Applicants Presentation to the Bream Bay Sand Extraction Application Expert Consenting Panel

14 April 2026

Table of Contents

McCALLUM BROS LTD
Established 1904

Introductions

- Callum McCallum (Managing Director, McCallum Bros Ltd)
- Shayne Elstob (COO, McCallum Bros Ltd)
- Luke Davis (Environmental Manager, McCallum Bros Ltd)
- Fraser McCallum (McCallum Bros Ltd)
- Jeremy Brabant (Legal Counsel)
- John MacRae (Legal Counsel)
- David Hay (Planning Consultant)

McCALLUM BROS LTD
Established 1904

McCallum Bros Ltd

MBL is a 4th generation 100% NZ family-owned business, established in 1904. In addition to sand extraction it has interests in coastal shipping, aquaculture and hospitality.

If granted, MBL can give effect to the approvals as soon as possible due to:

- A modern sand extraction vessel at the Port of Auckland
- A distribution and trucking fleet
- All infrastructure in place to start the activity upon grant of the consent
- Successfully extracting and distributing sand for more than 80 years

Applications Summary

Consents Being Sought

- Resource consent (coastal permit) for sand extraction (and associated discharges) under Rule C.1.5.13 of the Proposed Regional Plan for Northland (**PRPN**) for a term of 35 years. Discretionary activity.

- A wildlife approval for the disturbance, capture, collection, and incidental killing of Scleractinian cup corals (*Kionotrochus suteri* and *Sphenotrochus ralphae*) (**Cup Coral**).

McCALLUM BROS LTD
Established 1904

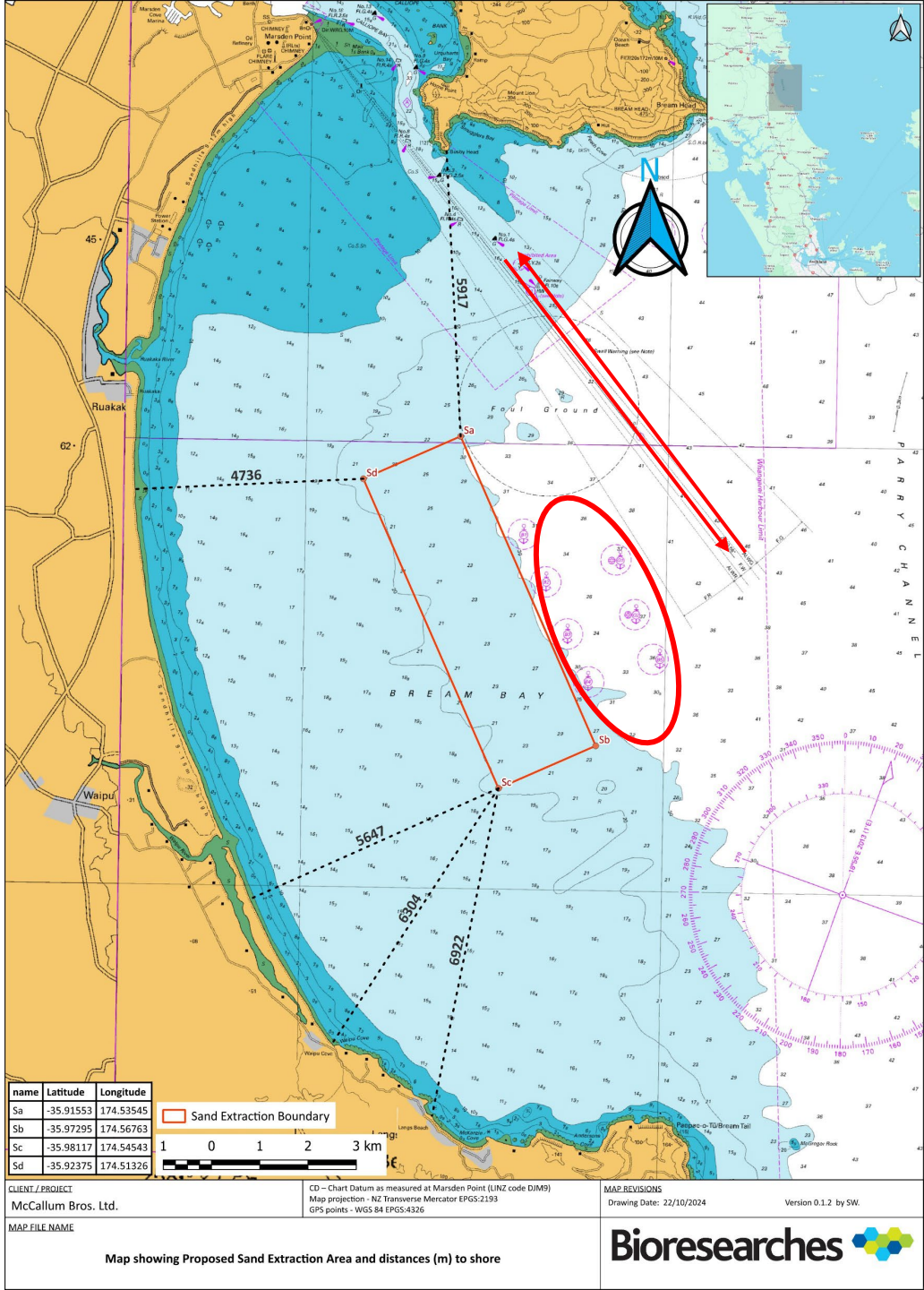
Staging for Resource Consent

- Proposed to be staged as follows:
  - Stage 1: annual sand extraction volume of up to 150,000 m^3 for at least the first three years from the commencement of the consent.
  - Stage 2: annual sand extraction volume of up to 250,000 m^3 for the remaining period of the consent.

- Stage 2 may be commenced from no sooner than 3 months after the submission of the Year 4 Sand Extraction Monitoring Report ("**SEMR**"), if:
  (i) Monitoring for the previous three years has not identified lowering within the 100 m wide bathymetric control area exceeding 0.15 m on average which cannot be explained by natural processes (having regard to any bathymetric changes at the northern and southern control sites, the six bathymetric profiles, and hydrodynamic conditions over the three-year period); and
  (ii) Monitoring for the previous three years has not identified an ecologically significant statistical adverse change in the benthic biota assemblage, composition, and abundance relative to changes which cannot be explained by natural processes (having regard to the northern, southern and remote control sites).

Application Area

- 7km long by 2.2 km wide
- 15.4 sq km in area
- Depth between 20 and 30m CD
- At least 4.7km offshore
- South-west of the commercial shipping anchorage area (red ellipse) and the shipping channel (red arrows)
- Three control areas plus 100m wide bathymetric control area



Project Objective

- To provide a long-term sustainable source of marine sand to Auckland, which is suitable for concrete and, in particular, high-strength concrete production.
- The project meets the functional need of providing a new marine sand source to meet in part the needs of the Auckland sand market and provide resilience by diversifying sources of supply.

McCALLUM BROS LTD
Established 1904

Sand Product and Demand

- The importance of sand to the New Zealand economy is acknowledged by its inclusion in the “A Critical Minerals List for New Zealand”.
- Extracted marine sand is primarily to be used for the manufacturing of concrete including high-strength concrete. The main market is Auckland, but sand can also be shipped to Northland and the Bay of Plenty/Waikato as demand dictates.
- In Auckland, high-strength concrete accounts for around 60% of concrete poured. Quartz feldspar marine sands are particularly suitable for high-performance concrete applications, and their use is crucial for the Auckland concrete market.
- The primary source of natural sand for concrete production in Auckland has been marine sand extracted under resource consents off Pākiri and in the Kaipara Harbour. There are limited suitable alternative sources of supply of sand to the Auckland concrete market.
- Sand extraction at Pākiri has ceased. Current resource consents for sand extraction from Kaipara Harbour expire in 2027. Replacement resource consent applications have been lodged but have not been notified to date.

