

**IN THE OTAGO REGIONAL COUNCIL**  
**AT DUNEDIN**

**IN THE MATTER OF** Hearing for Application Numbers RM10.193 –  
RM10.200, RM10.202 – RM10.203, RM10.205 and  
2000.472\_V1 Port Otago Limited – Various Coastal  
Activities, Port Chalmers and Otago Harbour

**BETWEEN** **PORT OTAGO LIMITED**

Applicant

**AND** **SOUTH COAST BOARD RIDERS ASSOCIATION**  
**INCORPORATED**

Submitter

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**SUBMISSIONS ON BEHALF OF SOUTH COAST BOARD RIDERS**  
**ASSOCIATION INC IN OPPOSITION TO VARIOUS RESOURCE**  
**CONSENT APPLICATIONS UNDER THE NOTIFIED PROVISIONS**

*Section 95A(2)(a) and 95A(2)(c) and Section 127 of the Resource  
Management Act 1991*

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**SUBMISSIONS ON BEHALF OF SOUTH COAST BOARD RIDERS  
ASSOCIATION INC IN OPPOSITION TO VARIOUS RESOURCE  
CONSENT APPLICATIONS UNDER THE NOTIFIED PROVISIONS**

TO: The Hearings Panel

Counsel for South Coast Board Riders Association Inc ("SCBRA") submits:

- 1) South Coast Board Riders (SCBRA) was formed in 1966 by a group of local surfers to promote surfing in Otago and has been prominent in the local and national surfing scene since then. SCBRA has and continues to provide the organisation and venues for some of the nation's most outstanding national and international surfing contests including the most recent 2011 Nationals.
- 2) SCBRA was incorporated as a Society on 15 March 1991 by the Society's first president, current Surfing New Zealand Chief Executive Greg Townsend.
- 3) Our objectives are stated in our Rules at:  
Clause 2.1 To, encourage, promote and advance generally the sport of surfboard riding in Otago.  
Clause 2.2 To support and promote environmental concerns and issues, especially relating water quality and the coastal environment.
- 4) In observance of these objectives our submission opposes the following applications by the Applicant.

**APPLICATION NO: 2000.472\_V1 – VARIATION – COASTAL PERMIT**

- 5) To vary the purpose and conditions of existing Resource Consent 2000.472 to authorise the disposal of dredge material derived from the dredging of the shipping channel or within Otago Harbour from activities associated with the operation and maintenance of Port

Chalmers facilities, in accordance with the following existing maximum annual discharge quantities at the following locations:

- i) Heywards Point disposal site (200,000 cubic metres);
- ii) Aramoana Beach (Spit) disposal site (200,000 cubic metres);
- iii) South Spit Beach (Shelly Beach) disposal site (50,000 cubic metres).

**APPLICATION NO: 2010.198 – COASTAL PERMIT – RESTRICTED COASTAL ACTIVITY**

- 6) To deposit up to 7.2 million cubic metres of dredge material sourced from the channel upgrading works and maintenance dredging at the new off shore disposal site A0.
  
- 7) SCBRA oppose the proposal to increased disposal of dredge spoil at the new disposal site A0 and the existing disposal sites as follows:
  - i) Heywards Point disposal site: Pacific Ocean, approximately 1.5kilometres northeast of Heyward Point;
  - ii) These three surf breaks are now protected under Policy 16 of the northeast of Spit Beach;
  - iii) South Spit Beach (Shelly Beach) disposal site: western end of South Spit Beach.
  
- 8) The specific parts of the application of our submission relates to are:
  - i) Disposal of dredged spoil from Project Next Generation.
  
- 9) SCBRA's main area of concern is the Variation of Consent 2000. 472\_V1 Application for disposal of spoil at the Aramoana "Spit" disposal mound and Heywards Point.

- 10) The potential effects of the accretion and movement of these spoil mounds and deposition of rock resulting in the modification of the wave environment causing adverse effects to the recreational values of the surf break.

#### **THE NEW ZEALAND COASTAL POLICY – POLICY 16: SURF BREAKS OF NATIONAL SIGNIFICANCE**

- 11) All decision makers must recognise and protect surf breaks of national significance for surfing, including those listed in Schedule 1, by:
  - i) Ensuring that activities in the coastal environment do not adversely affect the surf breaks; and
  - ii) Avoiding adverse effects of other activities on access to, and use and enjoyment of the surf breaks.
- 12) We request that the Consent Authority recognises the national and international significance of the surfing waves at Aramoana, Whareakeke (Murderers) and Karitane in respect of these consent applications.
- 13) All three breaks are listed in Schedule 1 of Policy 16 of the proposed New Zealand Coastal Statement (2010).
- 14) We have concerns over the effects that the continued consented volumes and deposition of dredged spoil at the three existing dumps sites, in particular The Spit/Aramoana, which will have the potential to adversely affect the quality of the surfable wave. This wave is recognised nationally and internationally as one of the best beach breaks in the world.
- 15) What concerns SCBRA the most is that the Applicant's May 2010 AEE report and associated independently peer review reports presented to satisfy the conditions of Policy 16 in relation to

