

3 April 2020



Waka Kotahi NZ Transport Agency
PO Box 1947
Palmerston North 4440
Via email: greg.lee2@nzta.govt.nz & Damien.mcgahan@aurecongroup.com

Attention: Greg Lee and Damien McGahan

Dear Greg and Damien,

Additional Information Request for Application APP-2017201552.00

Thank you for the resource consent application lodged for Te Ahu a Tūranga Manawatū-Tararua Highway (the “Project”) on 11 March 2020. The application has been assessed and it has been determined that in order to fully assess the effects of the Project additional information is required.

The additional information is listed below and is requested under section 92(1) of the Resource Management Act 1991 (the “Act”):

The following questions relate to Technical Assessment H – Freshwater Ecology, Technical Assessment C – Water Quality, Appendix E Proposed Conditions and the Ecology Management Plan

1. In the sedimentation section of Technical Assessment H – Freshwater Ecology, especially around effects on aquatic ecology, the scale and magnitude of effects varies between the catchments. This is understandable given the different values that the different sub-catchments have. The overall conclusion for sedimentation effects appears to make an overall assessment that the effects from the entire Project are acceptable. This is despite an acknowledgement that the potential effects will be high even with the implementation of mitigation measures and during construction in Catchments 4, 5 and 7.

Could the Applicant please advise as to what additional sediment and erosion control measures, if any, that could/should be undertaken in these catchments (at a minimum Catchments 4, 5 and 7) with higher values to ensure that the values are not comprised in these catchments? If no additional measures are proposed, what will be the subsequent effects on those catchments?

2. It is understood from the assessments included in the application that the Applicant relies on the effects from sedimentation being ‘short’ term and that the streams will revert to the pre-construction state after the project has ceased, with post construction monitoring to confirm this is the case. However, the Applicant has not addressed the following matters:
 - 2.1 What happens if the monitoring shows that the streams have not returned to their pre-construction state?

- 2.2 When comparing the post-construction with the pre-construction state what level is considered to be 'close enough' to the pre-construction state?
3. The Freshwater Monitoring Plan includes a range of monitoring (baseline, event triggered etc.). It would however be useful if the Applicant included the monitoring information into a table which shows frequency, parameters, and sites for the different monitoring regimes. The current word format makes it difficult to track what and where monitoring is going to happen.

Could the Applicant please provide this information as a table or via another appropriate means to demonstrate what is to occur and when?

4. There appears to be an inconsistency between proposed condition EC15 a) i. and EC15 a) ii. Condition a) ii. is technically more correct in its alignment with good practice for stream restoration. However, proposed condition a) i. states a maximum width of 20 metres, meaning that a 1 metre width would meet this condition but the environmental outcome would not be achieved.

Could the Applicant please clarify whether this is a typo in the conditions referred above, or expand on how this approach aligns with/meets best practice and fits within the restoration requirements for these streams?

5. There appear to be slightly conflicting opinions on the use of TSS between the Applicant's expert reports in Technical Assessment H – Freshwater Ecology, Technical Assessment C – Water Quality, and Technical Assessment A – Erosion and Sediment Control in terms of sedimentation and monitoring requirements. This is especially with regard to TSS vs NTU or visual clarity. Mr Stewart raises some technical challenges with the use of TSS, especially from an operational/response management point of view. The assessment completed by Mr Hamill uses TSS as the measure to assess effects. Mr Hamill has however calculated TSS using a relationship with turbidity based on the Manawatū River at the Teachers College flow site. In terms of end of pipe or in-river standards, would it therefore not be possible to calculate the turbidity level that would be associated with the TSS from either the Manawatū at Teachers College or Manawatū at Gorge monitoring locations? Such an approach would allow for ease of management (with instantaneous results) and allow for operational changes to occur. This relationship could also be tested with the baseline data/information that has been collected over the site.

Could the Applicant please provide comment as to the above matter?

6. The application currently does not propose any standards for in-river or at the end of treatment devices. However, when calculating effects as a result of sedimentation on the streams/ivers, a value (standard/trigger) has been used for the water coming out of these treatment devices. Therefore:
- 6.1 Could the Applicant please provide commentary on whether these values should be used as thresholds to ensure the devices treat the sediment water to a suitable standard and ensure effects are managed?