Future Demand

The Assessment of Economic Effects finds that the demand outlook for sand in the Auckland market is positive and states:

"67. The demand outlook for sand in the Auckland market is positive and is projected to grow under all scenarios. The shift in demand is considerable, and by 2054, the annual increase in demand is estimated as follows:

a. Under scenario 1, the additional annual sand demand, is estimated at between 260,575 tonnes and 335,625 tonnes.

b. Using the high population growth suggests that Auckland will require an additional 373,000 tonnes to 460,200 tonnes of extra sand (per year)."

McCALLUM BROS LTD
Established 1904

Why Marine Sand is Required?

- Has ideal particle size, shape and mineralogical properties suitable for high strength concrete projects such as:
  - Bridges and tunnels
  - Dams
  - Heavy-duty industrial floors, and
  - Marine structures.

- Is not prone to alkali-silica reaction unlike many of the alternative river and land-based sources for the Auckland market, particularly from the Waikato.

- Has qualities that assist the technical requirements of high specification concrete such as strength, good flow and pumpability.

- Many listed projects under Schedule 2 of the FTAA will have significant high-strength concrete requirements.

Why Bream Bay?

- The sand is a quartz feldspar sand, shares all the positive properties of the Kaipara Harbour and Pākiri marine sands and is suitable for the Auckland concrete production market.

- Given the current predominant dependence on marine sand from one location on the West Coast, there is a functional need for a marine sand source on the East Coast which is not subject to the same extent of severe weather conditions or tidal variations which the Kaipara Harbour is subject to.

- Delivery to market can be undertaken in an efficient manner.

- Sand extraction can be undertaken in a manner where adverse environmental effects will be minor or less although it is recognised that some iwi/hapū consider that from a Te Ao Māori perspective a range of adverse effects may arise.

- On-going environmental monitoring can be practically undertaken.

McCALLUM BROS LTD
Established 1904

Sand Extraction Methodology

- Occurs using a motorised trailing suction vessel, the *William Fraser*. Sand is generally transported directly from the sand extraction area to MBL's depot at the Port of Auckland.

- Sand is extracted using a draghead and pump system which fluidises the sand and delivers it into a holding hopper on the vessel (through a 2 mm screen). The width of the draghead is 1600 mm and it leaves a temporary extraction track approximately 100 mm (on average) deep.

- A rotational methodology is to be used to ensure that an even extraction over the seabed is achieved.

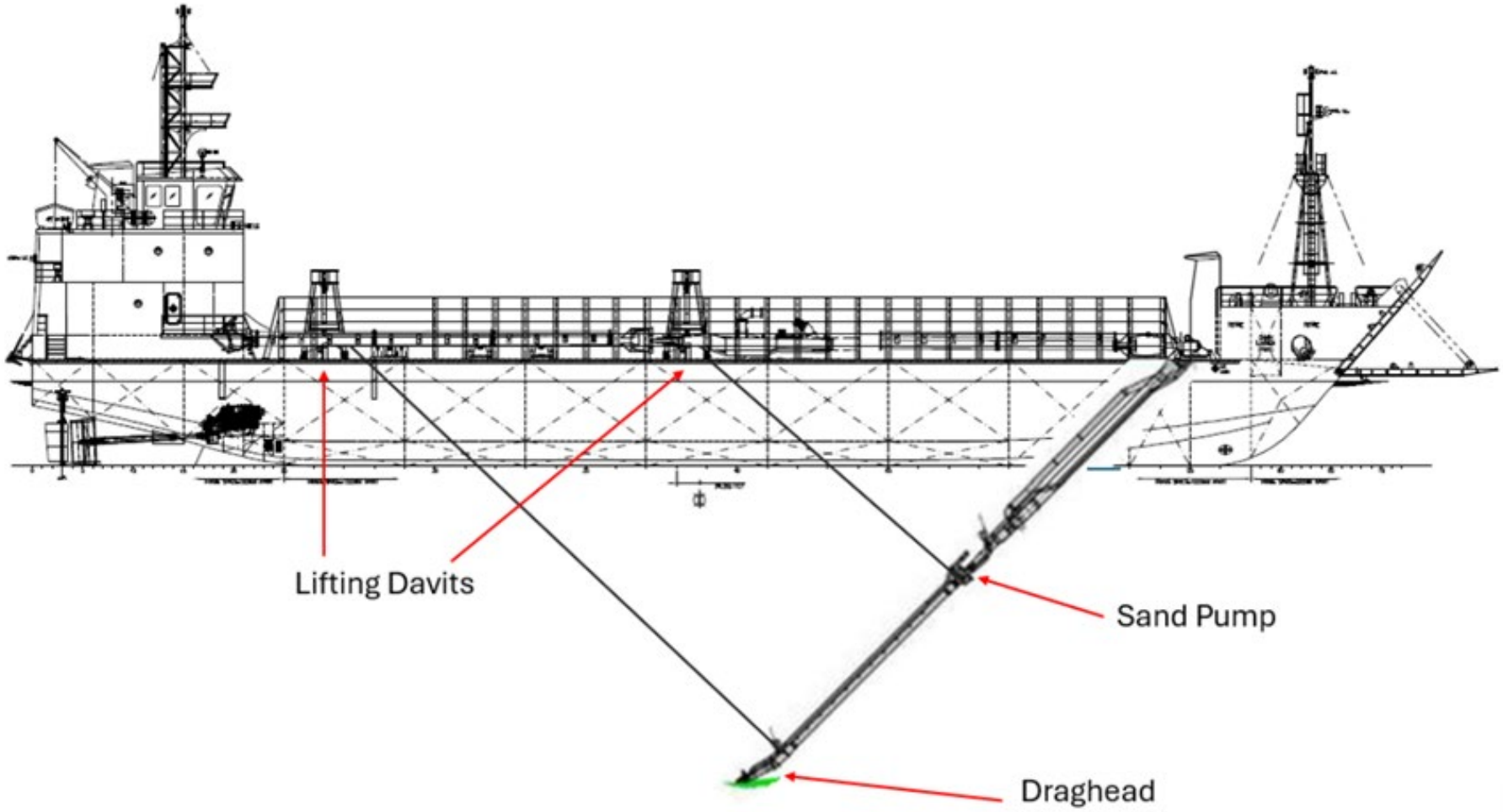
- The vessel will travel an expected distance of 13 km to fill the hopper with an average of approximately 923 m^3 of sand. This will take between 2.5 and 3.5 hours.

- A typical return trip (including the extraction period) from the Port of Auckland will range from 16-20 hours, depending on the weather.

