

Comment on the Bledisloe North Wharf and Fergusson North Berth Extension project

Please include all the contact details listed below with your comments and indicate whether you can receive further communications from us by email to substantive@fasttrack.govt.nz.

1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
Organisation name (if relevant)	[REDACTED]		
First name	Karen		
Last name	Long		
Postal address	[REDACTED]		
Home phone / Mobile phone	[REDACTED]	Work phone	[REDACTED]
Email (a valid email address enables us to communicate efficiently with you)	[REDACTED]		

2. We will email you draft conditions of consent for your comment			
<input checked="" type="checkbox"/>	I can receive emails and my email address is correct	<input type="checkbox"/>	I cannot receive emails and my postal address is correct

The Bledisloe North Wharf and Fergusson North Berth Extension project has been reviewed by Council's specialists in the following categories, which the council considers to be most relevant to this proposal:

- Landscape
- Coastal Ecology
- Transportation
- Noise and Vibration
- Air quality
- Infrastructure- wastewater and water supply
- Stormwater and Industrial Trade Waste
- Engineering
- Parks
- Economics

- Contamination
- Environmental monitoring
- Planning – consent matters

Auckland Council and the applicant (POAL) have engaged to address matters of concern (as directed in Panel Convenor conference 2 May 2025.) Consequently, Council provided POAL with the specialists' initial feedback on the Project. POAL responded to this feedback on 23 May 2025 - Attachment A.

Additionally, Council's planning and coastal specialists, came to a general agreement on consent matters - Attachment B. It should be noted however that Council considers there are two additional matters of consent as per Principal Specialist Response memo – Attachment C.

- Rule F2.19.10 (A139) Marine and Port facilities and buildings not on an existing wharf or existing coastal marine structures – Discretionary Activity
- F2.19.10 (A142) hard protection structures - Discretionary Activity

We note however that, given rule C1.6(4) of the Auckland Unitary Plan (Operative in Part) (AUP(OP)) the activity status in the precinct will override that of the zone so the activity status will remain Restricted Discretionary as applied for and the nature of the assessment will not change.

In response to the invitation from the Expert Panel to comment (dated 28 May) POAL response – Attachment A- was shared with Council specialists and the Waitemata Local Board.

The following technical memos are provided as part of Council's response- Attachment C¹:

- a) Assessment of AUP(OP) rules that apply to the Coastal Marine Area (prepared by Alan Moore, Principal Specialist – Coastal)
- b) Landscape (prepared by Gabrielle Howdle, Principal Landscape Architect)
- c) Coastal Ecology- including underwater noise; water and sediment quality (prepared by Kala Sivaguru, Senior Specialist)
- d) Ecology (prepared by Maddie White, Conservation Advisor, Natural Environment Delivery)
- e) Stormwater and Industrial Trade Activities (ITA) (prepared by Fereita Timoteo, Specialist)
- f) Air Quality (prepared by Louis Boamponsem, Senior Specialist)
- g) Noise and Vibration (prepared by Andrew Gordon, Senior Specialist)
- h) Contamination (prepared by Duffy Visser, Specialist)
- i) Development Engineering (prepared by Rajesh Jeyaram, Senior Development Engineer)
- j) Environmental Monitoring (prepared by Leon Blackburn, Principal Specialist)
- k) Chief Economist (prepared by James Stewart)
- l) Traffic (prepared by Honwin Shen, Senior Traffic Engineer)
- m) Auckland Transport (prepared by Neil Stone, Senior Development Planner)

¹ In all cases the specialists were asked to confirm that their initial comment/draft memos still stood or to provide an amended/new memo. Attachment C responses are final as of the date of Council's response to the Expert Panel.

- n) Watercare (prepared by James Shao, Senior Development Engineer)
- o) Healthy Waters (prepared by Hillary Johnston, Growth and Development, Healthy Water and Flood Resilience)
- p) Parks Planning (prepared by Roja Tafaraji, Senior Parks Planner)

Additionally, the project was referred to Elected Officials and the Independent Maori Statutory Board (Houkura). Comments were received from the Waitemata Local Board only.

Waitemata Local Board

The Waitemata Local Board (WLB) overall supports the proposed development. They recommended that POAL be obliged to mitigate the environmental impacts the construction and the project as a whole would have on the Hauraki Gulf. POAL in response to this comment gave examples of environmental restorative projects POAL are undertaking and proposed reliance on conditions of consent-refer response 2, Attachment A. Local Board member, Alexandra Bonham confirmed by email 13 June that the Board's *"initial comment can still stand. I am glad that a condition of consent is proposed that aligns with our feedback."*

Summary

Overall, Council supports the proposal taking into account adverse effects can be suitably avoided or mitigated by appropriate conditions of consent as proposed by the applicant. The proposed conditions should be read in conjunction with additional conditions set out in the specialists' memos. In particular, refer to memos in respect to:

- Air Quality
- Coastal ecology
- Landscape
- Stormwater
- Auckland Transport

Consent conditions

With reference to above, should the Panel be of a mind to grant consent, it is also recommended that the Panel refer to the council's 'Consent Conditions Manual' for standard conditions which may be appropriate for this development. The Consent Conditions Manual can be accessed at the following URL: [Resource consent conditions](#).

To provide for future administration and monitoring, Council's reference numbers for this application are: BUN60445198- Council application reference (Bundled); LUC60445199- s9 Land use; CST60445200- s12 coastal permit; DIS60445270 – Discharge of contaminants from ITA; DIS60445249 – Discharge of Stormwater

The council is appreciative of the opportunity to further comment on the draft conditions prior to any decision being issued.

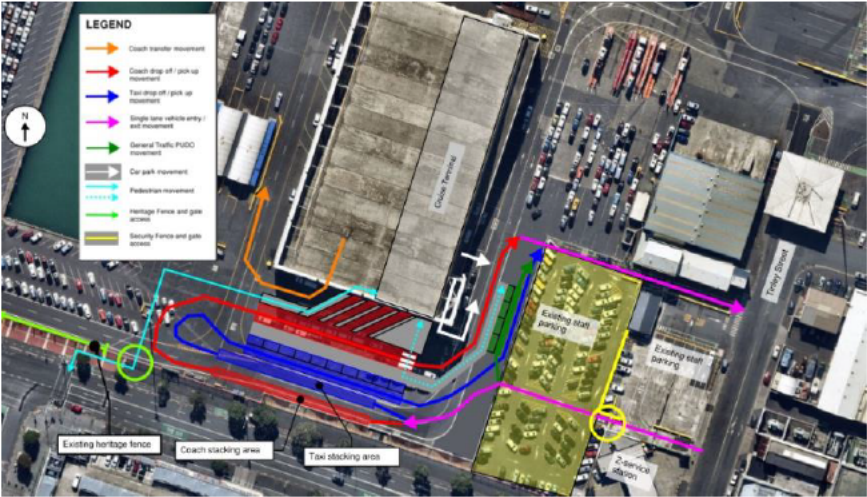
Attachment A: Applicant's Response (23 May 2025)

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	Feedback	Response
Waitematā Local Board		
1.	The local board supports the application, noting that it is the modified, less intrusive design presented to the governing body on 28 November, and it is part of a larger project to open the waterfront to the public which has wide support.	No response required.
2.	There is also strong community interest in improving the ecosystems of the Gulf and there are concerns about dumping and ongoing encroachment into the harbour. We strongly recommend that as a condition of the consent POAL is obliged to mitigate the environmental impacts the construction and the project as a whole has on the Hauraki Gulf.	<p>POAL has proposed conditions of consent which will ensure potential adverse effects are appropriately avoided, remedied or mitigated, but which are no more onerous than is considered necessary (s 83 FTAA).</p> <p>Unrelated to the substantive application, POAL is also undertaking a range of environmental restoration projects, including:</p> <p>(a) A restoration project at Āwhitu Peninsula, to replant approximately 18ha in natives at Te Mahaniani on the southern head of the Āwhitu Peninsula.</p> <p>(b) A multi-year project that aims to improve the marine biodiversity of the lower Waitematā Harbour and inner Hauraki Gulf with the aim of helping to naturally restore the historic shellfish beds of the inner Hauraki Gulf.</p>
Healthy Waters		
3.	The proposed stormwater management, including both new and existing components, is appropriate for this site, given the absence of flood hazards in the proposed development areas and proximity to the coastal environment.	No response required.
4.	As no stormwater management network is proposed to be vested to Council, and the proposed development is not expected to result in any catchment-wide impacts, Healthy Waters has no comments on the proposed conditions.	No response required.
Watercare		
5.	Watercare Services Ltd has no objection to the proposed work.	No response required.
6.	If there is any plan to extend the public water or wastewater network into the port-managed Warf area, we will provide our comments and advice accordingly.	No response required.

	Feedback	Response
	Auckland Transport	
7.	<p>The applicant is recommended to explore provisions such as providing a pick-up/ drop-off area for general traffic within or adjacent to their site:</p> <ul style="list-style-type: none"> (a) This can potentially be done in a small section of locations such as the proposed “truck waiting area” adjacent to Tinley Street, or in Tinley/ Plumer Street itself if found to be appropriate. For instance, time restriction parking spaces on all cruise scenarios besides the transit call scenario. (b) It is also noted that the Port of Auckland own sections of land adjacent to Plumer Street which are currently used for car parking for the Port outside of the customs area. The applicant could investigate the repurposing of some of these spaces for cruise ship pick-up/drop-offs even if only temporary and managed through temporary traffic management. 	<p>Beca (Joe Phillips, Principal Transport Advisor) has provided the following response:</p> <p>“Initial feedback from Auckland Transport has identified a concern that not providing public PUDO facilities at the cruise terminal area on the Bledisloe Wharf will lead to people stopping / waiting on Quay Street and other local roads, potentially impacting the safe operation of these roads.</p> <p>Beca has therefore reviewed the ability to provide public PUDO within the proposed cruise terminal area at Bledisloe Wharf, in terms of overall space available and an appropriate location for this facility.</p> <p>The overall area for PUDO facilities at Bledisloe Wharf cruise terminal area is over twice the area of the existing Queens Wharf facilities (which are shared with the ferry terminal) and over three times the area at Princes Wharf. There is sufficient overall space at the Bledisloe Wharf cruise terminal area to accommodate public PUDO facilities.</p> <p>As noted above, a limited number of public PUDO trips are anticipated and will be spread across the 3.5 hour period of disembarkation, through scheduled disembarkation windows. Therefore, it is considered that four private PUDO spaces will be sufficient to accommodate the public vehicle demand.</p> <p>Figure 1 below indicatively shows the proposed location of a public PUDO facility within the Bledisloe Wharf cruise terminal area. The facility has been located to avoid public vehicles accessing the main commercial vehicle PUDO and the associated stacking / overflow waiting areas. Private cars will be directed to this dedicated area by marshals at the entrance off Tinley Street.</p>

	Feedback	Response
		<p>The facility is able to be physically separated from the circulation route for coaches exiting the coach parking within the cruise terminal area. Space is identified for private cars to stop and other private cars to pass. There is an adjacent lane for taxis / rideshare vehicles exiting the commercial vehicle PUDO facility. From this location, people are able to safely walk (using a 3m wide path) to the main coach / taxi / rideshare facility, without crossing vehicle lanes.</p>  <p><i>Figure 1: Bledisloe Wharf Cruise Terminal Area – Amended Access and Circulation</i></p> <p>On this basis, it is considered that sufficient space can be provided for an appropriate public PUDO facility within the cruise terminal area to accommodate the anticipated private vehicle demand. This will avoid the need for private vehicles to stop / wait on Quay Street or other local roads.”</p>
8.	The proposed Transport Plan condition and review condition should be amended to better account for future congestion in Tinley Street because of the proposal’s additional demand, the following is also noted:	The coordination of cruise and other port activities on Tinley Street is an internal operational matter managed by POAL through established, internal procedures. POAL has extensive experience managing cruise and freight

	Feedback	Response
	<p>(a) The transport plan should include reference to the coordination of freight/port operation and cruise ship operation in order to ensure that Tinley Street's traffic numbers do not become saturated.</p> <p>(b) The review condition be amended to specifically have reference to transport related effects.</p> <p>(c) The applicant is also advised that AT will not accept responsibility for fixing any future congestion related issues as a result of this proposal, including rephrasing the signals of the Tinley Quay Street intersection at AT's expense. AT will also not likely accept future requests by the applicant for rephrasing of these signals as priority will be given to Quay Street and Tangihua Street based on their strategic priority.</p>	<p>activities simultaneously, successfully demonstrated at Princes Wharf, Queens Wharf, and Fergusson Wharf, each presenting constrained footprints and multiple vehicle and pedestrian interactions.</p> <p>POAL is comfortable with the traffic modelling undertaken for Tinley Street, which demonstrates that anticipated traffic effects remain acceptable. It is noted that primary periods of Port traffic generally occur outside of the weekday peak periods modelled, and passenger movements are intentionally staggered, distributing volumes effectively throughout these periods. Additionally, while Auckland Transport notes concern regarding conditions explicitly ensuring the coordination of Port and cruise operations, the proposed Transport Management Plan (TMP) condition clearly includes as an objective: <i>'Ensure the safe and efficient operation of marine and port activities at the Port of Auckland at all times,'</i> sufficiently addressing any potential concerns around operational coordination</p> <p>Cruise passenger operations involve staggered passenger movements over several hours, significantly moderating peak traffic demands. Arriving passengers are allocated staggered check-in times (typically 30 min) over a 3.5 – 4hr period to ensure a steady and smooth flow of passengers. The same applies for returning tour coaches.</p> <p>Departing passengers are also staggered over a similar timeframe to regulate flows in the cruise terminal and also regulate baggage handling flows. These staggered arrangements also 'smooth' the traffic effects as is experienced at Princes Wharf, Queens Wharf and Fergusson Wharf.</p> <p>Consequently, any potential congestion resulting from cruise or freight activities remains internal to POAL's operation, manageable within existing</p>

	Feedback	Response
		<p>port procedures, and unlikely to materially impact the broader transport network.</p> <p>Adjustments to the proposed Transport Plan or review conditions specifically referencing congestion management or signal phasing at Tinley Street are unnecessary.</p> <p>In planning terms, AT's remit extends to the wider transport network and does not encompass internal operational logistics managed by POAL.</p>
9.	<p>AT has also identified that there is the potential for adverse operational and road safety effects if the cruise embarking and disembarking processes (3.5 hours) coincide with major events at the Spark Arena. AT considers that the increase in trips could result in adverse user safety effects to pedestrians on Tangihua Street as this road is heavily used by pedestrians before and after events. In this regard it is recommended that the required 3.5 hours of embarking and disembarking of cruise ships do not coincide with the 3 hours prior and 2 hours after any event at Spark Arena which utilises the main arena. This is recommended as part of the proposed Transport Management Plan condition of consent.</p>	<p>Not accepted. Both the Port of Auckland and Spark Arena are situated within the Business – City Centre Zone and is “is an international centre for business and learning, innovation, entertainment, culture and urban living”. The zone anticipates a wide range of activities will establish and does not inherently prioritise one land use over another.</p> <p>Cruise ship arrivals and departures are typically scheduled well in advance and are subject to international itineraries, making rescheduling challenging. Similarly, events at the arena are planned months ahead, with dates often fixed based on international tour schedules. The City Centre Zone is equipped with infrastructure designed to handle significant pedestrian and vehicular traffic.</p> <p>It should also be noted that Tangihua Street is already well-equipped to manage significant pedestrian volumes safely during events, with existing signalised pedestrian crossings at both the Quay Street/Tangihua Street and Beach Road/Tangihua Street intersections. These facilities effectively mitigate pedestrian safety concerns. Furthermore, on the limited days (approximately 30-40 annually) that coincide with cruise ship operations, the incremental traffic generated is not expected to result in any notable additional adverse</p>

	Feedback	Response
		<p>operational effects beyond those typically experienced during Spark Arena events.</p> <p>Mandating that cruise ship operations avoid coinciding with events at Spark Arena is not a practical or proportionate response to the effects of the activity on the environment. This is particularly because the operational traffic effects from the use of the wharf for unloading cruise ship passengers through the new cruise ship facility on the adjacent transport network can be accommodated without adverse impact on the safe operation of the transport network (including the Tinley Street / Quay Street intersection and along Quay Street). Refer to Beca Transport assessment at 5.1.1.</p> <p>Additionally, passenger flows are staggered which regulates the flow of passengers when embarking / disembarking from cruise ships (see above).</p>
10.	<p>AT recommends that in proximity to the proposed pedestrian gate, appropriate and easily visible wayfinding is provided so that pedestrians exiting the site can readily and safely disperse into the city. The gate, internal area, and the signage requirements are recommended as a condition of consent individually or as part of the proposed transport management plan.</p>	<p>POAL considers there is sufficient space within the port site to safely accommodate waiting passengers at the pedestrian gates accessed from Quay Street. As outlined within the transport assessment recommendations, further detail on pedestrian routes, waiting areas, and overall pedestrian management will be provided within the Transport Management Plan (TMP), which is required as a condition of consent. The TMP condition explicitly requires detailed information on how cruise ship passengers will be guided to and from the city centre, including the use of marshals and wayfinding signage as necessary. This condition appropriately addresses the operational aspects of pedestrian management, negating the requirement for additional standalone consent conditions.</p>
11.	<p>There are concerns with the potential queuing of taxis or coaches onto the road reserve from the site if the site cannot process passengers into these vehicles quicker than the vehicles are arriving on site. This could cause queuing into the road reserve and if extending far enough, will queue into Quay Street itself. Any queuing into Quay Street will significantly adversely</p>	<p>Beca's modelling indicates sufficient internal queuing capacity to accommodate projected cruise-related vehicle flows. Experience at Queens and Princes Wharves confirms effective management of passenger and vehicle movements, with no history of queuing extending into public road reserves.</p>

