

File No: WGN130303 [32316]  
26 May 2015

Greater Wellington Regional Council Flood Protection Department  
Internal Mail

**For: Tracy Berghan**

Dear Tracey

**Further information request under section 92(1) of the Resource Management Act 1991**

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<b><i>Applicant:</i></b>	<i>Greater Wellington Regional Council Flood Protection Department</i>
<b><i>Proposal:</i></b>	<i>Operations and maintenance activities for flood protection purposes in the Waikanae River and Waimeha Stream</i>
<b><i>Location:</i></b>	<i>Waikanae River and Waimeha Stream</i>
<b><i>Resource consents required:</i></b>	<i>Water permits, land use consents and discharge permit.</i>

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Thank you for your application which we received on 22 May 2013 and the updated/amended version we received in October 2014.

I have reviewed your application, the supporting information, and the information provided by Alex James of EOS Ecology following his peer review of the amended application dated October 2014, the ecological AEE report, the draft Code of Practice including a draft Environmental Management Plan and a finalised version of Alton Perrie's memorandum.

I need further information on your application so that I can better understand the effects of your proposal operations and maintenance activities for flood protection purposes, its effects on the environment and how any adverse effects on the environment might be mitigated.

Overall, the description of the existing environment is missing some key information that is required to adequately assess the effects specific to the Waikanae River and the Waimeha Stream. This specific information is especially important given the adaptive management approach proposed by the "Code of Practice" document as the means of avoiding, remedying the mitigating the effects of the proposed flood protection activities over the proposed 35 year consent duration.

Information on the existing environment needs to compare the ecology of the area affected by the consent application (the impact section) with the upstream catchment that is outside the influence of flood protection activities (the reference section).

### **Information requested<sup>1</sup>**

1. **Maps** - Please provide an overview map or maps at a suitable scale, showing the areas covered by the application, the affected tributaries, the main existing flood protection features (eg. willow plantings, rip-rap rock linings, groynes), and any ecological site survey locations referred to in the application (please refer to Fish at point 5 below).
2. **Estuary** – Please provide full details and a description of the Waikanae River estuary and the potential effects flood protection activities may have on it. Given the proposed works include activities in the estuary and coastal marine area, a more thorough description of the receiving environment is required. This must be based on actual data or recently cited information of the Waikanae River estuary.

*Please include a full description and supporting data in relation to the composition of fish, resident and migratory shorebirds, invertebrate (marine and freshwater) communities, plant species, and any associated biodiversity values of the estuary.*

*Please provide full details of when resident and migratory shorebird species make use of the estuary.*

*Please advise whether any of the regionally rare and threatened plant species which are present in the DOC reserve are present in the area covered by the application.*

3. **Aquatic Plants/Macrophytes** – Please provide full details and a description of the macrophyte communities that are present especially those present in the Waimeha Stream where mechanical instream vegetation removal is proposed or where macrophyte communities will be affected by other flood protection activities.

*Please provide full details if there are native species or noxious exotic species present, and the location of any significant patches (in terms of areal extent) of these species.*

*Please advise whether the proposed mechanical instream vegetation removal will target noxious or exotic species and avoid natives.*

4. **Macroinvertebrates** – Please provide full details and a description of the invertebrate communities, including for habitats affected by gravel extraction and bed/beach recontouring, the hyporheic zone and deeper, non-wadeable habitats.

*Please provide information on macroinvertebrates within the Waimeha Stream especially in areas affected by this proposal. If MCI surveys of the Waimeha Stream are not possible, please*

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<sup>1</sup> Any person who has been asked to provide further information under section 92(1) of the Resource Management Act 1991 (the Act), has the right to object to the consent authority in respect of that request for information under section 357A(1)(b) of the Act.  
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*provide prediction data from the Freshwater Ecosystems of New Zealand (Leathwick et al, 2010)<sup>2</sup> Please provide details of whether any crayfish/koura or freshwater mussels/kakahi are present, especially in the Waimeha Stream.*

*What are the most common species/taxa in the sections to undergo gravel extraction/bed contouring? How does the community composition compare to that found outside of the area? Are there threatened or at risk invertebrates present?*

*SOE invertebrate monitoring data has been presented only for the period 2009-2011. Please provide data for the full period for which data is available and an analysis of the trends.*