McCALLUM BROS LTD
Established 1904

The *William Fraser*

The *William Fraser*



Video of Extraction occurring

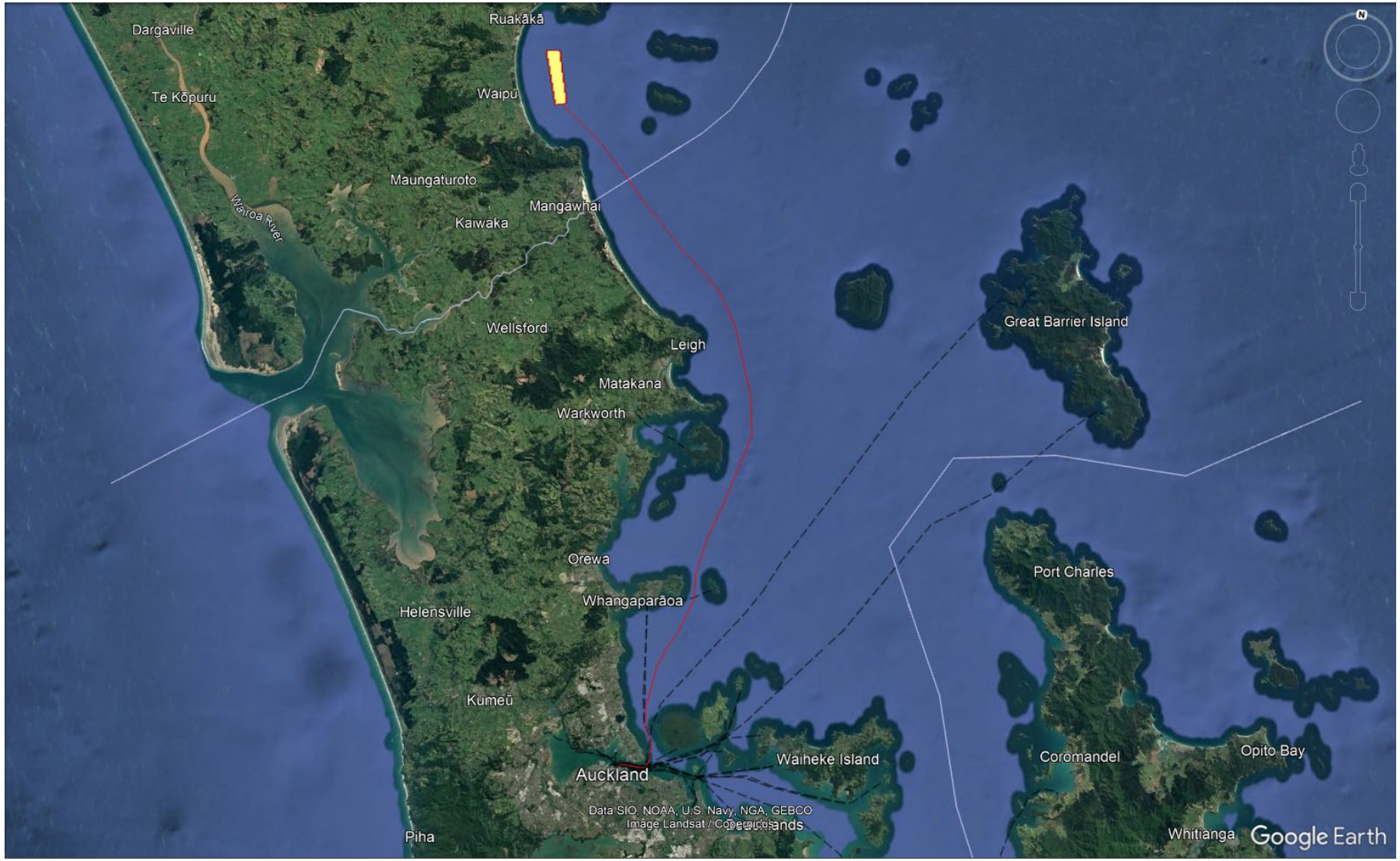
McCALLUM BROS LTD
Established 1904

Key Extraction Parameters

- Operational limits proposed:
  - During active sand extraction, the maximum speed is 2.5 knots.
  - Extraction spread evenly across the entire application area using a rotational methodology
  - Extraction by the trailing suction method only.
- Sand extraction limited to the following operational windows:
  - 12:00 pm to 6:00 pm during the months of April to September (inclusive).
  - 12:00 pm to 8:00 pm during the months of October to March (inclusive).
  - Extraction will be limited to 3.5 hours on any given day.

McCALLUM BROS LTD
Established 1904

Route to and from Auckland to the Extraction Area



McCALLUM BROS LTD
Established 1904

Sand Extraction Operation Plan

This plan outlines procedures for the management of sand extraction activities, including:

- An overview of extraction operations;
- Use of the sand extraction rotation methodology for even extraction;
- Monitoring, reporting, and compliance protocols;
- Roles, responsibilities, and training of operational staff; and
- Implementation of a Light Management Plan (LMP) to reduce light spill and glare, and minimise potential impacts on marine wildlife and seabirds.

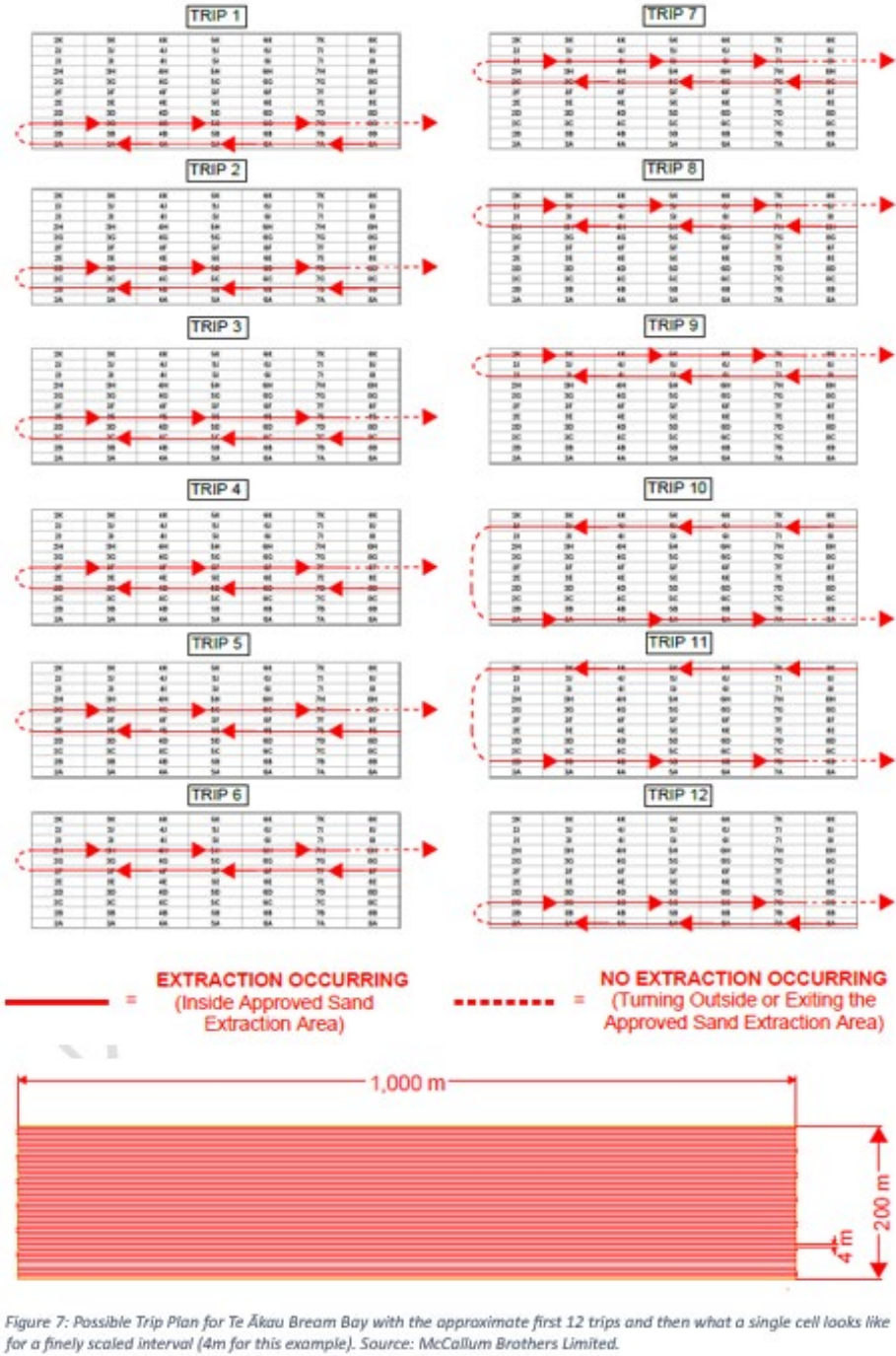


Figure 7: Possible Trip Plan for Te Ākau Bream Bay with the approximate first 12 trips and then what a single cell looks like for a finely scaled interval (4m for this example). Source: McCallum Brothers Limited.