	Feedback	Response
	<p>affect this corridor and reduce its efficiency in terms of general traffic, public transport and active modes, this must be avoided.</p> <p>This will be dependent on the efficiency of the site and customs clearance, which may not be consistent. AT recommends additions to the transport management plan provided by the applicant to ensure that vehicles entering the site arrive at the right time and in a staggered manner.</p>	<p>Efficient management of vehicle queuing, passenger flows, and customs processing are operational logistics fully under POAL's control. These internal operational measures do not require external regulatory oversight or conditions of consent. The Business – City Centre Zone explicitly anticipates and provides for intensive activity, including high traffic volumes associated with cruise operations, without necessitating specific consent conditions for internal logistics management.</p>
12.	<p>There are also concerns regarding the applicant's ability to adequately and safely manage, control and enforce traffic and parking on site. AT is concerned that there is a possibility that in the future the applicant and or Council might request AT to manage traffic/parking within the site. This risk is highlighted to both Council and the Fast Track Panel as a future possibility. Without adequate plans, it remains uncertain whether the internal site can function safely and efficiently.</p>	<p>Auckland Transport is not responsible for managing traffic on land within the Port of Auckland. The issue raised is a governance question, not an adverse effect on the environment. The Port efficiently manages thousands of vehicles per day within its site and will continue to do this in the future.</p>
13.	<p>The applicant has not assessed any potential effects of cruise ships manoeuvring (in and out) of the Bledisloe North Wharf on public ferry services. It is requested that the applicant assess this to establish if and to what extent ferry services might be delayed when cruise ships arrive, especially when they are manoeuvring into the wharf. If any effects are noted they must be avoided, remedied or mitigated by the applicant. Even if these delays are not considered significant, AT need to be aware of any potential future delays to services</p>	<p>Refer to Section 6.2.3 ("Ferry Traffic – General Harbour Navigation") and Section 6.2.4 ("Ferry Traffic – DFB") of the Navigational and Safety Assessment. The report concludes:</p> <ul style="list-style-type: none"> (a) General Harbour Navigation: Ferries generally pass the Bledisloe Terminal at distances of 100–200m. The construction and subsequent operations at Bledisloe North Wharf will not materially affect ferry operations or visibility, provided that standard clearance practices are followed. No issues were observed in prior survey work, and no non-routine risks were identified. (b) Downtown Ferry Basin (DFB): The project is assessed as reducing overall navigational risk in the DFB. By relocating larger cruise vessels from Princes Wharf to Bledisloe, the likelihood of conflicts with ferry services in the DFB is reduced. There is an overall deconfliction benefit and simplified operations are expected. (c) Risk Profile Summary: The overall navigational risk profile for ferry traffic is either unchanged or lowered as a result of the project. While

	Feedback	Response
		<p>there is some recommendation that the Harbourmaster may review speed-uplift zone boundaries, no changes to the operations of ferries were identified as necessary.</p> <p>(d) Stakeholder Consultation: SeaLink and Fullers were both consulted as part of the Navigational Safety Assessment. No concerns about impacts to ferry service schedules or safety were raised by these operators during consultation.</p> <p>Refer also to section 4.3 (“Consultation”) of the Navigation and Safety Assessment, which concludes:</p> <p>(a) The general finding from the consultation of the professional mariner stakeholders was that the proposed Project would act to make for simpler and more efficient operations (Ferry operations in the DFB) or have no material effect on their operations (SeaLink, RNZN).</p>
14.	<p>Section 3.1.1 of the Beca Transport Assessment notes that the wharf will cater for new large 300m+ cruise ships while section 3.1.3 notes this will occur between 30-40 times per year. The application does not discuss whether smaller ships may still be permitted to use this wharf and whether the proposed 30-40 estimate days per year is a limit. It does not appear that these noted restrictions are formally proposed in the consent. This matter is raised to Council as it might impact the Council Compliance Team’s ability to adequately review the required management plans as well as Eke Panuku’s management of the Queen and Princes’ Wharfs.</p>	<p>Refer to paragraph 5.15 of the assessment of effects: “The new Bledisloe North Wharf will accommodate multi-cargo vessels, including the relocation of RORO vessels from Captain Cook Wharf. The new wharf will also accommodate cruise ships that are over 300m in length...”</p> <p>The 30-40 annual berthings estimate for cruise ships is indicative rather than restrictive. POAL anticipates cruise activity growth over time, consistent with Auckland Council’s broader strategic goals supporting expansion of Auckland’s cruise sector.</p> <p>POAL has not proposed to restrict the number of cruise ships berthing at the new wharf at the Bledisloe North Terminal.</p> <p>The governing body of Auckland Council has endorsed this approach due to key strategic advantages, including reduced operational conflicts between cruise and ferry traffic in the Princes/Queens basin, freeing up Captain Cook</p>

	Feedback	Response
		and Marsden wharves for public realm enhancements, improving Auckland's ability to handle larger cruise ships, and relocating traffic from Quay Street West to the more heavily trafficked Tinley area.
Coastal/marine ecology including underwater noise effects, water and sediment quality (including construction effects)		
15.	Attachment 31 provides substantive information to understand coastal/marine ecological values including conservation status of species within and in the vicinity of the application area. I agree with the values assessment provided for the application area.	No response required.
16.	For piles removal (8-9), two options are proposed. I prefer the option of removing the piles in their entirety, if possible, otherwise I agree cutting the piles below the seabed level.	No response required.
17.	I agree with the applicant's assessment of the overall magnitude of effect of the revetment upgrading works on intertidal and subtidal habitats effects and mitigation proposed for the habitat loss resulting from the works including the effects on little penguins.	No response required.
18.	The applicant is relying on existing coastal permits for dredging associated with the proposed works. As such, effects from dredging do not need to be considered here.	No response required.
19.	I agree that the proposed piling works methodology is similar to the methodology used in the previous application. Impact driving and vibratory piling proposed for the works will generate underwater noise effects on marine fauna.	No response required.
20.	Effects on water and sediment quality resulting from an increase in the TSS & disturbance of contaminated sediment during construction would be localised and temporary. I agree with the assessment of effects and mitigation proposed.	No response required.
21.	I concur with the assessment of effects and support the mitigation measures and management zones proposed to minimise the effects on marine fauna (marine mammals, fish species & threatened species).	No response required.
22.	The draft Little Penguin Management Plan is consistent with the management plans used in similar projects in Auckland region (e.g., Kennedy	No response required.

	Feedback	Response
	Point Marina construction). Accordingly, I support implementing the Management Plan during the construction of proposed works. In addition, I support the mitigation options proposed in the Acoustic report and in the draft underwater construction noise management plan to minimise the underwater noise effects on little penguins during construction.	
23.	Overall, the underwater noise levels during proposed piling works are likely to be higher than the ambient noise within the application area, and predicted thresholds for marine mammals in particular. However, I consider that the mitigation measures proposed for piling and observation requirements proposed for marine mammals within the predicted management zones for different cetaceans, blue penguins and divers in the Acoustic report are reasonable. Accordingly, I conclude that the adverse effects on potential marine fauna from the proposed impact driving/vibrating will be less than minor. This approach is consistent with similar projects undertaken in Auckland region to minimise the underwater noise effects.	No response required.
24.	As stated in that Ecological report, the application area is well known to have a high number of non-indigenous species (NIS). Accordingly, biosecurity risks from the construction of proposed works is likely to be low.	No response required.
Parks Agency and Department Leads Input		
25.	From both a Parks Planning and asset-owner perspective, the proposal does not raise significant concerns. The planned extension is seen as a positive development for port activation and could improve the amenities in a currently industrialised area.	No response required.
26.	It is recommended that easement areas for public access be formalised to provide clear delineation between public and private areas, enhancing safety and clarity around management responsibilities. On this basis, the following advice note (in blue) is recommended under the proposed set of conditions: <i>Advice Note:</i> <i>Publicly Accessible Connections and Easements</i>	The application does not propose to establish areas that are publicly accessible. People accessing the Port of Auckland will be associated with the arrival and departure of cruise customers (rather than the general public). On non-cruise days the cruise traffic handling area will be used for RoRo cargo and therefore not accessible to the general public on these days. Bledisloe North Berth is a mixed-use wharf (multi-cargo and cruise ships) and the Bledisloe Terminal will continue to be utilised for POAL's considerable RORO throughput and

	Feedback	Response
	<i>x. The Consent Holder is advised that any publicly accessible connections and areas intended to be offered as easements should be formally established as easements and clearly identified on the final survey plan for clarity and administrative purposes.</i>	other bulk freight on non-cruise days. This multi use of the area, which allows POAL to increase efficiencies at the Port, will be managed by POAL staff. Therefore it would be inappropriate for an easement to be in place for publicly accessible areas and an advice note is not required.
Noise and Vibration		
27.	I agree compliance is expected to be achieved and that noise from the majority of works (except pile driving) will be indiscernible relative to existing ambient and background noise including noise from day to day port activities.	No response required.
28.	I confirm specific construction noise mitigation is not necessary and are not included in the predicted construction noise levels.	No response required.
29.	In my opinion noise effects during construction will be at reasonable level.	No response required.
30.	Based on my experience reviewing marine piling, I agree vibration effects are expected to be imperceptible given the setback distance from the piling works to the closest neighbouring occupied building.	No response required.
31.	In my opinion, the cruise passenger terminal is a relatively low noise creating activity compared to existing port activities and is expected to increase existing ambient noise levels by $\leq 3\text{dBA}$ (i.e. subjectively just perceptible) and will be limited to intermittent cruise ship passenger disembarkation and embarkation.	No response required.
32.	I agree specific conditions to manage construction noise (airborne) and operational noise are not required.	No response required.
Stormwater and Industrial Trade Activities		
33.	Stormwater runoff from the proposed development will ultimately be discharged into the coastal marine area (CMA). Therefore, the proposed wharf structure within the CMA does not meet the definition of impervious area within the AUP(OP) as the structure does not prevent or significantly retards the soakage of water into the ground. Consequently, consent is not required under E8.	Bentley & Co to discuss further with Council. Chapter E8 applies to the coastal marine area (F2.19.7(A65)). Rule E8.4.1(A10) relates to the <i>“Diversion and discharge of stormwater runoff from impervious areas onto or into land or into water or to the coastal marine area pursuant to sections 14 and 15 of the Resource Management Act 1991 [rcp/rp]”</i> . Rule A10 relates to <i>“All other diversion and discharge of stormwater runoff from impervious areas not otherwise provided for”</i> .

	Feedback	Response
34.	The impervious area comprising the pick-up and drop-off area and parking spaces in front of the passenger processing centre would be covered by the ITA consent, and therefore, the stormwater quality land use rules under Chapter E9 of the AUP(OP) would not apply.	No response required.
35.	I would like to highlight that the applicant is only requesting ITA consent for the new Bledisloe wharf, which has an area of 8,500m ² . However, they have not accounted for the additional ITA areas of approximately 1,800m ² related to the proposed extension of the Fergusson North wharf.	Bentley & Co to discuss further with Council. A discretionary activity consent has been sought for ITA discharges from Fergusson North Berth Extension.
36.	POAL already holds a comprehensive site ITA consent. It is considered that the proposed extensions & works could be included in the existing ITA consent via a s127 application. Doing so will enhance the monitoring of the overall site under the existing Environmental Management Plan and Spill Response Plan. Additionally, these plans will be revised to include the necessary measures, methods, and controls for managing stormwater discharges from the proposed Bledisloe North wharf and the Fergusson North wharf extension	Bentley & Co to discuss further with Council. The ITA consent is limited to the existing and consented wharf structures that existed at the time the application was processed. Additional wharf areas are beyond the 'scope' of the consent held.
37.	Although GD01 (the Council's Water Sensitive Design Guideline) excludes these devices, the Stormwater360 Jellyfish is designed to provide 75% Total Suspended Solids (TSS) (contaminant removal) in accordance with Auckland Council 'Technical Publication 10 Stormwater Management Devices: Design Guidelines Manual 2003' (TP10) (predecessor to GD01) and the Council's Proprietary Device Evaluation Protocol (PDEP) on a long-term average basis. As such, it is considered the best practicable option for water quality treatment for the new wharf structures.	No response required.
38.	The application documents do not include the cross-section & preliminary design sizing calculations for the new Jellyfish device. It is essential to review these preliminary calculations to ensure that the proposed treatment will mitigate the stormwater quality effects of contaminants generated by the site's proposed activities, such as total suspended solids (TSS), hydrocarbons, heavy metals, and oil & grease. The Jellyfish device is considered best practice as it	Beca to advise whether cross-section and preliminary design sizing calculations are required.

	Feedback	Response
	allows mitigating the effects of these contaminants generated by the site's proposed activities.	
39.	The proposed updated EMP has not been included in the application reports. This will need to be conditioned, and the applicant has suggested a condition for the EMP under Condition 44.	No response required.
40.	To ensure that the discharge of contaminants from the treatment system is minimised to an acceptable level and to assess the effectiveness of stormwater management practices, it is essential to implement and maintain a robust maintenance and monitoring program for stormwater discharges from the Jellyfish device. Therefore, we recommend including a discharge monitoring program to be conducted approximately quarterly or biannually over a period of three years.	Beca to advise. The approach is inconsistent with the established operations at the Port.
41.	The operation and maintenance of the stormwater management and treatment devices is crucial to ensuring that the effects continue to be mitigated. A draft operation and maintenance plan has not been submitted but will be developed following completion of the installation of the devices undertaken under this consent. The applicant has proposed under Condition 40 for the final O & M Plan to be developed and implemented upon completion of the proposed development.	No response required.
42.	Overall, the proposed water quality treatment is considered appropriate in the context of the development and the anticipated contaminants, such that the effects of stormwater discharge to the receiving environment will be adequately avoided or suitably mitigated.	
Landscape Architecture and Urban Design		
43.	Generally, I concur with the landscape, natural character and visual amenity context and values described within the Boffa Miskell Report and recognise the existing level of modification and presence of large-scale structures within the coastal environment. But also recognise the continued physical and visual connection between the city and the harbour edge, including as experienced from Queens Wharf and recreational users within the harbour waters, as well	No response required.

	Feedback	Response
	as the future anticipated public open space outcomes along the waterfront as outlined within the Port Precinct Future Development Framework Plan (April 2024, Eke Panuku).	
44.	I consider that the Bledisloe Wharf extension (330m long x 27.5m wide – 9,075m ²) will, from proximity viewpoints, initially appear as an annex to the existing wharf structure. This is due to the contrast in permeability and colour of the proposed structure, with the standard light colour of the concrete breastwork / edge and height of the edging disparity from the existing permeable wharf structure.	No response required.
45.	I consider that the physical extension to Fergusson Wharf will not significantly affect the landscape, natural character or visual amenity effects, considering the existing mooring dolphin and access gangway. The proposed structure and finished appearance will continue the appearance of the existing wharf in terms of the spacing and type of piles and the edge / fender elements.	No response required.
46.	I consider the greatest effects on natural character and visual amenity values will be the provision and increased number, size (being 300m+ long), regularity, and colour (e.g., orange ships will be more visually prominent) of large ships in berth. While these will generally be periodic in nature, they will have the greatest impact on the large audience at Queens's wharf, as well as to those recreational users within the proximate waters of the harbour, to a moderate degree.	<p>In relation to your follow up question in relation to whether a moderate effect equates to a more than minor effect, Boffa Miskell (Tom Lines, Landscape Architect) has provided the following response:</p> <p>“Referring to our Method statement (Appendix 1 to the Landscape Effects Assessment – a ‘moderate’ effect does equate to more than minor, however, as stated in the assessment, such occurrences will be periodic rather than permanent.”</p>
47.	The AEE does not assess the frequent occurrence of two or more cruise ships being berthed at the same time. For example, the Port Precinct Framework Plan (April 2024, Eke Panuku) notes there were 33 days in 2023-24 where two ships were to be berthed at the same time. There will be cumulative adverse visual amenity effects from the ships berthing at the Bledisloe Wharf Extension, as well as still berthing at Queens Wharf (300m or less) which I do not consider are thoroughly assessed in the information provided.	<p>Boffa Miskell (Tom Lines, Landscape Architect) has provided the following response:</p> <p>“This feedback appears to assume that ships berthed at the wharves negatively impact visual amenity, and that a greater number of ships would increase this effect when no assessment has been provided to determine whether this reflects a broadly held public view. It could also be suggested that public</p>

	Feedback	Response
		<p>interest may lie more in the variety and scale of vessels, with larger ships not necessarily being viewed negatively.</p> <p>In terms of cumulative landscape and visual amenity effects, the proposal is considered alongside the operational baseline. This includes but is not limited to current berthing at Queens Wharf with large vessels frequently arriving and departing from various docking points along this and other wharfs (such as Princess Wharf, Marsden Wharf and Captain Cook Wharf). The proposal will enable berthing along one new wharf (Bledisloe North Wharf), essentially accommodating one additional ship, noting that Fergusson North Wharf already accommodates large vessels.</p> <p>With an additional vessel present (over and above that considered as a baseline) along Bledisloe wharf, it is recognised that there would be some intensification of maritime activity however the area is already characterised as an operational port environment and subject to a high level of maritime activity. The proposal will also enable the removal of port associated vessels and operations associated with Captains Cook Wharf and Marsden Wharf. Moreover, the proposal will enable reduction in larger ships being berthed at Princess Wharf which is positioned in a more public location. This will enhance views from this Princess wharf when passenger ships are berthed in this location.</p> <p>Overall, the proposed activities associated with the Project are generally consistent with the established functions of the port and can be introduced in a way that aligns with the existing visual attributes of the area. This means that the additional vessel and associated elements at Bledisloe north wharf are unlikely to result in a significant departure or cumulative effects in relation to the current character or use of the site.”</p>

	Feedback	Response
48.	The visual connection between the city and the harbour edge will be reduced to a degree when larger ships are berthed (and when all existing and proposed berths are used) as experienced from Queen Wharf and other elevated viewpoints within the city.	Boffa Miskell (Tom Lines, Landscape Architect) has confirmed that they have sufficiently covered this matter in the reporting and do not consider this matter to require further discussion/response.
49.	The extent/scale of the extensions do not protrude further out into the harbour (compared to existing wharfs along the coastal harbour edge), ensuring that when the berths are not in use, the expanse and natural character values and amenity values of the harbour waters are not significantly affected.	No response required.
50.	The application documentation has not addressed how the proposal supports the wider public realm and urban design outcomes for the port precinct including how cruise infrastructure is integrated into the city, as outlined within the Port Precinct Future Development Framework Plan for Tāmaki Makaurau. The Framework Plan builds upon the City Centre Masterplan (2020) vision of relocating cruise operations from Princess and Queens Wharf to each side of an extended Captain Cook Wharf, with the occasional larger ships (greater than 320m) accommodated at Bledisloe North Wharf, but with the understanding these are infrequent.	<p>In relation to your follow up question to provide comment on in what way the proposal considers the Port Precinct Future Development Framework Plan (April 2024), the substantive application is fundamentally aligned with the high-level principles outlined in the Framework Plan.</p> <p>Specifically, the application facilitates the relocation of RoRo operations from Captain Cook Wharf to the proposed Bledisloe North Wharf, enabling Auckland Council to progress with the subsequent redevelopment and enhancement of Captain Cook and Marsden Wharves for public purposes.</p> <p>The Framework Plan sets a broad vision and indicative future land-use scenarios, notably predicated upon the transfer of RoRo activities from Captain Cook Wharf. The substantive application directly supports this prerequisite step, enabling Stage 1 of the Framework Plan which contemplates the early release of Captain Cook Wharf for public and urban design enhancements.</p> <p>The substantive application does not propose or require the relocation of cruise operations from Queens Wharf to Captain Cook Wharf. Decisions regarding cruise passenger infrastructure, including the provision of a terminal on Captain Cook Wharf, are beyond the scope of the substantive application</p>

	Feedback	Response
		<p>and will be addressed separately by Auckland Council, should it pursue such changes as the future owner of Captain Cook Wharf.</p> <p>Therefore, the substantive application should be viewed as facilitating the necessary first step toward achieving the broader strategic outcomes of the Framework Plan. Matters regarding specific public realm integration and cruise infrastructure placement within Captain Cook Wharf will be appropriately addressed in subsequent Council-led master planning and implementation phases.</p>
51.	This proposal does not address the anticipated relocation of cruise operations from Queens Wharf to Captain Cook Wharf, and the inefficiencies of providing two passenger terminals in relatively close proximity.	The substantive application does not propose to relocate cruise operations from Queens Wharf to Captain Cook Wharf. This is a matter for Auckland Council to address if and when it decides to make such changes (being the intended future owner of Captain Cook Wharf).
52.	While it may be possible for this fast-track consent and the Framework plan's new dedicated cruise passenger terminal to be developed independently of each other, better urban design practice would be to develop the designs in reference to each other. The fast-track consent risks becoming in conflict with the Framework Plan's public realm aspirations if not coordinated.	No response required.
53.	It is not clear how frequently the proposed cruise terminal within the ground floor of the vehicle handling building would be used if the Queens Wharf terminal was assumed to remain operational.	A dedicated cruise terminal will be provided for <u>each</u> cruise wharf. There will be no centralised terminal. This is standard practice around the world. The Princes terminal (within the Hilton) will serve the Princes cruise berth (smaller ships), the Queens terminal (Shed 10) will serve cruise at Queens wharf and the Bledisloe terminal (within the vehicle handling building) will serve cruise at BN.
54.	The proposed passenger terminal at the southern end of Bledisloe Wharf would not achieve a high amenity public realm and cruise facility space anticipated within the central wharves area. Arriving at the far end of a working multi-cargo wharf to be transported to a carparking building and	This element of the proposal is provided for as a permitted activity under the provisions of the Unitary Plan and does not require conditions of consent to address the effects, especially as conditions must be no more onerous than necessary (s83 FTAA).

