

## By email

17 June 2015

File Ref: N/50/06/01

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Dear Andrew

### **Response to further information request under section 92(1) of the RMA 91 - WGN130264 [32238] - Hutt River and specified tributaries Resource Consent Application**

Thank you for your letter dated 26 May 2015 regarding the above.

I have reviewed your request for further information and, as already discussed with you at our meeting on the 10 June 2015, we will need additional time to provide all the requested information. Due to the potential complexity and detail required the following dates are the earliest in which I believe that we can provide, to an appropriate standard, the further information requested.

- Mapping of flood protection structures and other features by the 3 July 2015
- Additional information associated with the Hutt River and specified tributaries and noted in the table below to be provided by the 19 September 2015.

A comparison between river communities in the 'application area' and in 'unaffected reference areas' has not been undertaken in any detail as in our view it will not provide information specifically relating to the effects of flood protection activities.

Flood Protection activities are undertaken in parts of the catchment which have been impacted by agricultural and/or urban development. The 'unaffected reference areas' referred to by EOS are almost invariably located in undeveloped parts of the catchment. The comparison requested would be between the urbanised main stem of the Hutt River and the relatively pristine upper reaches which is a smaller watercourse and mostly in forested catchments. There will certainly be differences in the aquatic ecology, but these will be primarily related to deforestation, loss of riparian vegetation, agricultural landuse, urban development, inputs of nutrients and other contaminants, introduced pest species, as well as flood protection activities.

HUTT S92 RESPONSE [1497566]



The approach taken, as described in the AEE, is to undertake a series of targeted before and after, upstream and downstream investigations of flood protection activities which are specifically designed to separate out the effects of those activities. These studies have been undertaken on the Hutt River for fish and invertebrate re-colonisation (Perrie, 2013) habitat quality (Cameron, 2013), and in northern Wairarapa Rivers for sediment deposition, periphyton, invertebrates and fish (Death and Death, 2013). A further study is currently underway on the Hutt River in relation to habitat quality, water quality and fish re-colonisation (Cameron 2015, in progress).

Having said this we intend to provide the following additional information outlined below:

- *Fish*: Update the existing information to show where each fish species has been found in relation to the application area.
  - *Macroinvertebrate community*: Undertake a comparison between the application area and unaffected reference area and provide more detail on community composition.
  - *Birds*: The bird survey undertaken by McArthur et al (2013) covered the river from Te Marua to Silverstream – which is nearly all within the application area, except the Te Marua reach, so we cannot fully meet the s92 request, but can present the information in more detail.
- Riparian Vegetation – refer to the COP timetable at section 3.2.1. It is intended that these surveys will be completed within three years of the consents being granted and at 9 year intervals thereafter.
  - Options for integration of native trees with willows for bank edge protection by the 30 November 2015.
  - Inanga Spawning – refer to the COP refer section 3.2.4, Currently, it is intended that Flood Protection (FP) undertake an Inanga Spawning habitat survey in the affected watercourses within 3 years of the consents being granted. The need for further surveys after 3 years will be addressed in the applicable monitoring report.

However, given the scale of this exercise, further discussions are required with Environmental Science GWRC, as we believe it is more appropriate to replicate the work undertaken by Niwa in 2001 and Environmental Science are best placed to co-ordinate and progress this.

Included below is a table indicating what further information will be lodged and when.