Adaptive Management – The PSEAR, ASEA and SEMR

- Preparation of a Pre-Sand Extraction Assessment Report (**PSEAR**) in those cells proposed for sand extraction within the consented sand extraction area. The first PSEAR for the whole site has been completed and is included in Attachment 29.
- Based on the PSEAR identify the Approved Sand Extraction Sub-Area (**ASEA**). That is, within the sand extraction area, those cells where sand extraction can occur are identified. The initial ASEA has been prepared and is included in Attachment 29.
- Preparation of a Sand Extraction Monitoring Report (**SEMR**) at set periods during the life of the consent (once sand extraction has commenced).
- The SEMR will:
    - Recommend any changes to the monitoring, reporting, sand extraction operation and maximum sand extraction volumes (including confirming from the Year 4 SEMR onwards when the maximum sand extraction volume can increase to the Stage 2 volume).
    - Update the ASEA (that is, identify any cells where sand extraction is to cease).
- During the life of the consent, additional PSEAR's can be completed for those cells where sand extraction has either not commenced or where it has ceased for a period of time. This PSEAR will then update the ASEA to identify those additional cells where sand extraction can now occur.

McCALLUM BROS LTD
Established 1904

ASEA Requirements

An ASEA must not include areas of the seafloor which contain any of the following:

- Sediment with an average proportion of mud (grain size finer than 0.063 mm) exceeding 20% by weight; or
- Areas of immobile layers (e.g. rock) or historic facies (e.g. partly consolidated orange Pleistocene sand deposit); or
- Sensitive benthic communities (as defined in Attachment Four to the Recommended Conditions (Attachment 26)); or
- Any absolutely protected species under the Wildlife Act 1953, excluding any species for which a wildlife approval is held; or
- Extraction track(s) longer than 100m with a width of less than 2m and a depth exceeding 0.4m below the typical adjacent seabed levels defined as the seabed area within 10m of each track edge.

Assessments Undertaken

- Landscape and Natural Character Effects Assessment (Brown NZ Ltd)
- Coastal Processes Effects Assessment (Tonkin and Taylor)
- Water Quality Assessment of Environmental Effects (SLR)
- Assessment of Airborne Noise Effects (Styles Group)
- Assessment of Underwater Noise Effects (Styles Group)
- Assessment of Ecological Effects (Bioresearches)
- Potential Effects on Seabirds and Shorebirds (NIWA)
- Marine Mammals Environmental Impact Assessment (SLR)
- Scleractinian Cup Corals (NIWA)
- Assessment of Effects on Fish and Fisheries (R O Boyd)
- Assessment of Effects on Surf Breaks (Metocean Solutions)
- Assessment of Economic Effects (M.E. Consulting)
- Navigation Safety Assessment (B Goodchild)
- Concrete Suitability Statement (P Donoghue)
- Assessment of Effects on the Environment (Osbornehay)

The summary of level of effects (excluding cultural effects) is provided on the following page.

McCALLUM BROS LTD
Established 1904

Summary of Level of Effects

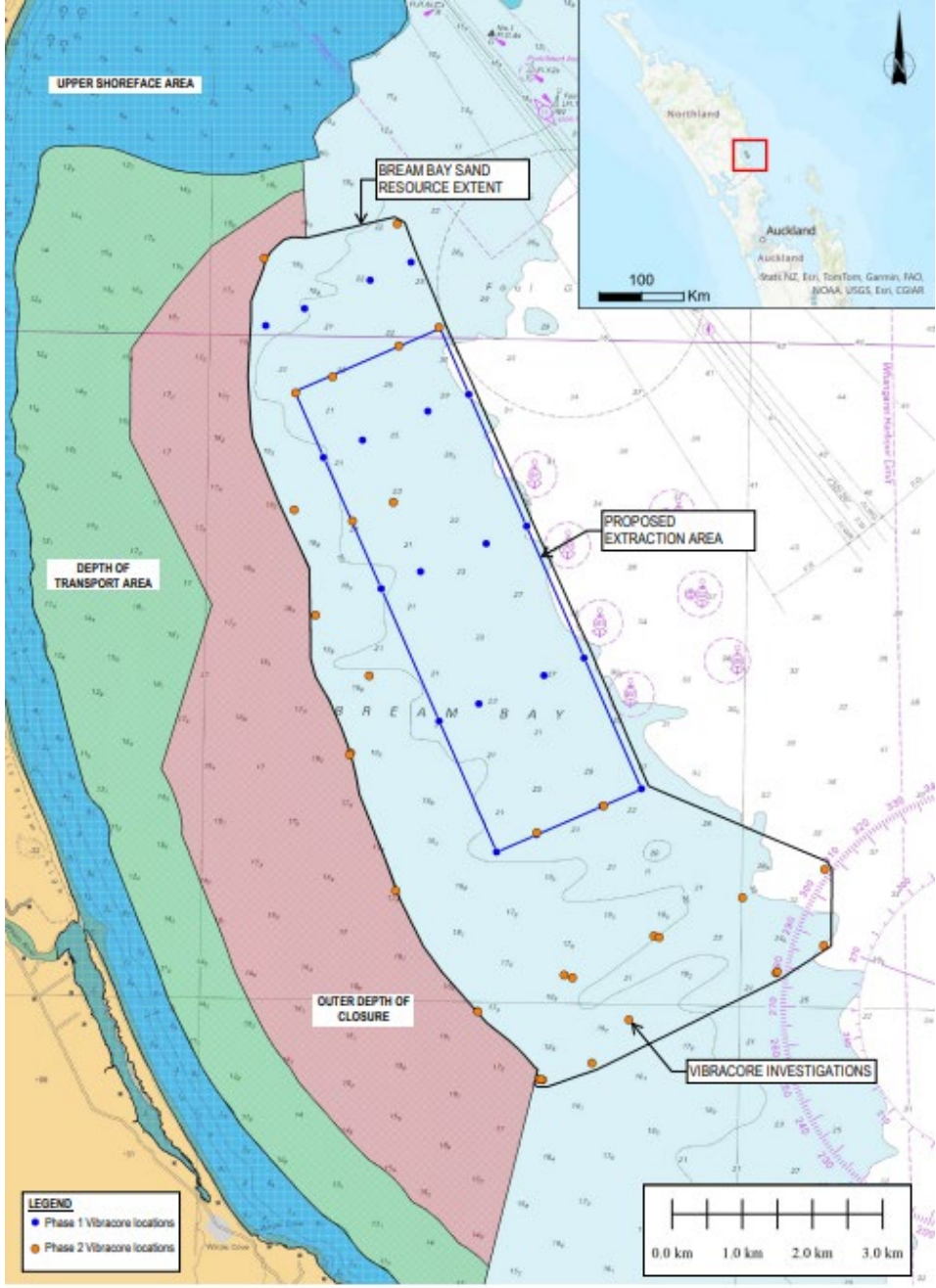
Matter	Level of Adverse Effect	Level of Adverse Effects (RMA Equivalent)
Fish and Fisheries	Negligible to low (if they occur at all)	Less than minor to minor
Surf Breaks and Other Recreational Activities	Negligible to less than minor	Less than minor
Navigation Safety	Does not impose an unacceptable risk	Not applicable
Airborne Noise	Negligible as the activity will comply with the relevant PRNP noise limits.	Less than minor
Underwater Noise	Negligible to low	Less than minor to minor
Water Quality	Negligible	Less than minor
Landscape and Natural Character – Biophysical Landscape Effects	Net gain to low	Positive to less than minor/minor
Landscape and Natural Character – Perceived/Experiential Effects	Very low to low moderate	Less than minor to minor
Landscape – Associative/Cultural Effects	Low	Less than minor/minor
Avifauna (Seabirds and Shorebirds)	Negligible to less than minor	Less than minor
Food-Web	Negligible	Less than minor
Coastal Processes	Negligible to low	Less than minor to minor
Coastal Vegetation	Negligible	Less than minor
Benthic Macroalgae	Negligible	Less than minor
Benthic Fauna	Negligible	Less than minor
Benthic Fish	Negligible	Less than minor
Marine Reptiles	Minor	Minor
Marine Mammals	Negligible to low	Less than minor to minor
Biosecurity	Negligible	Less than minor
Commercial Activities (including fishing)	Negligible	Less than minor
Climate Change and Natural Hazards	Negligible	Less than minor
Lighting	Negligible	Less than minor