	Feedback	Response
	then deposited on Quay Street a 10min walk from the transport hub of Waitemata Station is not considered a high-quality visitor experience. This would not be expected to meet the objectives of the City Centre Zone, in particular H8.2.(3) and (7).	POAL is engaging with the international cruise lines for input into an efficient terminal. The focus will be on the passenger efficiency and experience. The cruise industry is highly supportive of the Bledisloe proposal and consider it will provide passengers with an enjoyable arrival experience.
55.	The current parking building is not fit for purpose as a primary/permanent passenger terminal and the alterations and design of this are not clear within this application, stating the ground floor will be modified to “include drop down screens and/or walls to create areas for luggage handling and shuttle bus transfer”. It is not clear if the rest of the building would remain a vehicle handling facility.	The rest of the building will remain a vehicle handling facility. It is unclear what level of expertise Council’s urban designer has to reach a conclusion that “The current building is not fit for purpose as a primary/permanent passenger terminal”. Notwithstanding, this element of the proposal is provided for as a permitted activity under the provisions of the Unitary Plan and does not require conditions of consent to address the effects. POAL is engaging with international cruise lines to ensure an efficient fit for purpose facility is developed within the ground floor of the existing building.
56.	The carparking building is on the edge of the 50m zone defined as “Area A” in the Port Precinct, which requires additions and alterations to be assessed as an RD activity with regard to their visual appearance and design quality as a gateway to the city centre, it is not clear if the as-yet undefined work will be in part located in this Area A, e.g. pavilions, weather protection, etc.	No building works are proposed within “Area A”. The conversion of part of the ground floor to the cruise terminal can be undertaken as a permitted activity and does not require conditions of consent to address the effects.
57.	The terminal could result in a low level of amenity, less welcoming arrival and is disconnected from the current and future public realm that welcomes visitors to Tāmaki Makaurau.	This element of the proposal is provided for as a permitted activity under the provisions of the Unitary Plan and does not require conditions of consent to address the effects. POAL is engaging with international cruise lines to ensure an efficient fit for purpose facility is developed within the ground floor of the existing building.
58.	The pedestrian movement from a passenger terminal in this location would need to be separate and restricted from the working areas of the wharf (e.g., roll on and off, cranes, trucks).	No response required. This is an operational matter for POAL to address.
59.	Pedestrian movement would need to be direct, clear and separated from vehicle movement, from the future passenger terminal to Quay Street directing visitors through to key public spaces, such as Britomart Place. Given this distance, the Transport Assessment notes some mitigations could include:	This element of the proposal is provided for as a permitted activity under the provisions of the Unitary Plan and does not require conditions of consent to address the effects.

	Feedback	Response
	<p>“As the cruise terminal is located further east of the city centre, it is recommended that cruise passengers are provided with information on the route to the city centre area, particularly Britomart, where they can orientate themselves for their visit. In addition, it could be beneficial for marshals to be located along the route, during the busier arrival / departure times to guide passengers.” Weather protection and architectural treatment to provide an adequate sense of arrival in Tāmaki Makaurau and /or Aotearoa is considered important.</p>	
60.	Consider opportunities for incorporation of iwi design noting this will be the entry to Auckland for cruise visitors.	As set out within the application, POAL will continue to engage with iwi in respect of the Project. Cultural expressions will be developed with iwi as part of the design of the cruise terminal as a permitted activity.
61.	Encourage upgrades to the Britomart Place / Quay Street intersection to prioritise pedestrians (e.g., light phasing).	The phasing of lights at the Britomart Place/Quay Street intersection is beyond the control of the applicant.
62.	Overall, I consider the proposal for the extension to Bledisloe Wharf and Fergusson Wharf will generally have low to low-moderate adverse effects on the natural character, landscape and visual amenity at a wider context. For the large audience associated with Princess Wharf, Queens Wharf and recreational users in close proximity within the harbour the adverse effects on visual amenity, including the views to the wider harbour and gulf islands, will be impacted to a moderate degree.	No response required.
63.	The proposal has the potential to significantly impact the public space outcomes anticipated within the central wharves area, including providing high quality arrival spaces for cruise visitors, and opening up the waterfront area for the enhancement of Tāmaki Makaurau.	The issue appears to relate to the design of the cruise terminal, which can be established as a permitted activity and does not require further consideration.
64.	<p>The following could be included as part of Condition 72 offered in the proposed conditions of consent:</p> <p><i>The reuse of the existing rock revetment along Bledisloe Wharf is reused on site where possible, this could be in the construction of new structure, or elsewhere on site as barriers/features.</i></p>	The reuse of existing rock revetment material is primarily a construction management matter, and while beneficial reuse will be considered by POAL where practical and appropriate, it does not necessitate a specific condition of consent.

	Feedback	Response
	<p><i>The final materiality and finished appearance of the Bledisloe Wharf Extension and Fergusson North Wharf Extension including piles, breastwork /edges are to be provided, including the demonstration of where detail design, materiality and / or iwi design has been introduced to minimise visual impact on the landscape, natural character and visual amenity values.</i></p>	<p>Regarding detailed materiality and finished appearance of the Bledisloe Wharf Extension and Fergusson North Wharf Extension (including piles and breastworks/edges), it is important to emphasise that the design and materials proposed are inherently appropriate within the industrial port context in which the new structures will sit. The visual assessment undertaken has therefore identified visual impacts to be limited.</p> <p>Nevertheless, POAL confirms its ongoing commitment to meaningful engagement with mana whenua regarding detailed design elements. This engagement will seek opportunities for iwi-led design input to the cruise terminal, noting that the overall visual integration of the wharf structures into the existing port landscape is already well-managed by the chosen industrial design and material approach.</p>
Economics		
65.	<p>The EIA's quantitative methodology for assessing the benefits of POAL's current operations as importer/exporter using an input-output analysis is unsuited to the analytical task. The method employed assumes all inputs are wholly substitutable and exist in unlimited quantities at no cost and that there would be no behavioural change of economic agents in response to the expansion, beyond a pro rata increase in consumption / investment spending.</p>	<p>The limitations of economic models, including input-output (I-O) models, are acknowledged. However, I-O analysis is a common and widely accepted method to demonstrate the general scale of economic benefits for infrastructure and resource management projects. Importantly, the Fast-track Approvals Act 2024 does not rely on a precise dollar value but rather considers whether the benefits are significant in scale. Overall, the economic assessment confirms substantial benefits, and debate about specific modelling approaches does not materially affect the Panel's consideration of the application. Regarding environmental effects, these have been assessed separately by specialist technical experts and are not part of the economic model.</p>
66.	<p>The projections presented in the EIA suggest significant latent unused capacity in the economy would remain unutilised unless the port is expanded. The input-output analysis overstates the value of the expansion because it does not include the opportunity cost of these displaced resources, i.e., what these resources could achieve if allocated elsewhere. This is a significant disadvantage</p>	<p>There are two drivers for the project:</p> <ul style="list-style-type: none"> • Free up Captain Cook and Marsden to enable these wharves to be transferred to Auckland Council and developed for public use; and • Safely handle large cruise ships without impacting the ferry basin and increasing the operational (wind) window.

	Feedback	Response
	<p>of not utilising a framework that considers the overall resource impacts of investment decisions.</p>	<p>The counterfactual is to not undertake the works and not free up Captain Cook and Marsden for public use and limit the ability to handle large cruise ships in New Zealand.</p> <p>Enabling greater cruise capacity at the Port of Auckland is critical to the viability of New Zealand's international cruise market. Auckland functions as the country's principal exchange port, offering proximity to New Zealand's busiest international airport, extensive hotel stock, and the nation's largest urban market.</p> <p>For many international cruise operators, especially those deploying larger vessels, the ability to call at Auckland is essential to the commercial feasibility of visiting New Zealand at all. Ships, passengers, and associated expenditure are not easily redeployed within the domestic economy. Instead, if Auckland is unable to accommodate these vessels, the economic activity (passenger spend, provisioning, and port fees) is likely to be foregone entirely, with itineraries diverted to competing regions such as Australia or the Pacific.</p> <p>POAL has experienced this, when Cunard's Queen Elizabeth 2 removed all New Zealand calls for the 2024 season after Auckland could not confirm berth availability, rather than redirect to other ports.</p>
67.	<p>A cost-benefit analysis framework would be better suited to addressing the core task – weighing up resource trade-offs. This could be achieved by establishing an appropriate counterfactual (presumably no POAL expansion or the expansion of a competing port) and identifying and evaluating the costs and benefits of the proposed expansion against this counterfactual. This approach would be more flexible by enabling a range of scenario and sensitivity testing to ensure the robustness of the results under differing, plausible assumptions.</p>	<p>Refer to response to Q.65. While cost-benefit analysis (CBA) can be suitable for certain types of evaluations, the approach used in the application is appropriate for demonstrating the overall significance of economic benefits as required under the Fast-track Approvals Act 2024.</p> <p>Alternative port expansion scenarios or other hypothetical counterfactuals would not alter the fundamental conclusion that the proposed project delivers substantial economic benefits.</p>

	Feedback	Response
68.	<p>The EIA does acknowledge competing ports in the North Island; however, it does not consider whether these ports could substitute POAL to accept larger, modern vessels. An analysis of why these ports may not be suitable alternatives to Auckland could strengthen the report's findings, e.g. importing more containerised freight through ports that are further in distance for the main market (Auckland) would add overland transport costs that would ultimately be borne by the consumer (and so reducing the consumer surplus).</p>	<p>While the existence of other North Island ports is acknowledged, Auckland remains the only location that provides the necessary infrastructure, market access, and connectivity to support large cruise vessels at scale. Alternative ports such as Tauranga, Napier, or Wellington face physical constraints (e.g. berth length, draught, turning basin limitations), lack high-capacity cruise terminals, and are not proximate to international air gateways. They also entail greater overland transport distances to Auckland, which is the primary market for inbound and outbound cruise passengers. POAL's experience is that cruise operators do not simply substitute Auckland for a secondary port; rather, where Auckland cannot be included, itineraries are frequently altered to remove New Zealand entirely.</p> <p>While some niche or expedition operators do call at New Zealand without visiting Auckland, most mainstream lines consider Auckland an essential port of call.</p> <p>In terms of container vessels, currently large container ships cannot be handled by Northport. Although, large container can be handled by the Port of Tauranga, this would mean that the freight must then be trucked or railed back to Auckland at considerable cost and resulting emissions.</p>
69.	<p>While the report attempts to quantify some benefits of the proposed expansion, the methodology used is not particularly convincing. None of the costs of the proposal have been acknowledged or quantified, leaving it unclear whether the economic costs of the project outweigh the benefits. The EIA does not arrive on a position of the net economic impact of the POAL extension.</p>	<p>Refer to response to Q.65. The application does not attempt to present a traditional cost-benefit assessment, nor is it required to under the Fast-track Approvals Act 2024.</p> <p>The economic assessment provides evidence of substantial positive benefits, acknowledging that associated environmental costs have been thoroughly addressed separately by specialist technical experts. The overall determination of "net economic impact" in a strict economic sense is not necessary to meet the statutory purpose, which is focused on confirming that regional or national economic benefits are significant.</p>

	Feedback	Response
Air Quality		
70.	Overall, I support the applicant's conclusion that the air quality impacts of the project will be minor, with some localised shifts in pollutant exposure rather than an overall increase.	No response required.
71.	<p>To further mitigate potential impacts, the Port may consider:</p> <ul style="list-style-type: none"> (a) Continuous air quality monitoring for PM_{2.5}, PM₁₀, and SO₂ at a sensitive receptor near the project site is recommended to assess potential localised impacts from relocated shipping emissions. This will help validate air dispersion modelling, ensure compliance with air quality standards, and provide data for any necessary mitigation measures. (b) Ensuring compliance with low-sulphur fuel regulations to sustain the declining trend in ship-related emissions 	<p>Tonkin & Taylor (Jenny Simpson, Senior Environmental Engineer) has provided the following response:</p> <p>"The Officer has provided three reasons for recommending air quality monitoring, which I respond to below:</p> <ul style="list-style-type: none"> • <i>To validate air dispersion modelling</i> - Air dispersion modelling has not been carried out as part of the air quality technical assessment because the effects of the project can be described without modelling. Therefore, there is no need to undertake air quality monitoring to validate air dispersion modelling outputs. • <i>To ensure compliance with air quality standards:</i> <ul style="list-style-type: none"> ○ As agreed by the Council's reviewer, the air quality impacts of the project will be minor and are mainly related to emission sources (ships) being relocated rather than increasing emissions. This relocation will result in small changes in separation distances to receptors, which are not expected to have any material effects on PM10 and PM2.5 concentrations and only very small changes in SO2 concentrations at some receptors (other than at Princes Wharf where there should be a material improvement). ○ Shipping emissions are the main source of SO2 around the Port (and a small contributor to levels of PM10 and PM2.5). A full year of air quality monitoring for SO2 undertaken by Ports of Auckland in Parnell (approximately 350 m south of the Port boundary) in 2018/19 demonstrated that air quality met the NZ ambient air quality standards and guidelines, and the more stringent World Health Organization 2021 air quality guidelines. SO2

	Feedback	Response
		<p>concentrations will have reduced significantly (approximately 75%) compared to when this monitoring was conducted due to the 75% reduction in the marine fuel sulphur limit in January 2020.</p> <p>Consequently, further air monitoring for SO₂ is not warranted as there is a high degree of confidence that any minor changes in SO₂ air quality at some receptors will not contribute to exceedances of New Zealand ambient air quality guidelines.</p> <ul style="list-style-type: none"> ○ As shipping emissions are a small contributor to PM₁₀ and PM_{2.5} concentrations around the Port, any minor changes in air quality related to the project will be so small that they will almost certainly not be discernible in the monitoring data and will not impact on the extent to which existing air quality meets air quality standards. Air monitoring for PM₁₀ or PM_{2.5} is unlikely to provide useful information in relation to the effects of the project. • <i>To provide data for any necessary mitigation measures</i> – as the air quality impacts of the project will be minor, no specific mitigation measures are proposed (noting also that the normal emissions from ships are a permitted activity and do not require resource consent). The main mitigation measure for emissions to air from ships is compliance with the global marine fuel sulphur limit, which is implemented through the Maritime Transport (MARPOL Annex VI) Amendment Act 2021 and the Marine Protection Rules Part 199. The Marine Protection Rules are administered by Maritime NZ.” <p>In relation to item (b), compliance with low-sulphur fuel regulations is a requirement of MARPOL VI and administered by Maritime New Zealand.</p>
72.	Given the expected compliance with national air quality standards and ongoing regulatory improvements, adverse effects from the proposal should remain within acceptable limits.	No response required.

