

23 September 2020

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Arron Cox
Senior Analyst, Fast Track Consenting
Ministry for the Environment
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VIA Email

Dear Arron

Clarification of matters regarding the Eastern Porirua Regeneration Project – Infrastructure Works application made under the COVID-19 Recovery (Fast Track Consenting) Act

In your email dated 22 September 2020, you have sought clarification on the following matters to assist with the assessment of the application:

1. Confirmation that the applicants are seeking the ability to apply for the consents and designations outlined in Table 1 below.
2. Further detail on what the employment figures (in FTEs) will be over the first two to three years of the project. I note your comments that one of the intentions of this project over the first few years is to provide training to local people to increase the capacity of the work force, and provide them with skills in civil construction.
3. A brief assessment of how the Main Trunk Main works in the stream bed and wetlands will be consistent with the National Policy Statement for Freshwater Management 2020. I note your comments that works in wetlands may not be required, however you have assumed they are in your application to ensure all effects can be considered.

Responses to these matters are set out below.

Confirmation of consents and designations

I can confirm that, when applying a “belts and braces” approach, the applicant seeks the ability to apply for and obtain the following resource consents and designation approvals set out in table 1 below.

Table 1 – Consents and Designations needed for EPRP – Infrastructure Works project			
Project	Regional Consents	District Consents	Designation (new and alteration)
High Level Water Reservoir	Yes – for activities identified in rule table.	Maybe – a consent may be sought if the upgraded reservoir falls outside the existing designation, and	Maybe – an alteration to the existing designation maybe required if upgraded

		an alteration to the existing designation is not sought.	reservoir falls outside designation.
Main Wastewater Trunk Main	Yes – for activities identified in rule table.	Yes – for activities identified in rule table.	No – no designations being sought
Cannons Creek Park Wetland	Yes – for activities identified in rule table.	Yes – for activities identified in rule table.	Maybe – a designation may be sought

Further detail on employment figures (FTEs) in the first two to three years of the project

Please see attached a brief report titled *Eastern Porirua Regeneration Project Employment Projections from Investment in Infrastructure*, which provides more granular detail with regard to projected employment figures throughout the duration of the project’s construction programme. Employment projections and figures in the attached report are more detailed than those summarised in the COVID-19 Fast Track application and should be relied on where more detail/clarification is required in this regard.

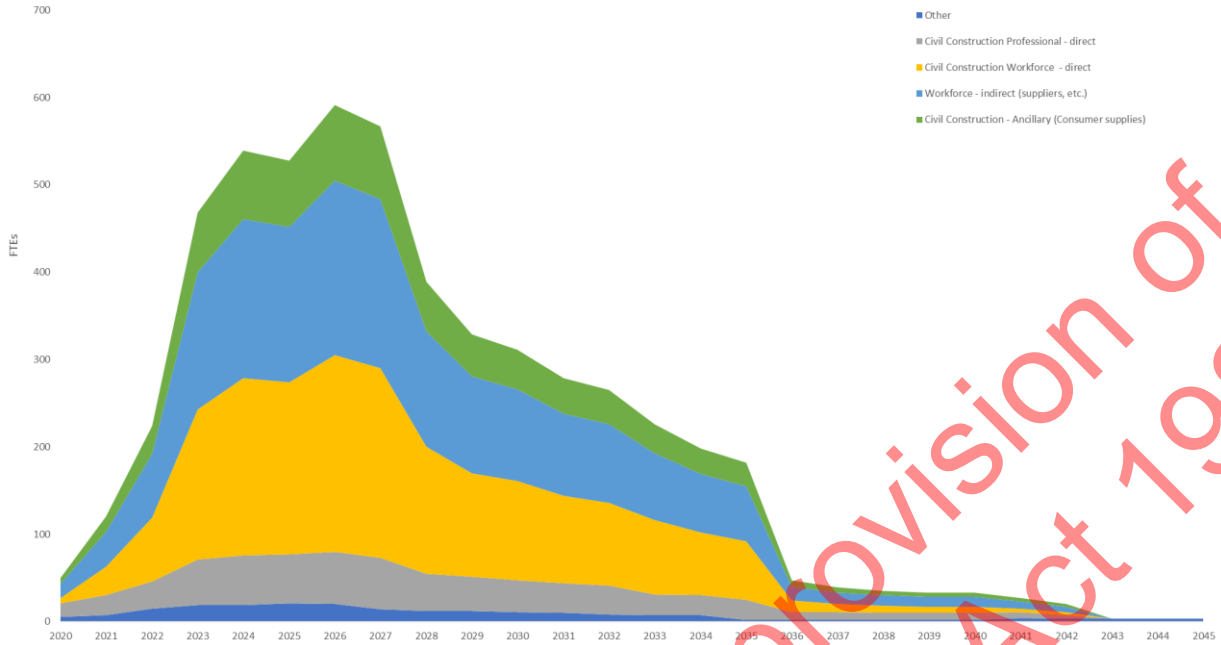
Direct employment from the project (i.e. not accounting for indirect and secondary employment) is projected to result in the following FTEs, as shown in graph 1 below (taken from the attached report).



Graph 1 – EPRP Civil Infrastructure – Direct Employment

This shows direct employment gradually climbing in the first few years, with approximate employment positions projected as being 55 FTE in 2021, 105 FTE in 2022, 225 FTE in 2023, and 260 FTE in 2024. Employment rates grow as the capacity and skill base of the local workforce is increased through training and investment opportunities from the project.

When secondary and indirect employment is taken into consideration as a result of investment in the infrastructure project, the FTE figures increase as shown in graph 2 below (also sourced from the attached report).



