recognise, protect, restore, or enhance the natural systems that reduce natural hazard risk along the Bream Bay coastline.
- 6.40 Accordingly, the proposal is inconsistent with Policies 4.4.1, 4.6.1, 5.1.2 AND 7.2.1 of the Regional Policy Statement for Northland.

Proposed Northland Regional Plan

- 6.41 The Northland Regional Council Proposed Regional Plan (“PRP”), is a combined regional air, land, water and coastal plan seeking to maintain and enhance the quality of Northland’s natural environment. The PRP has been prepared to give effect to the RPS and higher order documents.

6.42 The PRP contains overlays relating to areas with important values. The sand extraction proposal has the potential to adversely affect areas mapped in the regional plan with the following overlays:

- Significant Marine Mammals and Bird Area
- Significant Bird Area
- Significant Ecological Areas
- Regionally Significant Surf Breaks
- Sites and Areas of Significance to Tangata Whenua
- Outstanding Natural Features
- Outstanding Natural Character
- High Natural Character

6.43 In my opinion the following provisions are relevant to the Sand Extraction proposal.

D.2.17 – Managing Adverse Effects on Natural Character, Outstanding Natural Landscapes and Outstanding Natural Features

6.44 Policy D.2.17 directs that adverse effects on Natural Character, Outstanding Natural Landscapes and Outstanding Natural Features are to be managed by avoiding adverse effects identified in Table 17 and by ensuring activities are appropriate in terms of their location, intensity, scale and form having regard to natural elements and processes.

6.45 While the extraction area itself is not mapped as an Outstanding Natural Landscape or Outstanding Natural Character area, the adjacent Bream Bay dune systems are identified as Outstanding Landscapes and contain extensive areas of High and Outstanding Natural Character.

6.46 These landforms are dependent on the continued functioning of natural coastal sediment processes.

6.47 The proposal involves the extraction of significant volumes of marine sediment from an interconnected coastal system. The long-term effects of this extraction on sediment

transport processes and shoreline stability remain uncertain. However, any disruption to the sediment budget has the potential to adversely affect the integrity, resilience and functioning of the adjoining dune systems and beaches over time.

6.48 Policy D.2.17 specifically recognises seabed disturbance within areas of High Natural Character as an activity requiring minimisation of adverse effects. The proposal involves ongoing seabed disturbance and sediment removal at a substantial scale.

6.49 In circumstances where the proposal may adversely affect the natural elements and processes that sustain Outstanding Landscapes and areas of High Natural Character, and where those effects cannot be confidently avoided, the proposal is inconsistent with Policy D.2.17.

D.2.18 – Managing Adverse Effects on Indigenous Biodiversity

6.50 Policy D.2.18 requires adverse effects on indigenous biodiversity within the coastal environment to be avoided, particularly in relation to significant habitats, threatened species, and ecosystems vulnerable to modification.

6.51 The policy specifically identifies intertidal zones, coastal wetlands, spawning and nursery areas, estuaries, and other coastal ecosystems as environments particularly vulnerable to modification.

6.52 The Bream Bay coastal environment contains interconnected ecological systems reliant on the continued functioning of coastal sediment processes. The removal of sediment from the marine environment introduces uncertainty regarding the long-term stability and functioning of those systems.

6.53 While the precise ecological effects may not yet be fully quantified, the proposal has the potential to adversely affect coastal habitats and ecological processes through changes to sediment dynamics, shoreline behaviour, and coastal resilience over time.

6.54 Given the recognised vulnerability of coastal ecosystems, and the uncertainty associated with the proposal, it cannot be confidently concluded that adverse effects on indigenous biodiversity will be avoided.