	Feedback	Response
Ecology		
73.	The provided reports adequately identify the potential effects on avifauna within the proposed works area.	No response required.
Coastal effects		
74.	I can confirm that the coastal effects assessment report submitted in support of the proposed works is acceptable.	No response required.
Traffic Engineer		
75.	The proposed access, routing paths and pick-up/drop-off arrangements have been provided. Whilst diagrams are not detailed drawings and vehicle tracking has been undertaken on aerial drawings, the information is considered sufficient to indicate the workability of the proposed arrangements. Further detailed plans/and drawings should be provided as the design progress.	As identified in the transport report, further detail is required in the TMP, which is a proposed consent condition.
76.	<p>The anticipated trip generation for the larger cruise ship which could be accommodated at the Bledisloe Wharf once redeveloped, is based on the data from other cruise ships which currently dock at the port. However, the raw survey data has not been provided for this review. The review was based on informed the trip generation estimates for this assessment be provided.</p> <p>Assumptions adopted for the assessment:</p> <ul style="list-style-type: none"> - Maximum of 4,905 passengers; - Disembarkation would be the critical period for assessment; - 3.5 hour assessment period; and - Occupancy rates of 60 passengers per coach and three passengers per light vehicle <p>Two scenarios have been assessed with respect to disembarkation, these being:</p> <ul style="list-style-type: none"> - Transit call, where passengers disembark for a period or a day trip and re-embark; and - Passenger exchange, where passengers permanently disembark from the ship with their luggage in the morning and new passengers embark with their luggage in the afternoon. 	<p>Beca (Joe Philips, Principal Transport Advisor) has provided the following response:</p> <p>“The coach and taxi/rideshare provision is based on the higher demand scenario for either of the commercial vehicle types, refer to section 3.1.5 of the transport report. The disembarkation of passengers is staggered across 3.5hrs with transfers by coach from the cruise ship. The layout is designed to accommodate this forecast demand, which is based on existing cruise facilities and the larger cruise ships. In addition, there is an overflow area to accommodate fluctuations or higher demand. This overflow area indicatively doubles the available provision, so satisfactorily accommodates predicted demand. Refer to layout plan.”</p>

	Feedback	Response
	<p>It has been assumed that around 78% of passengers (3,800) would undertake a day trip for a transit call and around 97% of passengers (4,750) would disembark in the morning for a passenger exchange. Based on the adopted occupancy rates this equates to a demand for 42 coaches and 118 light vehicles over 3.5 hours, or a total of 160 vehicles (320 vehicle movements) over 3.5 hours for a transit call. Similarly, for a passenger exchange, a total of 365 vehicles (730 vehicle movements) are anticipated for a passenger exchange. Given the above, more details about the taxi, coaches, pick up and drop off should be provided to understand whether the proposal can cater for these additional demands.</p>	
77.	<p>The TA notes that the proposed expansion is expected to generate 1,500 TEUs (twenty-foot equivalent units) per metre per annum, which equates to a total of 67,500 TEUs per annum handled by the extended wharf.</p> <p>It has been assumed that 80% of the TEUs would be transported by trucks, with each truck carrying 1.4 TEUs. Based on this, trucks would transport some 54,000 TEUs per annum. A daily demand of 106 trucks per day has then been calculated, which is presumably based on 365 days per year. However, this includes non-working days such as public holidays.</p> <p>Notwithstanding this, truck movements typically occur outside of the peak periods, and it is unlikely that even if non-working days were excluded, the effects on the road network would be significant.</p>	No further response required.
78.	The likely effects of construction traffic have been assessed in the TA. This has been reviewed and it is agreed that with a proper Construction Traffic Management Plan in place, construction effects can be suitably managed.	No further response required.
79.	General operational effects have been assessed using the SIDRA analytical tool with the intersections of Tinley Street / Quay Street and Solent Street / Tamaki Drive analysed. The use of SIDRA in this circumstance is considered	Beca (Joe Philips, Principal Transport Advisor) has provided the following response:

	Feedback	Response
	appropriate. However, the actual SIDRA files are requested for review to understand what inputs and assumptions were used.	“The inputs and assumptions used for the SIDRA modelling are stated in the transport report, refer to section 4.2.1.4 (p. 24) and Appendix C. The base SIDRA models were informed by current traffic demands and signal timings (from SCATS data), as well as site observations of queues. The additional cruise ship demand was added to these base models, using the stated assumptions.”
80.	It was also unsure the analysis would also take account of the movement of crew, suppliers and service personnel occurring simultaneously with disembarkation. For example, the TA notes that cruise ship visits typically require up to 10 semi-trailer trucks transporting 40ft containers of provisions per berthing. Do these movements occur outside of the busiest periods associated with disembarkation?	<p>Beca (Joe Philips, Principal Transport Advisor) has provided the following response:</p> <p>“Supplies (containers) typically dropped to the wharf before the ship arrives, either the night before or very early in the morning, so does not coincide with the passenger movements. The same applies to pack-out – it will occur once the ship has left. Crew movements are very low, most are busy on board preparing the ship for the next passengers. Any who take shore leave will typically walk into town and usually separate to the passengers. Any cruise ships that exchange their crew, only a few occasions, do this outside of the passenger exchange window.”</p>
81.	The TA stated that an increase of 649 pedestrians per hour is anticipated on Quay Street. This represents a 35% increase on the reported peak hour pedestrian volumes on Quay Street. Do these peaks coincide? Is there sufficient capacity on the Quay Street footpaths to accommodate this increase? What is the likely effect on vehicular traffic of additional pedestrian movements crossing Quay Street at peak times?	<p>Beca (Joe Philips, Principal Transport Advisor) has provided the following response:</p> <p>“As disembarkation times are staggered and given the wide footpath on the northern side of Quay Street pedestrian demand will be adequately accommodated on the 30-40 days cruise ships berth. The pedestrian volumes are expected to disperse along Quay Street to the multiple signalised crossing locations to reach a variety of destinations, such as Britomart, Queen Street and Wynyard Quarter. No changes are proposed to signal phasing at intersections, so the operation of the corridor for cars and buses will not be affected.”</p>

	Feedback	Response
82.	During peak cruise periods there is a possibility of more than one cruise ship arriving simultaneously. Has this eventuality been considered in the assessment?	<p>Beca (Joe Philips, Principal Transport Advisor) has provided the following response:</p> <p>“This has not been specifically assessed. There are likely to be days when two cruise ships berth, but this currently occurs, so there are no additional transport effects. Indeed, the proposals to relocate some cruise ships to Bledisloe Wharf create some separation of the transport movements, when two ships berth.”</p>

Attachment B: Updated reasons for consent (29 May 2025)

Auckland Unitary Plan – Operative in Part

New Bledisloe North Wharf

- (a) New wharves in the Port Precinct require resource consent as a **restricted discretionary activity** (I208.4.1(A24)).
- (b) Hard protection structures (reconstruction of Bledisloe North revetment) require resource consent as a **restricted discretionary activity** (I208.4.1(A35)).
- (c) Earthworks exceeding a volume of 2,500m³ (approximately 8,400m³) require resource consent as a **restricted discretionary activity** (E12.4.1(A10)).
- (d) Temporary construction activities in the coastal marine area outside of the City Centre not otherwise provided for require resource consent as a **restricted discretionary activity** (E40.4.1(~~A10~~A6)).
- (e) Impact and vibratory piling activities require resource consent as a **restricted discretionary activity** (F2.19.8(A114)).
- (f) Temporary structures or buildings within the coastal marine area (associated with construction activities) (~~F2.9.10(A128)~~) that exceed 40 working days and therefore do not comply with Standard F2.21.10.4 require resource consent as a **restricted discretionary activity** (~~F2.19.10(A121)~~C1.9).
- (g) The discharge of stormwater from a wharf structure that exceeds 5,000m² (8,773m² proposed) to the coastal marine area requires resource consent as a **discretionary activity** (F2.8.4.1(A10)).
- (h) The use of the wharf for an industrial or trade activity listed as "high risk" in Table E33.4.3 requires resource consent as a **controlled activity** (E33.4.1(A8)).
- (i) The discharge of contaminants from a new industrial or trade activity area listed as "high risk" in Table E33.4.3 requires resource consent as a **discretionary activity** (E33.4.2(A24)).

Fergusson North Berth Extension

- (j) New wharves in the Port Precinct require resource consent as a **restricted discretionary activity** (I208.4.1(A24)).
- (k) Temporary construction activities in the coastal marine area outside of the City Centre not otherwise provided for require resource consent as a **restricted discretionary activity** (E40.4.1(~~A10~~A6)).
- (l) Temporary activities on land associated with building or construction that exceeds 24 months requires resource consent as a **restricted discretionary activity** (E30.4.1(A24)).
- (m) Impact and vibratory piling activities require resource consent as a **restricted discretionary activity** (F2.19.8(A114)).
- (n) Temporary structures or buildings within the coastal marine area (associated with construction activities) (~~F2.19.10(A128)~~) that exceed 40 working days and therefore do not comply with Standard F2.21.10.4 require resource consent as a **restricted discretionary activity** (~~F2.19.10(A121)~~C1.9).
- (o) The use of the wharf extension for a new industrial or trade activity listed as high risk in Table E33.4.3 requires resource consent as a **controlled activity** (E33.4.1(A8)).
- (p) The discharge of contaminants from a new industrial or trade activity area listed as "high risk" in Table E33.4.3 requires resource consent as a **discretionary activity** (E33.4.2(A24)).

National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health

- (q) The disturbance and removal soil from a piece of land that is subject to the National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health that does not meet the requirements of regulation 8(3) requires resource consent as a **controlled activity** (regulation 9(1))

Attachment C: Council Responses

Fast-track Approvals Act 2024

Application File Ref: FTAA-2503-1028

Applicant: Port of Auckland Limited.

Port of Auckland Limited has applied under the Fast-track Approvals Act 2024 for resource consents to:

1. construct a reinforced concrete-piled wharf at the Bledisloe Terminal – the Bledisloe North Wharf
2. construct a reinforced concrete-piled extension to the existing Fergusson North Berth, associated fendering and a cruise passenger terminal.

This document reviews the rules and activity status of the proposal under the Auckland Unitary Plan (Operative in Part) (AUP(OiP)) as identified by the Applicant in Attachment 22 to the application entitled ‘Auckland Unitary Plan Rules Assessment’.

In doing so, I have primarily reviewed the rules summary section in the application.

Auckland Unitary Plan Operative in Part (AUP(OiP)) Precinct, Zones and Overlays

Both the proposed Bledisloe North Wharf and the proposed extension to the Fergusson North Berth are located within the Port Precinct of the Auckland Unitary Plan.

That part of the wharves that sit within the Coastal Marine Area are:

- Port Precinct
- General Coastal Marine zone (Coastal Marine Area)
- Business - City Centre zone
- Auckland War Memorial Museum Viewshaft overlay

The Coastal Marine Area is part of the common marine and coastal area, Marine and Coastal Area (Takutai Moana) Act 2011.

Relevant provisions of the AUP (OiP)

The relevant provisions of the AUP(OiP) are:

- Port Precinct, Chapter I208 of the AUP(OiP).
- General Coastal Marine zone, Chapter F2 for those parts of the application within the coastal marine area
- Business – City Centre zone, Chapter H8 for those parts of the application that are within the Auckland district
- Auckland Wide provisions, Chapter E.

Section 1208.4 entitled 'Activity table' explains how AUP(OiP) is to be given effect to in relation to the interplay between the precinct, zone and Auckland wide provision:

The key references in I208.4 are:

- “The activities, standards and assessment criteria in the overlays and Auckland-wide rules apply in the Port Precinct, unless otherwise specified below.”
- “The activities, standards and assessment criteria in the underlying General Coastal Marine zone apply to the coastal marine area in the Port Precinct, unless otherwise specified below.”
- “The activities in the Coastal – General Coastal Marine Zone apply to the coastal marine area in the Port Precinct unless otherwise specified in the Port Precinct activity table below.”
- “The activities, standards and assessment criteria in the Business – City Centre Zone do not apply to land in the Port Precinct, unless otherwise specified below.”

In relation to activity status section I208.4 states:

- “Table I208.4.1 Activity table specifies the activity status for land use and development activities pursuant to section 9(3) of the Resource Management Act 1991 and the activity status for works, occupation and use in the coastal marine area pursuant to sections 12(1), 12(2), and 12(3) of the Resource Management Act 1991, including any associated discharges of contaminants or water into water pursuant to section 15 of the Resource Management Act 1991, or any combination of all of the above sections where relevant.”
- (1) “The following table also specifies the activity status of activities on land in the Port Precinct.”

Meaning of “Unless otherwise specified below”

The first 4 bullet points state “unless otherwise specified below’.

Council’s Practice and Guidance Note RC3.2.30 – Precinct -Rules and Standards sets out how this is to be interpreted.

Section 4.2.1 of Practice and Guidance Note RC3.2.30 states:

“The text ‘unless otherwise specified below’ in the preamble means that there must be an explicit reference either within the preamble or in the activity table that states that a specific rule in the precinct overrides a rule in any relevant overlay, zone and Auckland-wide chapter of the AUP (OP). For the avoidance of doubt, rules with similar activity names to those in other chapters is not 'otherwise specifying' that the relevant overlay, zone and Auckland wide provisions do not apply. Instead, both sets of rules apply.”

Section I208.4.1 includes the phrase “unless otherwise specified below” in the preamble, but does not explicit reference in the preamble, often included as bullet points under the preamble or within the rules.

The practice and guidance note also states that having similarly worded rules in both the precinct and the zone or Auckland wide rules does not constitute explicit reference.

Application of Precinct, Zone and Auckland-wide rules

In accordance with the above, the rules in the Precinct, Zone and Auckland wide rules apply to the proposal.

Activity status

When an activity within a precinct is subject to both a Precinct Rule and a similar Zone rule or Auckland wide rule the Precinct rule determines the activity status.

This is as set out in Rules C1.6(4) and C1.6(3) of the AUP(OiP).

Analysis

My analysis is provided in the two tables below.

A handwritten signature in black ink, appearing to read 'Alan Moore', with a long horizontal stroke extending to the right.

Alan Moore
Principal Specialist
Specialist Unit
Planning and Resource Consents

Dated: 01 April 2025

The following Tables primarily considers application of the AUP(OiP) rules that apply to the Coastal Marine Area- shared and agreed between Council and POAL 21 May 2025.

Bledisloe North Wharf						
Applicant's View		Council's View				
Activity	Rule/ Status	Agree/ Disagree	Comments	Bentley & Co Response	Council's Comments (21.05.2025)	Overall Status (C1.6(4) and C1.6(3))
New Wharves in Port Precinct	I208.4.1 (A24) RDA	Agree in part	Rule I208.4.1 (A24) is triggered, however the following F2 rule is also triggered: Rule F2.19.10 (A139) Marine and Port facilities and buildings not on an existing wharf or existing coastal marine structures - DA.	Agree an activity in a precinct triggers all applicable provisions, including the underlying zone. F2.1. Zone description states: <i>"Notwithstanding the spatial extent of the Coastal – General Coastal Marine Zone, its objectives, policies and rules apply to all coastal zones and coastal precincts unless otherwise provided for in the specific zone or precinct."</i>	The Council is of the view that for an activity to be 'specified', the exact activity should be specified. Activities with similar wording in our view does not constitute specifying (as mentioned in the letter above). Thus, we are of the view that F2.19.10 (A139) is applicable as well. However, given rule C1.6(4) the activity status in the precinct will override that of the zone (i.e. will be RDA). The overall activity status will remain RDA.	RDA B&C: Agree. Remains RDA as applied for.
Hard protection structures	I208.4.1 (A35) RDA	Agree in part	Rule I208.4.1 (A35) is triggered however the following F2 rule is also triggered: F2.19.10 (A142) hard protection structures - DA	Rule C1.6(2) states: <i>"Subject to Rule C1.6(4), the overall activity status of a proposal is that of the most restrictive rule which applies to the proposal."</i> Rule C1.6(4) also states: <i>"Where an activity is subject to a precinct rule and the activity status of that activity in the precinct is different to the activity status in the zone or in the Auckland-wide rules, then the activity status in the precinct takes precedence over the activity status in the zone or Auckland-wide rules, whether that activity status is more or less restrictive."</i> Rule I208.4 states: <i>"The activities, standards and assessment criteria in the underlying General Coastal Marine zone apply to the coastal marine area in the Port Precinct, unless otherwise specified below."</i> And: <i>"The activities in the Coastal – General Coastal Marine Zone apply to the coastal marine area in the Port Precinct unless otherwise specified in the Port Precinct activity table below."</i> In plain terms, this means that all relevant rules continue to apply within the Port Precinct unless the precinct provisions specifically override them. Where a precinct lists an activity in its activity table, this constitutes "otherwise specifying" how that activity is to be managed. In such cases, the corresponding zone rule for the same activity is overridden, but only to the extent that the precinct provides an alternative rule. Accordingly, only the precinct rule determines the activity status, in accordance with Rule C1.6(4). The Port Precinct specifies a restricted discretionary activity status for new wharves and hard protection structures,		RDA B&C: Agree. Remains RDA as applied for.

		Bledisloe North Wharf				
Applicant's View		Council's View				
Activity	Rule/ Status	Agree/ Disagree	Comments	Bentley & Co Response	Council's Comments (21.05.2025)	Overall Status (C1.6(4) and C1.6(3))
				<p>which differs from the discretionary status that would otherwise apply under the zone. Therefore, the precinct status takes precedence.</p> <p>For completeness, resource consent has been sought on the basis of a discretionary activity overall, and the application assesses the proposal against all relevant objectives, policies, and standards of the Coastal – General Coastal Marine Zone, in addition to those of the Port Precinct.</p>		
Earthworks >2500m3	E12.4.1 (A10) RDA	-	Development Engineers to review			-
Temp construction activities in the CMA outside the City centre	E40.4.1 (A10) RDA	Agree	<p>Rule E40.4.1 (A10) applies to activities other than structures and buildings. Rule F2.19.10(128) applies to temporary structures and buildings within the CMA – see below</p> <p>Note 3 in E40 states that the rules in E40 apply to temporary activities in the CMA except for temporary buildings including structures, where F2 needs to be referred to. Therefore, Rule F2.19.10(128) applies to temporary structures and buildings within the CMA – see below.</p> <p>Note 5 in E40 states that For the purposes of the following activity table, standards and assessment criteria, the reference to 'the City Centre and Metropolitan Centres' means the coastal marine area within the City Centre precincts for Port precinct.</p> <p>Therefore, Rule E40.4.1(A6) or (A24) is considered relevant to activities other than structures and buildings in the CMA.</p>	<p>Agree that the Port Precinct's coastal area is treated as part of the "City Centre" for the purposes of Chapter E40. As a result, the thresholds and activity statuses that apply to "City Centre and Metropolitan Centres" in Table E40.4.1 also apply to temporary activities located within the Port Precinct's coastal marine area.</p> <p>Agree that Rule E40.4.1(A6) applies (restricted discretionary activity) to the construction activity occurring within the Port Precinct CMA that exceeds 21 consecutive days. This rule relates to the "temporary activity" aspect of the works, including the use of the area and associated effects (e.g. duration, hours, amenity effects).</p> <p>Rule E40.4.1(A24) serves as a catch-all for temporary activities that are not otherwise provided for by Rules (A12) to (A23). However, Rule (A6) specifically captures long-duration temporary activities in the City Centre CMA and is therefore the more directly applicable rule. In any event, as both rules classify the activity as restricted discretionary, there is no difference in activity status or matters of discretion, regardless of which rule is relied on.</p> <p>Agree that, in accordance with Note 3, Chapter E40 applies only to the temporary activity itself and not to temporary buildings or structures within the CMA. The associated physical structures (such as scaffolding) that extend into the CMA are instead managed under Chapter F2 (discussed further below).</p> <p>On the landward side of MHWS, temporary construction activities and their associated structures are permitted under Rule E40.4.1(A20), which provides for "temporary activities associated with building or construction</p>	Agree. E40.4.1(A6) as a RDA is applicable to construction activities within the CMA.	<p>RDA</p> <p>B&C: Agree. Remains RDA as applied for.</p>

		Bledisloe North Wharf				
Applicant's View		Council's View				
Activity	Rule/ Status	Agree/ Disagree	Comments	Bentley & Co Response	Council's Comments (21.05.2025)	Overall Status (C1.6(4) and C1.6(3))
				(including structures and buildings that are accessory activities) for the duration of the project, or up to 24 months, whichever is the lesser." In this case, the construction programme is for duration of approximately 18 months.		
Impact and vibratory piling	F2.19.8 (A114) RDA	Agree				RDA
Temporary structure or buildings within the cma that exceed 40 working days	F2.19.10 (A121) DA	Disagree. Rule F2.19.10(121) does not apply to temporary structures.	Rule C1.9 applies - RDA. Temporary coastal marine area structures are under F2.19.10(A128) - PA. Permitted activity standard F2.21.10.4 states that if the activity does not meet the Standard the activity defaults to Rule C1.9 - RDA	Agree. Temporary coastal marine area structures are provided for as a permitted activity (Rule F2.19.10(A128), subject to Standard F2.21.10.4. As the temporary structures will be in place for more than 40 working days, compliance is not achieved with Standard F2.21.10.4, resource consent is required as a restricted discretionary activity (C1.9).	Agree.	RDA B&C: Agree the activity status is RDA
Discharge of SW from wharf that exceeds 5000m2	F2.8.4.1 (A10) DA	Disagree	The application refers to F2.8.4.1 (A10). This should read E8.4.1(A10). However, that part of the wharf within the CMA does not meet the definition of impervious surface within the AUP as the structure does not <i>prevents or significantly retards the soakage of water into the ground</i> . Only that part of the wharf that is landward of MHWS can count to impervious area. Rule F2.19.7(A62) -PA would apply. The activity would meet PA Standards F2.21.8.1 and F2.21.8.6. Management of contaminants in the stormwater from the wharf would be captured by the relevant ITA rule.	Disagree that Rule F2.19.7(A62) applies. That rule provides for discharges to the coastal marine area that are not otherwise covered by another rule in the Unitary Plan. In this case, Rule F2.19.7(A65) directs such discharges to be assessed under Chapter E8. The diversion and discharge of stormwater from impervious surfaces is therefore explicitly managed under Chapter E8 and falls outside the scope of Rule F2.19.7(A62). Table E8.4.1 relates to the diversion and discharge of stormwater runoff from impervious areas to land, water, or the coastal marine area. The definition of "impervious area" includes any surface which " <i>prevents or significantly retards the soakage of water into the ground</i> ." While the term "ground" is not separately defined in the Unitary Plan, the term "land", which includes land covered by water, is. Accordingly, the seabed beneath the wharf is "ground" for the purpose of this definition. In this instance, the wharf structure has an area of approximately 9,075m ² in area and is proposed to be constructed over an existing rock revetment (approx. 6,550m ²), which is to be reconstructed as part of the proposal. A small portion of the revetment is located above Mean High Water Springs (MHWS), with the balance extending below MHWS. The wharf occupies the airspace above MHWS but prevents water from reaching the ground below and is not permeable in nature. It therefore meets the definition of an impervious surface.	The Council is still of the view that the part of the wharf within the CMA does not meet the definition of impervious surface within the AUP. The ground in reference is covered by water, thus, the sw runoff is not preventing or significantly retarding the soakage of water into the ground below. Nonetheless, much of the treatment of stormwater will be dealt with under the ITA. Therefore, happy for this to be applied for as an abundance of caution (E8.4.1(A10)).	PA B&C: Disagree – DA required.