- 6.2 In terms of establishing what these standards could/should be, could the Applicant please provide the end of pipe standards that have been used in the Technical Assessment C – Water Quality and Technical Assessment H – Freshwater Ecology, noting that the relationship between TSS/turb in 5 above would be the basis of being able to create this relationship and a standard/trigger in turbidity.
7. There is no reference in the application to standards in terms of limiting effects in-stream (i.e. QMCI and %EPT taxa richness), with the proposal based around trigger levels. Trigger levels are important as they raise awareness of potential issues that may arise and therefore result in management changes before there is an issue. However, there is a point at which effects should be limited by a standard to ensure that these effects are not allowed to occur.

Could the Applicant please provide what they consider to be appropriate trigger(s) and subsequent standard levels for both in-stream parameters and also discharge from treatment devices?

8. Technical Assessment C – Water Quality refers to *EOS Ecology 2018. Te Ahu a Turanga; Manawatū Tararua Highway – Baseline freshwater monitoring plan. EOS Ecology Report No. NZT02-18064-04* prepared by A. James for New Zealand Transport Agency, and Technical Assessment H – Freshwater Ecology refers to *Te Ahu a Turanga; Manawatū Tararua Highway – Baseline Freshwater Monitoring Results. Report prepared by EOS Ecology. November 2019. Report number NZT02-18064-03.*

Could the Applicant please provide a copy of those report(s)?

9. It is noted that old Gorge Road had a stock effluent disposal facility at the eastern Woodville end, but there is no disposal facility proposed at the western Ashhurst end. Noting the gradient of the road, there is the potential for significant leakage (spillage) from stock trucks using the road, which will result in effluent spilling onto the roads and being transferred to the stormwater treatment devices. It is understood that these devices are not specifically designed to treat raw effluent.

Could the Applicant please advise if it is proposed to provide stock effluent disposal facilities at one or both sides of the proposed road and what consent if any are required for such facilities? If it is not proposed to install such facilities, could the Applicant please provide details on how the stormwater treatment devices will be effective (both short and long term) to treat the concentrated contaminants from stock effluent potentially present in the stormwater prior to the discharge to water?

10. It is not clear whether there will be operational stormwater (which will contain contaminants – possibly stock effluent, hydrocarbons, etc) discharged to any at ‘risk’ or ‘rare’ or ‘threatened’ habitats (Rules 13-8 and 13-9).

Could the Applicant please clarify the location of the operational stormwater discharge points/areas relative to any ‘at risk habitat’, ‘rare habitat’ or ‘threatened habitat’?



The following questions relate to Volume 1 Application for Resource Consent, Technical Assessment A – Erosion and Sediment Control and Volume III - Drawings

11. Section 3.5 of the AEE details that “Cut slopes steeper than 1V:3H will not be planted as topsoil will not stay on the slope...” Whereas section 6.4.3 of the AEE implies rapid stabilisation over the entire exposed area and Paragraph 72 of Technical Assessment A – Erosion and Sediment Control, refers to progressive and rapid stabilisation.

If these areas are not being topsoiled and planted, could the Applicant please clarify how cut slopes greater than 1V:3H are going to be stabilised?

12. The application refers to Site Specific Erosion and Sediment Control Plans (SSESCP), with examples provided as part of the application. While there have been plans provided as part of the drawing set, the full SSESCPs are missing from the application.

Could the Applicant please provide the SSESCPs?

13. The application contains details around the use of GD05 compliant controls and contains reports on how these are going to be constructed and managed. This includes the provision of example Site Specific Erosion and Sediment Control Plans. The application also contains detail on how sediment controls are going to be monitored for performance based on a 90% sediment treatment efficiency measured through turbidity. However, there appears to be no clear link between what ultimately comes off the site (sediment control device discharge point) and the resulting effects on the receiving environment. This is especially pertinent in sub catchments 4, 5, and 7 where the potential effects even through best practice sediment controls are stated in Technical Assessment H – Freshwater Ecology as being moderate to high.

Could the Applicant please provide further information on the link between what is discharged from the sediment controls and the receiving environment, how this is measured, and what is considered an acceptable discharge from the site to the receiving environment?

