

11 April 2024

Stephen West  
Principal Consents Officer  
Environment Southland  
Private Bag 90116  
Invercargill 9840

Dear Stephen

Request for further information under Section 92(1) of the Resource Management Act 1991: South Port NZ Limited – Dredging of Seafloor at the Syncrolift Site, Bluff Harbour (APP – 20242149)

We refer to the request for further information set out in your letter dated 24 June 2020 and respond as follows.

1. Assessment of the effects of the change in colour and clarity in the waters of Bluff Harbour on amenity values and natural character, and whether any plume of sediment will be conspicuous from the shore. I am requesting this because the assessment was primarily focused on the ecological effects of the discharge on water quality. But potentially there will be a conspicuous plume that impacts on other values in and around the harbour. If that is considered in the application already, please direct me to the correct part of the application.

In response we draw on the Natural Character, Landscape and Visual Effects assessment undertaken by Landscape Architect, Mike Moore<sup>1</sup> that was included in the application as Appendix 10 for the larger scale capital dredging project. The assessment of Mr Moore assumed the works will be visible from the shore.

In his assessment Mr Moore considers natural character sensory experiential effects, landscape effects and visual amenity effects.

Mr Moore assesses adverse experiential natural character effects such as sediment plume effects as low.

In terms of the landscape effects assessment, he notes the highly modified nature of Bluff Harbour and capacity of the harbour landscape to absorb the effects of the works (refer Section: Landscape Effects Assessment/Bluff Harbour). He assesses the adverse effects on landscape values associated with the proposed dredging as very low.

Mr Moore assesses the adverse visual amenity effects of the presence of dredge vessels and sediment plumes in the context of the working port environment as very low (refer Section: Visual amenity effects/Overall assessment – visual amenity effects).

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<sup>1</sup>[Application for Resource Consents - Bluff Harbour Capital Dredging - APP-20211362.pdf \(PDF, 49.9MB\)](#)

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Taking account of the assessments provided by Mr Moore for the larger scale capital dredging project and in consideration of the smaller scale and shorter duration of the proposed Syncrolift dredging works, the effects of the proposal on the natural character of Bluff Harbour and on visual amenity values will be very low.

2. Assessment of whether the discharge activity will impact on:
  - (a) existing water takes that draw from Bluff Harbour
  - (b) marine farms in Bluff Harbour
  - (c) investigations or monitoring associated with the nearby aluminium smelter, particularly once the plume passes out of the harbour and around the Tiwai Point Open Coast.
  - (d) any planned or proposed recreational activities in or adjacent to the harbour that may be impacted by a visible sediment plume or reduced water clarity in the harbour.

We attach a plan prepared by e3 Scientific (e3s) showing the location of existing water takes (Ocean Beach and Town Wharf) and discharge points, consented marine farms, the area where craypots are temporarily stored and the modelled sediment plume TSS concentrations and the sediment deposition footprint.

The plan and the model results as reported by Calypso and e3s show decreasing total suspended solids (TSS) and sediment deposition moving southeast, or away from the disposal point, gradually wrapping around Stirling Point on the western side of the harbour entrance. Once on the east side of Stirling Point, open water dispersion occurs. These results indicate that a sediment plume is unlikely to be transported around the Tiwai Point Open Coast as it will rapidly disperse beyond the harbour entrance.

We have consulted with senior members of the Bluff Yacht Club, Greenpoint Yacht Club and Awarua Rowing Club. These individuals stated that no formal activities take place between April and September and did not consider the effects of the dredging operation would pose any issues to its members.

We are not aware of any planned or proposed recreational activities taking place along the foreshore during this period.

3. Any feedback received about the application from Te Runanga o Ngai Tahu and Te Ao Marama Inc

We refer to the email of Frank O'Boyle dated 28 March 2024 which provides the latest update on consultation with Te Ao Marama.

South Port has previously circulated the application to Te Ao Marama on 4 December 2023 and a draft set of conditions on 16 February 2024 for comment.

Should written approval be received from Te Ao Marama this will be forwarded to Te Runanga o Ngai Tahu (TRONT) who will provide their written approval accordingly.

Despite its best endeavours and the period of time that has elapsed since consultation was initiated, South Port is concerned that written approval from Te Ao Marama and TRONT may not be forthcoming soon which will pose a programming issue for the project. South Port considers this situation unacceptable.

4. Any feedback received about the application, in particular the effects of the discharge, from Tangata Tiaki gazetted under the South Island Customary Fishing Regulations 1998. I am requesting this information because Policy 1 of Section 3.6.2 of Te Tangi a Taurira requires consultation with the gazette Tangata Tiaki under the customary fishing regulations. I note the assessment in the application indicates that the Mataitai Reserve will be unaffected, and that the consultation has been limited to Te Ao Marama Inc and Department of Conservation, but it may be beneficial to check about effects on customary fishing.

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South Port is currently seeking the contact details for the gazetted Tangata Tiaki for the Mātaitai Reserve from the Rūnaka and MPI.

5. Any feedback received about the application from the Department of Conservation.

No feedback has been received as the application was sent to the Department of Conservation on 28 March 2024 for comment.

Yours sincerely

A handwritten signature in blue ink that reads "S Beale".

Simon Beale  
Senior Planner

Copy to: Frank O'Boyle, Infrastructure Manager, South Port NZ Limited