		Bledisloe North Wharf				
Applicant's View		Council's View				
Activity	Rule/ Status	Agree/ Disagree	Comments	Bentley & Co Response	Council's Comments (21.05.2025)	Overall Status (C1.6(4) and C1.6(3))
				<p>Given the contributing impervious area exceeds 5,000m², and the discharge is not otherwise provided for by a permitted or controlled activity rule, resource consent is required as a discretionary activity under Rule E8.4.1(A10).</p> <p>Agree that the management of contaminants in the stormwater is captured by the relevant ITA rule.</p> <p>This approach is consistent with Auckland Council's approach to previous POAL's applications where consent was required under this rule.</p>		
Use of wharf for High Risk ITA activities	E33.4.1 (A8) CA	Agree	<p>SWWWITA to confirm</p> <p>The site (POAL) holds a port-wide ITA consent (No 25179) granted on 19 February 2010. This consent provides for the discharge of stormwater and contaminants from the entire existing commercial port designated as a "High Risk" activity area. The ITA consent is set to expire on 28 February 2045.</p>			<p>CA</p> <p>B&C: Agree</p>
Discharge from High Risk ITA activities	E33.4.2(A24) DA	Agree	<p>Section 5.53 of the application report outlines the proposed activities to be accommodated within the development and the applicant has applied for land use and discharge consent as follows:</p> <ul style="list-style-type: none"> E33.4.1 - Use of land The use of the wharf for an industrial or trade activity listed as "high risk" in Table E33.4.3 requires resource consent as a controlled activity (E33.4.1(A8)). E33.4.2 – Discharge of contaminants The discharge of contaminants from a new industrial or trade activity area listed as "high risk" in Table E33.4.3 requires resource consent as a 	<p>The matter of the applicability of the ITA discharge rule to Fergusson Wharf is discussed separately below.</p> <p>In relation to s 127 RMA, POAL is the holder of a permit (25179) to discharge contaminants into the coastal marine environment from an ITA; namely the activities associated with the commercial port operations at the Port of Auckland. The ITA 'activity area' was detailed within the application for consent and was limited to the land and wharves that were existing at the time the application was made.</p> <p>As the wharf extension will expand or extend the original activity beyond the original consent, it should be treated as a new application, rather than a variation.</p>	<p>Agree, the expansion should be treated as a new activity.</p>	<p>DA</p> <p>B&C: Agree</p>

		Bledisloe North Wharf				
Applicant's View		Council's View				
Activity	Rule/ Status	Agree/ Disagree	Comments	Bentley & Co Response	Council's Comments (21.05.2025)	Overall Status (C1.6(4) and C1.6(3))
			<p>discretionary activity (E33.4.2(A24)).</p> <p>I would like to highlight that the applicant is only requesting ITA consent for the new Bledisloe wharf, which has an area of 8,500m². However, they have not accounted for the additional ITA areas of approximately 1,800m² related to the proposed extension of the Fergusson North wharf.</p> <p>As noted above, the POAL already holds a comprehensive site ITA consent. It is considered that the proposed extensions & works could be included in the existing ITA consent via a s127 application. Doing so will enhance the monitoring of the overall site under the existing Environmental Management Plan and Spill Response Plan. Additionally, these plans will be revised to include the necessary measures, methods, and controls for managing stormwater discharges from the proposed Bledisloe North wharf and the Fergusson North wharf extension.</p>			

Fergusson North Berth Extension						
Applicant's View		Council's View				
Activity	Rule /Status	Agree/ Disagree	Comment	Bentley & Co Response	Council Comment (21.05.2025)	Overall Activity Status C1.6(4) and C1.6(3)
New wharves in Port Precinct	I208.4.1(A24) RDA	Agree in part	Rule I208.4.1 (A24) is triggered, however the following F2 rule is also triggered: Rule F2.19.10 (A139) Marine and Port facilities and buildings not on an existing wharf or existing coastal marine structures - DA.	<p>Agree an activity in a precinct triggers all applicable provisions, including the underlying zone.</p> <p>F2.1. Zone description states: <i>“Notwithstanding the spatial extent of the Coastal – General Coastal Marine Zone, its objectives, policies and rules apply to all coastal zones and coastal precincts unless otherwise provided for in the specific zone or precinct.”</i></p> <p>Rule C1.6(2) states: <i>“Subject to Rule C1.6(4), the overall activity status of a proposal is that of the most restrictive rule which applies to the proposal.”</i></p> <p>Rule C1.6(4) also states: <i>“Where an activity is subject to a precinct rule and the activity status of that activity in the precinct is different to the activity status in the zone or in the Auckland-wide rules, then the activity status in the precinct takes precedence over the activity status in the zone or Auckland-wide rules, whether that activity status is more or less restrictive.”</i></p> <p>Rule I208.4 states: <i>“The activities, standards and assessment criteria in the underlying General Coastal Marine zone apply to the coastal marine area in the Port Precinct, unless otherwise specified below.”</i></p> <p>And: <i>“The activities in the Coastal – General Coastal Marine Zone apply to the coastal marine area in the Port Precinct unless otherwise specified in the Port Precinct activity table below.”</i></p> <p>In plain terms, this means that all relevant rules continue to apply within the Port Precinct unless the precinct provisions specifically override them.</p> <p>Where a precinct lists an activity in its activity table, this constitutes “otherwise specifying” how that activity is to be managed. In such cases, the corresponding zone rule for the same activity is overridden, but only to the extent that the precinct provides an alternative rule.</p> <p>Accordingly, only the precinct rule determines the activity status, in accordance with Rule C1.6(4). The</p>	The Council is of the view that for an activity to be ‘specified’, the exact activity should be specified. Activities with similar wording in our view does not constitute specifying (as mentioned in the letter above). Thus, we are of the view that F2.19.10 (A139) is applicable as well. However, given rule C1.6(4) the activity status in the precinct will override that of the zone (i.e. will be RDA). The overall activity status will remain RDA.	RDA B&C: Agree. Remains RDA as applied for.

Fergusson North Berth Extension						
Applicant's View			Council's View			
Activity	Rule /Status	Agree/ Disagree	Comment	Bentley & Co Response	Council Comment (21.05.2025)	Overall Activity Status C1.6(4) and C1.6(3)
				<p>Port Precinct specifies a restricted discretionary activity status for new wharves, which differs from the discretionary status that would otherwise apply under the zone. Therefore, the precinct status takes precedence.</p> <p>For completeness, resource consent has been sought on the basis of a discretionary activity overall, and the application assesses the proposal against all relevant objectives, policies, and standards of the Coastal – General Coastal Marine Zone, in addition to those of the Port Precinct.</p>		
Temp Construction activities in the cma outside the city centre	E40.4.1(A10) RDA	Agree	Rule E40.4.1 (A10) applies to activities. Rule F2.19.10(128) applies to temporary structures within the CMA – see below	<p>Agree that the Port Precinct's coastal area is treated as part of the "City Centre" for the purposes of Chapter E40. As a result, the thresholds and activity statuses that apply to "City Centre and Metropolitan Centres" in Table E40.4.1 also apply to temporary activities located within the Port Precinct's coastal marine area.</p> <p>Agree that Rule E40.4.1(A6) applies (restricted discretionary activity) to the construction activity occurring within the Port Precinct CMA that exceeds 21 consecutive days. This rule relates to the "temporary activity" aspect of the works, including the use of the area and associated effects (e.g. duration, hours, amenity effects).</p> <p>Agree that, in accordance with Note 3, Chapter E40 applies only to the temporary activity itself and not to temporary buildings or structures within the CMA. The associated physical structures (such as scaffolding) that extend into the CMA are instead managed under Chapter F2 (discussed further below).</p>	Agree that E40.4.1(A6) applies to construction activity that exceeds 21 days within CMA.	<p>RDA</p> <p>B&C: Agree. Remains RDA as applied for.</p>
Temp structures on land associated with building and constriction greater than 24 mths	E40.4.1(A24) DA	-	<p>Planner to confirm</p> <p>Note 3 in E40 states that the rules in E40 apply to temporary activities in the CMA expect for temporary buildings including structures, where F2 needs to be referred to. Therefore, Rule F2.19.10(128) applies to temporary structures and buildings within the CMA – see below.</p>	<p>Rule E40.4.1(A24) serves as a catch-all for temporary activities that are not otherwise provided for by Rules (A12) to (A23). In this instance, as the construction programme for the Fergusson North Berth Extension is for a duration of approximately 26 months, resource consent is required as a restricted discretionary activity pursuant to Rule E30.4.1(A24).</p> <p>It is acknowledged that Rule (A6) also captures long-duration temporary activities in the City Centre CMA. Rule E30.4.1(A24) has been included as a reason for consent out of completeness</p>	Agree. Rule E30.4.1(A24) – RDA is applicable for construction on land greater than 24 months.	B&C: RDA

Fergusson North Berth Extension						
Applicant's View		Council's View				
Activity	Rule /Status	Agree/ Disagree	Comment	Bentley & Co Response	Council Comment (21.05.2025)	Overall Activity Status C1.6(4) and C1.6(3)
			Note 5 in E40 states that For the purposes of the following activity table, standards and assessment criteria, the reference to ‘the City Centre and Metropolitan Centres’ means the coastal marine area within the City Centre precincts for Port precinct. Therefore, Rule E40.4.1(A6) or (A24) is considered relevant to construction activities other than structures and buildings in the CMA.	In any event, as both rules classify the activity as restricted discretionary, there is no difference in activity status or matters of discretion, regardless of which rule is relied on.		
Impact and vibratory piling	F2.19.8 (A114) RDA	Agree				RDA
Temp structure or buildings in CMA that exceed 40 working days	F2.19.10(A121) DA	Disagree	Rule C1.9 applies - RDA. Temporary coastal marine area structures are under F2.19.10(A128) - PA. Permitted activity standard F2.21.10.4 states that if the activity does not meet the Standard the activity defaults to Rule C1.9 - RDA.	Agree. Temporary coastal marine area structures are provided for as a permitted activity (Rule F2.19.10(A128), subject to Standard F2.21.10.4. As the temporary structures will be in place for more than 40 working days, compliance is not achieved with Standard F2.21.10.4, resource consent is required as a restricted discretionary activity (C1.9).	Agree. Standard F2.21.10.4. compliance not achieved and resource consent required as RDA (C1.9).	RDA B&C: Agree the activity status is RDA
Use of wharf for High Risk ITA activities	E33.4.1 (A8) CA	Agree	SWWWITA to confirm			CA B&C: Agree
Discharge from High Risk ITA activities	N/A	Disagree	The site (POAL) holds a port-wide ITA consent (No 25179) granted on 19 February 2010. This consent provides for the discharge of stormwater and contaminants from the entire existing commercial port designated as a “High Risk” activity area. The ITA consent is set to expire on 28 February 2045. Section 5.53 of the application report outlines the proposed activities to be accommodated within the development and the applicant has applied for land use and discharge consent as follows:	Agree. The application includes the discharge of contaminants from Fergusson North Berth Extension as a reason for consent. The term “industrial or trade activity area” is defined as <i>“the area of land or coastal marine area where a particular industrial or trade activity is being undertaken, which may result in the discharge of environmentally hazardous substances associated with that activity onto or into land or water.”</i> The Fergusson North Wharf extension will be used for commercial port activities, including ship loading and unloading. While all environmentally hazardous substances will be transported across the extension within bunded containers (to and from bunded ships), and the potential for any discharge of contaminants onto or into land or water is	Agree, consent for E33.4.2(A24) for Fergusson Wharf has been applied for. Agree that a new application is appropriate compared to a s127.	DA B&C: Agree that a discharge is included - DA

Fergusson North Berth Extension						
Applicant's View		Council's View				
Activity	Rule /Status	Agree/ Disagree	Comment	Bentley & Co Response	Council Comment (21.05.2025)	Overall Activity Status C1.6(4) and C1.6(3)
			<ul style="list-style-type: none"> <i>E33.4.1 - Use of land</i> The use of the wharf for an industrial or trade activity listed as "high risk" in Table E33.4.3 requires resource consent as a controlled activity (E33.4.1(A8)). <i>E33.4.2 – Discharge of contaminants</i> The discharge of contaminants from a new industrial or trade activity area listed as "high risk" in Table E33.4.3 requires resource consent as a discretionary activity (E33.4.2(A24)). <p>I would like to highlight that the applicant is only requesting ITA consent for the new Bledisloe wharf, which has an area of 8,500m². However, they have not accounted for the additional ITA areas of approximately 1,800m² related to the proposed extension of the Fergusson North wharf.</p> <p>As noted above, the POAL already holds a comprehensive site ITA consent. It is considered that the proposed extensions & works could be included in the existing ITA consent via a s127 application. Doing so will enhance the monitoring of the overall site under the existing Environmental Management Plan and Spill Response Plan. Additionally, these plans will be revised to include the necessary measures, methods, and controls for managing stormwater discharges from the proposed Bledisloe North wharf</p>	<p>considered to be very low, it is accepted that the wharf extension can be considered to form part of the industrial or trade activity area under the definition above. As such, resource consent has been applied for as a discretionary activity under Rule E33.4.2(A24).</p> <p>The substantive application assesses the effects of the industrial or trade activity discharge on a discretionary basis, including discharges from the Fergusson North wharf. That assessment includes consideration of all relevant objectives and policies of the Auckland Unitary Plan, including those under Chapter E33. The proposed conditions offered in the application are intended to apply to the management of stormwater and potential discharges from both the Bledisloe North Wharf and the Fergusson North Wharf extension, including through an updated Environmental Management Plan and Spill Response Plan.</p> <p>In relation to section 127 of the RMA, while POAL holds existing discharge permit No. 25179 for the wider commercial port operations, the industrial or trade activity area covered by that permit was confined to the land and wharves existing at the time of application. As the Fergusson North Wharf extension will expand the activity into an area not previously authorised by the existing permit, it is not considered appropriate to treat the expansion as a variation to that permit under s 127. Rather, the discharge should be authorised through a new consent.</p>		

		Fergusson North Berth Extension				
Applicant's View			Council's View			
Activity	Rule /Status	Agree/ Disagree	Comment	Bentley & Co Response	Council Comment (21.05.2025)	Overall Activity Status C1.6(4) and C1.6(3)
			and the Fergusson North wharf extension.			

Feedback to the Minister for the Environment on consideration of a substantial application

From		Karen Long		
Date that invitation from MfE was received:	Current Working Days	Brief sent	Asset Owner / Specialist report due	
		30.05.2025	13.06.2025	
Proposal		To authorise the construction and operation of a new 330m long and 27.5m wide wharf to the northern end of the existing Bledisloe Terminal and a 45m x 34 wide extension to the length of the existing Fergusson North Berth and establish a new cruise passenger terminal within the ground floor of the existing vehicle handling facility that is located on the Bledisloe Terminal, together with associated public drop-off and pick-up areas for taxis and coaches.		
Site address and Legal Description:		1-19 Quay Street BUN60445198		
Applicant		Port of Auckland Limited		

Specialist Response

From: Gabrielle Howdle, Principal Landscape Architect, Auckland Council

Date: 5th June 2025

Documents Reviewed: I have reviewed the information lodged as part of this fast-track application, including the following.

- Substantive Application prepared by Bentley & Co, dated March 2025.
- Proposed Plans prepared by BECA, dated 18th September 2024.
- Landscape Effects Assessment prepared by Boffa Miskell, dated 5th February 2025
- Bledisloe North Wharf and Fergusson North Wharf Extension – Appendix2 Graphic Supplement – Photographic Library of Ports with Visiting Vessels, prepared by Boffa Miskell, dated 5th February 2025.
- Bledisloe North Wharf and Fergusson North Wharf Extension – Appendix3 Graphic Supplement – Site Photographs, prepared by Boffa Miskell, dated 5th February 2025.
- Bledisloe North Wharf and Fergusson North Wharf Extension – Appendix4 Graphic Supplement – Visual Simulations, prepared by Boffa Miskell, dated 5th February 2025.
- Proposed Conditions (Attachment 15).