14. There is some discussion on monitoring of erosion and sediment controls. However, there is no detailed discussion on contingency measures should monitoring determine that the systems in place are not functioning to a satisfactory level and what the trigger in terms of a sediment discharge might be in order to determine what a satisfactory level is.

Could the Applicant please clarify what the sediment discharge trigger points are and what additional measures will be considered should monitoring show sediment control performance is not meeting expectations?





The following questions relate to Technical Assessment F – Terrestrial Ecology and Technical Assessment G – Terrestrial Offset and Compensation

15. There appear to be a number of inconsistencies between the AEE Tables 4-6 and the tabulated values for habitats, magnitude of effects, and/or level of residual effects in Technical Assessment F – Terrestrial Ecology. By way of example;
 - 15.1 Table 2 reports the value of Old Growth tree land as 'moderate' whereas Table 8 says "High".
 - 15.2 Table 2 reports value of Advance secondary broadleaf as 'very high', whereas Table 8 says "High".
 - 15.3 Table 2 reports value of secondary broadleaf with old growth signatures as 'Very High', whereas Table 8 says "High".
 - 15.4 Table 2 reports value of the raupo wetland as "High", whereas table 8 says "Very High".
 - 15.5 Table 2 reports value of "moderate value wetlands" as "High", whereas Table 8 says 'Moderate'.

Could the Applicant please explain these apparent inconsistencies and indicate the values to be utilised for the ecosystem value, the magnitude of effects, and the residual effect to be addressed through the Project?

16. Could the Applicant and the Project Ecologists please provide comment as to the level of confidence that the hydrological integrity of the raupo-dominated seepage wetlands will remain intact?
17. In relation to water abstraction, could the Applicant please provide clarification as to which map in the Ecology series shows the indigenous habitats affected by the enabling works consents?
18. In order to demonstrate the ability/confidence for the offset/compensation to be undertaken, could the Applicant please provide a copy of a draft landowner agreement for the offset/compensation habitat restoration sites?

The following questions relate to Technical Assessment E – Air Quality

19. Technical Assessment E – Air Quality states that it has "built on" the air quality management plans required by the Designation Conditions.

Could the Applicant please clarify what is meant by this statement i.e. are the plans intended to form a baseline and if so, could the Applicant provide the Te Apiti Wind Farm Management Plan, National Grid Management Plan, and Ballantrae Research Station and Fertiliser Trial Management Plan?

20. In Technical Assessment E – Air Quality, the air quality assessment for the Woodville section identifies R4 and R5 as experiencing moderate to high levels of nuisance dust based on proximity and frequency of strong winds where the receptors are down wind.

Could the Applicant give consideration to including R7 as a receptor for potentially moderate to high nuisance due to proximity and the frequency that it is downwind of the north westerly? If not, please explain why?

21. There are recommendations in Technical Assessment E – Air Quality that do not appear to have been addressed in the ESCP Dust Management Procedure (DMP). For example, the sensitive receptors identified for the Woodville Section (Table 1) of the DMP differ between those identified in Technical Assessment E – Air Quality, as do the mitigation measures for site entrances.

Could the Applicant please advise if it is intended to update the DMP to ensure that it includes the air quality assessment recommendations?

The following questions relate to Technical Assessment I – Natural Character

22. The assessment states that its rating of effects has not considered mitigation measures. However, in some instances it appears that mitigation measures have influenced the assessed level of effects of the Project. For instance, in the table for Catchment 7 (page 110) it is stated that *“On balance, given the extent of stock exclusion compared to the current situation, the Project could lead to the improvement of overall water quality and hence increase the rating of this parameter to moderate high”*. It would appear in this example that the mitigation measure of stock exclusion has been considered in the assessment. Similarly, the table for Catchment 8 (page 117) says the following: *“May see small improvement in the riparian margins as diversions are planted.”* In this case, the mitigation measure of riparian planting appears to have been incorporated as part of the assessment. While the table for Crossing Point 7B (page 145) states that *“Crossing involves near-complete loss of existing channel in the sub-catchment and replacement with permanent diversion. Provided this results in complete removal of stock from the catchment with revegetation/retirement of former pasture in the sub-catchment then an increase in rating may result.”* In this instance it appears that the mitigation measures of stock exclusion and revegetation have been assessed as changing the existing natural character of water quality from low to moderate-low.

