

**BEFORE THE INDEPENDENT HEARINGS PANEL AT WELLINGTON CITY I MUA NGĀ
KAIKŌMIHANA WHAKAWĀ MOTUHAKE NGĀMOTU O TE WHANGANUI-A-TARA
UNDER THE Resource Management Act 1991**

**IN THE MATTER OF the hearing of submissions on the Proposed Wellington City
Plan**

**HEARING TOPIC Hearing Stream 8- Coastal Environment and Outstanding Natural
Features and landscapes**

STATEMENT OF EVIDENCE OF Guardians of the Bays Inc (452)

23 April 2024



1. Introduction

- 1.1 My name is Yvonne Weeber I am the Chair of Guardians of the Bays Inc (GOTB).
- 1.2 GOTB is an incorporated society that represents concerned Wellington residents working to reduce the adverse effects that arise from Wellington airport on the land surrounding the airport made up of predominately pre-existing residential neighbourhoods and the sea at either end of the airport runway. The bays that are referred to Evans Bay and the southern coastline from Lyall Bay to Moa Point.
- 1.3 GOTB have made submissions and further submissions on the Proposed District Plan.
- 1.4 This statement relates to Stream 8 – Coastal Environment and Outstanding Natural Features and Landscapes. GOTB has reviewed the documents supplied online for Hearing Stream 8.

2. Coastal Environment

- 2.1 Throughout Mr Sirl's evidence and Appendix A Coastal Environment – Tracked Changes (19 April 2024) he uses the term 'between Lyall Bay and Moa Point'. This phrase is confusing on a number of levels. As far as we can ascertain Moa Point according to the Wellington City 2024 District Plan is this area of land that is at 69A Moa Point Road comprising of 36,901.046m² (Figure 1). Moa Point is a considerable distance from Wellington Airport (over 500m from Moa Point to the Airport Zone).

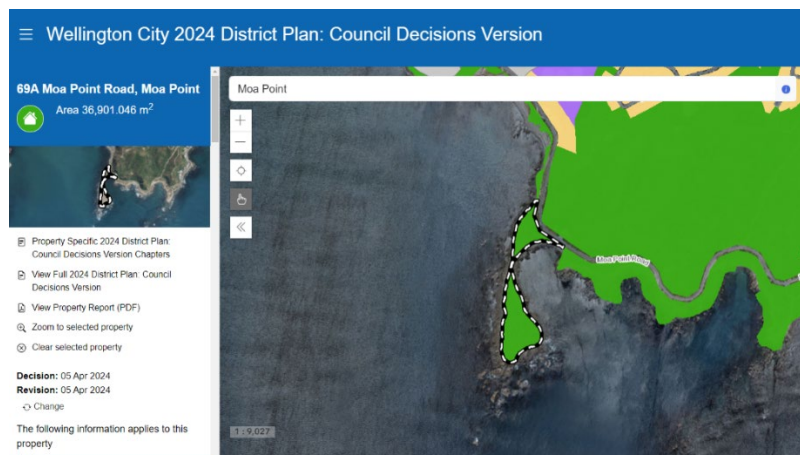


Figure 1 Moa Point according to the Wellington City 2024 District Plan

2.2 When Mr Sirl talks about ‘between Lyall Bay and Moa Point’ he appears to be talking about land referred to as 20A Moa Point Road in the District Plan. Which is a long lineal coastline from seawall to beach that connects with Moa Point itself (Figure 2). This area of land is Natural Open Space Zoned but it is made up of different landscape components. Some of this land is the current western and southern sea walls on land owned by Wellington City Council and maintained by Wellington Airport (WIAL). But from the intersection of Moa Point Road and Stewart Duff Drive to the east towards Moa Point the coastal area is a gravel beach of over half a kilometre commonly known by the locals as Moa Point Beach (Figure 3).

