

**BEFORE** Wellington City Council

**Under the** Resource Management Act 1991

**and**

**In the matter of** Proposed District Plan Change 83: Kiwi Point Quarry

**Date** 30 November 2018

## **STATEMENT OF EVIDENCE BY TARRYN WYMAN ON BEHALF OF THE SUBMISSION MADE BY GREATER WELLINGTON REGIONAL COUNCIL**

### **Introduction**

My name is Tarryn Wyman. I am a Biodiversity Advisor for Greater Wellington Regional Council. I have been employed by Greater Wellington Regional Council in this capacity since February 2018.

I have held previous positions as an Ecologist (Jacobs, UK), Environment Advisor (Network Rail, UK), and Analyst (Ministry for the Environment).

I hold the following qualifications; BSc in Zoology, BBS in Management, BSc (Hons) in Ecology (Massey University), and PhD in Ecology (University of Canterbury).

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### **1. Scope of evidence and Greater Wellington Regional Council's submission**

- 1.1 The following evidence relates to the submission from Greater Wellington Regional Council (GWRC) made on 15 May 2018 on Proposed District Plan Change 83: Kiwi Point Quarry.
- 1.2 GWRC's submission assessed the Proposed Plan Change for consistency with the *Regional Policy Statement for the Wellington Region (2013)* (the RPS). The assessment focused on how the Proposed Plan Change fits within the regional policy framework for the management of effects on indigenous biodiversity and whether it has been adequately addressed through the Proposed Plan Change process.
- 1.3 The purpose of this evidence is to provide responses to the recommendations in the Officer's Report and to highlight any outstanding areas of concern.

- 1.4 My evidence today will:
- (a) outline the policy and strategic context of this evidence,
  - (b) summarise GWRC's submission,
  - (c) respond to the Officer's Report recommendations on the matters covered in GWRC's submission, and
  - (d) request decisions on the Proposed Plan Change.

## **2. Policy and strategic context**

- 2.1 The RPS is a regional document that identifies significant resource management issues within the region and sets out the objectives, policies, and methods to achieve the integrated management of natural and physical resources for the Wellington region.
- 2.2 The RPS sets out objectives and policies that provide local authorities with direction and guidance on resource management issues that must be given effect to when making changes to district and regional plans (in accordance with section 75 of the Resource Management Act 1991 (the RMA), policies 1-34). The RPS also provides direction on policies that must be considered as part of resource consent applications (policies 35-60).
- 2.3 In assessing the Proposed Plan Change for consistency with the RPS, GWRC is particularly interested in how the Plan Change will support and contribute to achieving the integrated management of natural and physical resources in the Wellington region.

## **3. Summary of submission**

- 3.1 GWRC made a submission that conditionally supported the Proposed Plan Change and sought further consideration of some matters.
- 3.2 The primary reason for supporting the Proposed Plan Change is its consistency with Policy 60 of the RPS: Utilising the region's mineral resources - consideration. Policy 60 directs that particular regard be given to the social, economic and environmental benefits of utilising mineral resources within the region, and that particular regard be given to protecting significant mineral resources from incompatible and inappropriate land use alongside. GWRC supports the Plan Change in this regard as we recognise that aggregates in the Wellington region are in short supply.
- 3.3 GWRC's submission also raised concerns about the ecological effects of the proposed quarry expansion and how these would be adequately mitigated or offset to ensure no net loss of biodiversity. The submission supported the recommendation of the Assessment of Ecological Effects which is that mitigation should be in kind (like for like), on a site with similar environmental gradients, close to the affected area, and with the potential for additional

conservation actions over a larger area (ideally at least three times larger) than the affected area.

3.4 Relief was sought on the following matters:

- (a) further assessment of the area's ecological significance, including through surveys of freshwater fish and reptile fauna
- (b) the proposed site for mitigation to be increased to at least three times the size of the affected area
- (c) further assessments to identify adequate mitigation or offset options
- (d) further information to be provided on the operational and post operational phase impacts, including effective monitoring of mitigation/offsetting measures

3.5 The relevant policies of the RPS that address indigenous ecosystems include Policies 23, 24 and 47. These provide criteria to identify ecosystems and habitats with significant indigenous biodiversity values, and require that district plans include policies, rules and methods to protect these areas from inappropriate subdivision, use and development. These policies also require effects to be remediated, mitigated or offset where appropriate.

## **4. Response to the Officer's Report recommendations**

### **4.1 Further ecological assessments**

4.1.1 GWRC considered that further assessment of the biodiversity values and significance of the site was required and requested surveys of reptiles and freshwater fish as recommended in the Assessment of Ecological Effects.

4.1.2 Since the Plan Change was notified, a lizard survey was completed which ruled out the site as core habitat for lizards and satisfied the requirement for a lizard assessment. I **accept** the recommendation in the Officer's Report that no further lizard surveys should be required.

4.1.3 I **accept** the recommendation in the Officer's Report that fish presence need not be addressed in the Plan Change process because no streams are directly affected by the Proposed Plan Change. Freshwater fish surveys will be essential to design and delivery of future stream mitigation for the wider site and should be addressed through future consent applications.

4.1.4 I **support** the recommendation in the Officer's Report to include a new information requirement for future consent applications to provide an ecological survey and restoration plan report prepared by a suitably qualified ecologist (Chapter 3, Section 3.2). I consider that this addition will help ensure further ecological information is obtained. This information can then inform future mitigation strategies so that habitat can be replicated or enhanced in mitigation areas.

4.2 **The proposed site for mitigation be increased to at least three times the size of the affected area**

4.2.1 GWRC requested that the proposed area for mitigation be increased to at least three times the size of the affected area as recommended in the Assessment of Ecological Effects.

