

File No: WGN160274; SR357837
16 June 2016

Wellington International Airport Limited
C/- Lane Neave
PO Box 2331
Christchurch 8140

For: Amanda Dewar

Dear Amanda

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

Thank you for the letters dated 10 June 2016 and 13 June 2016 which responded to questions raised by Greater Wellington Regional Council (GWRC) and Wellington City Council (WCC) on 20 May 2016 and 27 May 2016. The information provided now forms part of the consent documentation for the resource consent application to construct and operate a proposed airport runway extension at Wellington International Airport.

This letter outlines areas where there are still information gaps regarding your consent application and additional questions that have come out of GWRC/WCC reviewing the further information. Please note the applicants answers to the questions relating to transport effects (refer to letter dated 13 June 2016) have not been assessed at this stage.

Information requested

1. One of the options proposed to discharge stormwater from the extended runway is via existing outfalls. Around the Wellington Airport there are stormwater networks administered by WCC and also private networks. Please advise whether WCC or private stormwater networks are to be used to capture and discharged stormwater from the extended runway and that the appropriate approvals can be obtained from the owner of the stormwater infrastructure. If you plan to use WCC stormwater networks, please note that the Integrated Catchment Management Plan (ICMP) that Wellington Water Limited are preparing under the global stormwater consents for Wellington City Council will need to take into account airport contributions to the receiving environment/network. The Stage 2 ICMP for Lyall Bay is due in approximately 2 years time so early contact with WWL is recommended.

Please also note GWRC accept your reasoning to apply for resource consent for operational stormwater discharges from the existing airport once the Proposed Natural Resources Plan (PNRP) becomes operative. GWRC withdraws the section 91 request (issued 20 May 2016) for a consent application for existing stormwater discharges to be provided as part of this application.

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2. The table provided to answer Question 2.2 (refer to the applicant's letter dated 13 June 2016) showing relative difference between the predicted construction noise levels and the representative background noise level (L90) is in the requisite form except there appears to be inconsistencies in the results. To allow a full understanding of how this table has been derived please provide the predicted construction noise levels (if these are different from those set out in Table 6 of the AECOM Technical Report 10) and the reasoning behind deriving the background sound levels used at the various times. As stated above, our assessment of the results in the table provided shows some inconsistency in the level difference i.e. the predicted noise level minus the "noise increase" does not result in the same background sound level for the various work stages for each time period. Please also explain how AECOM derived the background sound levels from the various sets of results that were provided in Technical Report 10.
3. With regard to the applicant's answer to Question 2.18 (refer to the applicant's letter dated 13 June 2016):
 - 1) How long will the temporary exclusion zone be in place around the construction site?
 - 2) Please outline the impacts the construction of the surf wave focussing structure will have on other recreational users i.e. stand-up paddle boarders, swimmers, surf-lifesaving training and events
4. There is a very limited data set from participant observation of recreational activity in Lyall Bay, which informed the assessment of recreational effects. The applicant's response (refer to letter dated 13 June 2016) appears to acknowledge this shortcoming but does not propose a strategy to deal with this issue. Please undertake further investigation and submit a more representative assessment of the recreational use of Lyall Bay. GWRC recommend this study is conducted through to the summer of 2016/17 (to capture a seasonal spread of recreational use), with findings available for decision makers at the consent hearing.
5. The applicant's response to Question 2.21 (refer to the applicant's letter dated 13 June 2016) states the landscape and visual assessment has been undertaken with reference to UK 'best practice' guidelines. These guidelines are underpinned by a number of (probably untested) assumptions, the basis for which is unreferenced in the guidelines document. GWRC is not aware of any evidence provided by the applicant that supports the proposition that the magnitude of visual effects can be generalised between two broad groups; 'residents' and 'transients', or that the occupation of viewers has any bearing on the magnitude of visual effects and if this generalisation has some basis at the most coarse level of analysis for the UK, such assumptions also apply in NZ. Therefore, please undertake and submit a visual effects investigation or survey that provides a more valid and reliable basis for decision making than the current professionally-based assessment, based as it is upon untested assumptions from the UK context.
6. The applicant's assessment of the fragility of the population of reef heron (refer to Question 2.23 of letter dated 13 June 2016) has only been made in terms of noise impacts. Loss of habitat (and food supply) is more likely to have an impact on the reef heron population.

During the construction phase there will be a constant source of turbidity affecting fish stocks. Post-construction, the extended surface will result in hydrocarbon run-off that may affect fish stocks. Please provide an assessment of those impacts on the reef heron population. There will also be a change in currents caused by the runway extension post-construction. What assessment has been made of the effect on the existing habitat for birds in relation to those changes?

