

2 March 2018

Todd Whittaker
Planning Consultant
Gisborne District Council
PO Box 747
Gisborne 4010

Dear Todd,

Re: Eastland Port Ltd: Wharves 6 & 7 and Slipway Redevelopment: Resource Consent Applications: Further Information on Ecology Matters

Further to the recent emails and telephone discussions. We provide the following further information and comments in relation to the matters raised by Shane Kelly (Council's Ecology Consultant) in the emails.

1. Slipway Redevelopment

I agree with the conclusions of the ecological and water quality assessment;
I support moving cats-eye prior to the physical works starting;
I support the optimisation of voids between rocks or concrete spalls to enhance the habitat values of the proposed revetment; and
I recommend including measures associated with moving cats-eye and providing voids as consent conditions.

We agree that the cats-eye snail relocation and revetment design/voids matters mentioned can be dealt with through consent conditions. We propose the following additional conditions:

Cats-Eye Snail Relocation

38. Not less than two (2) weeks prior to demolition works commencing the consent holder shall submit to the Council's Consents Manager for certification a plan and method statement for relocation of cats-eye snail (*Lunella smaragdus*) from the existing slipway sheet pile walls to sheet pile walls and intertidal habitat within the port harbour to the west of the slipway. The plan and method statement shall be prepared by suitably qualified professionals with the objective of avoiding unnecessary loss of cats-eye snail and optimising the opportunities for this species to recolonise new structures once they are completed.
39. The consent holder shall undertake the cats-eye snail relocation activities in accordance with the Council certified plan and method statement.

Provision of Rock/Concrete Spall Voids for Marine Habitat in Revetments

40. Not less than two (2) weeks prior to construction of the revetments the consent holder shall submit to the Council's Consents Manager for certification a plan and method

statement confirming the nature of the voids that will be created between the rock spalls exposed on the outer surfaces. The objective of the plan and method statement is to illustrate and explain the voids and substrate surface area which may be used by marine life as habitat.

41. The consent holder shall construct the revetments in accordance with the Council certified rock/concrete spall voids plan and method statement.

In terms of proposed Condition 41 WorleyParsons have advised that the rock spalls will be put in place using an excavator and be relatively random. No individual hand placement of the rock spalls is envisaged. However, based on similar projects the outer surfaces of the revetments are expected to contain around 35% voids.

As noted above we suggest the conditions be added into the current set as Conditions 38-41 of the Coastal Permit. Attached is an amended full set of the consent conditions.

2. Wharf 6 and 7 Redevelopment

I generally agree with the conclusions of the ecological and water quality assessment in relation to the existing environment, effects of stormwater discharges, and effects of dredging (while I have reservations about some of opinions expressed in the ecological and water quality assessment, I still agree conclusions about the effects of stormwater discharges and dredging on water quality and biota within the dredging footprint and disposal site);

I agree that the only effects of potential significance on habitat and biota are those related to juvenile crayfish (there will be other effects, but I consider them to be relatively minor). I agree that the loss of crayfish habitat will affect the ability to collect juveniles for research purposes, and possibly, future aquaculture. In addition, it would also adversely affect the ability of researchers to conduct in-situ field studies on juvenile crayfish. I note that it is one of the few sites in the world where substantial settlement on natural surfaces has been observed, and its importance to lobster research is clearly reflected in the number of studies that have been carried out in the port, or which have used juvenile lobsters obtained from the port. Due to the international rarity of such habitats, I also consider the site to be of significant intrinsic value.

I agree that the proposed crayfish settlement devices could the potential to compensate for the loss of habitat beneath Wharf 6. However, in my experience these things are never simple. For instance, developing methods for culturing new aquaculture species typically takes years and has a history of failures. Consequently, there is a high risk that the proposed settlement devices will not be as effective as envisaged. If consent is granted, I recommend consent conditions requiring proof that settlement devices are effective, coupled with provisions for the additional development and testing (if required), plus the ongoing monitoring and maintenance of collection devices.

We consider that the conditions relating to the proposed juvenile crayfish settlement devices can be made more explicit/robust. However, at the same time flexibility is required during the design, deployment and monitoring phases. The following amended conditions (revisions shown in **bold**) are being proposed:

Juvenile Crayfish Settlement Devices

48. The Consent Holder shall, **not less than two (2) weeks**, prior to construction of the reclamations submit to the Council's Consents Manager for certification a confirmed design and deployment **plan** for crayfish pueruli settlement habitat devices on the reclamations in conjunction with Dr Andrew Jeffs of Auckland University.
49. The approved design and deployment **plan** shall be implemented and operational before the first peak crayfish settlement period (May to September) following completion of the reclamations. A report on this matter shall be submitted to the Council's Consents Manager for certification by the end of the following October.
50. The juvenile crayfish settlement devices shall be monitored for a period of 5 years and then reviewed. An annual monitoring report shall be submitted to the Council's Consents Manager by March 31st each year. **The monitoring report shall contain information on inspection dates, observations, conclusions on to the effectiveness of the devices, and any changes proposed to the devices.**

Attached is a full set of the amended conditions.

We look forward to hearing from you.



Mark Poynter
Principal Ecologist



Max Dunn
Principal Planning and Policy Consultant

Attachments

Full set of amended Slipway consent conditions
Full set of amended Wharves 6 & 7 consent conditions

Copies –by email

Shane Kelly
Marty Bayley (Eastland Port Ltd)
Mark Poynter (4 Sight Consulting), David Aubourg (WorleyParsons)