4.2.2 In further discussions with WCC, best practice principles for biodiversity offsets for this site were agreed to be like-for-like (i.e., include actions that respond specifically to the loss caused), close to the affected site, and focusing on increasing the area of habitat before considering habitat enhancement (though the latter can also be included in the package).

4.2.3 A 3:1 mitigation and offsetting ratio was agreed by all parties, and GWRC would like this reflected in the Plan Change document to add a measure of certainty for future consenting processes. I consider that this level of clarity in the Plan Change document would support WCC (as the consenting authority) to ensure effects are appropriately managed for via the resource consents that will be needed for the quarrying activity.

4.2.4 I **ask** that the following amendment be made to **METHODS - A quarry management plan (page ii)**:

*“In respect of the Kiwi Point Quarry southern face, ecological mitigation for the loss of terrestrial vegetation and the associated habitat will be carried out in accordance with a restoration plan to achieve a 3:1 mitigation and offsetting ratio.”*

4.2.5 The report, *Mitigation options for the potential loss of indigenous vegetation and habitat at the proposed Kiwi Point Quarry, Wellington* provided by Wildlands explores ways to reach the 3:1 mitigation ratio. However, GWRC has concerns that the rationale for the ‘multipliers’ used in this report is unclear.

4.2.6 Biodiversity offsets exchange a certain impact now for an uncertain gain in the future. It is therefore important that the rationale used to decide which multipliers to use within offset calculations are provided alongside the offset calculations.

4.2.7 We understand that the details of the final effects management package will be included in the ecological restoration plan. However, we would like this plan to make it very clear what the contribution of each mitigation activity is to the overall effects management package as well as a clear line of sight between each mitigation activity and the ecological effect it is responding to.

4.2.8 I **ask** for the following amendment to **Chapter 3, Section 3.2: Ecological Survey & Restoration Plan (page x)**:

“d) a description of the methodology for adopting the specific suite of measures to address (c)(i)-(iv) above, including a description of the rationale for the components of the mitigation package to ensure a

3:1 mitigation and offsetting ratio, with specific regard to be given to the results of the surveys described under (a) and (b) above; and...”

#### 4.3 **Further assessment to identify adequate mitigation options**

4.3.1 GWRC considered that insufficient information had been provided to identify adequate mitigation options.

4.3.2 I **support** the recommendation of the Officer’s Report where it suggests amending the proposed text in the quarry management plan methods under Policy 33.2.2.7 to include other ecological mitigation, rehabilitation and enhancement options to be implemented in addition to those identified in the Notified Plan Change.

4.3.3 I note that two mitigation sites included in the Wildlands *Mitigation options* report are not mentioned in the plan change document. These are the Ngauranga site and Tyers Reserve. GWRC considers that these lots should be inserted into the plan change document or that it be made clear that mitigation in lots other than those mentioned is not excluded so it is not a definitive list of possible mitigation areas.

4.3.4 GWRC also considers that other areas for mitigation should be further explored, particularly other coastal escarpment corridor connections. This is because, as noted above, increasing the area of habitat is preferred over enhancing habitat already present.

4.3.5 I **ask** for the following amendment to **METHODS - A quarry management plan (page ii)**:

“... Other mitigation to be adopted will include pest control measures, enrichment of native vegetation and habitat within other adjoining open spaces, ~~and~~ staged riparian enhancement to Waitohi Stream to coincide with completion of quarry activities, and any additional measures required to achieve a 3:1 mitigation and offsetting ratio.”

4.3.6 I **ask** for the following amendment to **Chapter 3, Section 3.2: Ecological Survey & Restoration Plan (page x)**:

“c) iv. recommendations for naturalisation and riparian enhancement of Waitohi Stream;  
v. details of any additional measures required to achieve a 3:1 mitigation and offsetting ratio...”

4.3.7 I **support** the recommendation in the Officer’s Report of an integrated approach for freshwater and terrestrial mitigation, including an additional quarry management plan requirement for the enhancement of Waitohi Stream and riparian vegetation.

4.3.8 However, I note that stream rehabilitation is already a requirement of the regional consent (Consent No. WGN170175) and this should therefore not be counted towards the 3:1 mitigation ratio for the Proposed Plan Change.

- 4.3.9 I understand that the primary objective of the rehabilitation of quarry cut faces is visual amenity rather than ecological habitat creation. I also understand that the long-term nature of the quarrying activity means that rehabilitation of quarry cut faces will not occur for some decades. Furthermore, WCC staff and Mr Fuller have expressed concern that rehabilitation success may be limited due to the failure of planting trials and difficulty of the site.
- 4.3.10 I therefore consider that ecological mitigation and offsetting must take place in the immediate term and that site rehabilitation should not be counted towards the 3:1 mitigation package for the Proposed Plan Change. GWRC considers site rehabilitation to be complementary but additional to ecological mitigation and offsetting requirements.
- 4.4 **Further information relating to operational and post-operational phase ecological effects, including effective monitoring of mitigation/offsetting measures**
- 4.4.1 GWRC requested further details regarding the monitoring regime following remediation of the area.
- 4.4.2 I **support** the Officer Report's amendment to proposed Objective 33.2.14 to clarify that an anticipated outcome of the quarry will be 'remediation' of the site.
- 4.4.3 I **support** the Officers Report's recommendation to insert procedures for monitoring the effectiveness and maintenance of the ecological mitigation measures.

## **5. Decisions requested**

- 5.1 I ask that the hearing panel note GWRC's support for the Officer's Report recommendations related to Proposed District Plan Change 83 and accept the recommendations.
- 5.2 I ask that the additional amendments sought by GWRC are accepted and included in the decision.

**Tarryn Wyman**