McCALLUM BROS LTD
Established 1904

Coastal Processes

Key Findings

- The depth of sand in the extraction area was found to be at least 2.8m deep.
- The proposal area is seaward of the Depth of Closure and Depth of Transport that defines the seaward limit of sediment transport.
- The proposed area is sufficiently far offshore to have negligible effect on the beach and dune environment.
- The proposed area is sufficiently deep and spread out to have negligible effect on waves and currents.
- If sand extraction is managed as proposed, the overall effects on sediment transport, seabed morphology and waves are considered low.



McCALLUM BROS LTD
Established 1904

Benthic and Marine Ecology

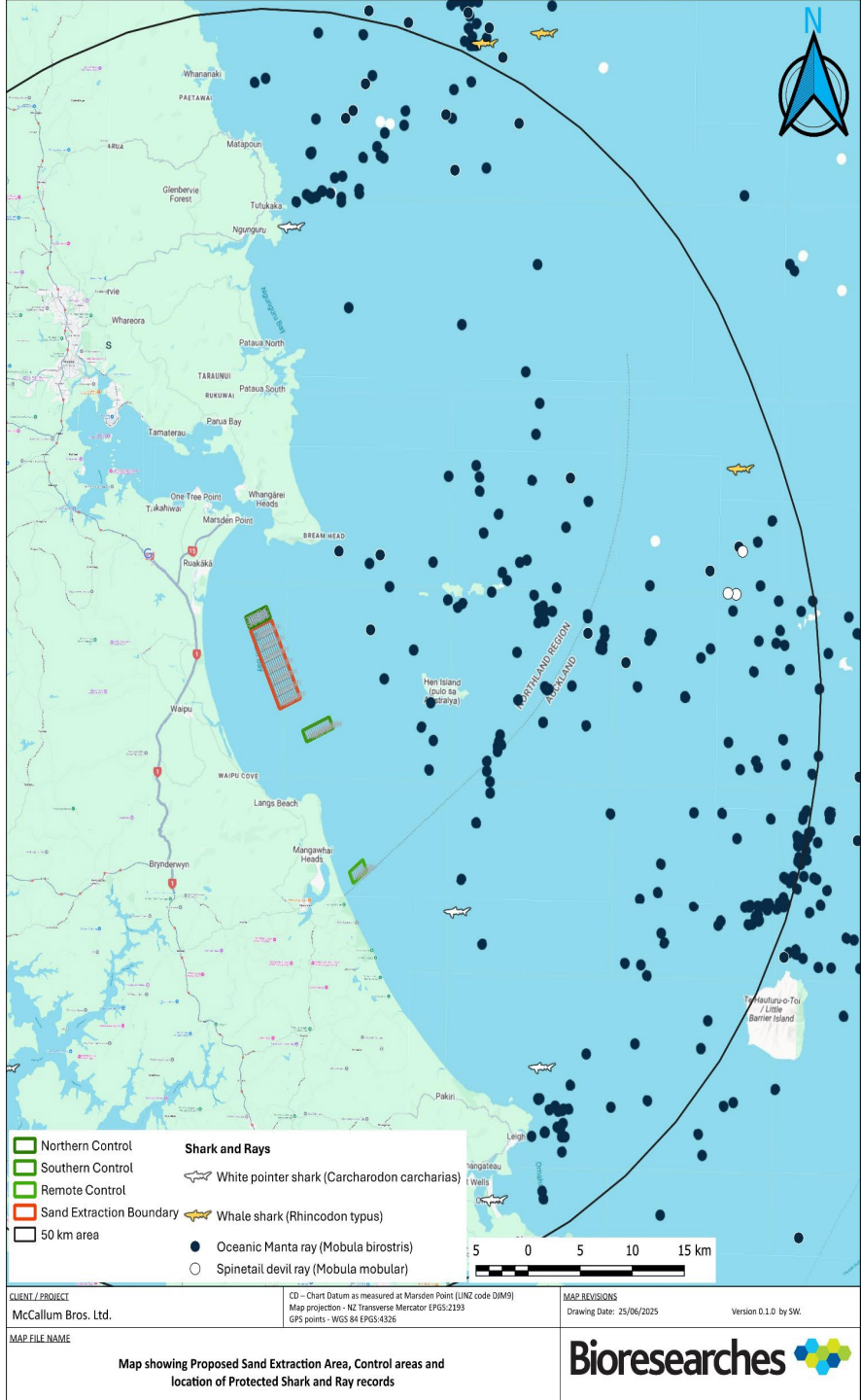
Key Findings

- **Benthic Fish** – Are highly mobile species. Due to the draghead's close proximity to the seabed while actively extracting, there is little chance of entrainment of fish.

- **Benthic biota** – The vast majority of biota that are entrained survive passage through the extraction process.

- **Sharks and rays** - Vessel strike is unlikely. None of the sharks and rays listed in the Wildlife Act have been reported as sighted within Bream Bay.

