

RESPONSE TO SUBMITTERS EVIDENCE

1. The Waiau Working Party (**WWP**) raise concerns in relation to the Project's effects on lacustrine channels of the former Mararoa River at paragraphs 41 – 42 of their evidence.
2. I have described these lacustrine channels and their vegetation and habitats in detail in the Wetland Assessment Report and summarised this information in paragraphs 49 – 59 of my evidence. The extent of these lacustrine channels, which I have delineated during site survey, is shown in Attachment 3 of my evidence.
3. The focus of my evidence, in relation to the lacustrine channels, is on wetland vegetation and habitats. Freshwater fauna, and recommendations to address effects on freshwater fauna are described by Dr Hickford in his evidence. Specific advice and recommendations on managing construction effects of the Project's proposed excavation works on freshwater fauna in these channels was provided in the Freshwater Assessment Memorandum appended to the Wetland Assessment Report (at Appendix 4) and these recommendations have been incorporated into the proposed conditions. Use of the Project site by birds has been assessed by Dr Bull, as described in her evidence.
4. I discuss the wetland status of the lacustrine channels in paragraph 60 of my evidence. With regard to the relevant Resource Management Act (1991) definitions, they are either the 'bed' of Lake Manapōuri, or wetland, or both. The Proposed Southland Water and Land Plan definition for 'wetland' is the same as the RMA definition. The section 42A Officer's Report concludes that wetlands within the project area that are within the maximum operating range of Lake Manapōuri (RL 180.5) are classified as lake bed in the RMA and the potentially relevant NES-F regulations therefore do not apply.
5. As I stated in paragraph 61 of my evidence, whether the lacustrine channels are wetlands, and natural inland wetlands, or not, I have assessed effects on the lacustrine wetland vegetation of these areas for completeness and reached conclusions as to the direct and indirect effects on their values. This assessment is summarised in paragraphs 78 – 79 and 85 – 87 of my evidence.

6. The WWP are concerned that construction of the parallel channel will substantially reduce the size of the lacustrine wetlands. As I have described in paragraph 73 of my evidence, construction of the parallel channel will result in the removal of 1.72 ha of this area of lacustrine and wetland habitat at the southern end of the channels. Much of the area that will be removed is either shallow open water, or turfland / benthic substrate (depending on lake levels). Based on the total extent of removal, the area of new lacustrine habitat created as a result of the construction of the channel, and the likely re-establishment of similar species on the channel margins and the benthic substrate of the parallel channel following construction, I have assessed the overall level of effect as Low at the Project site scale and Very Low at the ED scale. I included recommendations to manage construction effects on lacustrine wetland vegetation and habitats in these channels in paragraphs 98 - 99 of my evidence. I do not consider that excavation of the upstream ends of the lacustrine channels to create new lacustrine wetland habitat, as proposed by the WWP, is required.
7. Dr Hickford has discussed the potential effects of culvert installation under the haul road on freshwater fauna, including fish passage and culvert design and construction, and the management measures recommended to address those potential effects.
8. The section 42A Officer's Report and supporting technical report (Attachment 2 to the Officer's Report) do not raise any points of disagreement with respect to potential effects of the Project on the lacustrine channels, and how these can be managed through the proposed consent conditions.

Scott Hooson

13 September 2024