Graph 2 – EPRP Infrastructure Investment Total Employment Projections

This shows employment projections (both direct and indirect) also climbing in the first few years, with approximate overall projected employment positions resulting from investment in the project as being 120 FTE in 2021, 220 FTE in 2022, 460 FTE in 2023, and 530 FTE in 2024.

Assessment of how the Wastewater Trunk Main works in the stream bed and wetlands will be consistent with the NPS-FM 2020

An assessment of the project in relation to the NPS-FM 2020 is provided at pages 15-16 of the application. Further assessment is provided below specific to the proposed wastewater trunk main works in Bothamley Park, which builds on the assessment provided within the application.

National Policy Statement – Freshwater Management 2020:

The Freshwater NPS 2020 is one of several pieces of national direction for managing New Zealand’s freshwater. A key objective of the project is to improve the environmental outcomes of the Kenepuru Stream (in Bothamley Park), which is currently severely degraded through ingress of wastewater from the compromised network and structures inhibiting fish passage.

It has not yet been confirmed that the Regionally Significant Infrastructure works (i.e. “specified infrastructure”) will impact a wetland; noting that there is currently no identified wetland in Bothamley Park, in the area of the proposed works. However, the project is cautiously applying a conservative approach to this matter, as part of the physical area of works may be recognised as being a wetland following further detailed ecological assessment(s) given the proximity to the Kenepuru Stream and nature of the environment. For this reason, a more detailed assessment of the project’s alignment with the NPS-FM, with regard to wetlands, is provided below. However, for clarity it is noted that the works are not located within an identified wetland in any District or Regional Plan(s).

Wetlands are defined in the RMA as permanently or intermittently wet areas, shallow water and land water margins that support a natural ecosystem of plants and animals that are adapted to wet conditions.

As well as providing habitat for plants and animals, wetlands offer valuable ecosystem services such as flood protection, nutrient and sediment retention for water quality, recreational services, food provisioning and important cultural services for Māori, including food harvesting and weaving materials.

The NPS-FM 2020 directs Regional Council's to proactively identify natural inland wetlands (noting the area of proposed works is not currently within an identified wetland). While preceding the NPS-UD 2020, it is noted that the GWRC pNRP does not identify the area within Bothamley Park as being a wetland.

Identification and delineation of wetlands is a rapidly changing field due to the realisation that there has been a significant decline in the extent and quality of wetlands in New Zealand and this decline is currently ongoing. It is estimated that 250,000 ha or only 10% of the original coverage of wetlands remains in New Zealand, that there is less than 3% of the original extent of wetland remaining in the Wellington Region and that this continues to decline further. For this reason, a conservative and cautious approach is being taken to ensure the project is consistent with the objectives directed through the NPS-FM, in the event the area is considered to constitute a wetland by the project ecologists, and the resulting possibility that the Regionally Significant Infrastructure will have a functional need to be located within this environment.

Works within the stream bed will be avoided where possible, and where there is a functional need the works will be minimised and will only relate to those necessary to remove the redundant/degraded infrastructure. It is not anticipated that the new wastewater trunk main will be laid along the streambed.

Final determination of the wastewater trunk main alignment will be made through the detailed design phase.

If there is a functional need for the Regionally Significant Infrastructure to traverse an area that is ultimately recognised as being a wetland, or along the streambed, this will be appropriately addressed in the resource consent documentation. In any case, the proposed works will not degrade the environment, but instead will nourish and enrich the natural state of the existing environment. In this regard, the works will be fully consistent with the effects management hierarchy outlined in the NPS-FM 2020.

Ultimately, the wastewater trunk main renewal works will avoid further loss or degradation of wetlands and the stream in Bothamley Park. They will instead restore and replenish the natural environment. The works in Bothamley Park will be consistent with the NPS-FM in the following ways (noting this is not an exhaustive list).

- It will result in improved management of freshwater in a way that 'gives effect' to Te Mana o te Wai by way of involving tangata whenua and enhancing the mauri of the Kenepuru Stream waterway, thereby enhancing the mana of Ngāti Toa.
- It will result in a significant improvement to the existing degraded water waterbody of the Kenepuru Stream (by reducing inflow and infiltration, and discharge), which will enhance the natural health of the ecosystem and human health.
- Will avoid further loss or degradation of wetlands and streams. Instead, the focus will be on enhancement and restoration of the natural environment.

- Will result in remediation and enrichment planting in the adjacent (presumed) wetland in Bothamley Park and restoration of the wider waterways. This will also strengthen the green belt through Bothamley Park.
- Riparian planting will assist in reducing existing stream bank erosion and sediment load occurring within and along Kenepuru Stream.
- Will enhance fish habitat connectivity and address in-stream barriers to fish passage over time by reducing/removing wastewater pipes crossing the beds of streams, which are currently causing erosion and fish barrier issues.
- The proposal will not result in an increase in the piped extent of the stream waterway. Instead, the project will result in 'daylighting' sections of existing drains/piped sections of the network and stream corridor improvements, including addressing perched culverts/other barriers to fish passage.
- Infrastructure will be realigned to improve the relationship with the stream, for example, where trunk main stream crossings remain necessary, the new infrastructure will be attached to footbridges etc, to minimise disturbance to the stream. The existing wastewater trunk main crosses Kenepuru Stream in over 30 locations. The revised alignment will reduce the number of crossings and physical interactions with the stream and embankment.

The project will avoid degradation of the stream bed and (potential) wetland area. Instead, the works will result in the betterment of these environments. The details as to the final alignment of the infrastructure and identification of appropriate mitigation and restoration works will be addressed in further detail in the resource consent documentation. The project works will be fully consistent with the NPS-FM 2020.

Please do not hesitate to contact me if you require any further clarification on the above, or any other matters relevant to the application.

Yours sincerely

Karen Williams
Senior Planner

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