

14 May 2018

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Attn: Mitch Lewandowski (Principal Advisor Planning)

Dear Mitch,

Submission on Proposed District Plan Change 83: Kiwi Point Quarry Extension

Please find enclosed the Greater Wellington Regional Council's submission on Proposed District Plan Change 83: Kiwi Point Quarry.

Please feel free to contact me on 04 830 4122 or michelle.flawn@gw.govt.nz if you have any questions or concerns.

Yours sincerely



Michelle Flawn
Policy Advisor, Environmental Policy

Encl: Submission

Greater Wellington Regional Council: Submission

To:	Wellington City Council
Submission on:	Proposed District Plan Change 83: Kiwi Point Quarry Extension

1. Reason for submission

1.1 The Greater Wellington Regional Council (GWRC) wishes to make a submission on Proposed District Plan Change 83: Kiwi Point Quarry Extension pursuant to Section 6 of the Resource Management Act 1991 (RMA).

2. Comments

2.1 GWRC conditionally supports Proposed District Plan Change 83: Kiwi Point Quarry Extension (the Plan Change) and seeks further consideration of some particular matters.

2.2 The primary reasons for supporting the Plan Change are its consistency with:

- The Wellington Regional Policy Statement 2010 (RPS),
- The Regional Public Transport Plan 2014 (RPTP),
- The Regional Land Transport Plan 2015 (RLTP),
- The National Policy Statement for Freshwater Management 2014 (NPS-FM), and
- The proposed Natural Resources Plan (PNRP).

3. Policy framework

3.1 In assessing the Plan Change for consistency with the above documents, GWRC is particularly interested in how this plan change will support and contribute to achieving the sustainable management of natural and physical resources in the Wellington region.

Regional Policy Statement for the Wellington Region

3.2 The RPS gives guidance on the future direction for the sustainable management of natural and physical resources in the Wellington region. The RPS sets out objectives and policies to address regionally significant issues.

3.3 The first group of RPS policies are directive to local authorities and require provisions to be included in district or regional plans. The second set of RPS policies need to be given particular regard to when assessing and determining a resource consent, notices of replacing city, district or regional plans. Many of the regulatory policies will cease to have effect once the directive policies are given effect to through district or regional plans.

- 3.4 GWRC is responsible for the planning and delivery of the public transport network in the Wellington region. In doing so, GWRC is guided by the RPTP, which sets the direction for public transport over a 10 year period and aims to deliver an effective, efficient and integrated public transport network.
- 3.5 The Wellington RLTP provides the strategic direction for land transport in the region over the next 10-30 years.
- 3.6 The NPS-FM sets out the objectives and policies for freshwater management under the RMA. Of particular note is the requirement to maintain and improve water quality in water bodies in the region.
- 3.7 The PNRP is produced by GWRC in accordance with the RMA. It sets out the objectives, policies and methods for people and organisations that use the region's resources for a variety of purposes.

4. Relevant RPS provisions

4.1 We have assessed the Plan Change against the RPS policies. We recognise the main instrument for giving effect to these policies is through the Quarry Management Plan (QMP), and in particular the following policies :

- Policy 1 – Odour, smoke and dust
- Policy 15 – Minimising the effects of earthworks
- Policies 25 & 26 – Identification and protection of outstanding natural features and landscape values
- Policy 29 – Avoiding natural hazard risk
- Policies 40–45 – Safeguarding freshwater quality, quantity and ecological health

4.2 While no outstanding landscapes have been identified in the Plan Change, we understand that remediation of impacts on landscape values are being dealt with within the QMP.

4.3 We particularly note support for the Plan Change due to the requirement to have, and the criteria listed within, the QMP.

Recognising mineral resources within the region

4.4 Policy 60 of the RPS 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.

4.5 We support the Plan Change in this regard as we recognise aggregates in the Wellington region are in short supply.

Recognising biodiversity values

- 4.6 The relevant policies of the RPS which 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.

Assessment of biodiversity values

- 4.7 As with all resource management decisions, the protection of indigenous biodiversity must be considered alongside the potential for economic development. WCC have made some efforts to identify potential effects of the Plan Change on the ecological values of the site, however as noted in the Assessment of Environmental Effects (AEE) conducted by Wildlands, further surveys of freshwater fish and reptile fauna need to be completed before the significance of the site can accurately be determined. They consider that the AEE cannot be considered complete in its current form and therefore mitigation options cannot be adequately assessed.
- 4.8 GWRC would also like to raise concerns regarding the lack of full assessment on the biodiversity significance of the site, in addition to the comments by Wildlands in the AEE. We request that surveys of freshwater fish and reptile fauna are completed, and also request that further assessments be undertaken to identify adequate mitigation options.
- 4.9 The AEE for the Plan Change did not include any details on the operational phase and post-operation phase impacts, or details on how the identified mitigation sites would be remediated and monitored. We request that WCC provide further information on these impacts, including details of how the Plan Change will address the loss of the identified significant features of the site, as well as what monitoring regime will be followed once remediation of this area is completed. Should the Plan Change be accepted, this information will inform the QMP.

Ecological mitigation

- 4.10 As stated on page 16 of the AEE for the Plan Change, “In principle, 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”. This recommendation is supported by GWRC.
- 4.11 We note that the Plan Change does not currently meet those requirements, as the site specified for the preferred mitigation is only twice as large as the affected area.
- 4.12 Although this area is not recognised as a significant natural area in the WCC district plan, it has been identified as having significant ngaio-māhoe-māpou forest located within the footprint and there may be further significant values identified in the further assessments we request. To ensure the Plan Change follows recommendations made in the AEE, and no net loss of indigenous

biodiversity occurs, we request that the proposed site for mitigation be increased to at least three times the size of the affected area. We also request that the relevant district plan maps and new text in the QMP method are updated to reflect this.

4.13 We request that WCC address the concerns above before the Plan Change is heard.

5. Relief sought

5.1 GWRC requests that our support for the Plan Change is noted where given and amendments are made where sought.

5.2 We request that, prior to WCC making a decision on the Plan change:

1. Surveys of freshwater fish and reptile fauna are completed
2. Further assessments be undertaken to identify adequate mitigation options
3. Further information is provided on the operational and post operational phase impacts, as well as what monitoring regime will be followed once remediation of this area is completed
4. The proposed site for mitigation be increased to at least three times the size of the affected area, and
5. The relevant district plan maps and new text in the QMP method are updated to reflect this.

6. Further involvement

6.1 GWRC wishes to be heard in support of its submission. We would also welcome the opportunity to clarify and further discuss the matters raised.



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Matt Hickman
Manager, Environmental Policy

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