

Freshwater response to comments

DATE: 29/06/2026
TO: Carolyn Wratt (Fast-Track Advisor)
CC: Amy Robinson (Fast-Track Advisor)
FROM: Jacob Williams (Senior Technical Advisor, Freshwater)
SUBJECT: Freshwater response to comments

Freshwater response

The assessment I completed was based on desktop information and the information supplied by the applicant. A site visit was not deemed necessary due to the likely values that are present on the site.

The DOC approach for assessing the Freshwater values is based on our guidance document which has been provided to the applicant. This guidance document does not require an assessment to be completed based on total length, area, volume etc of the values of the sites. This approach focuses on the values present (or likely to be present), particularly highlighting rare or threatened species or ecosystems where present. The value may be high even though the quantity is low. I have reworded the description of the approach in my report to clarify.

The DOC freshwater assessment includes all freshwater values including both wetlands and waterways. I considered the freshwater components of the wetland values e.g. hydrology, habitat for fish and invertebrates, water quality and buffering.

The DOC freshwater assessment method also provides an overall score for 'freshwater value' by using the maximum score for any single criterion. This is to make sure we are not underestimating values based on uncertainty and assumes a precautionary position. In the cases of the blocks that are given a medium-high rating, this is primarily due to the presence of wetlands which are a rare ecosystem in the Wellington Region. The assessment aims to give an indication of the overall freshwater values in each block using the information available, not provide a weighting scale to assess the blocks against each other.

The freshwater assessment outlines the high-level values across all the blocks (give and get). Overall, while the values are assessed as medium-high for the give and get, I do not have any significant concerns about the loss and gain of freshwater values due to the potential land swap taking place.

For clarity, I confirm that the presence (or not) of the QEII block does not change my view of the values present as the values remain the same regardless of any covenant over the land. Likewise, the conditions proposed by the applicant in both package A and B do not change my view, as they do not include any major freshwater components.