6.55 Accordingly, the proposal is inconsistent with Policy D.2.18.

D.2.19 – Managing Adverse Effects on Land-Based Values and Infrastructure

- 6.56 Policy D.2.19 expressly recognises that adverse effects arising from activities within the coastal marine area may extend beyond the coastal marine area itself onto adjoining land-based environments, values and infrastructure.
- 6.57 This policy is directly relevant to the proposal.
- 6.58 The extraction activity occurs offshore, however the potential effects of sediment depletion and altered coastal processes extend well beyond the extraction site. The proposal has the potential to adversely affect:
- Outstanding Natural Landscapes and areas of High Natural Character associated with the Bream Bay dune systems;
 - recreational and tourism values associated with Waipu Cove;
 - indigenous biodiversity values; and
 - land-based infrastructure and assets associated with the Waipu Cove Reserve and Campground, and along the Bream Bay coast
- 6.59 The beaches and dune systems of Bream Bay provide a natural buffer protecting adjoining land and infrastructure from coastal erosion, inundation and storm effects. Any reduction in sediment supply has the potential to weaken these natural protective systems over time.
- 6.60 The policy specifically directs decision-makers to consider the proximity of Outstanding Natural Landscapes outside the coastal marine area and the potential for activities within the coastal marine area to adversely affect those values.
- 6.61 The proposal therefore raises significant concerns under Policy D.2.19 because the potential adverse effects are not confined to the offshore extraction area, but may extend onto the wider coastal environment and adjoining land-based assets and values.

D.2.20 – Precautionary Approach to Managing Effects on Significant Indigenous Biodiversity and the Coastal Environment

- 6.62 Policy D.2.20 directs decision-makers to adopt a precautionary approach where adverse effects on indigenous biodiversity or the coastal environment are uncertain, unknown, or little understood, particularly where effects may be significantly adverse or where coastal resources are vulnerable to climate change.

- 6.63 This policy is highly relevant to the current application.
- 6.64 The proposal involves large-scale extraction of sediment from a dynamic and interconnected coastal system where the long-term effects on shoreline stability, sediment transport, dune resilience, and coastal ecology remain uncertain.
- 6.65 Importantly:
- the extraction permanently removes sediment from the coastal system;
 - any resulting effects may only emerge over long timeframes;
 - the effects may be irreversible; and
 - the coastal environment of Bream Bay is already vulnerable to coastal erosion, storm events, and the effects of sea level rise.
- 6.66 The precautionary approach is intended to apply precisely in circumstances such as these.
- 6.67 In circumstances where there remains material uncertainty regarding potentially significant and irreversible adverse effects on the coastal environment, the policy framework directs caution rather than approval.
- 6.68 Accordingly, the proposal is inconsistent with Policy D.2.20.
- 6.69 The proposed Regional Plan provisions establish a strong policy framework directing the protection of coastal processes, natural character, indigenous biodiversity, Outstanding Landscapes, and coastal resilience.
- 6.70 The proposal introduces material uncertainty regarding the long-term effects of large-scale sediment extraction on the Bream Bay coastal system. Those effects have the potential to extend beyond the offshore extraction area and adversely affect:
- beaches and dune systems;
 - Outstanding Landscapes and areas of High Natural Character;
 - indigenous biodiversity;
 - natural coastal hazard protection systems;

- recreational and tourism values; and
- land-based infrastructure and public assets associated with Waipu Cove.

6.71 Given the uncertainty associated with the proposal, the irreversible nature of sediment removal, and the vulnerability of the coastal environment to climate change and erosion processes, the precautionary policy framework weighs strongly against approval.

7. Purpose and Principles of the Resource Management Act 1991

7.1 In considering this application, the Panel is required to have regard to the purpose and principles of the Resource Management Act 1991 (“RMA”), including sections 5, 6 and 7.

7.2 Section 5 of the RMA provides that the purpose of the Act is to promote the sustainable management of natural and physical resources. Sustainable management includes enabling people and communities to provide for their social, economic and cultural wellbeing while:

- (a) sustaining the potential of natural and physical resources to meet the reasonably foreseeable needs of future generations;
- (b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and
- (c) avoiding, remedying or mitigating adverse effects on the environment.

7.3 In WCRB’s opinion, the economic benefits claimed by the Applicant do not outweigh the significant uncertainty and risk associated with the proposal, particularly given the potential for irreversible adverse effects on the coastal environment and the Bream Bay sediment system. The proposal will not result in any economic benefit to the Northland Region and risks undermining existing regional economic activity.