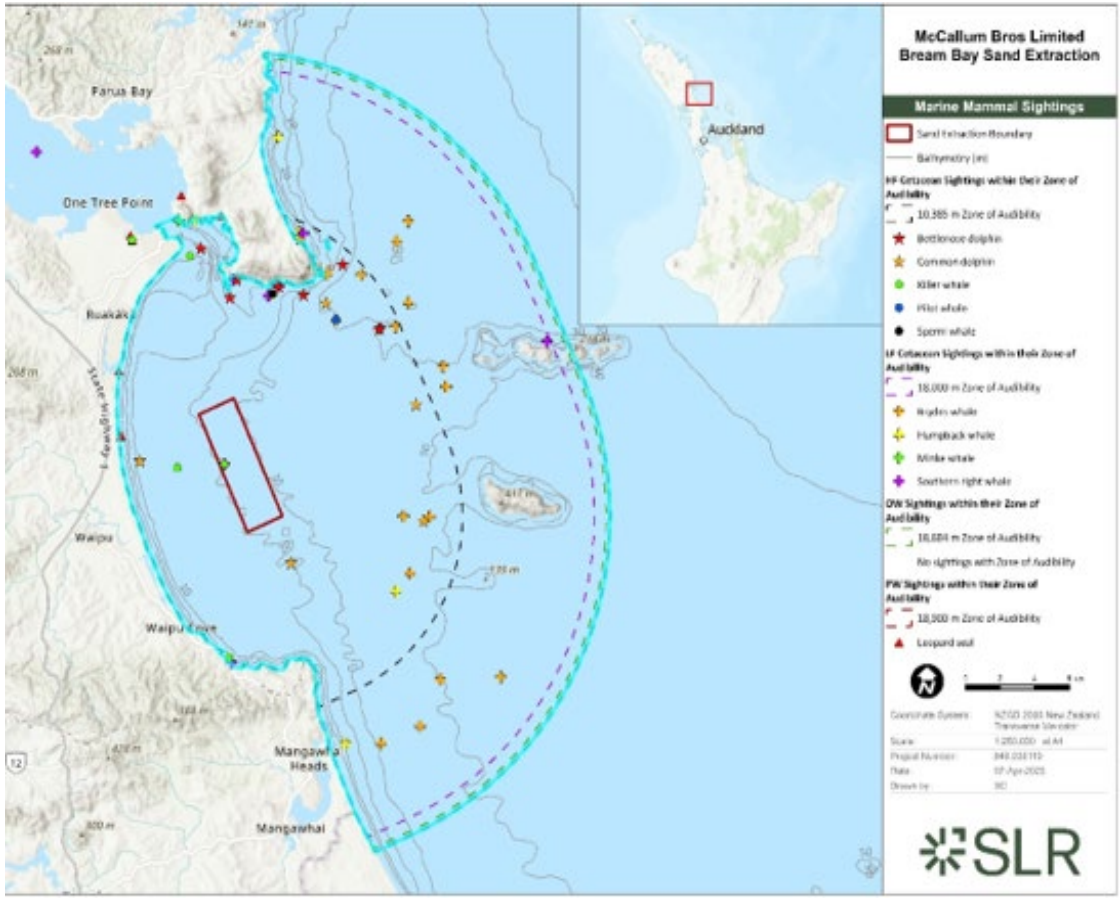
- **Marine reptiles** - Only one reptile has been sighted in the extraction area since records began 126 years ago (in 2006).



Marine Mammals

Key Findings

- Approx. 30 species of marine mammal utilise the wider area.
- There is a population of Bottlenose dolphins that regularly use the embayment.
- Several other species also use the embayment (especially areas offshore) for resting, feeding or while migrating through.
- Time of extraction was determined to be important. The ideal timing of between 12 and 8pm in summer (to 6pm in winter) has been adopted to minimise effect.
- Strict operational controls relating to Marine Mammals have been adopted in the MMMP.



McCALLUM BROS LTD
Established 1904

Fisheries

Key Findings

- No anticipated effect on prey species.
- The drag head (dredge) moves slow at 1.5 to 2.5 knots and will not entrain fish species.
- Both fishing effort and catches are moderate compared to other areas of the greater Hauraki Gulf where catches are higher.
- Scallop fishery currently closed for an unknown period of time. Scallop fishery data indicates that the extraction area is in an area of lower scallop abundance.

McCALLUM BROS LTD
Established 1904

Shore and Sea Birds

Key Findings

- Potential effects from the proposed sand extraction activity were assessed.
  - loss of terrestrial breeding habitat,
  - exclusion from marine habitat,
  - changes to prey abundance/availability,
  - interaction with the sand extraction vessel, fuel/oil spill,
  - airborne noise and
  - underwater noise.

- Impacts on all taxa will be less than minor and often negligible.

- The expert assessment includes specific assessment on the tara iti fairy tern.

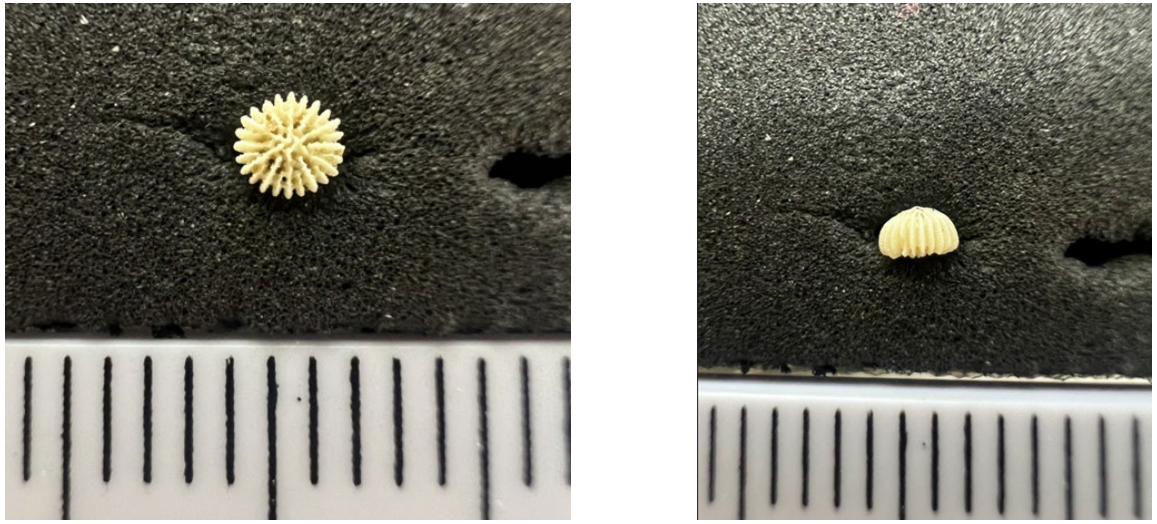
McCALLUM BROS LTD
Established 1904

Scleractinian Cup Corals

Key Findings

- Monitoring confirmed the presence of solitary scleractinian cup corals (*Kionotrochus suteri* and *Sphenotrochus ralphae*) within the sand extraction and control areas.
- All scleractinia species are absolutely protected under the Wildlife Act.
- They are solitary, less than 10 mm, non-branching, non-reef forming corals, and not threatened according to the New Zealand Threat Classification System.
- The proposed sand extraction area is less than 0.2% and 0.1% of the identified potential suitable habitat for Sphenotrochus ralphae and Kionotrochus suteri, respectively

Sphenotrochus ralphae (above) with ruler 1mm gradations



Kionotrochus suteri (above) with ruler 1mm gradations

McCALLUM BROS LTD
Established 1904

Water Quality

Key Findings

- The assessment concluded that effects would be negligible, and:
  - are highly localised (within a small part of the application area);
  - are temporary - only occur during extraction and return to background conditions within hours of works ceasing; and
  - do not alter ambient conditions.
- Within ~26 minutes (i.e., when the extraction vessel was 2000 m from the sampling vessel), there was minimal to negligible effects of the plume (as TSS or turbidity) in the water column in the two transects.

McCALLUM BROS LTD
Established 1904

Landscape and Amenity

Key Findings

- The existing shipping activity within the shipping lane, at anchor, and either entering or leaving Whangarei Harbour, limits the intrusiveness of the *William Fraser*.
- In general, the distance to the extraction area from the edge of Bream Bay also limits the visibility of the *William Fraser* and its effects.
- Overall, the effects that have been identified are of a very low to low order and are consistent with the relevant statutory instruments.