Overall Commentary:

- I understand that the proposal requires consent in relation to the wharf and berth extensions (structures within the coastal marine area and Port precinct) and earthworks.
- Previous consents cover required dredging or reclamation associated with the works, as well as a rock revetment associated with Fergusson North Berth, as such I have not provided comment on the potential adverse effects from these aspects. I understand that other works at Bledisloe Wharf associated with the cruise terminal are permitted activities, however it is recommended that good urban design outcomes are considered as part of this – e.g., pedestrian movement, opportunities for

incorporation of iwi design noting this will be the entry to Auckland for cruise visitors - the applicants response (23.05.2025) outlines their ongoing commitment to achieve this which is positive.

- Generally, I concur with the landscape, natural character and visual amenity context and values described within the Boffa Miskell Report and recognise the existing level of modification and presence of large-scale structures within the coastal environment. But also recognise the continued physical and visual connection between the city and the harbour edge, including as experienced from Queens Wharf and recreational users within the harbour waters, as well as the future anticipated public open space outcomes along the waterfront as outlined within the Port Precinct Future Development Framework Plan (April 2024, Eke Panuku).
- I consider that the Bledisloe Wharf extension (330m long x 27.5m wide – 9,075m²) will, from proximity viewpoints, initially appear as an annex to the existing wharf structure. This is due to the contrast in permeability and colour of the proposed structure, with the standard light colour of the concrete breastwork / edge and height of the edging disparity from the existing permeable wharf structure.
 - o However, over time with the aging of the concrete material, this contrast will be less prominent, with the wharf extensions appearing compatible with the overall wharf structure.
 - o I understand that feedback from mana whenua included commentary about providing for the opportunity for incorporation of iwi design into the project, as well as materials and design that manages the visual impacts of the structures, this wider edge /breastwork and the treatment of the visible piles (particularly at low tide) could provide opportunities for an element of detail, or artwork to be incorporated.
 - o The provision of fish habitat houses and mussel ropes (Condition 66 - Ecological Enhancement) is supported from a landscape and natural character perspective.
- I consider that the physical extension to Fergusson Wharf will not significantly affect the landscape, natural character or visual amenity effects, considering the existing mooring dolphin and access gangway. The proposed structure and finished appearance will continue the appearance of the existing wharf in terms of the spacing and type of piles and the edge / fender elements.
- I consider the greatest effects on natural character and visual amenity values will be the provision and increased number (including multiple cruise berthing at different wharfs e.g., Princess and Bledisloe at the same time), size (being 300m⁺ long), regularity, and colour (e.g., orange ships will be more visually prominent) of large ships in berth. While these will generally be periodic in nature, they will have the greatest impact on the large audience at Queens's Wharf, Princess Wharf, as well as to those recreational users within the proximate waters of the harbour to a moderate degree.
 - o The visual connection between the city and the harbour edge will be reduced to a degree when larger ships are berthed (and when all existing and proposed berths are used) as experienced from Queen Wharf and other elevated viewpoints within the city.
 - o The extent/scale of the extensions do not protrude further out into the harbour (compared to existing wharfs along the coastal harbour edge), ensuring that when the berths are not in use, the expanse and natural character values and amenity values of the harbour waters are not significantly affected.
 - o It is considered that the potential cumulative visual amenity effects of the additional berthing of ships at Bledisloe Wharf Extension (in addition to Queen and Princess Wharf) will not increase the impacts to any greater degree (moderate), as large ships are currently using Fergusson Wharf, and the visual impact will be temporary / on and off across the year. While the additional ship may block views to the water temporarily, it may also have a social or interest to some.
- It is understood that the proposal relocates the current roll-on-roll-off operations at Captain Cook Wharf to Bledisloe North Wharf. This facilitates, along with the previous removal of services / functions

on Marsden Wharf, for the future public orientated facilities and visitor facilities envisioned within the Port Precinct Future Development Framework Plan for Tāmaki Makaurau and City Centre Masterplan 2020 to be feasible.

- Overall, I consider the proposal for the extension to Bledisloe Wharf and Fergusson Wharf will generally have low to low-moderate adverse effects on the natural character, landscape and visual amenity at a wider context. For the large audience associated with Princess Wharf, Queens Wharf and recreational users in close proximity within the harbour the adverse effects on visual amenity, including the views to the wider harbour and gulf islands, will be impacted to a moderate degree. It is recognised that these effects will be experienced periodically throughout the year.

Recommended Additional Conditions:

- If the application was to be granted, I recommend the following points be included.

The following could be included as part of the proposed conditions of consent:

The final materiality and finished appearance of the Bledisloe Wharf Extension and Fergusson North Wharf Extension including piles, breastwork /edges are to be provided, including the demonstration of where detail design, materiality and / or iwi design has been introduced to minimise visual impact on the landscape, natural character and visual amenity values.

The following could be included as an advice note (associated with Condition 72):

The reuse of the existing rock revetment along Bledisloe Wharf is reused on site where possible, this could be in the construction of new structure, or elsewhere on site as barriers/features.

Appendix. – Effects Rating Table as it relates to RMA Situations – extracted from Te Tangi a te Manu

						SIGNIFICANT	
LESS THAN MINOR		MINOR		MORE THAN MINOR			
VERY LOW	LOW	LOW-MOD	MODERATE	MOD-HIGH	HIGH	VERY HIGH	

Asset Owner / Specialist Response (for BUN60445198, CST60445200)

From: Kala Sivaguru and Senior Specialist-Coastal, Auckland Council

Date: 02/04/2025

Application under the Fast-track Approvals Act 2024

Application File Ref: **FTAA-2503-1028**

Applicant: **Port of Auckland Limited.**

Overall Summary:

Port of Auckland Limited has applied under the Fast-track Approvals Act 2024 for resource consents to:

1. construct a reinforced concrete-piled wharf at the Bledisloe Terminal – the Bledisloe North Wharf (BN)
2. construct a reinforced concrete-piled extension to the existing Fergusson North Berth, associated fendering and a cruise passenger terminal (FN).

The application and technical reports submitted to support the application provides sufficient information to assess the effects from the proposal. My assessment in this memo covers **effects on coastal/marine ecology including underwater noise effects, water and sediment quality (including construction effects)**.

The technical reports relevant to my assessment have addressed appropriate effects from the proposal.

The proposed methodology of construction for the proposed works, including piling and the draft management plans submitted, are appropriate and are consistent with similar projects undertaken in Auckland region.

It is considered that any potential adverse effects on coastal/marine ecology including underwater noise effects on marine fauna from construction, water and sediment quality resulting from the proposed works would be less than minor on the coastal marine area, subject to adherence of good practice and with the proposed conditions of consent (including suggested amendments).

Review

I have reviewed the following reports submitted in support of the proposal:

- a) Substantive application for the Bledisloe north wharf & Fergusson north berth extension at the land and coastal marine area, The Port of Auckland, 1-19 Quay Street, Auckland.
- b) Attachment 31-Assessment of effects on the ecological environment prepared by KEL, dated February 2025.
- c) Attachment 33- Draft Little Penguin Management Plan
- d) Attachment 7-Indicative Construction Methodology, prepared by Beca, dated 10 September 2024.
- e) Attachment 10-Assessment of Construction Noise effects prepared by Marshall Day Acoustics, dated 04 February 2025.

- f) Attachment 11-Draft Underwater Construction Management Plan prepared by Marshall Day Acoustics, dated 04 February 2025.

My reviewed comments are outlined below:

1. Coastal ecological values (section 5 of the report)

The application area is within the Port precinct and in General Coastal marine Zone in the AUP (OIP). The site is not within Significant Ecological Area overlay in the AUP.

Attachment 31 provides substantive information to understand coastal/marine ecological values including conservation status of species within and in the vicinity of the application area. I agree with the values assessment provided for the application area..

2. Construction effects on coastal/marine ecology

Construction effects, including effects of demolition works, are covered in section 6 of the report.

Demolition works (BN, section 6.2 of the report):

For piles removal (8-9), two options are proposed. I prefer the option of removing the piles in their entirety, if possible, otherwise I agree cutting the piles below the seabed level.

Construction effects from proposed **revetment** works (Bledisloe North and Fergusson North, Section 6.3 of the report)

I agree with the applicant's assessment of the overall magnitude of effect of the revetment upgrading works on intertidal and subtidal habitats effects and mitigation proposed for the habitat loss resulting from the works including the effects on little penguins.

3. Construction effects on water and sediment quality

Effects from dredging (BN works)

Dredging/excavation is proposed for BN works (Section 6.4.4 of the report)

The applicant is relying on existing coastal permits for dredging associated with the proposed works. As such, effects from dredging do not need to be considered here.

Effects from piling works (Section 6.5 of the report)

I agree that the proposed piling works methodology is similar to the methodology used in the previous application. Impact driving and vibratory piling proposed for the works will generate underwater noise effects on marine fauna.

Effects on water and sediment quality from piling works

Effects on water and sediment quality resulting from an increase in the TSS & disturbance of contaminated sediment during construction would be localised and temporary. I agree with the assessment of effects and mitigation proposed.

4. Underwater noise effects from piling (impact and vibratory piling) on marine fauna (section 6.5.4 of the Ecology report & Section 5 of the Acoustic report)

I concur with the assessment of effects and support the mitigation measures and management zones proposed to minimise the effects on marine fauna (marine mammals, fish species & threatened species) in the above sections.

Underwater noise effects on threatened coastal birds (Little blue penguin)

I agree with the applicant that there are no established guideline values to assess the underwater noise effects from piling on birds. The applicant's search using a detector dog in 2024 identified a few positive signs of little penguins close to Fergusson wharf north and the Marine Rescue Centre. These findings indicate likely habitats of little penguins within the construction footprint of the proposal.

As stated in the Ecological report, rock revetment construction within Westhaven Marina in 2023 caused death of chicks due to disturbance of breeding little penguins.

Little penguins are categorised as "At Risk-Declining" in the New Zealand Threat Classification system (NZCTS) lists. Policy 11(a) of the NZCPS requires avoidance of adverse effects of activities on indigenous taxa that are listed as threatened or at risk in the New Zealand Threat Classification System (NZCTS) lists. The Ecological report has recognised the conservation values of little penguins and submitted a draft Little Penguin Management Plan.

The draft Little Penguin Management Plan is consistent with the management plans used in similar projects in Auckland region (e.g., Kennedy Point Marina construction). Accordingly, I support implementing the Management Plan during the construction of proposed works. In addition, I support the mitigation options proposed in the Acoustic report and in the draft underwater construction noise management plan to minimise the underwater noise effects on little penguins during construction.

Summary of underwater noise effects

The draft underwater construction noise management plan (UCNMP) submitted sets out best practicable options used in similar projects for underwater noise mitigation and management of piling works. The UCNMP states the draft plan shall be considered as a 'living document'. There may be changes as the project progresses. Accordingly, the UCNMP submitted must be finalised and certified by Council prior to construction.

Overall, the underwater noise levels during proposed piling works are likely to be higher than the ambient noise within the application area, and predicted thresholds for marine mammals in particular. However, I consider that the mitigation measures proposed for piling and observation requirements proposed for marine mammals within the predicted management zones for different cetaceans, blue penguins and divers in the Acoustic report are reasonable. Accordingly, I conclude that the adverse effects on potential marine fauna from the proposed impact driving/vibrating will be less than minor. This approach is consistent with similar projects undertaken in Auckland region to minimise the underwater noise effects.

Biosecurity effects

An assessment of the Biosecurity effects from the construction activity is provided in section 6.4.3 of the report. As stated in that Ecological report, the application area is well known to have a high number of non-indigenous species (NIS). Accordingly, biosecurity risks from the construction of proposed works is likely to be low.

5. Overall summary on coastal/marine ecology, water & sediment quality

In summary, it is considered that any potential adverse effects on coastal/marine ecology including underwater noise effects from construction, water and sediment quality resulting from the proposed works would be less than minor, subject to adherence of good practice and the proposed conditions of consent (including suggested amendments).

30 May 2025 comment

From: Kala Sivaguru <Kala.Sivaguru@aucklandcouncil.govt.nz>
Sent: Friday, 30 May 2025 11:00 am
To: Karen Long <Karen.Long@aucklandcouncil.govt.nz>
Cc: Alan Moore <Alan.Moore@aucklandcouncil.govt.nz>; Tola Omidiji <tola.omidiji@aucklandcouncil.govt.nz>
Subject: RE: Invitation to comment: Fast-track Application - Bledisloe North Wharf and Fergusson North Berth Extension-BUN60441598

I have had a review of the attached document with feedback from different parties. My understanding is that **no further comments are required from us** in relation to coastal matters. I can see some feedback on public access, but we did not assess the effects on public access, so it is not relevant to our assessment.

Specialist Response

From: Maddie White, Ecologist, Ecological Advice

Date: 12/03/25

Overall Summary:

I have reviewed Appendix 31 Assessment of Effect on Ecological Environment, Appendix 33 Draft Little Penguin Management Plan and Appendix 15 Proposed conditions of consent.

I defer to the Council Coastal specialist to review the effects on marine fauna and penguins while in the water.

Potential Effects of the Proposal on Avifauna

The Ecological Assessment identified red billed gulls and white fronted terns nesting within 300 m of the Bledisloe North (BN) works and 500 m of the Fergusson North (FN) works.

The Ecological Assessment also detected signs of little penguin burrows within the rock revetment near the FN works.

A Draft Little Penguin Management Plan has been provided with conditions to provide a finalised Little Penguin Management Plan. The Draft Little Penguin Management Plan outlines construction communications/ training, preconstruction survey, and capture, handling, and relocation of any little penguins identified within the works area.

Conclusion and Recommendations

The provided reports adequately identify the potential effects on avifauna within the proposed works area.

Asset Owner / Specialist Response

From: Fereita Timoteo– Specialist, Stormwater and Industrial Trade Activities, Specialist Input
– Planning & Resource Consents

Date: 13 June 2025

Overall Summary:

Port of Auckland Limited (POAL) have submitted a Fast-Track application for the construction and operation of a new 330m long and 27.5m wide wharf to the northern end of the existing Bledisloe Terminal and a 45m x 34m wide extension to the length of the existing Fergusson North Berth to accommodate larger container ships.

In addition, it is proposed to establish a new cruise passenger terminal within the ground floor of the existing vehicle handling facility that is located on the Bledisloe Terminal, together with associated public drop-off and pick-up areas for taxis and coaches.

The assessment herein presents comments from the perspective of a regulatory stormwater and industrial trade activity specialist of the Specialist Unit of the Planning & Resource Consents Department.

The application has been reviewed in relation to the relevant sections of the AUP(OP). The following application documents have been reviewed as part of this assessment:

- Part 1 - Substantive Application for the Bledisloe North Wharf and Fergusson North Berth Extension prepared by Bentley & Co dated February 2025, hereby referred to as the “application report”
- Attachment 13 - Assessment of Effects Associated with Industrial and Trade Activities and Stormwater Discharges prepared by Beca Limited dated 4 February 2025, hereby referred to as the “ITA report”
- Attachment 20 – Copy of Industrial or Trade Activity discharge permit

Authorisation

E8 – Diversion and discharge

Stormwater runoff from the proposed development will ultimately be discharged into the coastal marine area (CMA). Therefore, the proposed wharf structure within the CMA does not meet the definition of impervious area within the AUP(OP) as the structure does not **prevent or significantly retards the soakage of water into the ground**. Consequently, consent is not required under E8.

E9 – High contaminant generating activities

The impervious area comprising the pick-up and drop-off area and parking spaces in front of the passenger processing centre would be covered by the ITA consent, and therefore, the stormwater quality land use rules under Chapter E9 of the AUP(OP) would not apply.

Nevertheless, the AEE and relevant reports should note how the potential contaminants from the proposed pick-up and drop-off area will be mitigated.

E33 – Industrial or Trade Activities (ITA)

The site (POAL) holds a port-wide ITA consent (No 25179) granted on 19 February 2010. This consent provides for the discharge of stormwater and contaminants from the entire existing commercial port designated as a "High Risk" activity area. The ITA consent is set to expire on 28 February 2045.

Section 5.53 of the application report outlines the proposed activities to be accommodated within the development and the applicant has applied for land use and discharge consent as follows:

E33.4.1 - Use of land

The use of the wharf for an industrial or trade activity listed as "high risk" in Table E33.4.3 requires resource consent as a **controlled activity** (E33.4.1(A8)).

E33.4.2 – Discharge of contaminants

The discharge of contaminants from a new industrial or trade activity area listed as "high risk" in Table E33.4.3 requires resource consent as a **discretionary activity** (E33.4.2(A24)).

I would like to highlight that the applicant is only requesting ITA consent for the new Bledisloe wharf, which has an area of 8,500m². However, they have not accounted for the additional ITA areas of approximately 1,800m² related to the proposed extension of the Fergusson North wharf.

As noted above, the POAL already holds a comprehensive site ITA consent (No 25179). It is highly recommended that the proposed extensions & works be included in the existing ITA consent via a s127 application. Doing so will enhance the monitoring of the overall site under the same existing Environmental Management Plan and Spill Response Plan. Additionally, these plans will be revised to include the necessary measures, methods, and controls for managing stormwater discharges from the proposed Bledisloe North wharf and the Fergusson North wharf extension.

Stormwater management

The proposed development is expected to increase runoff flow rates and contaminant loading.

Section 3.2 of the ITA report outlines the proposed quality treatment for the development.

A new Stormwater360 Jellyfish device is proposed to treat stormwater runoff from the new Bledisloe North wharf. According to the ITA report, the stormwater treatment device has been sized in accordance with GD01 guidelines, taking into account the variations in levels between the existing and new wharf structures.

Stormwater runoff from the Fergusson North wharf extension will be diverted into the existing Stormwater360 Jellyfish chamber, which has sufficient capacity to treat stormwater discharges from the extension. As such, no additional stormwater treatment is proposed for the Fergusson North extension.

The applicant has proposed updating the existing Environmental Management Plan (EMP) to include the measures, methods, and controls necessary for managing stormwater discharges from the proposed Bledisloe North wharf and Fergusson North extension. This update will also encompass revisions to the existing Emergency Spill Response Plan (ESRP).

Assessment of effects on the environment

Multiple mitigation measures have been proposed to prevent contaminants from leaving the site. These measures include a proprietary treatment device (Stormwater360 Jellyfish), an updated Environmental Management Plan (EMP) that outlines both structural and procedural practices to prevent the discharge of contaminants, and a revised Emergency Spill Response Plan (ESRP).

Although GD01 (the Council's Water Sensitive Design Guideline) excludes these devices, the Stormwater360 Jellyfish is designed to provide 75% Total Suspended Solids (TSS) (contaminant removal) in accordance with Auckland Council 'Technical Publication 10 Stormwater Management Devices: Design Guidelines Manual 2003' (TP10) (predecessor to GD01) and the Council's Proprietary Device Evaluation Protocol (PDEP) on a long-term average basis. As such, it is considered the best practicable option for water quality treatment for the new wharf structures.