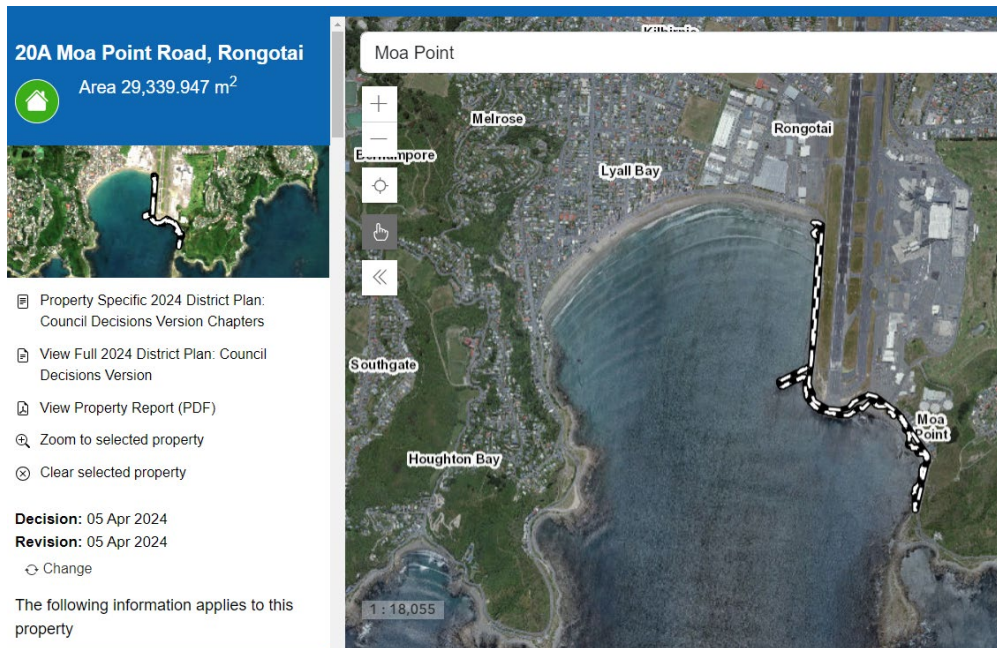


Figure 2. 20A Moa Point Road from Lyall Bay to Moa Point

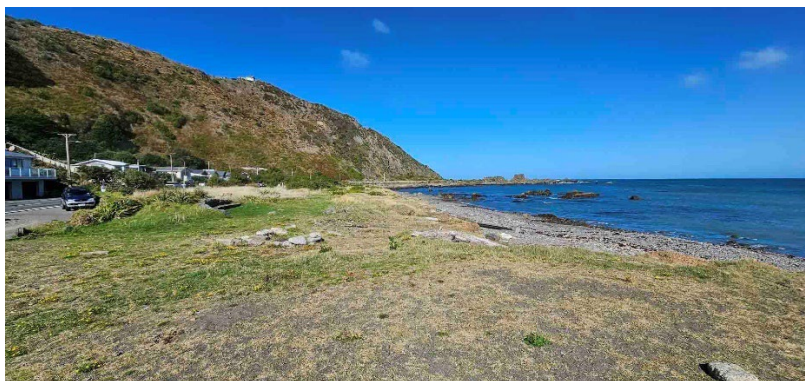


Figure 3 Moa Point Beach with Moa Point in the distance

2.3 GOTB considers the wording of ‘between Lyall Bay and Moa Point’ captures Moa Point Beach (from Stewart Duff Drive to Moa Point) in the development of seawalls for Wellington Airport. Moa Point Beach is an important buffer between the Airport seawalls and the Outstanding Natural Feature of Hue tē Taka Peninsula / Moa Point. Moa Point Beach should not be a piece of land that can be used and developed for

the Airport seawalls. This piece of land is not even adjacent to the Airport Zone (Figure 4).



Figure 4 Airport Zone does not include Moa Point Beach.

- 2.4 Kirsty O’Sullivan 12 April 2024 Statement of Evidence paragraph 33 uses the term of *the existing seawalls located between Lyall Bay and Moa Point Road*. This reference of Moa Point Road is also used in paragraph 36 and 37. It is worth noting that according to the District Plan and Google Maps that Moa Point Road starts at the eastern end of Lyall Bay and heads around the airport and on towards Breaker Bay Road. This description of the coastal landscape actually captures even more coastline and is therefore also not a very good reference to where seawall location actually exists in a District Plan.
- 2.5 Moa Point Beach (Figure 5) is definitely not an area of land that is similar to the Port and City Centre coastal environment. It is an important gravel beach with significant fauna (e.g. Penguins and sea birds) and coastal flora. It is used for casual recreation such sitting, walking, running, fishing and scuba diving. However, through bad plan writing it appears to be continually referred to in the text of the Coastal Environment and an area that can be developed with Wellington Airport sea walls and associated structures.



Figure 5 Moa Point Beach with Wellington Airport southern seawall in the distance

- 2.6 GOTB believes that Mr Sirl and Ms O’Sullivan are actually talking about land between Lyall Bay and the intersection of Moa Point Road and Stewart Duff Drive. We recommend the wording changes throughout the Coastal Environment with an amendment from ‘between Lyall Bay and Moa Point’ to ‘between Lyall Bay and Moa Point Beach at the intersection of Moa Point Road and Stewart Duff Drive’. This relates well to (Figure 6 and 7) coastal land adjoining the actual Airport Zone where the southern Airport seawall occurs and where the Moa point sewage pipe long outfall starts exits the land (Figure 8)
- 2.7 Use of the words ‘between Lyall Bay and Moa Point Beach at the intersection of Moa Point Road and Stewart Duff Drive’ should be added in:
- CE-P6
 - CE-P7 (twice)
 - CE-R8 (twice) in 1. Activity status: Permitted and 2. Activity status: Restricted Discretionary
 - CE-R15 (twice) in 1. Activity status: Permitted and 2. Activity status: Restricted Discretionary



Figure 6 Airport Zone, Moa Point Road and Stewart Duff Drive Intersection with Moa Point Beach and Hue tē Taka Peninsula / Moa Point - Grey shading = Airport Zone, dark green shading = Natural Open Space Zone, dark purple shading = Significant Natural Areas



Figure 7 Airport Zone, Mōa Point Road and Stewart Duff Drive Intersection with Mōa Point Beach and Hue tē Taka Peninsula / Mōa Point - Grey shading = Airport Zone, dark green shading = Natural Open Space Zone and light green= Outstanding Natural Feature of Hue tē Taka Peninsula Palmer Head.



Figure 8 Wellington Airport southern seawall and Mōa Point Sewage Pipe Long Outfall

3. Outstanding Natural Features

- 3.1 GOTB supports the Hue tē Taka Peninsula / Mōa Point being a High Coastal Natural Character Area and being recognised as an Outstanding Natural Feature.
 - 3.1.1 Schedule 12 – High Coastal Natural Character Areas. GOTB supports the Schedule 12 addition of High Coastal Natural Areas to the Hue tē Taka Peninsula / Mōa Point.
 - 3.1.2 Schedule 10 Outstanding Natural Features GOTB supports the Schedule with natural science values, sensory values and shared recognised values.