Economic Benefits

Key Findings

Enabling sand extraction at Bream Bay will provide a range of regional and national benefits including:

- Improving the resilience of the sand supply network.
- Improving the efficiency of the sand supply chain to avoid significant direct and indirect transport costs for the construction sector (e.g. reduced trucking movements, roading costs, CO2 emissions etc.).
- Contribute towards, and facilitate, the delivery of infrastructure and development projects including those of regional and national significance.

Iwi Engagement Summary

- MBL were advised by the NRC at the commencement of investigations to consult directly with:
  - Ngātiwai Trust Board
  - Te Parawhau ki Tai
  - Patuharakeke Te Iwi Trust Board

- Extensive consultation has been ongoing since early 2024 with Te Parawhau ki Tai and the Patuharakeke Te Iwi Trust Board in particular.

- 26 MACCA Applicants identified by NRC. Applicants have been contacted twice by MBL.

- Attachment Five includes the Consultation Register.

McCALLUM BROS LTD
Established 1904

Iwi Engagement Outcomes

- Three CIAs were provided by Te Parawhau ki Tai, the Ngātiwai Trust Board and the Patuharakeke Te Iwi Trust Board (with this CIA being a draft). All are included as part of the application.

- A Te Hononga Relationship Agreement and a Substantive Relationship Agreement have been entered into with Te Parawhau ki Tai. Te Parawhau ki Tai is supportive of the project (on the basis of the commitments in the Agreement).

- There is differing opinion between the different iwi and hapū as to the nature and level of effects and whether resource consent should be granted. From a Te Ao Māori perspective, it is recognised that some iwi/hapū consider that the project presents unacceptable cultural, ecological, and economic effects and there will be an adverse effect on customary authority, and customary rights/interests/practices. On this basis, the Ngātiwai Trust Board and the Patuharakeke Te Iwi Trust Board oppose the application as it currently stands.

Proposed Management Plans

- The following management plans have been prepared specifically for this project and are included as part of the application:
  - Sand Extraction Operation Plan (including the Light Management Plan)
  - Marine Mammal Management Plan
  - Environmental Monitoring Management Plan
  - Cup Coral Management Plan
  - Biosecurity Management Plan

- The *William Fraser* also operates the following management plans:
  - Garbage Management Plan (approved by MNZ)
  - Oil Spill Contingency Plan (approved by MNZ)

- Te Parawhau ki Tai have offered to prepare a Mahere Tikanga Plan for the project upon the granting of consent.

McCALLUM BROS LTD
Established 1904

Summary of Management Plans

- The **Sand Extraction Operation Plan** sets out how the actual sand extraction activity is undertaken. The objective of the SEOP is to avoid or minimise the risk of adverse effects arising from the operation of the *William Fraser* at the sand extraction site.

- The objective of the **Marine Mammal Management Plan** is to avoid or mitigate the potential effects of sand extraction operations (including active extraction and transit) on marine mammals.

- The **Environmental Monitoring Management Plan** is the management plan which outlines the monitoring requirements for the project.

- The objective of the **Cup Coral Management Plan** is to avoid or minimise the risk of disturbance, possessing and incidental killing of Cup Coral during both monitoring and sand extraction.

- The objective of the **Biosecurity Management Plan** is to prevent the introduction and spread of marine pests through effective ballast water management and vessel maintenance practices.

Environmental Monitoring

- The extraction area is divided into 77 cells (with each cell being 1000 m long x 200 m wide) for monitoring purposes. There are three control areas and a bathymetric control area (being a 100m wide area around the northern, western and southern sides of the extraction area). See following diagram from Attachment 6.

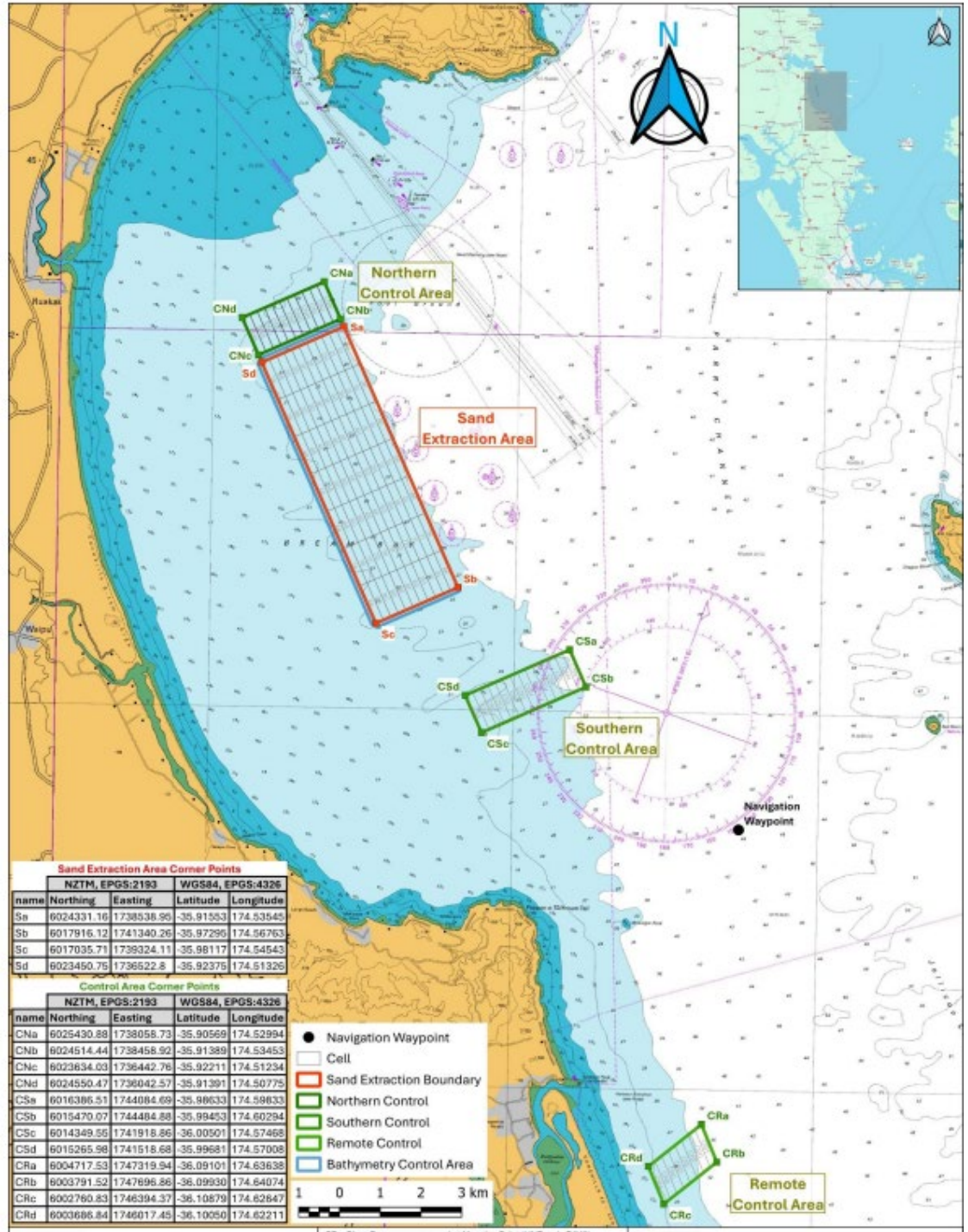
- There are three components to the proposed monitoring programme. These are:

  a) The PSEAR;

  b) SEMR (at specified milestones and including plume monitoring); and

  c) Soundscape Change Measurement and Assessment.

- The EMMP sets out the environmental monitoring design rationale and the objectives, methodology and required outputs for this monitoring. The proposed conditions set out the requirements for an EMMP and the monitoring reporting requirements and timing.