5. **Fish** – *Please provide more information on what fish species are most abundant in the reaches of the Waikanae River and Waimeha Stream that are subject to this resource consent application; and more information outlining what fish species spawn within these reaches.*

*Please provide greater detail on the fish species whose habitats are affected by gravel extraction and beach contouring. Please compare the data for impacted and reference reaches of the Waikanae River.*

*Tables of NZFFD records provided in the application and the AEE report give no indication of where each species has been found in relation to the area covered by the consent application. Please split the records into those from within the application area and those from outside. Please provide a map of site locations.*

*Please provide abundance data (relative abundance, rank abundance) rather than just presence/absence, so that which species are more abundant and the general community composition can be determined.*

*Please provide a map of the inanga spawning locations, and information on any other species that may spawn in the reaches affected by gravel extraction and bed recontouring (eg. torrentfish or bully species).*

*Please provide a map showing the survey reaches for the annual drift diving trout surveys.*

*Please provide details of the level of customary, recreational and commercial fishing for eels in the Waikanae River and Waimeha Stream.*

6. **Water quality** – *Please provide the water quality data that exists from 2004 and an analysis of any trends.*
7. **Gravel bar and beach flora and fauna** - *Please provide more information on the flora and fauna of gravel bars and beaches that might be affected by gravel extraction and beach recontouring.*

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<sup>2</sup> Leathwick, J.R., West, D., Gerbeaux, P., Kelly, D., Robertson, H., Brown, D., Chadderton, W.L., and Ausseil, A.-G. 2010. Freshwater Ecosystems of New Zealand (FENZ) Geodatabase Version One – August 2010 – User Guide. Department of Conservation. 57 p.  
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8. **Riparian vegetation** – Please provide a more complete description of riparian vegetation in the application area. Please describe in detail and shown on maps any remnant native vegetation in the area or significant areas of native vegetation.
9. **Birds** – Please provide more detailed information on the bird species (native or endemic) that roost, feed, nest or rest in the area covered by the application. Please provide details of which species feed and rest on gravel bars and which species may be nesting and roosting among the riparian vegetation (including willows) and when. Please include information for the Waimeha Stream also.

*From the 2012 survey it appears that there is higher resolution bird distribution data available than what has been presented in the AEE report. Please provide this data.*

10. **Herpetofauna** – Please provide full details in relation to herpetofauna that could be present in the areas potentially affected by flood protection works.

### **Environmental Monitoring Plan**

11. Please provide more details in relation to the proposed bird monitoring and its workability including details of the basis for the proposed percentage triggers.
12. 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.
13. Please provide further justification on how the Natural Character Index (NCI) will be useful in the context of ecological monitoring.
14. 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.

### **Date information required**

Please provide the above information to me by **Wednesday 17 June 2015**. If you are not able to supply the information requested<sup>3</sup> by this date, you must let us know in writing within this timeframe, either that you require additional time (at which time we will set a reasonable timeframe for you to provide the information) or that you refuse to provide the requested information. I appreciate it may take longer to address my requests depending on the complexity or amount of work required for each. It may be worth discussing timeframes or having a staged response to my request to ensure an understanding of how long it will take to respond.

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<sup>3</sup> Under section 92A of the Resource Management Act 1991.

We may decline your application if we consider we have insufficient information to enable us to determine your application, or if you do not respond to our request by **Wednesday 17 June 2015** or if you refuse to supply the information. If you consider you have a valid reason for refusing to provide the requested information, please contact me on the number below to discuss this further.

### **Processing of your application**

Your application has been placed on hold, and the statutory 'clock' stopped<sup>4</sup>, until such a time that either I am satisfied that I have received the above information, receive written notice that you refuse to provide it, or the time period for providing the requested information has expired. As soon as one of these occurs, the statutory 'clock' will restart and I can continue processing your application.

As soon as one of these occurs, the statutory 'clock' will restart and I will continue processing your application.

Please feel free to contact me on 04 830 4346 if you have any questions or concerns.

Yours sincerely



**Doug Fletcher**  
Resource Advisor, Environmental Regulation

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<sup>4</sup> Under section 88C of the Resource Management Act 1991  
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