Further Information Request – WGN130264 [32238]	Date to be provided by
<p>3. Please provide full details and description of options for the integration of native tree species with Willow for bank erosion protection purposes.</p> <p>I note your comments that this has been provided in the working draft Code of Practice (COP). For ease of reference please confirm where in the COP this has been provided.</p>	30 November 2015
<p>4. Please provide a detailed description of how rock rip rap will be managed in areas identified as being suitable Inanga habitat within the application area in the future.</p> <p>I note your comments that this has been provided in the work COP. For ease of reference please confirm where in the COP this has been provided.</p>	<p>17 June 2015</p> <p>Rock lining individual good practice method – includes restriction, Page 71, COP</p>
<p>10. Please provide identification of areas where mitigation planting using native species has been undertaken in the application area and how this is seen to be suitable mitigation.</p> <p>Information request met in that the information has been partially supplied. Overall, <i>a more complete description of riparian vegetation in the application area would be desirable. A detailed description and map showings any remnant native vegetation, areas of planted natives and significant areas of native vegetation would be useful.</i></p>	<p>The EMP requires that riparian vegetation is mapped within 3 years of consent being granted and repeated every 9 years. FP intends to keep to this timeframe.</p>
<p>13. Please provide a set of plans with a key that clearly and accurately shows the total area affected by the application including all specified tributaries. If possible these maps should show the location of where data was gathered that was included in the report.</p> <p>I consider this item has being partially met. EOS memorandum identifies that a single plan showing locations where data was gathered would be very useful. I feel this information would also be useful when notification occurs to make the application easier to understand. Therefore please provide this information.</p>	<p>Mapping of flood protection structures and other features by the 3 July 2015</p>
<p>14. Please provide full details and description of the composition of fish, periphyton, macrophyte, invertebrate communities and bird life in the application area compared to the unaffected area of the Hutt River.</p> <p>As this is a broad question I have broken it down into the various ecological components identified above as identified in the EOS Ecological memorandum.</p>	<p>19 September 2015</p> <p>Additional information to be provided on Fish, Macroinvertebrates and Birds, noting comments above.</p>
<p>16. Please provide an ecological description and details of the existing environment of the tributaries of the Te Mome Stream, Speedy’s Stream, Stokes Valley Stream and Akatarawa River.</p> <p>Overall no invertebrate, macrophyte, or bird information has been provided for the Te Mome Stream, Speedy’s and Stokes Valley Streams. While some fish data has been provided it does not relate to the specific areas or reaches that are to be impacted by</p>	19 September 2015

<p>the proposal.</p> <p>I do not consider the additional information provided to have completely satisfied question 16.</p>	
<p>17. Please provide a detailed assessment of environmental effects of channel and bank maintenance works on the tributary streams included in the application area.</p> <p>I do not consider the additional information provided to have completely satisfied question 17.</p>	19 September 2015
<p>18. Estuary description - additional information requested:</p> <p>Please provide full details and a description of the Hutt River estuary and the potential effects of flood protection activities. Please include a description and data in relation to the composition of fish, shorebirds, invertebrate communities, plant species, and the biodiversity values of the estuary.</p> <p>I note that recent surveys done by Robertson and Stevens 2012 could be utilised in providing this information. Also, work undertaken as part of the consents for WGN110149 may be relevant.</p> <p>This information is required as the Estuary, while outside the application area, is part of the receiving environment and affected by Flood Protection Activities.</p>	19 September 2015
<p><b>Code of Practice – additional information requested:</b></p> <p>Please provide comment on alternatives to mowing the riverbed of Stokes Valley Stream.</p> <p>19. This information is required in line with Schedule 4 of the Resource Management Act which requires an analysis of alternatives where adverse effects are proposed.</p> <p>20. Please provide comment on whether a free-draining bucket is the most appropriate method for removing silt from the Opahu Stream.</p>	19 September 2015 - with information also to be included in an updated EMP
<p><b>Environmental Monitoring Plan - additional information requested:</b></p> <p>21. Please provide more details in relation to the proposed bird monitoring and its workability including details of the basis for the proposed percentage triggers.</p> <p>22. Please provide further details on the proposed pool and riffle counts using aerial photography. Please discuss how features obscured by vegetation are accounted for, and discuss whether the variability of habitats (depth, area, ecological value) would be noted or whether the proposed methodology simply counts features.</p> <p>23. Please provide any information available on the optimal width of willow plantings to achieve the objective of vegetative bank protection. Please identify any areas where willow planting can be retired over time and natives planted instead.</p>	<p>19 September 2015 with information also to be included in an updated EMP.</p> <p>19 September 2015 with information also to be included in an updated EMP.</p> <p>30 November 2015</p>
<p><b>NCI</b></p> <p>Please provide further details on how the Natural Character Index (NCI) will be useful in the context of ecological monitoring. This information is required to ascertain if the NCI will be able to effectively monitor changes to the ecology of the</p>	19 September 2015

river in relation to the proposed activities.	
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Please feel free to contact me on 04 830 4045 if you have any questions or concerns.

Yours sincerely

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