The application documents do not include the cross-section & preliminary design sizing calculations for the new Jellyfish device. It is essential to review these preliminary calculations to ensure that the proposed treatment will mitigate the stormwater quality effects of contaminants generated by the site's proposed activities, such as total suspended solids (TSS), hydrocarbons, heavy metals, and oil & grease. The Jellyfish device is considered best practice as it allows mitigating the effects of these contaminants generated by the site's proposed activities.

The proposed updated EMP has not been included in the application reports. The applicant has suggested a condition for the EMP under Condition 44, which will need to reference the update of the existing EMP.

To ensure that the discharge of contaminants from the treatment system is minimized to an acceptable level and to assess the effectiveness of stormwater management practices, it is essential to implement and maintain a robust maintenance and monitoring program for stormwater discharges from the Jellyfish device. Therefore, we recommend including a discharge monitoring program to be conducted approximately quarterly or biannually over a period of three years.

The operation and maintenance of stormwater management and treatment devices are crucial to ensuring that the effects continue to be mitigated. The applicant has proposed, under Condition 40, that a final Operation and Management Plan (OMP) be developed and implemented upon the completion of the proposed development. As previously stated, it is recommended to include the proposed extensions and works in the existing ITA consent through a Section 127 application. Therefore, the POAL site currently has an OMP, which can be updated to incorporate the stormwater works related to the proposed development.

Overall, the proposed water quality treatment is considered appropriate in the context of the development and the anticipated contaminants, such that the effects of stormwater discharge to the receiving environment will be adequately avoided or suitably mitigated.

Specialist Response

From: *Louis Boamponsem PhD, Senior Specialist (Air Quality), Specialist Unit, Planning & Resource Consent Dept., Auckland Council*

Date: 24/2/2025

Overall Summary:

I have reviewed the proposed Bledisloe North Wharf and Fergusson North Wharf extension project, with a focus on potential air quality impacts from shipping emissions. This assessment considers relevant provisions of the Auckland Unitary Plan (AUP(OP)), national air quality standards, and findings from Boamponsem et al. ([2024](#)) and MfE ([2024](#)) on long-term air pollution trends and shipping-related emissions.

The Port of Auckland is a known source of fine particulate matter (PM_{2.5}) and sulphur dioxide (SO₂), primarily from marine diesel combustion in ship engines. Boamponsem et al. (2024) identified sulphate/marine diesel emissions as a contributor to Auckland's air pollution, with shipping impacts detected at key monitoring sites, including Queen Street and Khyber Pass Road. While shipping remains a contributor to Auckland's air pollution, its impact has lessened due to interventions such as regulations requiring low-sulphur fuels and improved engine technology.

Potential Effects of the Proposal on air quality

- Relocation of cruise ships to Bledisloe North Wharf may shift air pollution exposure from Princes Wharf to new receptor areas.
- Increased berth capacity at Fergusson North Wharf could result in a higher volume of ship movements, leading to temporary increases in emissions, though improved efficiencies in logistics may offset some of these effects.
- Existing background air quality in the Auckland city centre and port area generally meets national standards, though localised effects need careful consideration.

Conclusion and Recommendations

Overall, I support the applicant's conclusion that the air quality impacts of the project will be minor, with some localised shifts in pollutant exposure rather than an overall increase. To further mitigate potential impacts, the Port may consider:

- Continuous air quality monitoring for PM_{2.5}, PM₁₀, and SO₂ at a sensitive receptor near the project site is recommended to assess potential localised impacts from relocated shipping emissions. This will help validate air dispersion modelling, ensure compliance with air quality standards, and provide data for any necessary mitigation measures.
- Ensuring compliance with low-sulphur fuel regulations to sustain the declining trend in ship-related emissions.

Given the expected compliance with national air quality standards and ongoing regulatory improvements, adverse effects from the proposal should remain within acceptable limits.

Asset Owner / Specialist Response

From: Andrew Gordon, Senior Specialist (Noise & vibration), Auckland Council

Date: 1 April 2025

Overall Summary:

I have reviewed the AEE dated February 2025 and specifically Appendix 10 Assessment of Construction Noise Effects by Marshall Day Acoustics (Revision 3, 4 February 2025) and Appendix 15 Proposed conditions of consent.

The proposed works are adequately described, which is essential to identify key activities and machinery expected to be used during construction. Further, key machinery/activities and associated sound power levels set out in Table 2 are considered representative of the proposed works.

Affected neighbours (i.e. closest building occupants) are correctly identified. I note the closest neighbours are approximately 550m to the south within the Business – City Centre Zone on the south side of Quay Street.

For assessment purposes, I agree construction noise (airborne) levels specified in Auckland wide standard E25.6.28 and Table E25.6.28.2 apply.

Based on the assessment, I agree compliance is expected to be achieved and that noise from the majority of works (except pile driving) will be indiscernible relative to existing ambient and background noise including noise from day to day port activities.

I confirm specific construction noise mitigation is not necessary and are not included in the predicted construction noise levels.

In my opinion noise effects during construction will be at reasonable level.

Construction vibration effects are not assessed, however, I note the assessment states: -

Construction vibration is predicted to readily comply with E25.6.30. So much so, it is unlikely to be perceptible in any building outside the Port Precinct, so is not considered in any further detail in this assessment.

Based on my experience reviewing marine piling, I agree vibration effects are expected to be imperceptible given the setback distance from the piling works to the closest neighbouring occupied building.

Operational noise effects are not assessed, specifically from proposed activities described in the AEE: - *‘a new cruise passenger terminal within the ground floor of the existing vehicle handling facility that is located on the Bledisloe Terminal, together with associated public drop-off and pick-up areas for taxis and coaches.’*

In my opinion, this a relatively low noise creating activity compared to existing port activities and is expected to increase existing ambient noise levels by $\leq 3\text{dBA}$ (i.e. subjectively just perceptible) and will be limited to intermittent cruise ship passenger disembarkation and embarkation.

Also, as the above operational activities will occur within the Port Precinct (I208) I confirm Auckland wide Chapter E25 does not apply and as described in the AEE are a permitted activity within the Port Precinct.

I agree specific conditions to manage construction noise (airborne) and operational noise are not required.

MEMO

Assessment Contamination BUN60441598, The Land and Coastal Marine Area, The Port of Auckland, 1-19 Quay Street, Auckland.

From: Duffy Visser, Specialist -Contamination, Air & Noise Planning & Resource Consents Auckland Council.

Date: 19 June 2025

Documents Reviewed:

- Substantive Application for the Bledisloe North Wharf and Fergusson North Berth Extension, by Bentley and Co, dated February 2025. (AEE)
- DRAFT - Preliminary Site Investigation / Detailed Site Investigation – Contamination by Beca Ltd, dated 28 August 2024. (PSI /DSI)
- DRAFT Contaminated Soils Management Plan Fergusson (FN) and Bledisloe North Wharf (BN) Extensions by Beca, dated 19 September 2025.(CSMP)

Reasons for consent:

The National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health (NES:CS) applies to certain activities, such as soil disturbance or changing the use of a 'piece of land,' where it is more likely than not that an activity listed on the Hazardous Activities and Industries List ('HAIL', Ministry for the Environment, 2011) has occurred. Chapter E30 applies to discharges of contaminants to land or water from land containing 'elevated levels of contaminants,' as defined in the AUP(OP).

Based on the results of the PSI /DSI the land disturbance activities associated with the proposed development will likely require resource consent as a Controlled Activity under Regulation 9 of the NES:CS. A Contaminated Soil Management Plan (CSMP) to support the works has been provided.

However, as contaminants do not exceed the permitted activity soil acceptance criteria set out in Table E30.6.1.4.1, the site is not land containing 'elevated levels of contaminants' therefore the contaminated land provisions of Chapter E.30 of the AUP(OP) are not triggered in this instance.

Overall Summary:

The PSI/DSI identified multiple HAIL activities which may have resulted in the contamination at the site (BN area and FN area) on a more likely than not basis (including reclaimed land, chemical storage, a substation and port activities). Due to port operations at the time of the investigation only one sampling location was possible within the area proposed for soil disturbance. Additional soil sampling was undertaken from four additional sampling locations as close as possible to the BN area and from one location from as close as possible to the FN area. Groundwater sampling was undertaken from two of the soil sampling locations. Samples were tested for heavy metals, TPH, PAH and asbestos. All analyte concentrations were reported below the adopted human health guidelines, heavy metals PAHs, TPH and asbestos were detected above background levels.

Concentrations of nickel above the AUP(OP) permitted activity soil acceptance criteria were encountered in seven samples. However, the concentrations were reported below background concentrations for volcanic soils and therefore can likely be attributed to the local soils rather than contamination from a historic activity held on site. As a result, the environmental discharge risk from these nickel concentrations is considered to be low.

The concentrations of all contaminants of concern in the groundwater samples were below the laboratory limit of detection

The CSMP outlines procedures for the management of potential contaminants of concern identified in the PSI/DSI, in the case of unexpected discovery in which case, the procedures may need to be modified depending on the extent of the discovery.

The PSI/DSI identified additional areas on site in the eastern portion of the Bledisloe North Wharf (BN) site area which could present a contaminated soil risk. However, as these areas were operational at the time of the PSI/DSI investigation, soil sampling across these areas was not viable. As a result, should disturbance works be proposed in these areas, soil sampling will be required to appropriately inform risk from contaminants in soils. Depending on the outcome of this further testing the procedures within the CSMP may require updating.

Comments on draft conditions

It is my opinion that the draft conditions in Attachment 15 of the application 68 to 73 adequately addresses the contamination risks associated with proposed development.

I do not recommend any additional conditions.

Memo: Fast-track Application - Bledisloe North Wharf and Fergusson North Berth Extension-BUN60441598

From: *Rajesh Jeyaram*

Senior Development Engineer

Regulatory Engineering & Resource Consents – Central

Date:11/06/2025

Documents Reviewed:

The following documents were reviewed:

- Fast Track application by Bentley & Co dated March 2025
- Proposed conditions of consent
- Applicant's response to Council's specialists draft memos dated 23 May 2025

Overall Summary:

Thank you for sharing other specialist comments including Healthy Waters and Watercare comments. I concur with their comments on stormwater and wastewater reticulations, and I don't have any further feedback on this proposal.

I note you will be receiving stormwater quality feedback from SWWITTA team as such no further feedback is required from me. Coastal specialist input also sought on the coastal effects respect to coastal erosion and inundation and it is satisfied.

I support the impose of the condition on earthwork and sediment control covered under the proposed conditions (Erosion and Sediment Control (21)-(24)) where detailed construction methodology for the proposed extended Wharf Structure (pile supported concrete deck) is to be provided to the satisfaction of the Team Leader – construction monitoring with the Erosion Sediment Control Plan (ESCP)

I also support the impose of the condition on stormwater management works covered under the proposed conditions (Stormwater management works (35)-(43))

I have no concerns from a development engineering perspective.

Recommended Additional Conditions:

Nil

MEMO TEMPLATE AS FOLLOWS:

From: Leon Blackburn, Principal Specialist – Environmental Monitoring, Auckland Council

Date: 16 June 2025

Documents Reviewed:

- Attachment 15 Proposed conditions of consent
- Attachment 13 Assessment of ITA and Stormwater
- BUN60445198 Applicant Response to Auckland Council dated 23 May 2025

List all associated reasons for consent for your topic area: *List these*

All reasons for consent– based on monitoring of all consents

ITA and stormwater for ongoing monitoring and relationship with existing ITA and stormwater consents

Overall Summary:

Based on the areas outlined in consent (NRSI_25179) DIS60264283 being PoAL existing ITA consents, I would still consider in the monitoring of that consent, the need to provide flexibility through varying that consent to accommodate onsite improvements and developments.

These points formed initial questions as per points 35, 36 and 39 - Applicant Response to Auckland Council dated 23 May 2025

Some conditions of that ITA consent require variation to address on-site improvements and developments and a variation to that consent could incorporate this, and the Fergusson Wharf treatment device (in advice note to proposed condition 35) propose more fully and streamlined ongoing monitoring and compliance requirements. Such an approach would greatly improve the holistic management of the site and its operations.

Similar discussion has been had with other additional wharf extensions, previously.

Notwithstanding the above, and in anticipation that this proposal will result in additional ongoing consents, with conditions requiring management and monitoring, I provide recommendations to better integrate them with the ongoing management documents and approaches.

Comments on draft conditions (Appendix 15)

A number of conditions duplicate management plan requirements under the sites existing consents. It is recommended that these conditions require the updating of existing site management plans to avoid this duplication.

Condition 5:

I note that the proposed expiry date aligns with the expiry date of the current ITA consents and support this.

Condition 6(e):

- I recommend removal of clauses (d) and (e) as the EMP:S relates to the ongoing management of the site, and provision of an updated version 10 days prior to commencement of works makes little sense. Provision of the updated information can and should occur upon completion of the installation of the devices to and procedures to which the document relates.
- **Timeframe conflicts/unclear wording:**
 - Wording states '*unless stated otherwise within these conditions [...] 10 working days prior*'. Yet condition 40 requires submission within 30 days of completion of stormwater management works, but yet still needs to be in accordance with condition 6 '*at least ten working days prior to commencement of works*'.
 - The requirement to provide an Operation and Maintenance Plan (OMP) 10 days prior to works commencing (**condition 6(d)**) **conflicts with** the timeframe of providing an updated one within 30 days of installation of the stormwater management works. The later (as per **condition 40**) is preferable and workable.

I recommend that the condition 6 be split into those plans required to be provided 10 days and prior to commencement of works (condition 6A) and those management plans required to be provided at whatever time their specific condition requires (condition 6B). This will address the discrepancy for all relevant management plans.

Conditions 40 through 48

- The information required to be contained within the OMP and EMP:S forms an updated section of the sites existing EMP:S, not a stand-alone document. Subsequent conditions or an advice note to this effect would clarify this relationship.

Recommended Additional Conditions:

- None

Asset Owner / Specialist Response

From: James Stewart (Economist), Gary Blick (Chief Economist) Auckland Council

Date: Friday, 19 June 2025

Overall Summary:

We were invited to review and comment on, "Extension of Fergusson and Bledisloe Facilities Economic Impact Assessment" (EIA) by Market Economics. The EIA examines potential positive economic impacts of a proposed expansion by Ports of Auckland Ltd (POAL). Our interpretation, consistent with RMA (s.32), is the purpose is to assess the potential benefits and costs of the economic effects of the proposal relative to the counterfactual (in the absence of the proposal). We interpret this as an analysis of the resource trade-offs.

The EIA refers to a need for port capacity within New Zealand to respond to growing demand for traded goods and changes in modern vessel design. It underscores the importance of POAL activities, particularly as a major containerised goods and tourist port and highlights how its strategic location facilitates agglomeration benefits both locally and regionally.

However, the EIA's quantitative methodology for assessing the benefits of POAL's current operations as importer/exporter using an input-output analysis is unsuited to the analytical task. The method employed assumes all inputs (resources) are wholly substitutable and exist in unlimited quantities at no cost and that there would be no behavioural change of economic agents in response to the expansion, beyond a pro rata increase in consumption / investment spending.

The projections presented in the EIA suggest significant latent unused capacity in the economy would remain unutilised unless the port is expanded. The input-output analysis overstates the value of the expansion because it does not include the opportunity cost of these displaced resources, i.e., what these resources could achieve if allocated elsewhere. This is a significant disadvantage of not utilising a framework that considers the overall resource impacts of investment decisions.

A cost-benefit analysis framework would be better suited to addressing the core task – weighing up resource trade-offs. This could be achieved by establishing an appropriate counterfactual (presumably no POAL expansion or the expansion of a competing port) and identifying and evaluating the costs and benefits of the proposed expansion against this counterfactual. This approach would be more flexible by enabling a range of scenario and sensitivity testing to ensure the robustness of the results under differing, plausible assumptions.

The EIA does acknowledge competing ports in the North Island; however, it does not consider whether these ports could substitute POAL to accept larger, modern vessels. An analysis of why these ports may not be suitable alternatives to Auckland could strengthen the report's findings, e.g. importing more containerised freight through ports that are further in distance for the main market (Auckland) would add overland transport

costs that would ultimately be borne by the consumer (and so reducing the consumer surplus).

While the report attempts to quantify some benefits of the proposed expansion, the methodology used is not particularly convincing. None of the costs of the proposal have been acknowledged or quantified, leaving it unclear whether the economic costs of the project outweigh the benefits. The EIA does not arrive on a position of the net economic impact of the POAL extension.

Despite these methodological limitations, we consider it reasonable to conclude that the proposal is likely to make a positive contribution to the regional and national economy and deliver a net benefit to society. This conclusion assumes that, in the absence of the proposal proceeding, POAL would eventually face capacity constraints resulting in the displacement of container and/or vehicle trade to the next most likely port, the Port of Tauranga — which is located further from the primary import market of Auckland. As evidence, prior studies that have applied cost benefit analysis have found that:

- Society would likely be materially worse off if vehicle imports are moved away from Auckland, due to the increase in land-side supply chain costs (NZIER, 2017).¹
- Moving the POAL container trade to an alternative location, either an existing port or a new site, would be unlikely to result in a net benefit to society relative to the counterfactual where the activity remains at POAL (e.g. Sapere, 2020).²

¹ NZIER (2017) *Future of New Zealand's vehicle supply chain: The role of the Ports of Auckland*

² Sapere (2020) *Analysis of the Upper North Island Supply Chain Strategy Working Group Options for moving freight from the Ports of Auckland*

Asset Owner / Specialist Response

From: Honwin Shen, Auckland Council, Senior Traffic Engineer

Date: 28/05/2025

1. Overall Summary:

This memo provides a summary review on the Fast Track application of the proposed construction of a new wharf at the northern end of the Bledisloe North (BN) Terminal and an extension to the length of the existing Fergusson North (FN) Wharf.

The following documents were reviewed:

- Fast Track application by Bentley & Co dated March 2025
- Assessment of Transport Effects (TA) by Beca dated 5 February 2025
- Proposed plans by Beca dated 18 September 2024
- Proposed conditions of consent
- Beca's response dated 23 May 2025

2. The Proposal

The proposed access, routing paths and pick-up/drop-off arrangements have been provided. Whilst diagrams are not detailed drawings and vehicle tracking has been undertaken on aerial drawings, the information is considered sufficient to indicate the workability of the proposed arrangements. Further detailed plans/and drawings should be provided as the design progress.

*Beca's response Item 75 – Access, routing paths and pick-up/drop-off arrangements
Beca advises that further detail will be provided in the TMP which is a proposed consent condition.*

Council's Traffic Engineer - Response is accepted. The TMP will be a guiding document once the site is operational.

3. Trip Generations

3.1 Bledisloe Wharf

The anticipated trip generation for the larger cruise ship which could be accommodated at the Bledisloe Wharf once redeveloped, is based on the data from other cruise ships which currently dock at the port. However, the raw survey data has not been provided for this review. The review was based on informed the trip generation estimates for this assessment be provided.