Could the Applicant please confirm:

- 22.1 What mitigation measures have and have not been considered as part of the assessment of effects on natural character, and which ratings include or exclude mitigation?
- 22.2 If a difference in approach has been taken as between mitigation and non-mitigation of effects in any given instance, which ratings should be changed for the purpose of ensuring a consistent rating approach?
23. The assessment of natural character for the various streams affected by the Project appears to be considered at a catchment scale. The report provides the total catchment area and the length of stream under the Project footprint for each catchment. However, the report does not provide the total stream length in each catchment. This makes it difficult to ascertain the percentage or ratio of stream affected in comparison to its total length.



Could the Applicant please provide a total length of stream in each catchment?

24. The AEE states *“That Assessment concluded that the Project may lead to a significant diminishment of natural character of particular streams at the location where the Project’s construction footprint crossed the stream, but that the reduction in natural character would diminish when considered at an overall stream scale”* (page 137). This appears to be inconsistent with the natural character assessment which states that the assessment was undertaken at a catchment scale (rather than an overall stream scale).

24.1 Could the Applicant please clarify whether the AEE should say “catchment scale” rather than “overall stream scale”?

24.2 If this is the case, could the Applicant please clarify how the effect of ‘context’, which diminishes as one moves beyond the river/stream corridor, has been considered in a catchment scale or stream scale?

25. The natural character assessment states that only Catchment 9 has an overall high existing natural character rating, with high representing the highest rating of existing natural character in the report. Catchment 6 is rated as having a moderate-high existing natural character. In the Notice of Requirement (NOR) process the natural character assessment for East QEII Crossing had an overall rating of high. This area corresponds with Catchment 6 in the natural character assessment undertaken for regional consenting purposes. Catchment 7 is rated as having a moderate-high existing natural character. In the NOR natural character assessment the QEII West Stream and lower stream/wetland had an overall rating of high. Both of these areas correspond with Catchment 7. If a catchment is not considered as having an existing natural character rating of high or above, then it is not assessed as to whether effects of the Project will be significant (as per wording in Objective 6-2(b)(ii) of the One Plan).

Could the Applicant please clarify/explain:

25.1 Why Catchment 6 and 7 (which include QEII East, QEII West and lower stream/wetland (raupō wetland)) are considered to have an existing natural character rating of moderate-high, while QEII East, QEII West and lower stream/wetland were identified as having high existing natural character ratings in the NOR natural character assessment prepared by NZTA and its experts?

25.2 Why is there a decrease in existing natural character ratings between this current assessment and the ratings provided as part of the NOR natural character assessment?

26. The calibration method for the natural character assessment only provides examples of rivers and streams with existing natural character ratings of very high/outstanding, moderate and low/very low. There is a gap in the examples of high and moderate-high rivers and streams (shown in Figure 1.3).



Could the Applicant provide examples of streams or rivers in the Horizons Region that would have a high and moderate/high natural character rating and include these in the calibration section of the report?

27. In paragraph 24 (d) and 234 (d) (page 8 and 68) of the assessment it is concluded that *“Post-development, there is a reduced level of overall natural character in catchments 2, 3, 4, 5 and 7; in catchments 1, 6, 8 and 9 there is no change.”* In paragraph 134 it is stated that *“Given the scale of the works associated with construction and operation of the Project, the natural character of the waterbodies it interacts with will be affected in some way”* (page 36). There appears to be inconsistency between these paragraphs.

Could the Applicant please explain in detail why catchments 1, 6, 8 and 9 will experience no change in natural character despite the Project affecting the natural character of the waterbodies in these catchments in some way?

