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15 July 2009

**SUBMISSION FROM MAINLAND ISLAND RESTORATION OPERATION
(MIRO) INC REGARDING APPLICATION FOR RESOURCE CONSENT:
WGN090117, RM20-F32-HQ/7 AND RM080595 UNDER SECTION 93(2) OF THE
RESOURCE MANAGEMENT ACT 1991**

APPLICANT: HOROKIWI QUARRIES LIMITED

BACKGROUND:

MIRO is a group of conservation volunteers from around Wellington who have been practically involved in East Harbour Regional Park since 1994. Involvement includes:

Northern Forest Block

- Possum trapping
- Rodent/mustelid monitoring
- Bird and vegetation monitoring
- Reintroduction of North Island robin into the Mainland Island area

Parangarahu Lakes

- 3000 eco-sourced trees supplied for restoration planting from the MIRO Nursery in the last 3 years.

MIRO regards the Lake outlets and surrounding areas of Fitzroy Bay as a natural extension of East Harbour Regional Park, though under separate management control.

COUNCIL OBLIGATIONS

HCC: According to the Hutt District plan the site under consideration falls within a strip defined as being an extension of the East Harbour Regional Park. The Plan specifically requires consideration of the natural character and amenity values in the coastal environment as well as any significant indigenous vegetation or habitat for indigenous fauna to be protected from inappropriate subdivision, use of development (88 1.1.2). The Plan also requires (88 1.1.7) consideration of the effects of mining on landscape character and any adverse effects on amenity values

GW: The Greater Wellington Regional Council Draft Policy Statement identifies Lakes Kohangapiripiri and Kohangatera as having regional significance for landscape and ecological values.

MIRO concerns regarding the consent application are:

1. The proximity of proposed mining at its northern end to East Harbour Regional Park and the outlet of Lake Kohangatera.

The northern boundary of the consent application is only 250m from the outlet of Lake Kohangatera. This is seen as compromising the landscape amenity of land surrounding the southern aspect of the Park. Since the current consent was granted, the Parangarahu Lakes Block has been incorporated into the Regional Park. To mitigate the effects of this mining activity on the amenity value of the Park the northern boundary needs to be moved further southward.

2. Lack of protection afforded to the two breeding sites of the threatened banded dotterels.

The report by Boffa Miskell clearly identifies the two breeding areas of the banded dotterels. It should be noted that the banded dotterel has recently been upgraded nationally to 'threatened' status. There are only 20 000 of these birds nationally. These sites in Fitzroy Bay are the only known breeding sites in the Wellington Region. Up to 50 dotterels have been recorded in the vicinity of Lake Kohangatera in surveys carried out by members of the NZ Ornithological Society, Wellington

These breeding sites need more robust protection from possible disturbance by any mining activity. These birds are particularly vulnerable during their breeding season, from the beginning of August to the end of January. Optimally there should be no mining in the vicinity of the nests during that 6 month breeding period.

This is very obviously a small population of a nationally threatened species that requires a concerted effort for protection and conservation. Confining mining activity south of the Piaka Stream during the breeding season would be a positive step to give the dotterels maximum protection and room for expansion. It would also help to mitigate for loss of amenity values from the mining to the Regional Park for 6 months over spring/summer.

3. Inclusion of areas in the consent clearly identified by Boffa Miskell as of moderate and high ecological value.

These areas are identified in Figure 1 of the 'Assessment of Ecological Values and Effects' and in spite of the high and moderate classification accorded by Boffa Miskell are shown to be inside the area over which consent is sought. These areas should be excluded from the consent area and restoration undertaken.

4. The proposed quantity to be extracted.

The consent application requests the same level of annual extraction as under the previous consent. In the light of points made above 1,2 & 3, a reduction in the total permitted would be more appropriate.

5. The proposed length of the consent.

A term of 35 years is too long and well out of step with current practice here and elsewhere around the country. A maximum of 10 years is suggested.

In addition MIRO wishes to support the comments made by EHEA in their submission regarding:

- The need for clarification regarding areas over which consent is being sought.
- The extent to which the material being removed is renewable and or sustainable.
- That the effects of the current consent be analysed by a qualified expert in coastal processes.
- The need for adequate monitoring of any consent granted and rehabilitation programmes. Conditions should be imposed if consent conditions are not met.
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- The removal of fines and the effect this is having on the lake outlets and the ability to breach to the sea. Of concern here is the recruitment of juvenile fish into the wetland, streams and lakes.

We wish to be heard in support of our submission.

Gail Abel

Chairperson
MIRO Committee

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