Assumptions adopted for the assessment:

- Maximum of 4,905 passengers;
- Disembarkation would be the critical period for assessment;
- 3.5 hour assessment period; and
- Occupancy rates of 60 passengers per coach and three passengers per light vehicle

Two scenarios have been assessed with respect to disembarkation, these being:

- Transit call, where passengers disembark for a period or a day trip and re-embark; and
- Passenger exchange, where passengers permanently disembark from the ship with their luggage in the morning and new passengers embark with their luggage in the afternoon.

It has been assumed that around 78% of passengers (3,800) would undertake a day trip for a transit call and around 97% of passengers (4,750) would disembark in the morning for a passenger exchange. Based on the adopted occupancy rates this equates to a demand for 42 coaches and 118 light vehicles over 3.5 hours, or a total of 160 vehicles (320 vehicle movements) over 3.5 hours for a transit call. Similarly, for a passenger exchange, a total of 365 vehicles (730 vehicle movements) are anticipated for a passenger exchange. Given the above, more details about the taxi, coaches, pick up and drop off should be provided to understand whether the proposal can cater for these additional demands.

Beca's response Item 76 – Trip generation assumptions

Beca advises that the coach and taxi/rideshare provision is based on the higher demand scenario for either of the commercial vehicle types. Demands will be staggered across 3.5hrs. An overflow area is also proposed to accommodate fluctuations or higher demand.

Council's Traffic Engineer - Response is accepted. A conservative assessment has been undertaken and as the trips will be staggered over a 3.5hr period, effects will be able to be managed.

3.2 Fergusson Wharf

The TA notes that the proposed expansion is expected to generate 1,500 TEUs (twenty-foot equivalent units) per metre per annum, which equates to a total of 67,500 TEUs per annum handled by the extended wharf.

It has been assumed that 80% of the TEUs would be transported by trucks, with each truck carrying 1.4 TEUs. Based on this, trucks would transport some 54,000 TEUs per annum. A daily demand of 106 trucks per day has then been calculated, which is presumably based on 365 days per year. However, this includes non-working days such as public holidays.

Notwithstanding this, truck movements typically occur outside of the peak periods, and it is unlikely that even if non-working days were excluded, the effects on the road network would be significant.

4. Construction Transport Effects

The likely effects of construction traffic have been assessed in the TA. This has been reviewed and it is agreed that with a proper Construction Traffic Management Plan in place, construction effects can be suitably managed.

5. Operational Effects

General operational effects have been assessed using the SIDRA analytical tool with the intersections of Tinley Street / Quay Street and Solent Street / Tamaki Drive analysed. The use of SIDRA in this circumstance is considered appropriate. However, the actual SIDRA files are requested for review to understand what inputs and assumptions were used.

Beca's Response Item 79 – SIDRA models

Beca have not provided the actual SIDRA models and the assumptions built into the models. Beca confirms that the base models were informed by current traffic demands and signal timings (from SCATS), as well as site observations of queues.

Council's Traffic Engineer - Response is accepted. There is no reason to suspect that the default parameters in the SIDRA model have been changed and that the base models will have been calibrated to the queues observed.

It was also unsure the analysis would also take account of the movement of crew, suppliers and service personnel occurring simultaneously with disembarkation. For example, the TA notes that cruise ship visits typically require up to 10 semi-trailer trucks transporting 40ft containers of provisions per berthing. Do these movements occur outside of the busiest periods associated with disembarkation?

Beca's Response Item 80 – Co-incident crew movements and traffic movements associated with supplies

Beca confirmed that supply movements do not coincide with passenger movements and that crew movements are typically low (and usually occur separate to passengers).

Council's Traffic Engineer - Response is accepted. Traffic movements associated with supplies and crew will not coincide with passenger movements so will not contribute to the effects on the transportation network in the vicinity of the site.

The TA stated that an increase of 649 pedestrians per hour is anticipated on Quay Street. This represents a 35% increase on the reported peak hour pedestrian volumes on Quay Street. Do these peaks coincide? Is there sufficient capacity on the Quay Street footpaths to accommodate this increase? What is the likely effect on vehicular traffic of additional pedestrian movements crossing Quay Street at peak times?

Beca's Response Item 81 – Pedestrian demands

Beca states that disembarkation times are staggered and the wide footpath on Quay Street will be able to handle the anticipated pedestrian volumes. Beca also states that no changes are proposed to signal phasing at intersections, so the operation of the corridor for cars and buses will not be affected.

Council's Traffic Engineer - Response is accepted. The anticipated peak 649 pedestrians per hour reflects a rate of around 11 pedestrians per minute and the footpath width of almost 6m will be capable of handling this pedestrian flow.

During peak cruise periods there is a possibility of more than one cruise ship arriving simultaneously. Has this eventuality been considered in the assessment?

Beca's Response Item 82 – Simultaneous arrival of cruise ships

Beca responds, "There are likely to be days when two cruise ships berth, but this currently occurs, so there are no additional transport effects".

Council's Traffic Engineer - Response is accepted. It is anticipated that POAL will control this to some extent.

The responses received from Beca are accepted, no further information is required from a traffic engineering perspective.

Overall, there are no concerns with this proposal from a traffic generation and safety perspective. The proposed conditions of consent are acceptable.

Agency and Department Leads Input Request

From: Neil Stone, Principal Development Planner, Auckland Transport

Date: 26/05/2025

Overall Summary:

Thank you for the opportunity to comment on the Fast Track application to authorise the construction of a new wharf at the northern end of the Bledisloe North (BN) Wharf and an extension to the length of the existing Fergusson North Wharf. It is noted that the proposed extension to Bledisloe Wharf will accommodate large cruise ships (>300m), while the extension to the Fergusson North Wharf is to cater for larger container ships. Additionally, it will allow, all roll-on/ roll off vessels from Captain Cook to be relocated to the BN wharf, and that this will ultimately enable the transfer of Captain Cook and Marsden Wharves and associated land to transfer to Auckland Council in due course.

AT acknowledges the benefits of the proposal and notes that the proposal will remove some traffic from Quay St and Princes Wharf associated with >300m long ships. The proposal also avoids the need for a significant number of coach movements between Queen's and Fergusson Wharf, which can affect pedestrian and cycling movements in Quay Street. The proposal will over-time enable a reduced number of cruise ships visiting Princes Wharf which will assist in reducing conflicts with ferry movements. The proposal is considered to be consistent with the strategic intent of the Central Wharves Masterplan and long-term goals for the waterfront.

1. Documents reviewed

- Fast Track application and Assessment of Effects prepared by Bentley and Co, dated March 2025;
 - Unitary Plan rules assessment (Fast Track attachment 22);
 - Proposed conditions of consent (Fast Track attachment 15);
- Assessment of Transport Effects, prepared by Beca, dated 5 February 2025 (Fast Track attachment 12);
- Beca letter to Ports of Auckland dated 15 May 2025.

2. Teams consulted

- Traffic Engineering;
- Auckland Transport Operations Centre;
- Integrated Network Planning;
- Network Operations Planning;
- Design and Standards;
- Transport Operations.

3. Background

AT was invited to provide feedback on a pre-application with Council prior to the lodgment of the Fast Track consent. A memorandum outlining AT's initial comments was provided to Council and the applicant on the 29th of November 2024. The initial feedback provided was based on a presentation document prepared by Port of Auckland (dated 26 July 2024) and an Assessment of Transport Effects report prepared by Beca (dated 6 November 2024). Further discussions have taken place with the Port of Auckland and a letter from BECA has been provided, which AT considers would form part of the application documents and will be considered an update to the Transport Assessment submitted.

Anticipated Trips and Movement

The Beca Transport Assessment section 3.1.3 provides an overview of the anticipated movements generated by the proposal. This section provides two scenarios:

- I. Transit call - Limited time berth where passengers undertake a day trip. This is expected to include 3800 passengers, which requires 42 coaches, 118 light vehicles (such as taxis), and 926 pedestrians across 3.5 hours.
- II. Passenger exchange - Disembarking of passengers with other passengers embarking on the ship within one day (noting that embarking and disembarking times do not coincide). Either embarking or disembarking is expected to require 25 coaches, 341 light vehicles, and 2227 pedestrians across 3.5 hours.

4. AT Comments

4.1 Private Vehicle Parking

The Transit call scenario results in a higher portion of coach trips but fewer light vehicular trips, the assessment outlines that these passengers are more likely to be tourists and not reliant on private vehicle movements. The passenger exchange scenario includes a higher number of passengers who may rely on pick-up and drop-off (PUDO) by private vehicle. The letter to PoA from BECA, dated 15 May 2025 notes that the number of passengers entering or exiting the cruise ships via private PUDO will be low, it acknowledges that a private PUDO area will be provided internally to the site through four parking spaces. Private vehicles entering the site will be directed to this drop-off area by marshals at the entrance off Tinley Street.

AT considers that the four private vehicle PUDO spaces will be sufficient and that procedures could be put in place by the PoA, as they see fit to manage the turnover of these spaces to manage volumes and in order to maintain the efficiency of coach and ride share spaces.

4.2 Tinley Street, Quay Street, Tangihua Street Operation

Based on the assessment provided by the applicant, including the modelling of the Tinley Street/ Quay Street intersection and AT's own review, it is noted that Tinley Street would experience an increase in congestion when cruise ship passengers are being processed. The model indicates a high increase in the Degree of Saturation for the Tinley Street approach. This indicates that Tinley Street is sensitive to high increases in traffic levels.

AT notes that there is potential for minor delays relating to vehicles exiting or entering Tinley Street. This might result in effects on both Quay Street and Tangihua Street; however, it is expected that these effects can be managed. As such it is considered the proposal aligns with Future Connect - Auckland Transport's Network Plan, as well as the Auckland Network Operating Plan. The policy documents indicate higher strategic priority for Quay and Tangihua Streets. AT considers that the Port can address any potential capacity and congestion issues on Tinley Street through the proposed Cruise Ship Traffic Management Plan. The plan would be able to allow a range of interventions to manage the movements associated with both cruise and freight traffic.

4.3 Pedestrian Access Gate on Quay Street

The applicant is proposing a pedestrian gate on the northeastern side of the Britomart Place/ Quay Street intersection. AT agrees that this gate is required for direct pedestrian access to Quay Street and is a positive addition to the proposal. The applicant also proposes a waiting area

internally to the site to help manage volumes on the Quay Street footpath and to avoid any effects of spill over onto the cycleway.

AT also recommends that, visible wayfinding signage should be provided in proximity to the proposed pedestrian gate, so that pedestrians exiting the site can readily and safely disperse into the city.

The provision of the gate is considered to form part of the proposal. The signage requirements are recommended as a condition of consent as part of the proposed transport management plan.

Watercare Services Limited's comment regarding **Bledisloe North Wharf and
Fergusson North Berth Extension**

From: *James Shao, Watercare Services Limited*

Date: *5 June 2025*

Overall Summary:

Watercare (WSL) has reviewed the document from the link regarding the proposed extension work plan for Bledisloe North Wharf and Fergusson North Berth. WSL has no objection to the proposed work.

WSL could not identify any existing public water or wastewater asset within the area outlined for the above-described wharf extension work.

If there is any plan in the future to extend the public water or wastewater network into the port-managed Wharf area, WSL can provide our advice accordingly.

Agency and Department Leads Input Request – Healthy Waters

From: Hillary Johnston – Consultant Specialist, Growth & Development, Healthy Waters and Flood Resilience

Date: 07.04.2025

Overall Summary

The Applicant, Ports of Auckland Limited, is seeking consent to construct and operate a new wharf, measuring 330m in length 27.5m in width (9,075m² total area), at the northern end of the existing Bledisloe Terminal (**Bledisloe North Wharf**). This will enable the accommodation multi-cargo vessels, including the relocation of roll on roll off and large cruise ship vessels .

The proposal also includes an approximately 45m x 34m extension (1,530m² total area) to the existing Fergusson North Berth to accommodate larger container ships and enable quay cranes to access the full length of the berth (**Fergusson North Berth Extension**).

Authorisation Mechanism

All stormwater networks within the development site are private. It is not proposed to vest any stormwater management devices or network to Healthy Waters.

The applicant has sought a private diversion and discharge consent as a Discretionary Activity under E8.4.1(A10) of the Auckland Unitary Plan. The proposed development will not rely on the Regionwide Network Discharge Consent.

Stormwater Management

For the Bledisloe North Wharf, stormwater from the new main wharf deck area will be collected and treated by a proprietary Stormwater360 Jellyfish Filter (or similar), before directly discharging into the Waitematā Harbour.

The Fergusson North Berth has an existing Stormwater360 Jellyfish Filter which has been sized to accommodate runoff from the proposed extension. No additional stormwater treatment has been proposed for the Fergusson North Berth Extension. The existing stormwater management for the Fergusson North Berth Extension also discharges directly into the Waitematā Harbour.

At source management of potential contaminant sources is proposed consistent with existing Port of Auckland environmental management practices including Emergency Spill Response procedures.

Hydrology mitigation is not proposed as stormwater is discharged directly to a coastal environment.

Neither of the proposed wharf areas are located within an overland flow path, flood-prone area, or floodplain area. Healthy Waters is confident that the proposal will not result in any adverse flooding, erosion, or stability effects related to stormwater.

Summary

The proposed stormwater management, including both new and existing components, is appropriate for this site, given the absence of flood hazards in the proposed development areas and proximity to the coastal environment.

Conditions

As no stormwater management network is proposed to be vested to Council, and the proposed development is not expected to result in any catchment-wide impacts, Healthy Waters has no comments on the proposed conditions.

Parks Agency and Department Leads Input

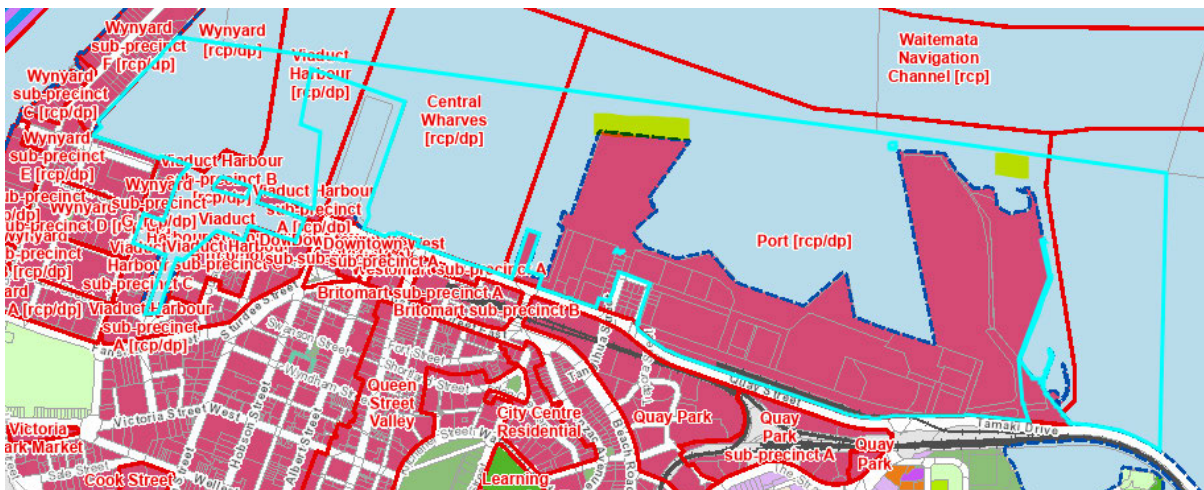
From: Roja Tafaraji, Senior Parks Planner, Parks and Community Facilities

Date: 30/05/2025

Overall Summary:

Parks Planning has a limited scope in assessing the proposed Fast Track Consent for the extension of the Bledisloe Wharf and Fergusson Wharf at 1-19 Quay Street, Auckland Central. The site is owned by Ports of Auckland Limited and is zoned Coastal - General Coastal Marine, Coastal Transition, and Business - City Centre Zone, with the extensions proposed within the Port Precinct.

Figure 1. snippet of AUP plan showing the extent of the site with underlying zone and precincts, and proposed areas of wharfs' extension (**highlighted**)



Key Considerations:

- Unitary Plan Perspective: The proposed extension falls within the Port Precinct, and the development does not directly affect any parks, reserves, or public open spaces.
- Asset Owner Perspective: The Parks and Community Facilities department supports the proposal as it is expected to activate the port area more effectively than the current use, enhancing the visitor experience and port operations in an industrial zone.

Assessment:

- Impact on Parks/Reserves: The proposed wharf extensions do not impact any local parks or reserves. No park or reserve area is adjacent to or directly affected by the proposed works.
- Public Access and Safety: The initial feedback from Parks Agency and Department Lead Input dated 7.4.2025 recommended for formalising of a public access easement over the subject site. The applicant provided a response to the feedback from Auckland Council including Parks dated 23 May 2025 which suggests that there is no public

access intended by the way of this proposal. In the response provided, the applicant states the below:

People accessing the Port of Auckland will be associated with the arrival and departure of cruise customers (rather than the general public). On non-cruise days the cruise traffic handling area will be used for RoRo cargo and therefore not accessible to the general public on these days. Bledisloe North Berth is a mixed-use wharf (multi-cargo and cruise ships) and the Bledisloe Terminal will continue to be utilised for POAL's considerable RORO throughput and other bulk freight on non-cruise days. This multi use of the area, which allows POAL to increase efficiencies at the Port, will be managed by POAL staff. Therefore it would be inappropriate for an easement to be in place for publicly accessible areas and an advice note is not required.

- *Based on the applicant's response provided, I consider no public easement is recommended and amend Parks recommendation as below:*

Conclusion and Recommendation:

- *From both a Parks Planning and asset-owner perspective, the proposal does not raise significant concerns. The planned extension is seen as a positive development for port activation and could improve the amenities in a currently industrialised area.*
- *Parks Planning does not recommend any additional conditions or amendments to the proposed conditions by the applicant.*



Prepared by:

Roja Tafaroji

Parks Agency Lead:

Parks and Community Facilities

Roja Tafaroji, on behalf of Hester Gerber,
Manager Parks Planning
Parks and Community Facilities

Date:

30/05/2025

Memo ends.

Elected Officials/ Houkura Response

From: *Alex Bonham, Waitemata Local Board*

Date: 1 April 2025

Overall Summary: The local board supports the application, noting that it is the modified, less intrusive design presented to the governing body on 28 November, and it is part of a larger project to open the waterfront to the public which has wide support. However, we know that there is also strong community interest in improving the ecosystems of the Gulf and there are concerns about dumping and ongoing encroachment into the harbour. We strongly recommend that as a condition of the consent POAL is obliged to mitigate the environmental impacts the construction and the project as a whole has on the Hauraki Gulf.