7.4 The proposal involves the permanent removal of approximately 8.5 million cubic metres of sediment from an interconnected coastal system over a 35-year period. The long-term effects of this extraction on sediment transport processes, shoreline stability, dune resilience, and coastal hazard risk remain uncertain. Importantly, if the Applicant’s predictions are incorrect, the adverse effects may be irreversible and incapable of effective remediation.

7.5 In these circumstances, WCRB considers that the proposal is inconsistent with section 5(2)(b) and (c) of the RMA because the application does not provide sufficient certainty that the

life-supporting capacity of coastal ecosystems and natural coastal processes will be safeguarded, nor that adverse effects on the environment can be avoided, remedied, or mitigated.

7.6 WCRB also considers that the proposal may adversely affect a number of matters of national importance under section 6 of the RMA, including:

6(a) the preservation of the natural character of the coastal environment, wetlands, lakes and rivers and their margins, and the protection of them from inappropriate subdivision, use and development;

6(b) the protection of outstanding natural features and landscapes from inappropriate subdivision, use and development;

6(c) the protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna; and

6(d) the maintenance and enhancement of public access to and along the coastal marine area.

7.7 The beaches and dune systems of Bream Bay are identified within the regional planning framework as areas of High Natural Character and Outstanding Natural Landscape values. These environments are fundamentally dependent on the continued functioning of natural coastal sediment processes. The proposal introduces uncertainty regarding the resilience and long-term stability of those systems, particularly in the context of sea level rise and increasing storm intensity.

7.8 WCRB further considers that the proposal will result in adverse effects on the following other matters listed under section 7 of the RMA, including:

7(c) – the maintenance and enhancement of amenity values;

7(d) – the intrinsic values of ecosystems;

7(f) – maintenance and enhancement of the quality of the environment;

7(g) – any finite characteristics of natural and physical resources; and

7(i) – the effects of climate change.

- 7.9 In particular, marine sediment is a finite natural resource within the Bream Bay coastal system. The proposal involves the permanent extraction and removal of that resource at a significant scale from a dynamic and interconnected environment. WCRB considers that the long-term sustainability of the coastal system, including the natural protection function provided by beaches and dune systems, has not been adequately safeguarded.
- 7.10 The potential adverse effects on coastal resilience, natural character, recreation, tourism, indigenous biodiversity, and public coastal assets are matters that weigh strongly against the proposal when assessed against the purpose and principles of the RMA.
- 7.11 Overall, WCRB considers that the proposal does not promote the sustainable management of natural and physical resources as required under section 5 of the RMA. Given the uncertainty regarding potentially irreversible adverse effects on the coastal environment, and the direction provided by sections 6 and 7, WCRB considers that the application is inconsistent with the purpose and principles of the Act.

8. CONCLUSIONS

- 8.1 The purpose of the Act, set out in section 3, is to facilitate the delivery of infrastructure and development projects with significant regional or national benefits. Under section 81(4), expert panels are required to give weight to this purpose when considering applications. WCRB believes that the economic benefits claimed by the Applicant are overstated and do not demonstrate sufficient regional or national significance. In terms of the Northland Region where the extraction activities will be taking place, the project has the potential to adversely affect the local economy and existing commercial operations.
- 8.2 The proposal introduces material uncertainty regarding shoreline stability, with potentially irreversible effects on a significant public coastal asset. This places at risk the long-term sustainability of the Waipu Cove Campground and the associated economic, social, cultural, and environmental benefits the ongoing use of the recreation reserve provides to the local population, visitors and the Northland region.
- 8.3 In these circumstances, the Panel cannot be satisfied that the adverse effects outlined above will be avoided, remedied, or mitigated.
- 8.4 WCRB considers that the proposal is inconsistent with the relevant provisions of the applicable RMA planning documents and the overarching purpose of the RMA. In particular, the significant uncertainty regarding potentially irreversible adverse effects directs the Panel to adopt a precautionary approach under the NZCPS and the Proposed Regional Plan.
- 8.5 In the absence of sufficient certainty that adverse effects on the Northland region can be avoided, remedied, or mitigated, WCRB submits that the application should be declined.”

Evan James Cook

22 May 2026