Sand Extraction Area Corner Points

	NZTM, EPGS:2193		WGS84, EPGS:4326	
name	Northing	Easting	Latitude	Longitude
Sa	6024331.16	1738538.95	-35.91583	174.53545
Sb	6017916.12	1741340.26	-35.97296	174.56763
Sc	6017035.71	1739324.11	-35.98117	174.54543
Sd	6023450.75	1736522.8	-35.92375	174.51326

Control Area Corner Points

	NZTM, EPGS:2193		WGS84, EPGS:4326	
name	Northing	Easting	Latitude	Longitude
CNa	6025430.88	1738058.73	-35.90569	174.52994
CNb	6024514.44	1738458.92	-35.91389	174.53453
CNc	6023634.03	1736442.76	-35.92211	174.51234
CNd	6024550.47	1736042.57	-35.91391	174.50775
CSa	6016386.51	1744084.69	-35.98633	174.59833
CSb	6015470.07	1744484.88	-35.99453	174.60294
CSc	6014349.55	1741918.86	-36.00501	174.57468
CSd	6015265.98	1741518.68	-35.99681	174.57008
CRa	6004717.53	1747319.94	-36.09101	174.63638
CRb	6003791.52	1747696.86	-36.09930	174.64074
CRc	6002760.83	1746394.37	-36.10879	174.62647
CRd	6003686.84	1746017.45	-36.10050	174.62211

McCALLUM BROS LTD
Established 1904

Resource Consent Conditions

- Attachment 26 includes the recommended conditions (refer to AEE Paragraph 7.68 onwards).
- The conditions are intended to ensure potential adverse effects on the environment are avoided or mitigated to an appropriate level and to provide for an adaptive management approach.
- The conditions incorporate recommendations of the technical specialists, the outcomes of engagement with iwi, NRC and DOC and draw on the experience of MBL in previous sand extraction operations and resource consenting processes. The conditions can be practically implemented (including the required monitoring).
- The draft conditions have been provided to Te Parawhau ki Tai, the Patuharakeke Te Iwi Trust Board and the Ngātiwai Trust Board for comment.
- Te Parawhau ki Tai identified a preference for a separate pre-start meeting and for opportunities to review any future PSEAR and all SEMR's. Te Parawhau ki Tai also offered to prepare a Mahere Tikanga Plan for the project. These requests have been included in the recommended conditions along with a cultural contribution condition.

Resource Consent Conditions Structure

The recommended conditions are structured as follows:

- General Conditions
- Pre-Commencement Conditions
- Management Plans and Amendment Certification Conditions
- Operational Conditions
- Monitoring and Reporting Conditions
- Contributions and Mahere Tikanga Plan

Wildlife Approval Conditions Structure

- The recommended conditions are at Attachment 35 (and refer to AEE Paragraph 20.11 onwards). They take account of feedback from DoC.
- Recommended Schedules 1 and 2 follow the current standard template for wildlife approvals. Schedule 3 includes the special conditions, Schedule 4 includes the CCMP, and Schedule 5 includes the site plan showing the sand extraction area and control areas.
- The special conditions cover the following matters:
    - A requirement to undertake the activity in accordance with the CCMP.
    - Cup corals must only be handled by authorised personnel or by parties under direct supervision of those personnel.
    - DOC has the ability to instruct the authority holder to make reasonable improvements to techniques (including catching, handling, releasing, preserving and storing).
    - The approval gives the approval holder the right to hold absolutely protected wildlife for short periods in accordance with the terms and conditions of the approval.
    - If, in the course of undertaking the activities, all reasonable effort has been made to meet all of the conditions expressed and implied in this approval; then any incidental killing of wildlife by the approval holder is permitted under this authority.
    - All monitoring records must be made available for inspection at reasonable times by officers of the Grantor.

Assessment under Statutory Documents

- The project is either consistent with or gives effect to the relevant objectives and policies of the **New Zealand Coastal Policy Statement**. Policy 6 specifically identifies that the extraction of minerals is an activity important to the social, cultural and economic wellbeing of people and communities. There is a functional need for marine sand and for the extraction of this sand from the coastal marine area. A precautionary approach in terms of the development of the project, the site selection, extraction volumes and monitoring has been taken consistent with Policy 3.
- The **National Policy Statement for Infrastructure 2025** provides a clear direction that decision makers must recognise and provide for the role of infrastructure supporting activities such as this proposed sand extraction activity. Granting consent would allow for the efficient extraction of a marine sand resource required for the production of concrete (and in particular high-strength concrete) which is vital for the development of infrastructure activities.
- The **National Policy Statement – Indigenous Biodiversity** is of limited relevance and only in respect to highly mobile fauna. The project and granting of consent is not contrary to the NPSIB in respect to those birds listed as highly mobile fauna in Appendix 2 of the NPSIB.
- In terms of the **Regional Policy Statement for Northland,** it is considered that the project and granting consent would either give effect to, is consistent with or is not contrary to the relevant objectives and policies.
- There are a significant number of objectives and policies in the **Proposed Regional Plan for Northland** of relevance to this application. The project and granting consent would either directly give effect to, is consistent with or is not contrary to the relevant objectives and policies of the PRPN.

Assessment against the Purpose of the Act

- The project is consistent with and supports the purpose of the Act, as it will provide for sand extraction at Bream Bay which will secure an efficient sand supply to the Auckland market. This is critical for the continued production of concrete products required for a range of development applications including regional and nationally important infrastructure.
- The efficient delivery of sand to the Auckland concrete market will facilitate the future delivery of infrastructure and development projects of regional and/or national benefit.
- The provision of an efficient and secure marine sand supply to the Auckland market and in particular for the manufacture of high-strength concrete for infrastructure and development projects is vital for the economic, social and cultural well-being of the Auckland community and beyond. The proposed sand extraction site meets the requirements for being able to provide the required type of sand for high-strength concrete manufacturing in Auckland efficiently. Furthermore, the location of this site means that sand can also be transported efficiently to a range of other ports to service in part the Northland, and Bay of Plenty/Waikato regions.

Assessment of the Wildlife Approval

- The two cup coral species known to be present within the proposed extraction area are not deemed to be 'Threatened', 'Data Deficient' or 'At Risk' wildlife (as defined in the NZTCS).
- During extraction any cup coral are expected to be returned to the seafloor as oversized material. There is potential that cup coral could be damaged or killed during this process.
- The sand extraction area is less than 0.2% and 0.1% of the identified potential suitable habitat in northern New Zealand for *Sphenotrochus ralphae* and *Kionotrochus suteri*, respectively.
- The Cup Coral Management Plan outlines the operational measures to minimise the risk of cup corals being retained during both monitoring and sand extraction and the process to release them.
- Any killing of cup corals is incidental to the monitoring and sand extraction process. It is not directly intended but is to a degree unavoidable and foreseeable as a consequence of carrying out monitoring and the sand extraction.
- Populations of wildlife are unlikely to be threatened or materially affected by the activities enabled by the approval. Any threat to individual wildlife is incidental, has been avoided, minimised and mitigated to the extent possible through the reasonable steps adopted.

Conclusion

- In terms of s85 of the Act, it is contended that there are no matters listed under s85(1) which provide the basis for this substantive application to be declined.
- In terms of s85(3) it is contended that no potential adverse impacts have been identified which are sufficiently significant to be out of proportion of the projects regional and national benefits.
- It is considered that the recommended conditions are no more onerous than necessary and can be practically implemented.
- It is considered that it is appropriate and practical for the various Management Plans to be certified through this consenting process.