Spit/Aromoana, Whareaeke and Karitane surf breaks states reveals that there will be:

*"No discernable effect on the "surfability of the wave". – (Single)*

- 16) This statement and others like it throughout the May 2010 AEE are made in regards to modelling of effects based on channel deepening at the harbour mouth, and deposition of spoil at the AO dumpsite.
- 17) SCBRA believe these monitoring results fail to take into account the cumulative effect of greater volumes of dumping of spoil from capital dredging at The Spit mound than previously documented minimal volumetric years.
- 18) The real and potential dumping of up to 200,000 m<sup>3</sup> a year at The Spit existing spoil mound is a reality, especially in light of the revised stage 1 project of 500,000m<sup>3</sup> per year, where the Recommendations Report states that the inshore site will be used first and the remainder at the A0 site.
- 19) This in reality means that proposed increased dumping at The Spit of 200,000m<sup>3</sup> of capital dredge spoil over 3 years will raise the 23 hectare mound by 1.5 metres building an already shallow mound giving a greater modifying effect to the swell corridor of the surf break, altering existing wave peel angles and dissipating energy through shoaling over the mound.
- 20) The true effects are unknown and although wave monitoring has been promised, measuring and assessing during a period of heaving dumping in the next few years will not give an accurate picture of the effects. If it cannot be proved that effects will be avoided, remedied or mitigated.

- 21) SCBRA submit that the dumping at The Spit should be restricted to 30-50,000m<sup>3</sup> per year until a bathymetric and visual (CamERA) dataset has been obtained.

## **CONCLUSION**

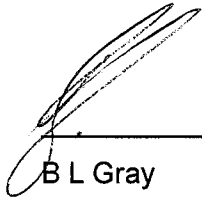
- 22) SCBRA do not oppose the dredging of the Otago harbour basin, but rather oppose the dumping of the spoils at the existing and proposed AO site.
- 23) Despite SCBRA representatives Graeme Carse and Brett Hastie being present and part of the Applicant's Next Generation Public Consultative Group since its inception four years ago, SCBRA's concerns with the proposal have largely been ignored, dismissed and minimised leading SCBRA to question the validity of the evidence submitted and good faith of the process employed by the Applicant.
- 24) SCBRA believe that if the Applicant is allowed to dump capital spoil at the existing sites at maximum capacity, which we believe will be an economically logical outcome of the current application, there will be significant potential for adverse affects on these world class waves.
- 25) The existing dump sites are areas of undisputed beauty and are international assets for the general public and the national and international surfing community today and for the future generations to come.
- 26) SCBRA believe the spoil material could be used to replenish other Dunedin beaches rather than being dumped at the existing and proposed AO site at sea.

- 27) SCBRA believe further investigation into other uses for this spoil material should be initiated, with options such as the replenishment of St.Kilda/St.Clair beaches where considerable erosion over the past few years has led to the trucking of dredge spoil and sand from nearby beaches to rectify this imminent danger to surrounding suburbs.
- 28) SCBRA are opposed to the continued and increased dumping of spoil material at the Heywards Point and Spit Beach disposal sites. SCBRA is of the view that there has not been enough, if any, true investigation of the effects on the quality of waves at these world class surf breaks which are now listed as surf breaks of national significance under Policy 16 of The New Zealand Coastal Policy.
- 29) The observations and modelling carried out by the Applicant have only been located at the mean tidal areas, not further offshore where it directly affects the wave quality for surfers. Since dumping began at these sites, surfers have been aware of the adverse changes to the quality of waves directly affected by the disruption to the swell corridor.
- 30) SCBRA request that the Consent Authority impose a condition on Applicant to further investigate the issues raised in our submissions including;
- i) Considering alternative uses for the maintenance and capital dredging spoil;
  - ii) Allow and fund independent analysis of the effects of the wave quality at the existing dump sites, with special reference to the quality of waves used by surfers offshore at these sites, not at the tidal marks;
  - iii) The placement and maintenance of a CamERA site on the cliffs above the existing dump site, either by NIWA or by ASR the results of which can provide accurate forecast scenarios of spoil effects by volume, as well as define the

characteristics of the surf break that bathymetric studies do not afford.

- iv) Request robust monitoring of the spoil mound and affect on the Aramoana surf break four times a year, and that if there is a trigger/change in activity that the dumping of spoil be immediately ceased and the volumes be reviewed to determine the adverse effects on these surf breaks of national significance.

Dated this 19<sup>th</sup> day of APRIL 2011



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B L Gray

(Counsel for)

South Coast Board Riders Association Inc.