

BEFORE THE INDEPENDENT HEARING PANEL AND FRESHWATER HEARING PANEL OF
GREATER WELLINGTON REGIONAL COUNCIL

IN THE MATTER OF of the Resource Management Act 1991

AND

IN THE MATTER OF of Proposed Plan Change 1 to the Greater Wellington Natural
Resources Plan

**SUPPLEMENTARY STATEMENT OF EVIDENCE BY KIRSTY O’SULLIVAN ON BEHALF OF
WELLINGTON INTERNATIONAL AIRPORT LIMITED**

17 APRIL 2025

Hearing Stream 2

- 1.1 My name is Kirsty O'Sullivan.
- 1.2 My qualifications, experience and expert witness statement are set out in my evidence in chief for this hearing stream.
- 1.3 My supplementary evidence relates to the section 42A Reporting Officer's Appendix 2, which was updated during the course of the hearing ("the 11 April 2025 provisions"). My further recommendations and explanation, as relevant to my evidence and summary evidence presented to the Hearings Panel on Tuesday 15th April, taking into consideration 11 April 2025 provisions, is set out in Table 1 attached.

Kirsty O'Sullivan

17 April 2025

Table 1: Amendments to the 11 April 2025 provisions

New text recommended to be added to the Regional Plan as recommended by section 42A Report shown as red underline and recommended to be deleted shown as ~~red strikethrough~~.

New text recommended to be added to the Regional Plan as recommended by GWRC section 42A Reporting Officer rebuttal and subsequent amendments shown in 11 April 2025 provisions, shown as blue underline and recommended to be deleted shown as ~~blue strikethrough~~.

New text recommended to be added to the Regional Plan as recommended by K O’Sullivan following 11 April 2025 Reporting Officer provisions shown as purple underline and recommended to be deleted shown as ~~purple strikethrough~~.

Recommended amendments to provision	Comments
<p>Objective WH.O1</p> <p>The health of all freshwater bodies rivers and lakes and their margins, natural wetlands, groundwater and the coastal marine area within Whaitua Te Whanganui-a-Tara is progressively improved and is wai ora by 2100.</p> <p>Note</p> <p>In the wai ora state:</p> <p>a. Āhua (natural character natural form and character) is restored <u>where deteriorated to the extent practicable</u> and <u>freshwater bodies</u> exhibit their natural quality, rhythms, range of flows, form, hydrology and character to the extent practicable, and</p> <p>b. All freshwater bodies rRivers and lakes have planted margins, where practicable other than where physical constraints may prevent this, and</p>	<ul style="list-style-type: none"> • Have recommended numbering bullet points for ease of reference. • Limb (a): As per my Summary Statement of Evidence, it is not clear whether the recommended inclusion of the text “to the extent practicable” applies generally or just to freshwater bodies. I therefore recommend relocating the qualifier earlier in the statement, for the reasons set out in my EIC. • With respect to limb (c), I supported the section 42A Reporting Officer’s recommended amendment to this limb as per her rebuttal evidence. I prefer the rebuttal evidence version of limb (c) (tracked here in purple) and consider there could be merit further recognising that while a species may be naturally present, it may not naturally thrive and thus will not necessarily be able to be abundant in that environment.

Recommended amendments to provision	Comments
<p>c. All freshwater bodies Rivers and lakes and their margins, natural wetlands, groundwater and coastal waters have healthy functioning ecosystems and their water conditions and habitat support the presence, abundance, survival and recovery of At-risk and Threatened species and taonga species where they would have naturally occurred and where naturally present in those environments, and</p> <p>d. Mahinga kai and kaimoana species are healthy, plentiful enough for long term harvest and are safe to harvest and eat or use, including for manuhiri and to exercise manaakitanga, and</p> <p>e. Mana whenua are able to undertake customary practices at a range of places throughout the catchment, and</p> <p>f. Water is able to be used People and communities can provide for social and economic use benefits, including by providing for the operational and functional requirements of Regionally Significant Infrastructure, provided that the health and wellbeing of the waterbodies, freshwater ecosystems and coastal waters is not compromised.</p> <p>Note: Objectives WH.O2 to WH.O9 set out what is needed to achieve progressive implementation of this long-term objective up to 2040. Therefore, resource consent applicants applications and Notices of Requirement do not need to demonstrate their proposed activities alignment with this objective.</p>	<ul style="list-style-type: none"> As per my EIC and summary statement of evidence, I maintain the reference to regionally significant infrastructure is warranted in limb (f) and recommend consistency in the language used between WH.O1 to WH.O3. As per my EIC and summary statement of evidence, I also maintain that reference to “Notices of Requirement” within the note is warranted. As a further note, the use of “and” between each limb is problematic as not all limbs will apply in every circumstance.
<p>Objective WH.O3</p> <p>The health and wellbeing of Coastal water quality, and the health and wellbeing of ecosystems and habitats in Te Whanganui-a-Tara is maintained, or improved where</p>	<ul style="list-style-type: none"> Limb (b) was originally recommended to be struck out in the Reporting Officer’s rebuttal evidence.