28. Paragraph 237 (page 69) of the natural character assessment, identifies a number of modifications within the Project area (pasture, farm, a wind farm, Saddle Road, the railway line, and the former Gorge Road), however the report does not include a cumulative effects assessment of the Project across the different catchments, nor does it consider the cumulative effects with existing modifications in the Project area. Could the Applicant please provide a cumulative effects assessment which considers both these factors?
29. The AEE recognises that the Project alignment is within *“Two regionally outstanding natural features and landscapes being the ridgeline of the Ruahine Range and the Manawatū Gorge (Schedule G)”* (page 157). The AEE goes on to say that *“the management of competing pressures for the subdivision, use and development of land that may affect ONF and landscapes is most appropriately dealt with at a territorial level and therefore not dealt with in this application”* (page 187). The objectives, policies and methods contained within Chapter 6 (the RPS component) of the One Plan provide guidance and direction for the protection of the values identified for the areas within Schedule G, as well as any areas spatially defined within District Plans (note not all District Plans have given effect to the Regional Policy Statement at this time). In particular, Policy 6-6 requires avoidance of significant adverse cumulative effects (i.e. cumulative effects that are so adverse that they have the potential to significantly alter or damage the essential characteristics and values of the natural feature or landscape.). The assessment of effects has not considered Policy 6-6.

Could the Applicant please provide an assessment of the Project (and its effects) against Objective 6-2 and Policy 6-6 of the One Plan? Also:

- 29.1 The Landscape Management Plan (LMP) forms part of the Construction Environmental Management Plan (CEMP), which states that the LMP will be prepared in accordance with Condition 17. The CEMP provides a list of what the LMP should include but the completed LMP itself is missing. Could the Applicant please provide the LMP?
- 29.2 In the CEMP (page 66), under clause b)iii)B) and C) of the LMP, it refers to *“landscape and visual amenity planting(s)”*. The Ecology Management Plan

(12.2, page 128) refers to various types of planting (offsetting, compensation and revegetation). Could the Applicant please clarify if the *landscape and visual amenity planting* refers to all plantings that are to be undertaken as part of the Project (including offsetting, compensation and revegetation planting) or if this refers to a subgroup of planting in specific areas? If it refers to a subgroup, could the Applicant please define where these are to be located or alternatively what criteria/conditions will determine their location?

The following questions relate to Appendix E Proposed Conditions and consent duration

30. It is understood that some of the offset/compensation measures, such as revegetation and/or restoration will be permanent. However, it is noted that the duration of resource consents applied for are either 10 years or 35 years.

Could the Applicant please clarify:

- 30.1 How the permanence as to offset/compensation measures (for both terrestrial and freshwater) will be achieved relative to the particular consents applied for, the duration of any such consents, and the conditions proposed?
- 30.2 How they intend to condition to affirm (through monitoring for example) that the offsets/compensations perform as they have been modelled, and what the response will be if the offsets/compensations do not achieve the modelled outcomes?

Additional matters

31. As per the requirements of section 89A of the Act, Maritime New Zealand (“MNZ”) have reviewed the application and note the key concern for MNZ is Bridge “BR02” to be built over the Manawatū River at the western end of the Manawatū Gorge. MNZ advise that the application does not provide any detail around the typical use of this stretch of the navigable river by the public (whether for recreational and / or commercial activities) and what controls, apart from condition BD3, are planned to ensure the safety of any river users whilst the bridge “BR02” is being constructed in this particular location.

Could the Applicant please provide detail around the typical use of this stretch of the navigable river by the public (whether for recreational and / or commercial activities) and what, if any, additional measures are planned to ensure the safety of any river users whilst the bridge “BR02” is being constructed in this particular location?

Under the Act, you must, within 15 working days of the date of this letter, take one of the following options:

- a. provide the information; -OR-

- b. advise in writing that you agree to provide the information (at which point we would negotiate a reasonable time within which the information will be provided); -OR-
- c. advise in writing that you refuse to provide the information.

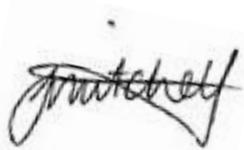
If you have any questions in relation to the determination or wish to discuss any aspects of this letter, please contact me on 021 271 0815.

Yours faithfully,



Mark St.Clair
CONSULTANT CONSENTS PLANNER
HORIZONS REGIONAL COUNCIL

APPROVED by,



Jasmine Mitchell
TEAM LEADER CONSENTS
HORIZONS REGIONAL COUNCIL