7. With regard to the applicant's assessment against Policies P36, P40 and P42 of the PNRP (refer to the applicant's letter dated 13 June 2016), the runway extension site is not adjacent to the significant habitat for indigenous birds identified in the PNRP – it is within that area (refer to the Te Raekaikau Point (east of Moa Point) to Ohiro Bay Road boundary in Schedule F2c page 391 of the PNRP). How did your consultant complete the ecological assessment for bird values, i.e. how long did they survey and at what time of year?
8. The proposed extension (post construction) may affect the flight paths of birds that will continue to fly across the bay. Birds will not deviate from their habitual routes. Please provide an assessment of the risk of bird strike resulting from the change in flight path for both inland and offshore bird species.
9. The applicant's response to Question 2.28 is inadequate and further explanation is required to prove DHI model (in Technical Report 11) is valid. DHI has used as boundary conditions to their models, assumptions of the wave climate based on the wave climate in the North Sea. But the wave climate in the North Sea - the marginal ocean between the UK and Europe, which has a limited fetch - is quite different to the wave climate at the entrance to Lyall Bay, which is exposed to storms over the unlimited fetch from the Southern Ocean. DHI claim they did this because they had no access to local data. However there is a long-term wave record available from nearby - Baring Head. GWRC helps fund the Baring Head buoy which is maintained by NIWA, so the data is readily available. Also, GWRC recently commissioned NIWA to undertake numerical modelling of regional storm surge and extreme water levels for which a local wave model was built for Cook Strait. A 40 year wave hindcast dataset was used for this and it should be possible to derive the spectral wave parameters from this work that can then be used to calibrate the JONSWAP spectrum used for the boundary conditions of the model.

The applicant asserts the local data will make no difference to their results, but there is no evidence to support this claim. Please respond to this matter and provide evidence in the form of:

- 1) a plot comparing the JONSWAP spectrum used for the model with an average spectrum either from the Baring Head record or the 40-year hindcast, and
 - 2) the peakedness parameter (γ), and the spectral width parameters (before and after the peak) used to scale the JONSWAP spectrum for the model.
10. Placing the emphasis on the CBA report and stating that the EIA report is for “background information only”, does not remove the need for a robust assessment of the wider economic impacts of the proposal. The EIA report provides some indication of the geographic

distribution of the effects (among regions) and it also presents an indication of the potential GDP effects (not employment). This is important because it provides an indication of the potential effects on economic wellbeing in the region as well as NZ as a whole. Given the scale of the proposal, and its potential effects on the lower North Island economy, understanding the GDP and employment effects across the regions is important. Please provide a robust assessment of the wider economic impacts of the proposal.

11. The CBA report assumes that the proposal will be funded through general taxation (ie central government). The CBA report also compares the alternative approaches to funding, but does not include these in an alternative CBA – it only compares the funding approaches against each other. The CBA report needs to reflect the results for the different funding approaches because each funding option has different implications as to where the costs will fall, and the benefits will arise. The overall net benefits of the proposal are tied directly to the costs and how those costs are recovered. The CBA has a national focus only. In theory, the national total should match the sum of regional costs and benefits, which would be shown if the CBA had a regional (bottom up) structure. Understanding this regional distribution is important because it sheds light on how different communities' economic wellbeing is affected under the different options. The assumption about funding through general taxation is very important, because this heavily influences how costs will be distributed. Please assess the distribution of costs and benefits under the different sensitivities as included in the assessment. With reference to the sensitivity analysis, it is not clear if a 'worst case scenario' has been tested.

General comment

GWRC recommend you apply for consent for noise emissions from reclamation works and installation of temporary structures because it appears you won't be able to meet the general conditions 5.7.2 of the PNRP. Please note that although noise limits (14.1.3) in the general standards of the Regional Coastal Plan are not rules in their own right and only apply where a rule in the Plan requires the activity to comply with these standards, the PNRP uses the noise general conditions slightly differently as both a test for specific activities and more generally as a policy test. Policy P150 of the PNRP directs that noise in the coastal marine area is managed by applying the general conditions set out in section 5.7.2 of the PNRP or by adopting best practicable options to ensure emissions do not exceed a reasonable level. Section 16(2) of the RMA allows consents granted for section 12 activities to prescribe noise emission standards. Therefore any reclamation (as a discretionary activity) and temporary structure consent description needs to include noise emissions as part of the consent scope.

Date information required

Please advise us by **10am Friday 17 June 2016** whether you would like to respond to the questions raised in this letter prior to your consent application being notified to the public.

If you would like to proceed with public notification (currently planned required by 21 June 2016) please advise a reasonable timeframe when the information will be provided or that you refuse to provide the requested information.

Processing of your application

Your application was placed on hold, and the statutory 'clock' stopped¹, for information requested on 20 May 2016. Some of the questions outlined above relate to inadequate responses to questions raised on 20 May 2016. However, because you have requested the consent application is publically notified and to keep the process moving, the provision of the information requested in this letter will not stop the consent processing clock.

Please feel free to contact me on 04 830 4148 or if you have any questions or concerns.

Yours sincerely



Jude Chittock
Senior Resource Advisor, Environmental Regulation

Copy to: Peter Daly email: Peter.Daly@wcc.govt.nz

¹ Under section 88C of the Resource Management Act 1991