Recommended amendments to provision	Comments
<p><u>deteriorated, to achieve the coastal water objectives set out in Table 8.1 and 8.1A, and by 2040:</u></p> <p>(a) <u>sediment inputs into Mākara Estuary are reduced, and</u></p> <p>(b) <u>high contaminant concentrations, including around discharge points, are reduced where causing deteriorated ecosystems, in addition to meeting the harbour and estuary wide targets for copper and zinc in Table 8.1, and</u></p> <p>(c) <u>diversity, abundance, composition, structure and condition of mahinga kai species and communities has increased, and</u></p> <p>(d) <u>huanga of mahinga kai and Māori customary use for locations identified in Schedule B (Ngā Taonga Nui a Kiwa) are maintained or improved, and</u></p> <p>(e) <u>the extent and condition of estuarine seagrass, saltmarsh and brackish water submerged macrophytes are increased and improved to support abundant and diverse biota, and</u></p> <p>(f) <u>coastal areas support healthy functioning ecosystems, and their water conditions and habitats support the presence, abundance, survival, and recovery of At-risk and Threatened species and taonga species, and</u></p> <p>(g) <u>mana whenua can safely connect with the coastal marine area and enjoy a wider range of customary and cultural practices, including mahinga kai gathering and tauranga waka, and</u></p> <p>(h) <u>mana whenua and communities can more safely connect with use coastal marine area and enjoy a wider range of activities, including food gathering, and swimming, paddling, Māori customary use and tikanga, and</u></p>	<ul style="list-style-type: none"> • In the 11 April 2025 provisions, the Reporting Officer has recommended amendments to WH.O3(b) which seeks to ensure that <i>"high contaminant concentrations around discharge points are reduced where causing deteriorated ecosystems, in addition to meeting the harbour and estuary wide targets for copper and zinc in Table 8.1."</i> In my view, this management response exceeds that set out in the New Zealand Coastal Policy Statement ("NZCPS"), which under Policy 23(1)(d) seeks that regard be given to avoiding significant adverse effects on ecosystems and habitats after reasonable mixing, when managing discharges to the coastal environment. I therefore do not support this amendment, and consider it demonstrates the difficulties in trying to reconcile the policy directives between the National Policy Statement for Freshwater Management ("NPS-FM") and the NZCPS. I therefore continue to support the deletion of this limb, or an alternative that better aligns with the NZCPS policy directive for the coast. • With respect to limb (h), the Reporting Officer has recommended including "more" in the policy. In my view, this is unnecessary and may result in an expectation that every activity provides greater safety benefits even for minor consents. In my view, the additional word should be deleted. • Having given limb (j) some further thought since the hearing, I am of the view that all of limbs WH.O1 to O3 should be consistent. I

Recommended amendments to provision	Comments
<p>(i) <u>for coastal areas not covered by Table 8.1, in addition to relevant matters in (a)-(h) above:</u></p> <ul style="list-style-type: none"> • <u>fish and benthic invertebrate communities are resilient and their structure, composition and diversity are maintained, and</u> • <u>there is no increase in the frequency of nuisance macroalgal blooms, and</u> • <u>phytoplankton levels are maintained and monitored in applicable areas of point source discharges and locations that experience riverine mouth closures with limited water mixing</u> <p>(j) <u>People and communities can provide for social and economic use benefits, including by providing for the operational and functional requirements of Regionally Significant Infrastructure, provided that the health and wellbeing of the waterbodies, freshwater ecosystems and coastal waters is not compromised.</u></p>	<p>therefore recommend that the reference to regionally significant infrastructure is provided for across each objective.</p>